

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2021 SEP 13 PM 1:16

RICHARD ARJUN KAUL, MD;
DAVID BASCH, MD;
JANE DOE; JOHN DOE.

v.

INTERCONTINENTAL EXCHANGE; GEICO;
TD BANK; ALLSTATE INSURANCE COMPANY;
FEDERATION STATE MEDICAL BOARDS; ARTHUR HENGERER
(in his personal and official capacity);
CHRISTOPHER J. CHRISTIE; DANIEL STOLZ;
ATLANTIC HEALTH SYSTEM; ROBERT HEARY;
PHILIP MURPHY (in his personal and official capacity)
GURBIR GREWAL (in his personal and official capacity)
RIVKIN RADLER LAW FIRM; MAX GERSENOFF;
JANE DOE; JOHN DOE.

CIVIL ACTION
21-CV-06992 (JPO)
AMENDED COMPLAINT

SUBMITTED PURSUANT
TO RULE 15(a)(2)(A)

KAUL V. ICE
K11-7

Parties

Plaintiffs

1. RICHARD ARJUN KAUL, MD – 440c Somerset Drive, Pearl River, NY 10965: 862 881 9702: DRRICHARDKAUL@GMAIL.COM (**Exhibit 1**).
2. DAVID BASCH, MD – 90 S Sparta Ave, Sparta, NJ 07871: 201 396 0346: dbbortho@yahoo.com (**Exhibit 1**).

Defendants

1. INTERCONTINENTAL EXCHANGE – 11 Wall Street, New York, NY 10005 (**Exhibit 2**).
2. GEICO INSURANCE COMPANY – 5260 Western Avenue, Chevy Chase, MD 20815 (**Exhibit 2**).
3. TD BANK - 1701 Marlton Pike East, Suite 200, Cherry Hill, NJ 08003 (**Exhibit 2**).
4. ALLSTATE INSURANCE COMPANY – Attention Thomas Wilson, 2775 Sanders Road, Northbrook, Illinois 60062 (**Exhibit 2**).
5. FEDERATION STATE MEDICAL BOARDS - 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039 (**Exhibit 2**).
6. ARTHUR HENGERER – 2365 S CLINTON AVENUE, ROCHESTER, NY 14618 (**Exhibit 2**).
7. CHRISTOPHER J. CHRISTIE – 2nd Floor, 36th Street Capital, Maple Avenue/Dehart Street, Morristown, NJ 07960 (**Exhibit 2**).
8. DANIEL STOLZ – 60 Christy Drive, Warren, NJ 07059-6833 (**Exhibit 2**).
9. ATLANTIC HEALTH SYSTEM – 475 South Street, Morristown, NJ 07960-6459 (**Exhibit 2**).
10. ROBERT HEARY – 1 Bay Avenue, Suite 5, Montclair, NJ 07042 (**Exhibit 2**).
11. PHILIP MURPHY – c/o NJ AG, 25 Market Street, Trenton, NJ 08611 (**Exhibit 2**).
12. GURBIR GREWAL – c/o Securities + Exchange Commission, 100 F St NE, Washington, DC 20549 (**Exhibit 2**).
13. RIVKIN RADLER LAW FIRM – 477 Madison Avenue, Suite 410, NY, NY 10022
14. MAX GERSENOFF – 477 Madison Avenue, Suite 410, NY, NY 10022

Co-conspirators

The identities and roles in the scheme/s are stated in (**Exhibit 3**).

The State of New Jersey

1. Executive members
2. Legislative members
3. Judicial members – eg. Jay Howard Solomon/Stuart Rabner/Kenneth Grispin/Mark Ciarrocca/Jeffrey Beachem/Dennis Carey

The District of New Jersey-Newark:

1. Judicial members.

Politicians:

1. Jeffrey Chiesa
2. Cory Booker
3. Steven Sweeney
4. Charles E. Schumer
5. Mitch McConnell
6. Philip Murphy
7. Scott Rumana

Lawyers:

1. Lewis Stein
2. Kenneth Hollenbeck
3. Joseph Gorrell
4. Michael Keating
5. William Roeder
6. William Fiore
7. Joseph McCarthy
8. Eric Kanefsky
9. John Hoyt
10. Paul Fishman
11. John Dilorio
12. Joshua Raymond
13. Scott Rever
14. John Robertelli
15. Thomas Manahan
16. Doreen Hafner
17. Eric Katz
18. Gurbir Grewal
19. Robert McGuire
20. Abbot Brown

Physicians:

1. Steven Lomazow
2. Gregory Przybylski
3. Frank Moore
4. Peter Carmel
5. William Mitchell
6. Peter Staats
7. Marc Cohen
8. Christopher Wolfla
9. Andrew Kaufman
10. Thomas Peterson

Hospital/Insurance/Banking Executives/Others:

1. Richard Crist
2. Divyesh Kothari
3. James Gonzalez
4. Lindy Washburn
5. Robert Garrett
6. Brian Gragnolati
7. Bharat Masrani
8. Warren Buffet

Preliminary Statement

1. K11-7 is about the corruption of United States of America by global publicly traded for-profit corporations, through the ruthless exploitation of the American public, medical profession/legal professions and state/federal politicians, and through the perpetration of massive schemes of racketeering, that have caused, and continue to cause the wrongful deaths/incarceration of millions of innocent Americans (**Exhibit 4**). Within the United States at this point in time there are approximately two thousand (2000) unsafe convictions of principally ethnic minority physicians, orchestrated by the insurance industry, in collusion/conspiracy with rogue state/federal investigators/prosecutors. These facts are detrimental to share value.
2. K11-7 exposes the inner machinations of these schemes and seeks to: **(i)** effectuate regulatory and political reformation; **(ii)** to cause the perpetrators of such tyranny to be monetarily penalized; **(iii)** to re-distribute their wealth amongst the victims of their tyrannical corporate greed.

Jurisdiction + Venue

3. Jurisdiction:

General:

28 U.S.C. § 1331 – Plaintiff's allegations arise pursuant to Section 1983 claims of violations of Kaul's Constitutional rights and U.S.C. § 1964(a)(b)(c)(d) and 1962.

U.S.C. § 337 – Plaintiff's allegations allege violations of an Act of Congress regulating commerce and monopolies.

28 U.S.C. § 1332(d)(2)(A) – Plaintiff is a citizen of a different state to certain Defendants and the aggregate amount in controversy exceeds seventy-five thousand dollars (\$75,000).

Personal:

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

4. Venue:

28 U.S.C. § 1391(b)(1) – A civil action may be brought in (1) a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located and (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of property that is the subject of the action is situated

Evidence

5. Tacit admissions:

Defendants Christie/TD/Allstate/AHS/Heary/Geico have, pursuant to F.R.E. 801(d)(2)(b), have admitted to the RICO and Section 1983 claims (Exhibit 5).

6. Defendant Geico's "pattern" within the United States District Court:

Since 2008/2009, Defendant Geico has filed almost identical and knowingly fraudulent claims against physicians to whom it owes money, in the willful commission of mail/wire fraud/obstruction of justice. Below are just four (4) examples:

1. Geico v Kaul: 13-CV-02597 – U.S.D.C.-D.N.J. (Exhibit 12).
2. Geico v Specialty Medical Services: 14-CV-08015 – U.S.D.C.-D.N.J. (Exhibit 12).
3. Geico v Kosiborod: 16-CV-04662 – U.S.D.C.-D.N.J. (Exhibit 12).
4. Geico v Basch: 19-CV-13948 – U.S.D.C.-D.N.J. (Exhibit 12).

The Slaving-Nazi-COVID-Insurance Axis

7. In K11-2 Kaul exposed the motivation and method for the adding and abetting of the perpetration of the slaving industry and Holocaust, by the insurance industry, of which Defendants Allstate/Geico are members (**Exhibit 6**). In 2021, the insurance industry controls the pharmaceutical industry, and is the principal financial beneficiary of the billions of dollars generated from forced mass global vaccination programs, that violate fundamental human rights and the Nuremberg Code. The insurance industry holds substantial controlling shares in Pfizer (USA) and Astra Zeneca (UK) and are continuing the same **"pattern of racketeering"** that commenced in the 1600s with the Trans-Atlantic slaving trade, and which involved the commission of the RICO predicate act of murder, through the United States, a colony that the British Empire/Insurance Industry converted into a **"racketeering enterprise"** for the purpose of profit.
8. The forced/coerced mass vaccination programs/passports are the chains and whips of the COVID enslavement program, the strings of which are being pulled by the British controlled insurance industry. Dominion never ended. It simply switched hats.
9. In K11-2, the Defendants and the Court devoted inordinate page space to Kaul's exposition of the insurance industry's four hundred (400) year-long genocide, and in doing so, did betray their conviction of the absolute truth of the matter.
10. In K11-7, Kaul identifies how, in 2021, the **"pattern"**, like the COVID-19 virus, has mutated into a purported mission to save humanity, the calling card of which is a supposed **"vaccine"**. The vaccine is more than useless, as it was the cause of the viral mutation, as Kaul explained it would be (**Exhibit 7**).

Statement of Fact

11. The relevant facts are incorporated into the legal claims.
12. However, the most salient and irrefutable facts of the Defendants' guilt are found within their ill-conceived schemes to have Kaul kidnapped and to commit securities fraud for five-plus-years. These facts, in conjunction with the perjury/obstruction of justice/mail fraud/wire fraud/kickbacks/honest services fraud/extortion/bank fraud/bankruptcy fraud/racketeering/conspiracy/public corruption/judicial corruption/false imprisonment/false arrest committed by The Kaul Cases Defendants from 2008/2009 to 2021, are deemed admitted pursuant to F.R.E. 801(d)(2)(b), because they have not, nor could they be, denied.
13. The facts in The Kaul Cases are irrefutable proof of: (i) Corporate corruption/tyranny; (ii) Political corruption/tyranny; (iii) Judicial corruption/tyranny; (iv) Medical corruption/tyranny.

Legal Claims

Violation of Sarbanes-Oxley Act As to Defendants Allstate/TD/Geico

14. On February 22, 2016, Kaul filed suit against the Defendants in the United States District Court for the Southern District of New York (K1). The claim for monetary damages was \$28, 000 trillion + (**Exhibit 8**), a figure in excess of ten percent (10%) of the market capitalization of all three Defendants, and thus the law required the case be disclosed in SEC filings, Forms 10K/13K, and in the corporations' accounts.
15. The Defendants conspired with their lawyers and accountants to file knowingly false returns/accounts, with the recognition that this crime did constitute a violation of Sarbanes-Oxley and was represented a willful commission of securities fraud on the global equities market.
16. From 2016 to the present, the Defendants continued to fail to report their liability, a liability that continues with K11-1/K11-3/K11-7.
17. On November 22, 2018, Kaul sent letters to the top ten corporate shareholders of Defendants Allstate/TD/Geico, creating a record in which the shareholders are foreclosed from asserting plausible deniability of the Defendants crimes. A number of these entities withdrew their positions. Kaul sent a subsequent letter on August 18, 2020 (**Exhibit 9**).
18. The key provisions of the Sarbanes-Oxley Act are:
 - (1) **SOX Section 302: Corporate Responsibility for Financial Reports** – (a) CEO and CFO must review all financial reports; (b) Financial report does not contain any misrepresentations; (c) Information in the final report is “**fairly represented**”; (d) CEO and CFO are responsible for the internal accounting controls; (e) CEO and CFO must report any deficiencies in internal accounting controls, or any fraud involving the management of the audit committee; (f) CEO and CFO must indicate any material changes in internal accounting controls.
 - (2) **SOX Section 401: Disclosures in Periodic Reports** – All financial statements and their requirement to be accurate and presented in a manner that does not contain incorrect statements or admit to state material information. Such financial statements should also include all material off-balance sheet liabilities, obligations and transactions.
 - (3) **SOX Section 404: Management Assessment of Internal Controls** – All annual financial reports must include an Internal Control Report stating that management is responsible for an “adequate” internal control structure, and an assessment by management of the effectiveness of the control structure. Any shortcomings in these controls must also be reported. In addition, registered external auditors must attest to the accuracy of the

- company management assertion that internal accounting controls are in place, operational and effective.
- (4) **SOX Section 409: Real Time Issuer Disclosures** – Companies are required to disclose on an almost real-time basis information concerning material changes in its financial condition or operations.
 - (5) **SOX Section 802: Criminal Penalties for Altering Documents** – This section specifies the penalties for knowingly altering documents in an ongoing legal investigation, audit, or bankruptcy proceeding.
 - (6) **SOX Section 806: Protection for Employees of Publicly Traded Companies Who Provide Evidence of Fraud** – This section deals with whistleblower protection.
 - (7) **SOX Section 902: Attempts & Conspiracies to Commit Fraud** Offenses – It is a crime for any person to corruptly alter, destroy, mutilate, or conceal any document with the intent to impair the object's integrity or availability for use in an official proceeding.
 - (8) **SOX Section 906: Corporate Responsibility for Financial Reports** – Section 906 address criminal penalties for certifying a misleading or fraudulent financial report. Under SOX 906, penalties can be upwards of \$5 million in fines and 20 years in prison.
19. The Defendants knowingly/willfully violated every SOX provision, to a criminal standard. The violation caused a massive and ongoing injury to Kaul's prosecutorial and due process rights, in that he was illegally deprived of incriminatory evidence regarding the securities fraud, that Kaul would have submitted as further evidence of the Defendants "pattern of racketeering" through the commission of the RICO predicate act of securities fraud.
20. The Defendants violation of SOX did violate Kaul's rights, and caused further injury to his economic standing, reputation and ability to become 'un-imprisoned' and regain his livelihood, for this, all Defendants are liable.

RICO 1

Association-In-Fact Enterprise: State of New Jersey-NYSE-SEC

Defendant Persons: Allstate/TD/Geico/ICE/Christie

RICO Predicate Acts: Securities fraud/mail fraud/wire fraud/money laundering

Overview:

21. In a time period commencing in approximately 2009, the Defendants did conspire to commit, and did commit a knowingly illegal "pattern of racketeering" and did convert the NYSE/SEC/State of New Jersey (executive/legislative/judicial) into an association-in-fact enterprise, through and under cover of which they perpetrated thousands of the RICO predicate acts of mail fraud/wire fraud/securities fraud/money laundering, purposed to advance their political/economic agenda. Specifically, Defendant Christie sought to raise monies for gubernatorial and presidential campaigns, while Defendants Allstate/TD/Geico/ICE sought to increase executive compensation and share price. The

Defendants **"State of New-NYSE-SEC" ("SNS Scheme")** scheme involved an intersection of the worlds of medicine/business/law/politics, and commenced in 2009, with the purpose of, amongst other things: (i) having Kaul's medical license revoked; (ii) eradicating all debt owed to Kaul by insurance carriers (approx. \$45 million); (iii) destroying Kaul's reputation; (iv) eliminating any future financial liability to Kaul; (v) causing Kaul to enter a state of poverty/homelessness; (vi) attempting to cause Kaul to be jailed/deported/killed; (vii) intimidating other minimally invasive spine surgeons into not performing minimally invasive spine surgery, in order to divert a greater percentage of the public's insurance premiums into corporate/executive compensation.

22. The Defendants have colluded and conspired to orchestrate both their underlying **"SNS Scheme"** and the subsequent, and multiple schemes to conceal and provide cover for the **"SNS Scheme"**. The concealment has been perpetrated through massive schemes of corruption of state/federal politicians/judges, in an attempt to prevent Kaul from exposing the Defendants decades-long schemes of judicial/public corruption.
23. In 2005, Kaul invented and successfully performed the first outpatient minimally invasive spine surgery, at a NJ surgical center that had credentialed him to perform the procedure, and under the authority of his state medical license; a license issued in 1996 by the State of New Jersey for both medicine and surgery. The state argued in proceedings from April 2 to June 28, 2013 that Kaul was not licensed to perform surgery. In this proceeding the Defendants and the state committed massive fraud, as evidenced in 'The Solomon Critique' (K1-D.E. 225) + 'The Solomon Critique 2' (K1-D.E. 299-18).
24. From 2006 to approximately 2009, Kaul was subjected to rule-of reason antitrust violations by, amongst others, Defendants Heary/AHS, who wanted to eliminate the threat of Kaul's rapidly expanding minimally invasive spine surgery practice. In furtherance of this scheme, the Defendants did engage in multiple quid pro quo schemes with Defendant Christie, in which they funneled bribes into his political campaign, purposed to have him use state power to have the medical board revoke Kaul's license. Kaul's license was illegally suspended/revoked on April 2, 2012/March 24, 2014, and the Defendants then, with knowing illegality, did use the US mail/wires to transmit this fraudulent notice globally to all governmental agencies, including all state medical boards/National Practitioners Data Bank/DEA/FBI.
25. From 2012 to 2020, the Defendants/co-conspirators did conspire to commit, and did commit bankruptcy fraud and insurance fraud, by defrauding Kaul's medical malpractice carriers of millions of dollars through the submission and fraudulent judicial adjudication of false claims, as pled in K11-4.
26. Commencing in 2016, the Defendants/co-conspirators did extend their **"pattern of racketeering"** into the NYSE, through an ongoing commission of the predicate acts of securities fraud, in that they submitted false SEC filings/accounts, that defrauded, and continue to defraud the global equities market. Based on this knowingly false

information, the Defendants did perpetrate millions of trades with unsuspecting investors, concealing from them the massive risk associated with the purchase of these fraudulent equities. In conjunction with these crimes, the Defendants/co-conspirators did not disclose to the market that its profits are the product of crimes, as detailed in The Kaul Cases, but yet willfully and with knowledge of its illegality, did launder the proceeds of these crimes through the NYSE.

27. From 2006 to the present, the overarching theme of the Defendants/co-conspirators crimes, has been the commission of increasingly more serious crimes, in an attempt to conceal their prior crimes, malfeasance and misconduct. What commenced in 2006 with the professional jealousy of Kaul's competitors, of which Defendant Heary was a 'ring-leader', is in 2021, a multitude of felonies that include, amongst others: (i) bankruptcy fraud; (ii) securities fraud; (iii) mail fraud; (iv) wire fraud; (v) perjury; (vi) bribery; (vii) obstruction of justice; (viii) public/judicial corruption; (ix) civil rights violations; (x) evidence tampering; (xi) witness tampering; (xii) false imprisonment; (xiii) false prosecution; (xiv) insurance fraud; (xv) kickbacks; (xvi) human rights violations; (xvii) retaliation; (xviii) false seizure of property; (xix) honest services fraud; (xx) racketeering; (xxi) conspiracy; (xxii) market manipulation/money laundering.

ICE:

28. From 2016 to the present, Defendant ICE knew or should have known that Defendants Allstate/TD/Geico committed securities fraud, in willfully, and with knowledge of its illegality, failing to report to the market and the SEC its liability in The Kaul Cases.
29. Defendant ICE was motivated to willful ignorance and did fail to cross reference court records with the filings of Defendants Allstate/TD/Geico.
30. Defendant ICE, in recognizing that its profits were tied to those of Defendants Allstate/TD/Geico, did tacitly conspire with these Defendants to perpetrate a knowingly illegal scheme of securities fraud concealment, that artificially manipulated the market, and was purposed to prevent a decrease in its share price.
31. Defendant ICE used the US mail and wires to exchange information with Defendants Allstate/TD/Geico, in furtherance of the **"SNS Scheme"**, in recognition of the illegality of the scheme and the manipulation of the market that would be caused by such a fraud.
32. Defendant ICE did conspire with and did commit a **"pattern of racketeering"** by aiding and abetting the laundering of the criminal proceeds of Defendants Allstate/TD/Geico through the apparatus of the **"SNS Association-In-Fact Enterprise"**, the principal purpose of which was to increase insurance industry executive profit and share price, at the expense, and through the exploitation of Kaul and thousands of other physicians, many of whom remain falsely imprisoned.

33. Defendant ICE, although having reported regulatory/litigation risks in its SEC filings, did willfully and knowingly fail to specifically identify the securities fraud crimes of Defendants Allstate/Geico/TD, and is thus liable for not just these crimes, but for those from which the criminal proceeds originated in administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey, in a period that commenced in at least, if not before, Defendant Christie's first term as governor.
34. Defendant ICE recognizes that because it both trades on the NYSE and engages in commerce with global exchanges, which affects the value of those exchanges, that its participation in the **"SNS Scheme"** caused it to become a conduit to these exchanges of market valuations that it knew, or ought to have known were false, and were the product of crime.
35. Defendant ICE used the US mail/wires to globally transmit knowingly fraudulent information about the market valuations of Defendants Allstate/TD/Geico, in that it omitted any specific reference within its SEC filings to the legal liability (\$28,000 trillion +) to the global equities market of The Kaul Cases.
36. Defendant ICE, in propagating this knowingly fraudulent information to the global equities market, did recognize its role in false equity evaluations and the creation of a 'bubble market'
37. Defendant ICE's Indian headquarters is Hyderabad (Kaul's birthplace), and it is cognizant of the fact that the Indian stock market is currently reported as being in a 'bubble' by the Reserve Bank of India.
38. Defendant ICE recognizes that the false evaluations of the NYSE are responsible for the Indian 'bubble', and that the false evaluations of the NYSE are a consequence of the Defendants financial crimes.

Christie:

39. From 2000, the year that Defendant Christie was appointed the US Attorney for the District of New Jersey, he has abused state power and converted state/federal agencies into **"racketeering enterprises"**, through which he has conducted a **"pattern of racketeering"** purposed to further the economic/political agendas of himself and those individuals with whom he engaged in quid pro quo schemes of bribery and public corruption.
40. Commencing in or around 2008/2009, Defendant Christie entered into knowingly illegal conspiracies with Defendants Allstate/TD/Geico, in which they methodically planned schemes to eliminate Kaul, through the abuse of governmental power. The Defendants conspired with state/federal investigative/prosecutorial authorities to file criminal

indictments against Kaul. These investigations ceased when Kaul filed K1 on February 22, 2016.

41. From 2009 to 2017, he converted the executive/legislative/judicial branches of the State of New Jersey into a **"racketeering enterprise"**, that he used against Kaul, in an attempt to have him jailed/deported/seriously injured/killed, in order to eliminate: **(i)** the debt owed to him by the insurance industry; **(ii)** future liability to Kaul by the insurance industry; **(iii)** the threat that Kaul's minimally invasive spine surgery practice posed to **The Kaul Cases** physician/hospital Defendants, from whom, along with Defendants Allstate/TD/Geico, Defendant Christie had received bribes.
42. Defendant Christie believed that he would become the 2016 President of the United States, that Kaul would be eliminated, and the crimes of **The Kaul Cases** Defendants would go undetected, and that Kaul would not commence litigation in 2016.
43. However, when Kaul did commence litigation, Defendant Christie, in collusion/conspiracy with **The Kaul Cases** Defendants and certain judges within the United States District Court, did perpetrate a massive scheme of obstruction of justice, that violated Kaul's human rights, and was intended to prevent Kaul from exposing the crimes, and to obviate the obligation of Defendants Allstate/TD/Geico (Berkshire Hathaway) to report the \$28,000 trillion + in their SEC filings.
44. In the perpetration of the **"SNS Scheme"**, Defendant Christie did use the US mail/wires to transmit information with **The Kaul Cases** Defendants regarding the bankruptcy and securities fraud, as it pertained detrimentally to the share price of Defendants Allstate/TD/Geico.
45. In aiding and abetting the **"SNS Scheme"**, Defendant Christie did fully recognize its illegality and the international criminal consequences of his participation in the defrauding of the global equities market.
46. Defendant Christie, nonetheless, did persist in the perpetration of the scheme out of fear that if the \$28,000 trillion + liability were disclosed to the global equities market, it would cause shareholder litigation, that would expose the massive crimes committed by **The Kaul Cases** Defendants within the executive/legislative/judicial branches of the State of New Jersey, the United States District Court and the United States Bankruptcy Court (2006 to Present).
47. Defendant Christie was also motivated to aid and abet the securities/bankruptcy fraud, as he had been bribed with shares from Defendants Allstate/Geico, as part of the quid pro quo scheme in which he ordered the medical board to revoke Kaul's license.
48. Defendant Christie maintains a controlling position within the **"SNS Association-in-Fact Enterprise"** from which he continues to illegally profit, the profits of which he launders

through the enterprise his political lobbying/law business, that currently provide cover for his **“ongoing”** schemes of bribery and public corruption.

Allstate/Geico:

49. Kaul commenced suit against Defendant Allstate on February 22, 2016 in K1, in which Kaul seeks \$28,000 trillion + in monetary damages. Allstate’s market capitalization was approximately \$33 billion, and thus it was obligated to report the claims in its SEC filings. It did not.
50. Defendant Allstate, in recognizing the immense civil/criminal consequences of disclosure, and the damage to its reputation within the global equities market, did conspire with Defendant ICE in its withholding of this information.
51. Defendant ICE was motivated to participate in the **“NSS Scheme”** as its share price and corporate profits were linked to those of Defendant Allstate, and it recognized that exposure to the global equities market of the \$28,000 trillion + liability had the potential to bankrupt Defendant Allstate.
52. Defendants ICE/Allstate did use the US mail/wires and face-to-face meetings to exchange information about the **“NSS Scheme”**. Within the corpus of communication, Defendants ICE/Allstate concluded that the risk of Kaul exposing a securities fraud violation was minimal compared to the risk of bankruptcy if **The Kaul Cases** were exposed to the global equities market.
53. Defendant Allstate, in recognizing that Defendant ICE would not report its false filings to the SEC/DOJ, did continue to fraudulently trade millions of shares from 2016 onwards, in the knowledge of its illegality, and that it would cause false market valuations, market manipulations and investors to be defrauded.
54. Defendant Allstate reaped illegal profits from the **“NSS Scheme”**, that it funneled as bribes to certain judges within the United States District Court (K11-3) and certain state/federal politicians (K11-1), in order to control the **“racketeering enterprise”** into which **The Kaul Cases** Defendants had converted certain courts (district/appellate) within the United States District Court.
55. Defendant Allstate, through a **“pattern of racketeering”**, and in conspiracy/collusion with **The Kaul Cases** Defendants, did in a period commencing in approximately 2008/2009, convert into **“racketeering enterprises”** the State of New Jersey, the United States District Court, the United States Bankruptcy Court and the New York Stock Exchange and state/federal investigative/prosecutorial authorities, all purposed to eliminate Kaul and then to provide cover for their crimes, when their Kaul elimination scheme failed (2008/9 to 2021).

TD:

56. On February 22, 2016, with the filing of K1, Kaul did expose the crimes of Defendant TD, and their role in the revocation of Kaul's license and the knowingly illegal use of state/bankruptcy courts within the geographic boundaries of the State of New Jersey to bankrupt Kaul's corporations.
57. Defendant TD commenced conspiring with Defendants Christie/Allstate/Geico in or around 2010, in a series of quid pro quo schemes, in which Defendant TD received regulatory favors from Defendant Christie in return for arbitrarily foreclosing on Kaul's personal/commercial loans.
58. Defendants Allstate/Geico had bribed Defendant Christie to eliminate Kaul, and Defendant Christie's quid pro quo with Defendant TD, was purposed to deprive Kaul of monies to litigate the licensing case against the State of New Jersey, and to bankrupt his corporations in order to facilitate the elimination of debt (\$45 million) owed to Kaul by the insurance industry.
59. Defendant TD, in recognizing the immense civil/criminal liability of The Kaul Cases, did conspire with Defendant ICE to conceal the litigation from the global equities market, and did submit false SEC filings and accounts from 2016 to 2021, in the belief that Kaul would not expose its prior crimes, as The Kaul Cases Defendants had bribed certain judges within the United States District Court and the United States Bankruptcy Court.
60. From 2016 onwards Defendant TD did use the US mail/wires and engage in face-to-face meetings with Defendants ICE/Allstate/Geico/Christie, in furtherance of the "**NSS Scheme**". At these meetings, and within these communications, the Defendants did discuss and conclude that the risk of Kaul exposing their securities fraud violation was substantially outweighed by the risk of disclosing the \$28,000 trillion + liability to the global equities market.
61. In conspiring with The Kaul Cases Defendants, Defendant TD did recognize the illegality of their failure to disclose and did follow the advice of counsel in failing to disclose.
62. Defendant TD's counsel did conspire/collude with counsel for The Kaul Cases Defendants in furtherance of the "**NSS Scheme**", for the purpose of concealing their prior crimes, which involved massive schemes of judicial/public corruption, at the center of which was Defendant Christie, his presidential ambitions and the commercial agendas of corporations/persons from whom Defendant Christie had received bribes.
63. Defendant TD, in willfully committing securities fraud and defrauding the global equities market of their right to honest services, did perpetrate such a scheme with the premeditated purpose of violating Kaul's litigation rights, in that it stymied his 'whistleblowing' on the crimes of The Kaul Cases Defendants.

64. Defendants Allstate/TD/Geico did recognize that disclosure to the global equities market would cause investors to withdraw their stock position, as occurred with K11-2 Defendant Boston Partners, after Kaul informed them in November 2018 of the pending litigation in K1/K2.
65. Defendants Allstate/TD/Geico did recognize that a disclosure of the \$28,000 trillion + liability would cause massive shareholder litigation and damaging publicity regarding their schemes of judicial/public corruption, and that this litigation/publicity would augment Kaul's prosecution rights.
66. Defendants TD/Allstate/Geico knowing and willful violation of the Sarbanes-Oxley Act was purposed to provide cover for their previous crimes against Kaul (bribery/mail fraud/wire fraud/judicial corruption/public corruption/civil rights violations/perjury/kickbacks/false arrest/false imprisonment/obstruction of justice/illegal seizure of assets/money laundering/bankruptcy fraud/bank fraud), and were purposed to, and did in fact, violate Kaul's prosecutorial rights.

RICO 2

Association-In-Fact Enterprise: United States Bankruptcy Court-NYSE-State of New Jersey

Defendant Persons: Allstate/TD/Geico/Stolz

RICO Predicate Acts: bankruptcy fraud/mail fraud/wire fraud/public corruption/bank fraud/securities fraud/money laundering

Overview:

67. In a period commencing in approximately 2008/2009, Defendants Allstate/Geico/TD did commence conspiring to commit, and did commit a **"pattern of racketeering"** through the enterprise of the executive/legislative/judicial branches of the State of New Jersey and did, in 2013, extend and amplify this **"pattern of racketeering"** into the U.S.B.C., and did, in 2016, extend and amplify this **"pattern of racketeering"** into the NYSE, to form an association-in-fact enterprise, the **"State of New Jersey-United States Bankruptcy Court-New York Stock Exchange Association-In-Fact Enterprise"** (**"SUN-Association-In-Fact Enterprise"**).
68. The Defendant Persons, that orchestrated, controlled, aided and abetted, and that did either occupy or effect controlling positions within the enterprises were Defendants Stolz/Allstate/TD/Geico.
69. The co-conspirators and specifically, K11-3 Defendant/U.S.B.J. John Sherwood, did aid and abet the Defendants perpetration of their **"SUN Scheme"** through a **"pattern of racketeering"** that involved the commission of the RICO predicate acts of mail fraud/wire fraud/perjury/obstruction of justice/kickbacks/judicial corruption/public corruption/money laundering/bankruptcy fraud/bank fraud/securities fraud, and was

committed, knowingly/willfully, and with knowledge of its illegality, through a purposeful conversion of the State of New Jersey/U.S.B.C./NYSE into **“racketeering enterprises”**, the principal purpose of which was to increase executive/corporate profit and compensation for Defendants Stolz and Christie (political campaign donations/other bribes).

70. The Defendants did use the US mail/wires and conduct face-to-face meetings in New York, for the purpose of devising, planning and executing the knowingly illegal **“SUN Scheme”**.
71. The Defendants, in the initial planning of their criminal enterprise did not anticipate that in 2016, Kaul would commence litigation, or that the damages sought would be in excess of ten percent (10%) of their market capitalization. In fact, the Defendants believed that Kaul would be deported/jailed/killed, and on May 27, 2021, the Defendants, in a state of desperation, did perpetrate a final scheme in which Kaul was illegally arrested/imprisoned, with the intention of having him permanently injured or killed in the Mercer County jail in Trenton, New Jersey. The scheme failed, and Kaul filed suit on June 15, 2021 against K11-9 Defendants Christopher J. Christie/Philip Murphy/Doreen Hafner/Gurbir Grewal/Robert McGuire.
72. Defendants Allstate/TD/Geico, in recognizing their \$28,000 trillion + liability, did conspire with Defendant ICE, in the concealment of this information from the global equities market, in which Defendants Allstate/TD/Geico (Berkshire Hathaway) trade. In 2012, Defendant Allstate extended its operations into India, while simultaneously conducting, in collusion/conspiracy with American state/federal investigative/prosecutorial authorities, policies of racially targeting Indian physicians for license revocation and imprisonment (Exhibit 4).

Defendants Allstate/Geico:

73. In June 2013, Defendant TD, in furtherance of the Defendants **“racketeering schemes”** (2008/2008-2021) caused Kaul’s corporations to file for Chapter 11 bankruptcy. On July 21, 2014 the Chapter 11 was converted to a Chapter 7, because of the illegal revocation of Kaul’s license on March 24, 2014. Defendant Stolz and his now deceased law partner, Robert Wasserman, were assigned as the trustee.
74. In a period that commenced in approximately July 2014, Defendants Allstate/Geico did enter into a conspiracy with Defendant Stolz, in which Defendant Stolz agreed to accept bribes from Defendants Allstate/Geico in return for not pursuing the \$45 million owed to Kaul by Defendants Allstate/Geico and others within the insurance industry, as irrefutably pled in K4.
75. Defendants Allstate/Geico did use the US mail/wires and face-to-face meetings with Defendant Stolz to exchange information regarding the perpetration of the **“SUN**

Scheme”, the purpose of which was to increase share price and compensation to their executives and Defendant Stolz.

76. During these communications, Defendants Allstate/Geico and Stolz did consider the money laundering risk posed by the investment of the proceeds of their crimes into the NYSE. The Defendants calculated that the risk was minimal, as Kaul would be eliminated, and any person who had knowledge of the crime would not disclose, out of fear of retaliation of a criminal indictment from Defendant Christie.
77. Defendants Allstate/Geico/Stolz calculated that their illegal scheme would cause an elevation of share price, the false basis of which would be concealed from the global investment community.
78. Subsequent to Kaul’s filing of K1, the Defendants did conspire to not report the case in their SEC filings, in order to provide cover for, amongst other things, their crime of bankruptcy/creditors fraud. However, in doing so, they commenced committing securities fraud, a crime that they have undoubtedly committed before, but in this case, a crime that commenced in 2016, and is ongoing in 2021.
79. On May 27, 2021, the Defendants attempted to have Kaul seriously injured or killed (K11-9).

Defendant Stolz:

80. Defendant Stolz, a lawyer, knew that in conspiring to commit and committing the RICO predicate acts of bankruptcy fraud/securities fraud/mail fraud/wire fraud, through a **“pattern of racketeering”** in which he converted the United States Bankruptcy Court into a **“racketeering enterprise”**, for a period commencing on July 21, 2014, he has incurred international criminal liability, and has defrauded the global equities market of its right to honest services.
81. Kaul has exposed the crimes of Defendant Stolz, who from 2018 conspired with corrupted judges in the District of New Jersey to prevent Kaul from prosecuting his claims against Defendant Stolz. The tactics used by Defendant Stolz included having Defendant/U/S.B.J. John Sherwood enter an order in February 2020, that sought to bar Kaul from prosecuting Defendant Stolz for his crimes. Defendant Sherwood, as plausibly and irrefutably pled in K11-3, did accept bribes from Defendants Allstate/Geico, in return for entering judgements adverse to Kaul/creditors in the bankruptcy proceedings (July 21, 2014 to July 31, 2020).
82. When Kaul commenced litigation against Defendant Stolz in 2018, Defendant Stolz and his lawyer, Scott Rever, desperate to prevent their prosecution by Kaul, did threaten to expose the names of state/federal politicians and judges, who had either

participated/facilitated his bankruptcy fraud in Kaul's case, or had received bribes from Defendants Allstate/Geico in cases involving other physicians/healthcare providers.

83. From 2016 to the present, Defendant Stolz, with knowledge of Defendants Allstate/TD/Geico's securities fraud crimes, has failed to report the crimes to regulators or the global equities market, as he recognizes that to report would expose his crime of bankruptcy fraud, and the crimes/malfeasance of all of The Kaul Cases Defendants, extending back to 2006.
84. Defendant Stolz has knowledge that Defendants Allstate/TD/Geico did conspire with Defendant ICE to conceal from the global equities market, their \$28,000 trillion + liability, and did conspire with the SEC to have K11-9 Defendant, Gurbir Grewal, transferred on June 29, 2021 from the Office of the NJ AG to the securities fraud enforcement division, after Kaul had sued him in K11-9, and K11-2 Defendant, Boston Partners, had admitted to withdrawing its position in Allstate, after Kaul they received a letter from Kaul in November 2018.

Defendant TD:

85. In approximately 2010, Defendant TD commenced conspiring against Kaul with Defendants Allstate/Geico/Christie, in a scheme to eliminate Kaul through the destruction of his career/livelihood/reputation/economic standing.
86. In furtherance of this scheme, Defendant TD used the US mail/wires to transmit information regarding its devising/implementation/execution, in the knowledge that such transmission constituted the crimes of mail/wire fraud.
87. However, Defendant TD did not believe that Kaul would expose its crimes, as it received information from Defendants Christie/Allstate/Geico that Kaul would be eliminated.
88. Defendant TD entered into a series of quid pro quo schemes with Defendants Allstate/Geico/Christie, in which they conducted a **"pattern of racketeering"** through the American banking system and state/bankruptcy courts within the geographic boundaries of the State of New Jersey, through the commission of the RICO predicate acts of mail fraud/wire fraud/bankruptcy fraud/bank fraud.
89. Defendant TD, in converting into an association-in-fact **"racketeering enterprise"**, the executive/legislative/judicial branches of the State of New Jersey/United States Bankruptcy Court/NYSE, did know of the immense civil/criminal liability that such crime, if exposed, would cause to them and their shareholders.
90. In approximately late 2013/2014, Defendant TD, in collusion/conspiracy with Defendants Allstate/Geico/Christie, did file a knowingly false banking fraud claim against Kaul, with www.checksystems.com. The purpose and effect of this fraud was to prevent

Kaul's access to banking services, cause a deterioration in his credit score and prevent him from funding litigation. Defendant TD did not anticipate that Kaul would sue them in 2016, nor that he would expose their securities fraud violation (2016 to present).

91. During the bankruptcy proceedings (June 17, 2013 to July 31, 2020), Defendant TD, with knowledge of the illegality of the revocation of Kaul's license, and the **"racketeering schemes"** perpetrated by, amongst others, Defendants Allstate/Geico/Christie that caused the revocation/subsequent legal cases against Kaul, did conspire with its counsel to not report the bankruptcy fraud to authorities. The reason for not reporting was that Defendant TD did not want exposed its prior crimes and involvement in The Kaul Cases Defendants scheme to eliminate Kaul (livelihood/reputation/assets/freedom/human rights).
92. Defendant TD conspired with Defendants Stolz/Allstate/Geico and The Kaul Cases Defendant, Dilorio, to threaten Kaul that unless he signed over title to the real estate in which his surgical center was located, despite it belonging to a corporation not part of the Chapter 11 proceeding, that Kaul's ex-wife would be sued by Defendant Stolz.
93. In a period from 2016 onwards, Defendant TD conspired with its lawyers/accountants to defraud the global equities market of its right to honest services, through the submission of false SEC filings and accounting reports. Defendant TD perpetrated these crimes, in the belief, and with the intention to violate Kaul's prosecutorial rights, and in an attempt to prevent Kaul from exposing their crimes, that include those associated with the purchase of Commerce Bank in 2007, in which they bribed multiple NJ state politicians in a 'pay-to-play' scheme, in order to complete the purchase.

RICO 3

Association-In-Fact Enterprise: State of New Jersey-United States District Court
Defendant Persons: Christie/AHS/Heary

RICO Predicate Acts: mail fraud/wire fraud/bribery/obstruction of justice /public corruption/money laundering

Overview:

94. In a period commencing in approximately 2006, Defendants Christie/AHS/Heary commenced conspiring to commit, and did commit, a **"pattern of racketeering"** through the association-in-fact enterprise of the legislative/executive/judicial branches of the State of New Jersey and the United States District Court, the **"SU Association-In-Fact Enterprise"**, in furtherance of the **"SU Scheme"**, through the commission of the RICO predicate acts of mail fraud/wire fraud/bribery/public corruption/obstruction of justice/perjury/kickbacks/bank fraud/investor fraud. The motivation for the **"SU Scheme"** was: (i) to increase the Defendants economic/political power within the American legal/medical/business/political sectors of industry, at the expense of Kaul, free standing surgical centers and non-neurosurgical minimally invasive spine surgeons;

(ii) to use the United States District Court to provide cover for the Defendants crimes within the legislative/executive/judicial branches of the State of New Jersey.

Christie:

95. In 2000, when Defendant Christie was appointed the US Attorney for the District of New Jersey, he commenced abusing state prosecutorial power for advancement of his personal/political/economic agendas and used this power to threaten persons with criminal prosecution in order to coerce them into funneling money into his political campaigns and off-shore bank accounts/trusts. Defendant Christie used this money to occupy the governor's office in 2009/2013 and abused the power of the governor's office to extort further money from persons with threats of criminal prosecution, and did engage in massive schemes of bribery, in which monies were funneled into his political campaigns/off-shore bank accounts by, amongst others, Defendants AHS/Heary. The bribes from Defendants AHS/Heary were part of a series of quid pro quo schemes, purposed to have eliminated Kaul/free standing surgical centers/billing codes for outpatient spine surgery and to have introduced legislation that prevented the issuance of state licenses for physician owned surgical centers and downgraded the RVU of billing codes for spine surgery in free standing physician owned surgical centers. These illegally conducted tactics were part of an overall strategy perpetrated by for-profit healthcare corporations, such as Defendants AHS/Allstate/Geico, to illegally monopolize, through both per se/rule of reason violations, the American healthcare market. At the heart of this conspiracy lies the **"HIPIC-FC"** and related to this is the **"Hospital-Insurance-Pharmaceutical-Industry-Complex-US Government Cartel"** the **"HIPIC-USC"**. These two cartels operate to eliminate physicians through license revocation/incarceration/suicide/death, in order to increase the corporations' profits/share price, by reducing the amount of patient care provided, by reducing the number of physicians.
96. Defendant Christie, in his capacity as the US Attorney, and through his association with his brother, did come to understand the mechanics of the securities market, and was involved with securities fraud cases. ICE came into existence in 2000, the year Defendant Christie became US Attorney, and in 2021 it has a market capitalization of \$68 billion.
97. Bribery: Defendant Christie's relationship with bribers, bribery and quid pro quo schemes extends back to his early political/legal career in Morris County, New Jersey. Without corruption his career would have stalled at the NJ municipal court level. In a time period from 2008 to 2016, Defendants AHS/Heary funneled bribes to Defendant Christie, using as cover, his political campaign account and law/public relation/political lobbying firms with whom Defendant Christie conducted illegal transactions, in which he used the public treasury to funnel state contracts to these firms in return for bribes. The monies (bribes) flowed from Defendants AHS/Heary to Defendant Christie, and the

public's money (kickbacks) flowed from Defendant Christie to Defendants AHS/Heary (\$3.1 million state 'salary').

98. Mail Fraud/Wire Fraud: In a period from 2008 to 2021 Defendant Christie/counsel did, with knowledge of its illegality, use the US mail/wires to exchange information with Defendants AHS/Heary/counsel in furtherance of the **"SU Scheme"**, for the purpose of illegal market monopolization (2008-2014) and then to provide them cover in the United States District Court against Kaul's prosecution of their crimes (2016-2021).
99. Obstruction of Justice: In a period from 2012 to 2021, Defendant Christie did conspire to commit, and did commit an obstruction/violation of Kaul's right to justice by, through and as a consequence of his control of the executive/judicial/legislative branches of the State of New Jersey. This period of obstruction (2012-2017) resulted in some of the injuries detailed in (**Exhibit 10**). Defendant Christie conspired with Defendants Stolz/Allstate/Geico/TD to obstruct Kaul's right to justice in the United States Bankruptcy Court (2013 to 2020), and this period of obstruction resulted in injury exacerbation and further injuries detailed in (**Exhibit 10**). Defendant Christie/counsel conspired with **The Kaul Cases** Defendants/counsel (2016-2021) to obstruct/violate Kaul's prosecutorial rights in the United States District Court, in order to prevent Kaul from further exposing their crimes in the State of New Jersey and the United States Bankruptcy Court.
100. Public Corruption: In a period from 2008 to 2021, Defendant Christie abused his political power and public office to engage in acts of public corruption with private actors (persons/corporations), state/federal judges, medical boards and NJ state police to: (i) eliminate Kaul (deportation/jail/killed); (ii) to order state judges/courts to obstruct Kaul's right to justice/enter multi-million dollar judgments against him; (iii) to obstruct Kaul's right to justice in the United States Bankruptcy Court; (iv) to violate Kaul's prosecutorial rights in the United States District Court; (v) conspire with the SEC to have K11-9 Defendant Grewal transferred to the enforcement division of the SEC on June 29, 2021, to attempt to quash a securities fraud prosecution of Defendants Allstate/TD/Geico.

AHS:

101. Mail/Wire Fraud: In a period from approximately 2008/2009 to 2014, Defendant AHS did with knowledge of its illegality, use the US mail/wires to conspire with, amongst others, Defendant Christie, regarding the perpetration of the first half of the **"SU Scheme"**, that being the revocation of Kaul's license, the destruction of his economic standing/reputation and elimination, be it by jail/deportation/death. From 2016 to 2021, Defendant AHS/counsel did, with knowledge of its illegality, use the US mail/wires to conspire with **The Kaul Cases** Defendants/counsel, regarding the perpetration of the second half of the **"SU Scheme"**, that being the corruption of judges within the United States District Court to obstruct justice by violating Kaul's prosecutorial rights, in order

to prevent him further exposing the crimes committed in the first half of the “**SU Scheme**”, and the securities fraud violations of Defendants Allstate/TD/Geico. Defendant AHS shareholding in these corporations has increased since the filing of K1, on February 22, 2016, as is the case with many other Defendants.

102. Bribery: In a period from 2008/2009, Defendant AHS did engage in a series of quid pro quo schemes with Defendant Christie, in which they converted the executive/legislative/judicial branches of the State of New Jersey into a “**racketeering enterprise**”, through which they conducted a “**pattern of racketeering**”, in which they conspired to commit, and did commit with knowing illegality, the RICO predicate acts of bribery/public corruption.

Heary:

103. Mail/Wire Fraud: In a period from approximately 2008/2009 to 2014, Defendant Heary did with knowledge of its illegality, use the US mail/wires to conspire with, amongst others, Defendant Christie, regarding the perpetration of the first half of the “**SU Scheme**”, that being the revocation of Kaul’s license, the destruction of his economic standing/reputation and elimination, be it by jail/deportation/death. From 2016 to 2021, Defendant AHS/counsel did, with knowledge of its illegality, use the US mail/wires to conspire with The Kaul Cases Defendants/counsel, regarding the perpetration of the second half of the “**SU Scheme**”, that being the corruption of judges within the United States District Court to obstruct justice by violating Kaul’s prosecutorial rights, in order to prevent him further exposing the crimes committed in the first half of the “**SU Scheme**”, and the securities fraud violations of Defendants Allstate/TD/Geico. Defendant Heary’s shareholding in these corporations has increased since the filing of K1, on February 22, 2016, as is the case with many other Defendants.

104. Bribery/Public Corruption: In a period from 2008/2009, Defendant Heary did engage in a series of quid pro quo schemes with Defendant Christie, in which they converted the executive/legislative/judicial branches of the State of New Jersey into a “**racketeering enterprise**”, through which they conducted a “**pattern of racketeering**”, in which they conspired to commit, and did commit with knowing illegality, the RICO predicate acts of bribery/public corruption.

RICO 4

Association-In-Fact Enterprise: State of New Jersey-United States District Court-United States

Bankruptcy Court-NYSE

Defendant Persons: Allstate/Geico/FSM & Christie

RICO Predicate Acts: mail fraud/wire fraud/bribery/obstruction of justice/public corruption/money laundering

Overview:

105. In a period that commenced in approximately 2008/2009, the Defendants did conspire to commit, and did commit, with knowledge of its illegality, a **"pattern of racketeering"**, through the commission of the RICO predicate acts of mail fraud/wire fraud/bribery/obstruction of justice/public corruption, by converting the executive/legislative/judicial branches of the State of New Jersey, the United States Bankruptcy Court and the United States district Court into an association-in-fact racketeering enterprise, the **"SUUN Association-In-Fact Enterprise"**, through which the Defendants perpetrated the **"SUUN Scheme"**, the purpose of which was: (i) to eliminate Kaul; (ii) have Defendant Christie become the 2016 US President; (iii) prevent Kaul from further exposing their crimes, and the securities fraud/bank fraud/bankruptcy fraud of Defendants Allstate/TD/Geico.

106. Central to the perpetration of the **"SUUN Scheme"** was the **"Hospital-Insurance - Pharmaceutical-Industry-Complex"** (**"HIPIC-FC"**) (**Exhibit 11**) and their monopolization/control of all elements of American medicine by for-profit public/private corporations, whose shared economic mission is the maximization of corporate profit and share price, through the exploitation of the American public (denial of care) and medical profession (license suspension/revocation/incarceration) achieved through their corrupt control of the executive/legislative/judicial branches of state/federal government.

Christie:

107. **Mail/wire fraud:** In a period commencing from approximately 2008/2009 to 2016 Defendant Christie did use the US mail wires in a knowing illegal manner, to exchange information with Defendants Allstate/Geico regarding the perpetration of the first half of the **"SUUN Scheme"** to revoke Kaul's license, destroy his economic standing/reputation and have him eliminated (jail/deportation/killed). From 2016 to 2021, Defendant Christie/counsel did use the US mail/wires in a knowingly illegal manner, to exchange information with Defendants Allstate/Geico/FSMB regarding the second half of the **"SUUN Scheme"** to obstruct his efforts to procure a license anywhere in the world and to violate his prosecutorial rights/obstruct justice by corrupting judges within the United States District Court, in an attempt to prevent Kaul from further exposing their crimes, and the securities fraud/bankruptcy fraud/bank fraud crimes of, amongst others, Defendant Allstate/TD/Geico/Boston Partners (K11-2)/State Street

- Capital (K11-2)/Stolz. Defendant Christie received substantial shares from Defendants Allstate/TD/Geico as part of the quid pro quo schemes of bribery, to eliminate Kaul.
108. Bribery: In a period from 2008/2009 to 2016, Defendant Christie did enter into a series of quid pro quo schemes with Defendants Allstate/Geico, in which he received bribes under cover of political campaign donations and shares, and monies transferred into multiple tax free off-shore havens, including Israel, the latter having occurred with monies received from, by and through entities associated with Sheldon Adelson and his corporations. An element of these monies pertained to his trafficking of chemical weapon components to Syrian rebel forces between 2012-2013. Adelson sought to destabilize the region, blame Assad, and thus provide pretext for further Israeli incursion into Arab territories. In a period from 2016 to 2021, Defendant Christie/counsel did corrupt judges within the United States District Court in quid pro quo schemes purposed to violate Kaul's prosecutorial rights and prevent him from exposing the crimes of The Kaul Cases Defendants, including their securities fraud/bankruptcy fraud/bank fraud crimes, either through direct or vicarious liability, pursuant to RICO.
109. Obstruction of justice/public corruption: In a period from 2008/2009 to 2016, Defendant Christie conspired to commit, and did commit, in collusion/conspiracy with The Kaul Cases Defendants, and as part of the first half of the "**SUUN Scheme**", an ongoing scheme to violate Kaul's right to justice within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey, based on multiple quid pro quo schemes in which The Kaul Cases Defendants funneled bribes to Defendant Christie to have Kaul eliminated. In a period from 2016 to 2021, Defendant Christie/counsel did corrupt judges within the United States District Court to violate Kaul's prosecutorial rights in order to obstruct justice and prevent Kaul from exposing the Defendants decades-long schemes of corruption of American state/federal politicians/judges/legislators and the "**FC**", and the ongoing securities fraud and bankruptcy fraud/bank fraud.
110. Money laundering: In a period from 2008/2009 to 2017, Defendant Christie did launder the proceeds of his "**SUUN Scheme**" related criminal activity, in the same places that he laundered the proceeds of his many other criminal enterprises, those being: (i) his family; (ii) the NYSE; (iii) off-shore trusts/banks; (iv) his law/political lobbying firm; (v) his lawyers; (vi) his accountants; (vii) his public relation personnel (Mercury); (viii) investments in Defendants Allstate/TD/Geico/AHS/HUMC (K11-2); (ix) real estate holdings.

Allstate/Geico:

111. Mail fraud/wire fraud: In a period from 2008/2009, Defendants Allstate/Geico did, with a knowing illegality, use the US mail/wires to exchange information with Defendant FSMB, in furtherance of both the first half of the "**SUUN Scheme**" and in continued furtherance of the decades-long "**HIPIC-FC**" scheme (1986-Present). In these communications, Defendants Allstate/Geico conspired with Defendant FSMB to globally disseminate information regarding Kaul's elimination, in order to prevent him exposing their crimes. From 2016 to 2021, Defendants Allstate/Geico/counsel did, with a knowing

illegality, use the US mail/wires to exchange information with Defendant FSMB/counsel and all **The Kaul Cases** Defendants/counsel, in furtherance of the second half of the **"SUUN Scheme"** to violate Kaul's prosecutorial rights in the United States District Court through judicial corruption; in order to prevent him exposing the Defendants prior crimes (2008/2009-2016) in the executive/legislative/judicial branches of the State of New Jersey and the United States Bankruptcy Court, in addition to attempting to conceal their securities fraud crimes in the NYSE (2016-2021).

112. **Bribery:** Defendants Allstate/Geico have, since 1986, participated in an illegal bribery-based scheme of racketeering with Defendant FSMB, the **"HIPIC-FC"** scheme, purposed to monopolize the entire American healthcare system, a monopolization made possible by the corruption/control of the American judiciary and body politic, and facilitated in 2010 by Citizens United. From 2008/2009 to 2016 Defendants Allstate/Geico/FSMB perpetrated a massive series of crimes against Kaul, though the conduction of a **"pattern of racketeering"** through the **"SUUN Association-In-Fact Enterprise"** and in furtherance of the first half of **"SUUN Scheme"** and the entire **"HIPIC-FC"** scheme.

113. **Obstruction of justice/public corruption:** From 2008/2009 to 2016, Defendants Allstate/Geico did with knowing illegality, use the US mail/wires to exchange information with Defendant FSMB, regarding the **"SUUN Scheme"** to eliminate Kaul. From 2016 to 2021, Defendants Allstate/Geico/counsel did with knowing illegality use the US mail/wires to conspire to commit, and commit corruption of judges within the United States District Court, to violate Kaul's prosecutorial rights and obstruct justice, in order to prevent Kaul from further exposing the Defendants prior crimes (2008/2009-2016) in the executive/legislative/judicial branches of the State of New Jersey and the United States Bankruptcy Court, in addition to attempting to conceal their securities fraud crimes in the NYSE (2016-2021).

114. **Money laundering:** Defendants Allstate/Geico did launder and continue to launder the proceeds of their crimes (2008/2009-2021) through the NYSE and global investment community, including the sovereign funds of many other nations, and exchanges, including the London, Shanghai and Bombay Stock Exchanges. Defendants Allstate/Geico continue to fail to disclose to international markets their ongoing commission of securities fraud (2016-Present), and the liability this continues to cause to private/sovereign funds currently invested/investing in these Defendants. Defendants Allstate/Geico have not disclosed the **\$28,000 trillion +** liability in any filings, anywhere in the world, at any point in time after 2016.

FSM B

115. **Mail fraud/wire fraud:** In a period from 2008/2009 to 2016, Defendant FSMB did, with knowing illegality, use the US mail/wires to exchange information with Defendants Allstate/Geico regarding the first half of the **"SUUN Scheme"** pertaining to the elimination of Kaul. From 2016 to the present, Defendant FSMB did similarly use the US mail/wires to conspire with **The Kaul Cases** Defendants/counsel to commit acts of corruption of judges/senators within the United States District Court/US Government, purposed to violate Kaul's prosecutorial rights and obstruct justice, in order to prevent

Kaul from further exposing The Kaul Cases Defendants crimes (2008/2009 to 2016), in addition to attempting to conceal their securities fraud crimes (2016-Present). From 2014 to 2021, Defendant FSMB, in collusion/conspiracy with and through the "FC", did conspire with The Kaul Cases Defendants/counsel to attempt to obstruct Kaul from procuring a medical license anywhere in the world, in order to violate his prosecutorial rights by restricting his access to capital, to prevent him from exposing the crimes (2008/2009 to 2021) of The Kaul Cases Defendants (mail fraud/wire fraud/perjury/extortion/kickbacks/obstruction of justice/public corruption/evidence tampering/witness tampering/securities fraud/bankruptcy fraud/bank fraud/money laundering/judicial corruption/kidnapping/manslaughter/chemical weapon trafficking).

116. Bribery: Since 1986, Defendant FSMB has conducted ongoing schemes of bribery with for-profit corporations ("HIPIC-FC"), in furtherance of their scheme to monopolize all elements of American medicine, from the business of regulation to healthcare commerce. Defendants Allstate/Geico bribed, and continue to bribe Defendant FSMB, to have Kaul eliminated from the market (2012/2014) and to attempt to prevent his re-entry, in order to deny him access to capital, to attempt to prevent Kaul from prosecuting them in the United States District Court. From 2016 to 2021, Defendant FSMB has bribed judges/senators within the United States District Court/US Government, in order to violate Kaul's prosecutorial rights and obstruct justice, in order to prevent Kaul from further exposing The Kaul Cases Defendants crimes (2008/2009 to 2016), in addition to attempting to conceal their securities fraud crimes (2016-Present).
117. Obstruction of justice/public corruption: From 2016 to 2021, Defendant FSMB, by, through and with the "FC", and in collusion/conspiracy with The Kaul Cases Defendants, did bribe judges/senators within the United States District Court/US Government to pervert the course of justice, and violate Kaul's prosecutorial rights, in order to prevent him from further exposing the crimes of The Kaul Cases Defendants.
118. Money laundering: Since 1986, Defendant FSMB, has generated millions of dollars from its "pattern of racketeering" within American medicine, through the exploitation of the American public and medical profession. The criminal proceeds have been laundered through investments in corporations publicly traded on the NYSE, including Defendants Allstate/Geico and other health insurance companies including third-party carriers commercially allied with state/federal governments. The proceed are also laundered through law/political lobbying/public relation firms that funnel bribes to state/federal judges/executives/legislators, in exchange for judgments/legislation that further the political/economic agendas of Defendant FSMB and all corporations involved in commerce with the "HIPIC-FC-Association-In-Fact Enterprise".

RICO 5

Association-In-Fact Enterprise: State of New Jersey-United States Bankruptcy Court-United States District Court

Defendant Persons: Christie/Murphy/Grewal/Allstate/Geico

RICO Predicate Acts: kidnapping/mail fraud/wire fraud/bribery/obstruction of justice/public corruption

Overview:

119. In a period from February 22, 2016 to February 24, 2021, The Kaul Cases Defendants did conduct a “**pattern of racketeering**” within the association-in-fact enterprise of the State of New Jersey-United States Bankruptcy Court-United States District Court, and did convert it into a “**racketeering enterprise**”, through which they perpetrated the RICO predicate acts of kidnapping/mail fraud/wire fraud/bribery/obstruction of justice/public corruption/judicial corruption, in order to prevent Kaul from further exposing their crimes prior to the crime of having Kaul kidnapped on May 27, 2021. The scheme functioned in that it caused all cases filed by Kaul, except K11-1/K11-3, to be transferred to the District of New Jersey-Newark. However, the courts in K11-1/K11-3 have refused, in collusion/conspiracy with The Kaul Cases Defendants to issue summonses.

Christie:

120. Kidnapping: On May 27, 2021, Defendant Christie was served at his law office in Morristown, with a summons and complaint in K11-2. Shortly thereafter, Defendant Christie did, with knowing illegality, conspire with Defendants Murphy/Grewal/Allstate/Geico to have Kaul kidnapped on May 28, 2021 by nine (9) armed individuals (K11-9), who purported to be NJ state police. No warrants were produced, and Kaul was forcibly detained against his will, and rapidly removed to a local police station, where he was chained to a bench. He was then forcibly transferred to another police station and told that he was to be transferred to the Mercer County Jail in Trenton, NJ. Kaul’s repeated requests for a warrant were ignored. The events surrounding the kidnapping are detailed in K11-9. This RICO predicate act was committed in order to have Kaul jailed/injured/killed in order to cause him to become unable to continue the prosecution of K11-2, to prevent him from further exposing the crimes of The Kaul Cases Defendants, including those of securities fraud.
121. Mail/wire fraud: In a period from May 27, 2021 to the present, Defendant Christie, with knowing illegality did use the US mail/wires to exchange information with Defendants Murphy/Grewal/Allstate/Geico regarding the planning/execution and unexpected consequences of the ‘Kaul Kidnapping Scheme. When the scheme failed, the Defendants, realizing that Kaul would file suit, did use the US mail/wires to conspire with judges/senators in the United States District Court/US Government to violate Kaul’s prosecutorial rights by obstructing justice through venue transfer from the Southern District of New York to the District of New Jersey, where the case was dismissed, in an attempt to prevent Kaul from further exposing the crimes of The Kaul Cases Defendants (2008/2009 to 2021).
122. Bribery: In a period from 2008/2009 to 2016, Defendant Christie did engage in multiple quid pro quo schemes of bribery with Defendants Allstate/Geico, in which he abused state power to further the economic/political agendas of, amongst others, himself and these corporate Defendants, the principal purposes of which were to have elected as the 2016 US President and to increase share value/executive compensation

of Defendants Allstate/Geico, through the knowing/willful exploitation of the American public and medical profession. During his tenure as NJ Governor (2009-2017) Defendant Christie abused state power to have incarcerated many innocent physicians (principally ethnic minorities) to whom the insurance industry owed money for the provision of clinical services. These false prosecutions/convictions were perpetrated by his Attorney General, and in NJ state courts corrupted by Defendants Allstate/Geico.

123. Obstruction of justice/public corruption: Defendants Christie, in conspiring to have Kaul kidnapped, did attempt to violate Kaul's prosecutorial rights and obstruct justice in the United States District Court, in order to prevent Kaul from exposing the massive crimes of The Kaul Cases Defendants, of amongst other things, judicial/political corruption.

Murphy:

124. Kidnapping: Defendant Murphy, prior to becoming the NJ Governor was the US Ambassador to Germany, and prior to that was a partner at Goldman-Sachs, a corporation that holds shares in Allstate/Geico, the dividends from which Defendant Murphy continues to profit. Defendant Murphy, recognizing that there were no legitimate means of contesting Kaul's right to continue prosecuting The Kaul Cases Defendants, did conspire with Defendants Christie/Grewal/Allstate/Geico to have Kaul eliminated on May 28, 2021, be it by either severe injury and or death, in order to prevent him from further exposing the crimes of The Kaul Cases Defendants, including the securities fraud violations. Defendant Murphy, in perpetrating the 'Kaul Kidnapping Scheme', did recognize its illegality and violation of Kaul's basic human rights, but persisted nonetheless, because of the immense civil/criminal liability posed to The Kaul Cases Defendants.
125. Mail/wire fraud: Defendant Murphy, in conspiring to perpetrate the 'Kaul Kidnapping Scheme' did, with knowledge of its illegality, use the US mail/wires to exchange information with Defendants Christie/Grewal/Allstate/Geico, about both the execution and the unintended consequences, including the filing/publicization of K11-9.
126. Bribery: Defendant Murphy continues to receive bribes from Defendants Allstate/Geico, under cover of dividends/shares from Goldman-Sachs, and has not, since becoming the NJ Governor, relinquished his or his family's holdings in the corporation, in accordance with NJ law pertaining to state official conflicts of interest.
127. Obstruction of justice/public corruption: Defendant Murphy, in conspiring to have Kaul kidnapped, did attempt to violate Kaul's prosecutorial rights and obstruct justice in the United States District Court, in order to prevent Kaul from exposing the massive crimes of The Kaul Cases Defendants, of amongst other things, judicial/political corruption. Defendant Murphy, in furtherance of this scheme to obstruct justice, did in a period from June 15, 2021, conspire with judges/senators in the United States District Court/US Government to have K11-9 transferred from the Southern District of New York to the District of New Jersey, and then dismissed.

Grewal:

128. Kidnapping: On May 27, 2021, Defendant Grewal did conspire with Defendants Murphy/Christie/Allstate/Geico to have Kaul kidnapped on May 28, 2021, with the purpose of having him incarcerated in the Mercer County jail in Trenton, over the Memorial Day Weekend, in order to have him either seriously injured or killed. When the 'Kaul Kidnapping Scheme' commenced on May 28, 2021 at approximately 2:30 pm EST, Defendant Grewal remained in constant contact with the kidnappers, and did, at approximately 7 pm EST, learn that the scheme had publicly failed. Defendant Grewal, in the planning and execution of the scheme, did know that its principal purpose was to have Kaul eliminated, in order to prevent him further exposing the serious and massive crimes (2008/2009-2021) of The Kaul Cases Defendants.
129. Mail/wire fraud: Defendant Grewal, in the planning, perpetration and 'damage control' phases of the 'Kaul Kidnapping Scheme' did, with a knowing illegality, use the US mail/wires to exchange information with Defendants Christie/Murphy/Allstate/Geico, and in these exchanges the Defendants revealed their opinion that the scheme would be successful, and Kaul would be mentally and or physically unable to continue his prosecution of The Kaul Cases Defendants. Also in these exchanges, were frantic emails that evidenced their fear of public exposure when they learned that the scheme had failed, particularly as it related to the political careers of Defendants Murphy and Grewal.
130. Bribery: Defendant Grewal made the decision to participate in the 'Kaul Kidnapping Scheme' believing that it would be successful. However, when it failed and Kaul sued him on June 15, 2021 (K11-9), he panicked and was transferred to the enforcement division of the SEC, in the belief that it would shield him from Kaul's prosecution. The transfer was the bribe, part of the quid pro quo with the other Defendants, in which they attempted to purchase the silence of Defendant Grewal, while placing him in a position with a perception that it would prevent exposure of the securities fraud crimes of Defendants Allstate/TD/Geico (Berkshire Hathaway).
131. Obstruction of justice/public corruption: Defendant Grewal was appointed the NJ AG in 2017 by Defendant Murphy. He, as with Defendant Murphy, took orders from the insurance industry, in the filing of indictments and or license revocation actions against physicians to whom the insurance industry owed monies. Many of these false cases were brought on fabricated and meaningless claims regarding the prescription of pain-relieving medications. Defendant Grewal participated with Defendants Allstate/Geico/Murphy/Christie in schemes of public corruption and abused state power to violate the Constitutional rights of these physicians, and in the process caused an obstruction of justice, all purposed to further the economic/political agendas of Defendants Christie/Murphy/Allstate/Geico, through the exploitation of the American public and medical profession. Defendant Grewal, in the commission of these RICO predicate acts, did recognize that he, a public servant, was converting the State of New Jersey into a "**racketeering enterprise**" to serve the interests of corrupt corporations/politicians/judges.

Allstate/Geico:

132. Kidnapping: From 2006 to 2016, Defendant Allstate employed a multi-pronged strategy to attempt to eliminate Kaul, that included: (i) denial of certification for patient clinical care; (ii) denial of payment after Kaul provided clinical care; (iii) contesting Kaul at every fee arbitration; (iv) disseminate falsehoods to lawyers/doctors/surgical centers/hospitals to attempt to destroy Kaul's reputation, and make it impossible for him to work; (v) file fraudulent lawsuits against Kaul in corrupted NJ state/federal courts when Kaul wins the arbitration hearings; (vi) order the state medical board to revoke Kaul's license; (vii) have the state AG and US Attorney/FBI initiate far-reaching investigations purposed to alienate Kaul, have him incarcerated and seize his assets and those of his family; (viii) have him indicted on false tax charges; (ix) conspire with his ex-wife to have him jailed on unpaid child support charges; (x) prevent him access to banking services; (xi) bribing judges/senators in federal court/government to obstruct/dismiss all cases filed by Kaul; (xii) scheming to have Kaul **KIDNAPPED/** deported/jailed/seriously injured/killed.
133. Mail/wire fraud: Defendants Allstate/Geico, in the planning/execution/'damage control' phases of the 'Kaul Kidnapping Scheme', did, with knowledge of its illegality, use the US mail/wires to exchange information with Defendants Murphy/Christie/Grewal
134. Bribery: In conspiring to commit the RICO predicate act of kidnapping, Defendants Allstate/Geico did funnel bribes to Defendants Christie/Murphy/Grewal, as part of a quid pro quo scheme, in which Defendants Christie/Murphy/Grewal sold, without the public's permission, state power to Defendants Allstate/Geico, in furtherance of their efforts to eliminate Kaul, and prevent him from further exposing their crimes.
135. Obstruction of justice/public corruption: In having Kaul kidnapped, **The Kaul Cases** Defendants did attempt to violate his prosecutorial rights in the United States District Court, in the belief that he would either be unwilling or unable to continue the prosecution of his claims, and did in the process, attempt to cause a knowingly illegal obstruction of justice within the United States District Court. Defendants Allstate/Geico, in coopting a state police agency into the commission of the crimes of kidnapping/mail fraud/wire fraud to obstruct justice in the United States District Court, did simultaneously: (i) convert the State of New Jersey into a "**racketeering enterprise**" through which the Defendants, being aided/abetted by the state police, did conduct a "**pattern of racketeering**" through the commission of RICO predicate acts; (ii) convert the United States District Court into a "**racketeering enterprise**" through which the State of New Jersey, being aided and abetted by the Defendants/NJ state police, did conduct a "**pattern of racketeering**" through the commission of the RICO predicate acts of obstruction of justice/kidnapping/mail fraud/wire fraud/bribery, all purposed to eliminate Kaul and prevent him from further exposing their corporate decimating crimes.

RICO 6

Association-In-Fact Enterprise: State of New Jersey-State of New York-NYSE ("SSN Association-In-Fact Enterprise)

Defendant Persons: Allstate/Geico/FSM & Hengerer

RICO Predicate Acts: Bribery/Mail Fraud/Wire Fraud/Obstruction of Justice/Conspiracy

Overview:

In a period that commenced in late 2020, the Defendants did conspire to, and did conduct a knowingly illegal **"pattern of racketeering"** through the **"SSN Association-In-Fact Enterprise"**, through the commission of the RICO predicate acts of mail fraud/wire fraud/obstruction of justice/conspiracy, the purpose of which was to prevent Kaul from obtaining a physician license in the State of New York, in an attempt to stymie his economic resurgence, in the belief that such a scheme would mitigate the exposure of their crimes from 2008 onwards, amongst which are bribery/public corruption/evidence tampering/witness tampering/bankruptcy fraud/bank fraud/mail fraud/wire fraud/judicial corruption/perjury/kickbacks/securities fraud.

In the commission of obstructing Kaul's efforts to obtain a license in the State of New York (October 2020 to July 2021), the Defendants did conspire to and did use a multitude of frauds to attempt to deceive, delay and deny Kaul's application, by using the US wires to propagate knowingly false information that there existed a question of so called **"moral character"**, and failed to produce any state policy regarding the regulation of any process of character assessment. Kaul made multiple requests for such a policy, but none was provided, and instead, the Defendants conspired with an individual by the name of **"Vincent Vollaro"** to attempt, on June 17, 2021, to engage me in a non-recorded phone call, in which he would **"explain the process"** to me. The call did not occur, but its purpose was to fabricate evidence to bolster their false position regarding moral character.

On July 14, 2021, consequent to Kaul having sent letters to every member of the NY State Government regarding the state's liability for the crimes of The Kaul Cases Defendants, the Defendants did conspire with **"Vollaro"** to use the US wires to transmit a knowingly fraudulent document, in which **"Vollaro"** asserts that a **"subcommittee"** of the state medical board had purportedly found there existed a **"question"** regarding moral character. Kaul's requests for a copy of the transcript and signed opinion of the supposed subcommittee were ignored and then denied.

On August 27, 2021, Kaul filed a petition (Kaul v Zucker/Hengerer: 101019-2021) in the New York Supreme Court (Borough of New York) (Exhibit 13), that seeks to compel Defendant Hengerer to produce the purported **"subcommittee"** opinion. To date no physician/member of the New York State Medical Board has confirmed participating in any evaluation of Kaul's application.

Hengerer:

Defendant Hengerer is a board director on Defendant FSMB, with whom he engages in commerce related to the business of so called “**physician discipline**”, and in the perpetration of this scheme he does abuse the authority as the Chairman of the Board for Professional Medical Conduct, to eliminate physicians targeted by Defendants Allstate/Geico, to whom the Defendants owe money.

Defendant Hengerer, cognizant of the illegality of his participation in the “**HIPIC-FC**” scheme, has persisted in his unlawful use of the US mail/wires to propagate the scheme to both eliminate physicians and prevent Kaul, an individual suing entities from whom he receives bribes, from properly participating in the relevant market, an offense that Defendant Hengerer recognizes is violative of antitrust law and Kaul’s constitutional/human rights.

Defendant Hengerer, despite knowing the penalties associated with his violation of law and of Kaul’s rights, was motivated to commit the crimes because of the economic benefit that inured to him, and because of his recognition that Kaul’s pioneering minimally invasive outpatient spine surgery, did pose a substantial threat to the business of American hospitals and the American Hospital Association. Defendant Hengerer was paid to be a surgical chairman at Strong Memorial Hospital in Rochester, NY for many decades.

In a period from May 13, 2021, Defendant Hengerer, despite being noticed on multiple occasions by Kaul that he was participating in a “**pattern of racketeering**” did continue with his knowingly unlawful conduct (Exhibit 14).

FSM ~~B~~Allstate/Geico:

The introduction of the HCQIA in 1986 foreshadowed and created the conditions that spawned the “**HIPIC-FC**”, a scheme that Defendants Allstate/Geico/FSMB have used to convert American healthcare into a massive “**racketeering enterprise**” purposed simply for profit at the expense of the American public/medical profession, the singular goal of which is to increase share price at the cost of human life. The American Hospital Association shares the same exploitative business vision, and on February 22, 2018, a CNBC story published a ProPublica list of hospitals that receive vast sums of money from corporations doing business in the healthcare sector, and Strong Memorial Hospital is on the list (Exhibit 16). Hospital based medical mistakes are the third leading cause of deaths in America (Exhibit 17).

Defendants FSMB/Allstate/Geico did conspire with Defendant Hengerer to use the New York State physician licensing apparatus to conduct a “**pattern of racketeering**” and did recognize that in committing these crimes, did convert the State of New York into a “**racketeering enterprise**”, the principal purpose of which was to mitigate any further exposure to the global equities market/international regulators of their crimes of securities fraud crimes (Exhibit 15).

Defendants Allstate/TD/Berkshire Hathaway-Geico and their counsel do know that on September 7, 2021, a release was published to the world-wide-web entitled: “United States Securities And Exchange Commission Alerted To Securities Fraud Crimes Of Three Titans Of North American Finance”, and that the release was disseminated to the CEOs/CFOs of the S/P 500. On September 7, 2021 Defendant Allstate’s share price was 134, and on September 11, 2021 it was less than 132.

In this period, Defendants Allstate/TD/Berkshire Hathaway-Geico did use the US wires to transmit knowingly false information to their shareholders/global investment community that violates section 10(b) of the Securities/Exchange Act, in that they failed to inform the market of a pending action in the Indian High Court (K11-5) and attempted to frame this Court’s denial without prejudice of Kaul’s Summary Judgment motion, as evidence of their lack of guilt.

The Defendants ongoing crimes constitute an “ongoing open-ended pattern of racketeering” being conducted in collusion/conspiracy with Defendant Hengerer through the “SSN Association-In-Fact Enterprise”, that continues to violate Kaul’s constitutional/human rights, in that he continues to be deprived (2012-Present) of his right to a livelihood, his right/duty to support his children and his right to freedom. The Defendants, in knowledge of their immense civil/criminal liabilities in multiple international jurisdictions, did on May 27, 2021, attempt to have Kaul seriously injured/killed.

Pursuant to RICO’s doctrine of vicarious liability, all of The Kaul Cases Defendants have incurred, and will continue to incur liability of the aforementioned crimes, and any further ones that any of the Defendants might commit.

Violation of Civil Rights **Symbiosis of State/Private Actors**

136. Applicable state function tests:

1. The Symbiotic Test
2. The Joint Participation Doctrine
3. The State Command and Encouragement Test
4. The Pervasive Entwinement Test
5. The Public Function Test

137. Facts of test confirmation:

The above pled facts regarding: (i) the exchange between private and state actors, of monies and information pertaining to “patterns of racketeering” conducted through the executive/legislative/judicial branches of the State of New Jersey, the United States District Court and the United States Bankruptcy Court; (ii) the purchasing by private actors of state functions through schemes of judicial/political bribery; (iii) the funding by the State of New

Jersey of legal defenses of private actors in The Kaul Cases, do confirm the intertwinement, for the purposes of section 1983 claims, of the state actor status of the private actors/defendants, and that the crimes committed against Kaul by the private actors/defendants, are the crimes of the State.

Section 1983 claim
Violation of 1st/2nd/4th/5th/6th/8th/14th Amendments

138. The Law:

“Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer’s judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.”

139. The Facts:

In a period from 2008/2009 to the present, the Defendants, as state-actors did abuse state/federal power to knowingly/willfully violate and deprive Kaul of his constitutional rights pursuant to the 1st/2nd/4th/5th/6th/8th/14th amendments, and that these violations did illegally deprive Kaul of: (i) his property; (ii) his right to due process; (iii) his right to freedom of speech; (iv) his right to an impartial tribunal; (v) his prosecutorial rights; (vi) his right to equal protection; (vii) his liberty and a decade of his life. These injuries were perpetrated by private/state/federal actors, and through the State of New Jersey, the United States Bankruptcy Court, the United States District Court and the NYSE. The commercial nexus between Defendants Allstate/TD/Geico and Defendant ICE, and the complicity of Defendant ICE in the securities fraud violations of Defendants Allstate/TD/Geico, does confer state-actor liability on Defendant ICE with regards to the violations of Kaul’s constitutional rights.

The Kaul Cases Defendants were, and are motivated to commit, and continue to commit these violations of Kaul’s human rights, in order to prevent Kaul from exposing their crimes, including those of defrauding the global equities market.

Kaul’s injuries (Exhibit 10).

UN Human Rights Violation

The United Nations Universal Declaration of Human Rights

140. **The Kaul Cases** Defendants have knowingly/willfully abused the power of the American State to violate Kaul's human rights as enshrined in the Universal Declaration of Human Rights (**Exhibit 2**).

141. **BASCH CLAIM**
RICO

Association-In-Fact Enterprise: State of New Jersey-Rivkin Radler-United States District Court
("SRU Association-In-Fact Enterprise"/"SRU Scheme")
Defendant Persons: Geico/Rivkin Radler/Gersenoff
RICO Predicate Acts: mail fraud/wire fraud/bribery/public corruption

Overview:

142. In a period that commenced in or about 2008/2009, Defendants Geico/Rivkin Radler/Gersenoff did conspire to conduct, and did with a knowing illegality, conduct a **"pattern of racketeering"** through the **"SRU Association-In-Fact Enterprise"**, through the commission of the RICO predicate acts of mail fraud/wire fraud/bribery/public corruption, in the perpetration of the **"SRU Scheme"** under cover of the State of New Jersey and the United States District Court. The scheme is purposed to exploit the medical expertise of Plaintiff Basch and defraud him of his property, by illegally using the power of the United States District Court, in order to increase corporate/executive compensation and share price

143. The **"SRU Scheme"** is purposed to increase Defendant Geico's executive compensation/share price, and Defendant Rivkin Radler/Gersenoff's 'legal fees', at the expense, and through the grave exploitation of the American public and medical profession. The Defendants have been aided and abetted in their scheme by corrupted judges within the United States District Court for the District of New Jersey/corrupted politicians within both the state/federal governments/corrupted media outlets, the role of the latter entity being to digitally disseminate slanderous/libelous information about the person/s against whom they file suit.

144. Defendant Geico has perpetrated, and continues to perpetrate this scheme, at the heart of which lies the same **"pattern"** of fraud, and it is this: There exists within New Jersey a no-fault arbitration system that adjudicates claims filed by physicians and other health related professionals, against auto-insurance carriers for compensation regarding care life-saving care delivered to their clients, who have sustained injuries in car accidents. If a physician prevails in these arbitrations, members of this sector of the insurance industry then file knowingly fraudulent lawsuits in state/federal court within the geographic boundaries of the State of New Jersey, seeking to re-litigate their losses in state sanctioned arbitration forums, to whose jurisdiction they submitted.

145. In the arbitration proceedings the Defendants scheme to intentionally omit the arguments they subsequently submit in state/federal courts, as they recognize that the physician has no legal costs in the arbitration (paid by losing insurance carrier), but that state/federal courts actions will require the physician to retain a lawyer at his own enormous cost. Within the subsequent state/federal court actions, the Defendants conspire to file, and do file knowingly false, **evidentially un-supported** RICO claims, in which they seek not only monetary amounts far in excess of what they paid the physician, but injunctions to stop the physician ever treating any of their injured clients. This is their **"open-ended pattern of racketeering"**, one in which they have converted the United States District Court into a massive **"racketeering enterprise"** not dissimilar to the one they have created within American state/federal governments, and the NYSE/SEC.

146. As a consequence of the Defendants **"racketeering"**, Plaintiff Basch has sustained, and continues to sustain substantial and irreparable injury to his reputation and finances and has no other recourse than to bring suit in this Court. The Defendants have corrupted the judges/court within the District of New Jersey (K11-1/K11-3), and thus Plaintiff Basch, in exercising his Constitutional right to due process/impartial tribunal is afforded the right to vindicate his rights in any court within the United States District Court, other than the District of New Jersey.

Geico:

147. **Mail Fraud/Wire Fraud:** In a period from 2008/2009 to 2021, Defendant Geico did, with a knowing illegality, and in collusion/conspiracy with judges in the District of New Jersey/Defendant Rivkin Radler/Gersenoff use the US mail/wires in furtherance of the **"SRU Scheme"** and through a **"pattern of racketeering"** whose continuity is **"open-ended"** and has knowingly and respectively converted the United States District Court and it's judges into a **"racketeering enterprise"** and aiders/abettors of the Defendants decade-plus-long crime. Defendant Geico launders the process of its criminal enterprise through the NYSE and members of the S/P 500, a fact they conceal from the global equities market.

148. **Bribery/Public Corruption:** In a period from 2008.2009 to 2021, Defendant Geico, in collusion and conspiracy with Defendants Rivkin Radler/Gersenoff, did use the US mail and wires to conspire to commit, and did commit the RICO predicate acts of bribery/public corruption, in funneling bribes to judges within the District of New Jersey in a series of quid pro quo schemes, in which corrupted judges did enter order/judgements adverse to Plaintiff Basch and other physicians, while entering orders/judgments advantageous to Defendant Geico. In the commission of these crimes, Defendants Geico/Rivkin/Radler did know the illegality of their misconduct and did know the severe civil/criminal penalties associated with such felonious conduct. The Defendants corruption of the United States District Court has violated and continues to violate the Constitutional right of Plaintiff Basch to due process/impartial tribunal/equal protection, when life/liberty/property are at stake, as they are here. Defendant Geico has also violated the right of Plaintiff Basch to independent counsel, in that the

Defendants continue to conspire to coerce his counsel into having Plaintiff Basch concede to the Defendants fraudulent claims.

Rivkin Radler:

149. **Mail Fraud/Wire Fraud:** In a period from 2008/2009 to 2021, the law firm of Rivkin Radler has conducted and continues to conduct massive schemes of mail and wire fraud, in which, on a weekly basis, it uses, with a knowing illegality, the US mail/wires to exchange fraudulent information with members of the NJ state/federal judiciary and governments, in furtherance of its multiple **“ongoing”** illegal schemes, that do provide the basis for this complaint. Defendant Rivkin Radler is a central cog in the Defendants **“pattern of racketeering”** conducted in **“enterprises”** and association-in-fact enterprises over a decades-plus-long period in which it has used the cover of its law firm/attorney-client privilege to perpetrate a massive criminal enterprise, in collusion/conspiracy with the State of New Jersey and the United States District Court. Defendant Rivkin Radler has used and continues to use this criminal enterprise to inflict intentional harm on the economic standing and reputation of Plaintiff Basch, harm for which he now seeks recompense.
150. **Bribery/Public Corruption:** Defendant Rivkin Radler has within the last two (2) decades, if not longer, perpetrated massive schemes of judicial/public corruption, in which it has both acted as a conduit of bribes from corporations to state/federal politicians/judges, monies that it has disguised as ‘legal fees’ and ‘political campaign donations’, **and** a progenitor of bribes/favors to corrupted judges, to whose family members it provides ‘no show’ jobs. It has conducted these illegal schemes with impunity, as it knows its corporate masters control the investigative/prosecutorial arms of state/federal government. Defendant Rivkin Radler has employed and continues to employ this scheme against Plaintiff Basch, to violate his Constitutional right to due process/impartial tribunal/equal protection, in its pursuit of profit through the exploitation of the medical expertise and economic welfare of Plaintiff Basch. Defendant Rivkin Radler has conducted these illegal schemes of bribery/public corruption with knowledge of their illegality.

Gersenoff:

151. **Mail Fraud/Wire Fraud:** Defendant Gersenoff, in a period from 2008/2009 to 2021, has used, with a knowing illegality, the US mail/wires to exchange information with **The Kaul Cases** Defendants and Defendants Rivkin Radler, regarding the planning and execution of the multiple **“racketeering schemes”**, including the **“SRU Scheme”**, in which Defendant Gersenoff acknowledged that Defendant Geico’s strategy was to file knowingly false RICO claims against physicians to whom Defendant Geico owed monies and against whom Defendant Geico had lost in state sanctioned arbitration hearings. Defendant Gersenoff acknowledged that these filings did constitute the crimes of mail/wire fraud but stated that because Defendant Geico had corrupted the judges/prosecutors/politicians in the District of New Jersey, their crimes would remain

un-investigated and un-prosecuted, and that all lawyers in the District of New Jersey had either been corrupted or were too fearful to file racketeering claims against Defendant Geico. Defendant Gersenoff admitted during one phone call, that Defendant Geico controlled the entire judicial/prosecutorial apparatus within the District of New Jersey. Defendant Gersenoff's 'Fraud on the Court' scheme has caused and continues to cause injury and violation to the Constitutional rights/economic standing/reputation of Plaintiff Basch, for which he now seeks recompense in this Court.

152. Bribery: Defendant Gersenoff has, within the last two (2) decades, conducted a **"pattern of racketeering"** with knowing illegality, through the enterprise of the law firm of Defendant Rivkin Radler, by aiding and abetting, and using the attorney-client privilege as cover for the crime of trafficking bribes from Defendant Geico to state/federal politicians/judges, in furtherance of massive quid pro quo schemes, that have exploited, and continue to exploit the American public and medical profession in pursuit of corporate/shareholder profit. For these ongoing/willful injuries, Plaintiff Basch seeks recompense.

Relief

153. Please see (Exhibit 7).

Certification

We, the Plaintiffs, do certify that the above statements are true and accurate to the best of our knowledge, and that if it is proved that we knowingly and willfully misrepresented the facts, then we will be subject to punishment.



RICHARD ARJUN KAUL, MD



DAVID BASCH, MD

DATED: September 13, 2021

Exhibit 1

DAVID B. BASCH, MD
Spina & Orthopedic Center of New Jersey
90 Sparta Avenue
Sparta, NJ 07871
Phone: (973) 726-9500
Fax: (973) 726-8218

UNDERGRADUATE: Rutgers University, New Brunswick, New Jersey 1981-1985
B.A. Anthropology
B.A. Chemistry

MEDICAL SCHOOL: University of Medicine and Dentistry of NJ (UMDNJ) 1985-1989

RESIDENCY: Maimonides Medical Center, Brooklyn, NY
1989-1990 Department of General Surgery
1990-1994 Department of Orthopedic Surgery

FELLOWSHIP: Spinal Surgery
University of Colorado Health Science Center
University of Colorado Medical School
July 1994-August 1995

Thomas G. Lowe, M.D.
Woodridge Orthopedic Center
2nd Floor, Ste 201, 3550 Lutheran Parkway West
Wheat Ridge, CO 80033 (303) 422-1388

Anthony P. Dwyer, M.D.
University of Colorado, Health Science Center
Department of Orthopedics, Division of Spinal Surgery
Campus Box E2063, 4701 East Ninth Avenue
Denver, CO 80262 (303) 372-1266

HONORS & AWARDS: Dean's List, Rutgers University
Henry Rutgers Honors Research Program, 1985
Henry Rutgers Honor Thesis, 1985
Brooklyn Postal Worker's Union Scholarship, 4 years
Fair Lawn H.S. Scholarship of Academic Achievement (\$1000)

MEDICAL LICENSURE

Medical Licenses in New Jersey-issued 09-08-1995

CERTIFICATIONS

July 1998: Board Certified in Orthopedic Surgery.
Diplomat of the American Board of Orthopedic Surgery
March 2000: Fellow in American Academy of Orthopedic Surgeons

HOSPITAL PRIVILEGES

Hudson Regional Hospital – Secaucus, New Jersey 2019
St. Clare's Medical Center- Denville, Dover, Sussex Campuses 1995-2019
The Surgical Center at Millburn, Millburn, New Jersey

RESEARCH EXPERIENCE

- 1994-95 Investigational Use of Moss Instrumentation for Anterior Scoliosis Surgery
Sponsor-Thomas G. Lowe, M.D.
- 1994-95 Clinical Investigation of how Pedicle Screw Fixation of the Lumbar Spine
Affects the Curvature of the Lumbar Lordosis postoperatively.
- 1986: Research in field of Microbiology
Using newly developed gene hybridization techniques to identify
spontaneous and induced mutations in gene sequences of bacteriophage
particles. Sponsor-Lynn Ripley, UMDNJ-New Jersey Medical School.
- 1984-85 Research in field of Biophysical Chemistry
Forming synthetic bilayer lipid membranes (liposomes) and utilizing them
for drug transport and storage vesicles.
Sponsor-Dr. George Strauss, Associate Professor of Chemistry,
Rutgers University.

PRESENTATIONS

- Mallet Finger Deformity—an Overview. Combined Orthopedic & Plastic Surgery Conference.
Maimonides Medical Center, 1992.
- Chronic Dorsal Fracture Dislocation of the Proximal Interphalangeal Joint: Treatment with Dizarov's
Method of Gradual Joint Distraction (Arthrodiastias). American Society for Surgery of the Hand,
47th Annual Meeting, Phoenix, AZ 1992.
- Breast Cancer Metastasis to Bone. SUNY Health & Science Center at Brooklyn, 1991.
- Trauma of the Cervical Spine including C1 and C2 Vertebrae. SUNY Health & Science Center at Brooklyn,
1990.

PUBLICATIONS

- Identification of Spontaneous and Induced Mutations of the rB11 gene of Bacteriophage T4 through the
Process of Hybridization to the Complementary Oligonucleotides. Summer Student Research Program Report,
University of Medicine & Dentistry of New Jersey, 1986.
- Contributor: Manipulations Under Anesthesia, Concepts in Theory and Applications CRC Press, 2005

CONTINUING EDUCATION COURSES

Advanced Spine Workshop & Seminar, CO 1996
Annual American Academy of Orthopedic Surgeons, Beaver Creek, CO 1995
Minimally Invasive Spine Surgery Course, 2003
Manipulation Under Anesthesia, 2004
IDET IntraDiscal ElectroThermal Therapy and ElectroThermal Disc Decompression, 2005
Symposium on Current Concept in Spinal Disorders, 2005
Therapeutic Challenges in the Management of Patient's with Chronic Pain, 2005
DePuy Spine – Charite Arthroplasty Training Course, 2005
Kyphon Inflatable Bone Tamp Technology Course, 2005
NJOs Annual Fall Symposium "What's On The Orthopaedic Horizon, 2006
Zimmer Spine Dynesys Dynamic-Stabilization System, 2006
Interbody Fusion Technologies Techniques, 2006
Cervical Spine Stabilization Techniques Workshop, 2006
Use of Buprenorphine in Pharmacologic Management Opioid Dependence, 2006
NJOs Spring Meeting, 2007
Lippincott Bone & Joint Volume: 13 Issue: 1, 2007
Hip Resurfacing Product Skills Program April 10th 2008
Physicians Practical Guide to Culturally Competent Care 6/21/09

ACTIVITIES AND INTERESTS

Downhill Skiing, Swimming, Diving, Long Distance Running, Scuba, Water Skiing, Bicycling Reading
& Traveling

Revised 8-8-2002
Revised 1-21-2004
Revised 1-15-2007
Revised 6-11-2007

As of September 2009 there are no changes

CURRICULUM VITAE

RICHARD KAUL, M.D.

120 Temple Terrace
Palisades Park
New Jersey
USA
07650

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dr-richardkaul@gmail.com

Date of Birth: 5 November 1964

EDUCATION:

1983-1988: The Royal Free Hospital School of Medicine, London University, London, England. (Rowland Hill Street, Hampstead, London, NW3. Tel- 011442077940500).

1988-1989: Surgical House Officer, Lister Hospital, Stevenage, Hertfordshire, England. (Preceptor: Keith Giles, M.D.) (Contact Clare Randall, Medical Staffing, Corey's Mill Lane, Stevenage, Hertfordshire, SG1 4AB. Tel- 011441438314333).

1989-1989: Medical House Officer, Academic Unit of Medicine, Royal Free Hospital, London, England. (Preceptor: Professor Neil Macintyre M.D.) (Contact Kerry Dolan, Center for Hepatology, Upper 3rd floor, Rowland Hill Street, NW3 2PF. Tel- 011442077940500).

1989-1990: Surgical Intern, Catholic Medical Center, Queens, New York. (Preceptor: Walter Pizzi, M.D.) (Contact Rita Raio, Department of Surgery, 88-25 153rd Street, Suite 1L, Jamaica, Queens, NY, 11432. Tel-718-558 7216).

1990-1991: Surgical Intern, Nassau County Medical Center, East Meadow, New York. (Preceptor: James Evans, M.D.) (Contact Ann Marksteiner, 8th floor, Resident Resource Officer, 2201 Hempstead Turnpike, East Meadow, NY, 11554. Tel-516-572 6273).

1991-1992: PGY-2 Surgery Resident, Booth Memorial Medical Center, Queens, New York. (Preceptor: Jameson Chassin, M.D.) (Contact Donna DeChirico, The New York Hospital of Queens, 5645 Main Street, Flushing, NY, 11355. Tel-718 670 1120).

1992-1995: Anesthesiology Residency, Albert Einstein- Montefiore Medical Center, Bronx, New York. (Preceptor: Albert Saubermann, M.D.) (Contact Department of Anesthesiology, 4th floor. Tel 718-920 4316).

1995-1996: Pain Fellowship, Department of Anesthetics, Bristol Royal Infirmary, Bristol, England. (Preceptor: Robert Johnson M.D.) (Contact Tel-011441179230000).

PROFESSIONAL APPOINTMENTS:

December 2008-Present-President, The Spine Africa Project-www.spineafricaproject.org

March 2007 – June 2012: Private Practitioner, New Jersey Spine & Rehabilitation, Pompton Lakes, New Jersey.

April 2010 – February 2011: Attending in Interventional Pain and Minimally Invasive Spine, North Jersey Surgery Center, Englewood Cliffs, New Jersey.

April 2007 – October 2010: Director of Outpatient Spine Surgery, The Bergen Passaic Ambulatory Surgery Center, Clifton, New Jersey.

May 2007 – December 2007: Attending in Interventional Pain and Minimally Invasive Spine, Pain & Surgery Ambulatory Center, Wyckoff, New Jersey.

November 2006 – March 2007: Medical Director of The North Jersey Center for Surgery, Newton, New Jersey.

September 2004 – March 2007: Medical Director of Market Street Surgical Center, Saddle Brook, New Jersey.

June 2004 – May 2007: Attending in Interventional Pain and Minimally Invasive Spine, The North Jersey Center for Surgery, Newton, New Jersey.

June 2004 – March 2007: Private Practitioner in Interventional Pain and Minimally Invasive Spine, Saddle Brook, New Jersey.

October 2002 – December 2003: Attending, Pain Management Center, St. Clare's Hospital, Denville and Dover, New Jersey.

February 2002 – August 2002: Attending Anesthesiologist and Director of Pain Services, Columbus Hospital, Newark, New Jersey.

October 2001 – December 2001: Attending Anesthesiologist, Hackensack University Medical Center, Hackensack, New Jersey. (Contact Dr. Mark Schlesinger, Chairman Dept. of Anesthesiology. Tel 201 996 2419).

January 1997 –February 2001: Attending, The Regency Clinic, London, England. (Contact 27 Welbeck Street, London W1M 7PG, England. Tel-011448454583589)

September 1996 – December 1996: Attending in charge of pain clinic, Macclesfield General Hospital, Macclesfield, Cheshire, England. (Contact Tel-011441625421000).

CERTIFICATION/LICENSURE:

2006 Member of The American Society of Interventional Pain Physicians.

2004 Completion of visiting fellowship in Minimally Invasive Spine Surgery, Wooridul Spine Hospital, Seoul, Korea.

2004 Member of The American Academy of Minimally Invasive Spinal Medicine and Surgery.

2004 Diplomate of the American Board of Interventional Pain Management.

1996 Diplomate of American Board of Anesthesiology.
1996 Medical License, State of New Jersey: MA 63281.
1993 F.L.E.X
1989 E.C.F.M.G.
1988 MB.BS (London University).

CREDENTIALS AND CERTIFICATES:

North American Spine Society – Evaluation & Treatment of Adult Spinal Deformity: Hands-On Course. March 16 – 17, 2012. Burr Ridge, IL. Certificate of Participation.

Beckers ASC 18th Annual Ambulatory Surgery Centers Conference. Improving Profitability and Business and Legal Issues. Featured Speaker: Orthopedics and Spine in ASC's – Key Trends and Ideas. October 28, 2011. Chicago, IL.

The Philipino-American Medical Conference – The Future of Outpatient Spine Surgery. Featured Speaker. September 24, 2011. Atlantic City, NJ.

AOSpine Live Tissue Training – The Prevention and Management of Complications in Spine Access Surgery. September 17, 2011. Strasbourg, France. Certificate of Participation and Completion.

SI-Bonc – iFuse Implant System Surgeon Training Program. May 21, 2011. Jamesburg, NJ. Certificate of Completion.

LDR – Anterior Stand-alone Clinical Solutions utilizing VerteBRIDGE Technology. A hands-on cadaver skills lab. May 13, 2011. Las Vegas, NV.

The 3rd Annual ASC Review Seminar. April 27, 2011. Somerset, NJ.

Utilizing Urine Drug Screens Appropriately sponsored by Avee Laboratories. March 15, 2011. East Hanover, NJ. Certificate of Attendance.

Spine Arthroplasty Society. The Second Annual Meeting of the International Society for the Advancement of Spine Surgery – Middle East Chapter (SASME). February 3 – 5, 2011. Movenpick Dead Sea, Jordan.

20th Annual Dr. Tom Lowe Spine Symposium: The Surgical Management of Spinal Disorders. January 14 – 17, 2011. Beaver Creek, CO. Certificate of Participation.

Weill Cornell Medical College. Indications and Controversies: Minimally Invasive Spinal Surgery and Navigation. Hands-on Symposium. December 2 – 4, 2010. New York, NY. Certificate of Participation.

2010 Annual Meeting of the Society for Minimally Invasive Spine Surgery. November 5 – 7, 2010. Miami, FL. Certificate of Participation.

Informed - Cultural Competency Update for the Physician. October 12, 2010. Certificate of Completion.

X-Spine - Advances in Interspinous and Transfacet Fixation: A Hands-On Cadaver Course. August 27, 2010. Henderson, NV.

American Society of Interventional Pain Physicians Webinar – Urine Drug Screen Testing Compliance conducted on July 15, 2010.

Columbia University College of Physicians & Surgeons – 19th Annual Course & Symposium, Basic & Advanced Techniques in Electrodiagnostic Medicine. June 16 – 17, 2010. New York, NY. Certificate of Participation.

Dubai Spine Masters: Interventional and Pain Management Techniques. May 26 – 27, 2010. Dubai, UAE. Certificate of Participation.

Dubai Spine Masters: Minimally Invasive Surgical Strategies. May 23 – 25, 2010. Dubai, UAE. Certificate of Participation.

10th Annual Global Symposium on Motion Preservation Technology. April 27 – 30, 2010. New Orleans, LA. Certificate of Participation.

American Society of Interventional Pain Physicians Webinar – Evidence-Based Interventional Techniques: An Algorithmic Approach To Keeping It Simple, Safe and Successful conducted on March 30, 2010. Certificate of Participation.

Spine Arthroplasty Society. February 18, 2010. Certificate of Membership.

North American Spine Society – 24th Annual Meeting. November 11 – 14, 2009. San Francisco, CA. Certificate of Completion.

North American Spine Society – 24th Annual Meeting Technique Workshop: Interbody Fusion Technologies. November 10, 2009. San Francisco, CA. Certificate of Completion.

2009 Annual Meeting of the Society for Minimally Invasive Spine Surgery. Oct. 9 – 12, 2009. Las Vegas, NV. Certificate of Participation.

North American Spine Society - Spine Across The Sea 2009. July 26 – 30, 2009. Maui, Hawaii. Certificate of Completion.

21st Annual International Bethesda Spine Workshop: Thoraco-Lumbar Course. April 19-20, 2009. Certificate of Participation.

13th Annual International Argospine Symposium. January 29-30, 2009. Paris, France. Certificate of Attendance.

SRH Klinikum Karlsbad-Langensteinbach gGmbH. Akademisches Lehrkrankenhaus der Universität Heidelberg. Guttmannstrasse 1, 76307 Karlsbad, Germany. January 26-28, 2009. Visiting doctor, rounds with Dr. Robert Melcher.

University of California, San Diego School of Medicine. 2008 Annual Meeting of the Society for Minimally Invasive Spine Surgery. November 13-15, 2008. Henderson, NV. Physician Certificate of Credit.

North American Spine Society – 23rd Annual Meeting. October 14-18, 2008. Toronto, Canada. Certificate of Completion.

North American Spine Society – 23rd Annual Meeting Technique Workshop: Interbody Fusion Technologies. October 14, 2008. Toronto, Canada. Certificate of Completion.

Cleveland Clinic Foundation Center for Continuing Education – Spine Review – July 16-22, 2008. Cleveland, OH. Certificate of Participation.

Columbia University College of Physicians & Surgeons – Basic & Advanced Techniques in Electrodiagnostic Medicine. June 11-12, 2008. New York, NY. Certificate of Participation.

North American Spine Society – Minimally Invasive Spine Surgery: A Hands-on Course. June 6-7, 2008. Spine Masters Institute. Burr Ridge, IL. Certificate of Participation.

Interventional Spine. PERPOS Surgical Training Program. February 15, 2008. Clifton, NJ. Certificate of Recognition.

Spineology Physician Instructor at Bergen Passaic Ambulatory Surgery Center. Didactic and Hands-on Cadaver Implantation of OptiMesh Surgical Mesh System. February 15, 2008. Clifton, NJ.

Cedar-Sinai Institute for Spinal Disorders - 7th Annual Symposium on Current Concepts in Spinal Disorders. February 1-2, 2008. Las Vegas, NV. Certificate of Participation.

Saint Louis University School of Medicine – The 1st CSRS Hands-On Cadaver Course. Cervical Spine Decompression & Stabilization Techniques. January 18-19, 2008. Certificate of Participation.

Saint Louis University School of Medicine - The 1st CSRS Cervical Spine Decompression & Stabilization. January 18-19, 2008. Certificate of Attendance.

Medtronic Midas Rex Institute – Instruction in advanced high speed instrumentation for surgeons. St. Louis, MO. January 17, 2008. Certificate of Attendance.

Spine Conference Case Presenter – Lenox Hill Hospital, NY. December 13, 2007.

Weill Cornell Medical College, NY – Minimally Invasive Spinal Surgery and Navigation. November 30 – December 1, 2007. Certificate of Attendance.

University of California, San Diego School of Medicine – Minimally Invasive Surgery of the Spine 2007. November 16-17, 2007. Physician Certificate of Credit.

North American Spine Society – 22nd Annual Meeting. Austin, TX. October 23-27, 2007. Certificate of Completion.

North American Spine Society – Interbody Fusion Technologies. Austin, TX. October 23, 2007. Certificate of Completion.

North American Spine Society - Motion Stabilization: A Hands-On Course. May 18-19, 2007. Spine Masters Institute. Burr Ridge, IL. Certificate of Participation.

19th Annual International Bethesda Spine Workshop: Thoraco-Lumbar Course. May 6-7, 2007. Certificate of Participation.

19th Annual International Bethesda Spine Workshop: Cervical Course. May 4-5, 2007. Certificate of Participation.

AOSpine North America Challenges and Complications in Complex Spine Surgery Symposium. San Francisco, CA. April 28-29, 2007. Certificate of Participation.

North American Spine Society – NASS Spring Break 2007: Back to the Future: Straight Spines, Straight Talk. March 14-17, 2007. Certificate of Attendance.

MinSurg Biomechanical Innovations – TruFUSE Surgical Training. February 17, 2007. Certificate of Completion.

Surgeon Training Program for Atavi Minimally Invasive Posterior Cervical & Upper Thoracic Surgery conducted by Endius, Inc. September 9, 2006. Certificate of Attendance.

Zimmer Spine – Dynesys Dynamic-Stabilization Workshop at St. John's Health Center – Santa Monica, CA. July 21-22, 2006. Certificate of Attendance.

Zimmer Spine – Center of Excellence Program at St. Mary's Hospital – West Palm Beach, FL. June 1-2, 2006. Certificate of Attendance.

University of South Florida – Preservation of Motion in the Spine. April 5-8, 2006. Certificate of Completion.

North American Spine Society – NASS Spring Break: Back to the Evidence. March 8-11, 2006. Certificate of Completion.

The Royal College of Physicians & Surgeons of the United States of America. 5th Global Congress of Minimally Invasive Spinal Specialists. Laser Assisted Spinal Endoscopy, Nucleoplasty & Coblation, Percutaneous Cervical Discectomy, Vertebral Augmentation, Foraminal Decompression, Laser Facet Rhizotomy, Laser Sympathectomy, Epiduroscopy. December 15-18, 2005. Certificate of Attendance.

18th Annual Meeting of the International Intradiscal Therapy Society (IITS). May 25-28, 2005. Certificate of Participation.

Spineology Physician Instructor at Market Street Surgical Center. Didactic and Hands-on Cadaver Implantation of OptiMesh Surgical Mesh System. Saddle Brook, NJ. May 7, 2005.

National University of Health Sciences – Lincoln College of Postprofessional, Graduate & Continuing Education. Manipulation Under Anesthesia. April 4, 2005. Certificate of Proficiency.

University of South Florida – Preservation of Motion in the Lumbar Spine. March 17-20, 2005. Certificate of Completion.

University of South Florida – Preservation of Motion in the Lumbar Spine Labs. March 18, 2005. Certificate of Completion.

North American Spine Society – Advanced Lumbar Spine Surgery: Minimally Invasive Surgery and Motion Preservation: A Hands-On Course. March 4-5, 2005. Certificate of Completion.

North American Spine Society – Cervical Fixation: A Hands-On Course. January 21-22, 2005. Certificate of Completion.

North American Spine Society – 19th Annual Meeting. October 27-30, 2004. Certificate of Attendance.

North American Spine Society – NASS 19th Annual Meeting Techniques Workshop: Minimally Invasive Spine Surgery: Decompression & Fusion/Implants. October 26, 2004. Certificate of Completion.

North American Spine Society – NASS 19th Annual Meeting Techniques Workshop:
Percutaneous Vertebral Augmentation. October 26, 2004. Certificate of Completion.

The 11th Congress of the International Musculoskeletal Laser Society. May 12-15, 2004 in Seoul
Korea. Certificate of Attendance.

Continuing Education, Inc. – Minimally Invasive Spine Update 2004. March 26-28, 2004.
Certificate of Participation.

Continuing Education, Inc. – Fourth Global Congress: Minimally Invasive Spinal Surgery and
Medicine. November 19-22, 2003. Certificate of Participation.

American Association of Medical Foot Specialists. Attended course: Problems in Wound
Management. November 2, 2003.

American Society of Interventional Pain Physicians – Active Member since March 2002.

ABSTRACTS:

Kaul R. Percutaneous Lumbar Fusions in the Outpatient Surgical Practice. 2nd Annual Meeting
of the International Society for the Advancement of Spine Surgery Middle East Chapter
(SASME). Feb. 4, 2011. Movenpick, Dead Sea, Jordan.

Datta S., Kaul R., Manchikanti L. Letter to Editor: Is there really a cause-effect relationship
between steroid dose, pain management practices, joint injected (sacroiliac joint), and infection?
Reg Anesth Pain Med. 2011 Jul-Aug; 36(4):410.

Datta S., Kaul R. Outpatient Thoracic Endoscopic Discectomy (PETD) for Herniated Thoracic
Disc with Thecal Sac Adhesions: Case Report and Review of Literature.

PROCTORSHIPS:

Amendia Education/Certification Proctorship. December 3, 2011. Pompton Lakes, NJ.

Amendia Education/Certification Proctorship. October 8, 2011. Pompton Lakes, NJ.

Disc-FX Education/Certification Proctorship. September 10, 2011. Baldwin, NY.

Disc-FX Education/Certification Proctorship. July 23, 2011. Newport Beach, CA.

Disc-FX Education/Certification Proctorship. June 11, 2011. Dallas, TX.

Disc-FX Education/Certification Proctorship. April 30, 2011. Pompton Lakes, NJ.

WEBINAR HOST/CASE PRESENTATIONS:

Motion Sparing Devices as an Alternative to Fusion. Webinar Host. September 27, 2011.

Grade 1/2 Spondylolisthesis. Case Presentation. September 27, 2011.

Lumbar Herniated Disc and Junctional Syndrome. Case Presentation. September 27,
2011

Advanced Medical Techniques Designed to Compliment Chiropractic Care. Webinar Host. September 20, 2011.

Discography and the Silent MRI. Webinar Host. August 2, 2011.

PHILANTHROPY:

The Spine Africa Project

www.spineafricaproject.org

Founded in August 2008.

The mission of The Spine Africa Project focuses on three objectives: the treatment of those afflicted with spinal conditions, the education of local medical personnel, and social change.

- Jason Sendwe Hospital-Lubumbashi, Democratic Republic of Congo. December 1 – 5, 2008.
- MyungSung Christian Medical Center-Addis Ababa, Ethiopia. December 11 – 15, 2010.
- Panzi Hospital-Bukavu, Democratic Republic of Congo. August 20 – 25, 2011.
- Panzi Hospital-Bukavu, Democratic Republic of Congo. February 5 – 10, 2012

Universal Declaration of Human Rights

Preamble

Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world,

Whereas disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people,

Whereas it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law,

Whereas it is essential to promote the development of friendly relations between nations,

Whereas the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom,

Whereas Member States have pledged themselves to achieve, in cooperation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms,

Whereas a common understanding of these rights and freedoms is of the greatest importance for the full realization of this pledge,

Now, therefore,

The General Assembly,

Proclaims this Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by

teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.

Article 1

All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2

Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3

Everyone has the right to life, liberty and the security of person.

Article 4

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6

Everyone has the right to recognition everywhere as a person before the law.

Article 7

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 8

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

Article 9

No one shall be subjected to arbitrary arrest, detention or exile.

Article 10

Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Article 11

1. Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defence.
2. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier

penalty be imposed than the one that was applicable at the time the penal offence was committed.

Article 12

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 13

1. Everyone has the right to freedom of movement and residence within the borders of each State.
2. Everyone has the right to leave any country, including his own, and to return to his country.

Article 14

1. Everyone has the right to seek and to enjoy in other countries asylum from persecution.
2. This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.

Article 15

1. Everyone has the right to a nationality.
2. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

Article 16

1. Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
2. Marriage shall be entered into only with the free and full consent of the intending spouses.
3. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.

Article 17

1. Everyone has the right to own property alone as well as in association with others.
2. No one shall be arbitrarily deprived of his property.

Article 18

Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

Article 19

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Article 20

1. Everyone has the right to freedom of peaceful assembly and association.
2. No one may be compelled to belong to an association.

Article 21

1. Everyone has the right to take part in the government of his country, directly or through freely chosen representatives.
2. Everyone has the right to equal access to public service in his country.
3. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.

Article 22

Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.

Article 23

1. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
2. Everyone, without any discrimination, has the right to equal pay for equal work.
3. Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
4. Everyone has the right to form and to join trade unions for the protection of his interests.

Article 24

Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Article 25

1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.

Article 26

1. Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.
2. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.
3. Parents have a prior right to choose the kind of education that shall be given to their children.

Article 27

1. Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.

2. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.

Article 28

Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized.

Article 29

1. Everyone has duties to the community in which alone the free and full development of his personality is possible.
2. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
3. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.

Article 30

Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein.

Exhibit 2

www.drRichardKaul.com

August 7, 2021

Jeffrey Sprecher
CEO
Intercontinental Exchange
11 Wall Street
New York, NY 10005

Re: Kaul v Murphy: No. 21-5306 – K11-9

Dear Mr. Sprecher,

I write this letter to alert you to an ongoing violation of the Sarbanes-Oxley Act by The Kaul Cases Defendants, Allstate/TD/Geico. Please find enclosed a copy of a pending SCOTUS petition, in which I have raised the violation and request it be referred to prosecutorial authorities.

This letter provides fair notice to ICE regarding its legal obligation to report the ongoing securities fraud violation.

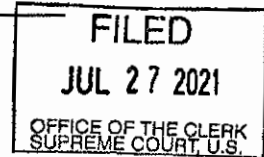
Enclosed is a copy of a previously served NOTICE OF LITIGATION, regarding a case filed in the Indian High Court (K11-5).

Yours sincerely

Richard Arjun Kaul, MD

21-5306 ORIGINAL
IN THE SUPREME COURT OF THE UNITED STATES

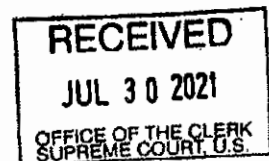
In re Richard Arjun Kaul, MD
Petitioner



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

PETITION FOR WRIT OF PROHIBITION

Richard Arjun Kaul, MD
Propria Persona
440c Somerset Drive
Pearl River, NY, 10965
drRichardkaul@gmail.com
Dated: July 25, 2021



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The Kaul Cases

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

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

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

K4: Kaul v Stolz: 18-CV-01489 – VOLUNTARILY DISMISSED

K5: Kaul v Federation: 19-CV-3050 – APPEAL DISMISSED FOR LACK OF PROSECUTION

K6: Kaul v Kaufman: State Criminal Indictment

K7: Kaul v Federation: 20-CV-01612 – OPEN

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 – CLOSED

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

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

K11-2: Kaul v Boston Partners: 21-CV-10326 – OPEN

K11-3: Kaul v Allstate: 21-CV-00736 – OPEN

K11-4: Kaul v Murphy: 21-CV-09788 – VOLUNTARILY DISMISSED

K11-5: Kaul v State of New Jersey: No. 2092-DRR – INDIAN HIGH COURT

K11-6: Kaul v Moore: Docket Number Pending (New York State Supreme Court)

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

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

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

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

Legal Standard of Review

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

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

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

Related British/House of Lords jurisprudence:

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

Parties to The Proceeding

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

Relief Sought

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

Issue/Question Presented

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

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

Statement + Facts Necessary to Understand Petition

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

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

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

Standard of Review/Legal Authority for grant of writ

28 U.S.C. § 1651

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

Reasons for Granting the Writ

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Summary of Appendices

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

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

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

Appendix B – June 9, 2021: 21-CV-13069: Complaint:

Defendant Christie was served in K11-2 on May 26, 2021 at his law office in Morristown, New Jersey. On May 27, 2021, Kaul was illegally arrested/imprisoned/maliciously prosecuted, as pled in the Complaint. Witness to the arrest was a Dr. Evangelos Megariotis, a colleague of Kaul, with whom Kaul just happened to be on a phone call when nine (9) armed men illegally and without warrants entered his place of work. Kaul had Megariotis on speaker-phone for the duration of the events, and Megariotis did talk directly with one of the armed men. On the morning of May 28, 2021, Kaul submitted a letter into K11-2 (D.E. 18/19) that details these events and identifies Dr. Megariotis as a witness to the crime. In the afternoon of May 28, 2021, the fiancée of Dr. Megariotis was contacted via telephone by two men purporting to be DEA agents, who wanted to talk with her about Dr. Megariotis, regarding an investigation they had supposedly initiated against him. She felt threatened and intimidated, and thus did, on July 12, 2021, testify before a grand jury impaneled in the District of New Jersey. The Kaul Cases Defendants, in recognizing their immense civil/criminal liability, in part because of their violation of Sarbanes-Oxley, and Kaul's civil rights, did commit the RICO predicate act

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

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

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

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

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

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

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

Conclusion

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

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

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

Dated: July 25, 2021



RICHARD ARJUN KAUL, MD

www.drrichardkaul.com

May 12, 2021

Jeffrey Sprecher
CEO
International Exchange
5660 New Northside Drive NW 3rd Floor
Atlanta, GA 30328

Re: NOTICE OF LITIGATION
Kaul v Allstate et al.
K11-5

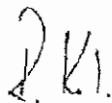
Dear Mr. Sprecher

Please accept this letter as Notice of Litigation and statement of your legal duty to preserve all evidence and data that might produce evidence, that relates, pertains or has any association to any of the claims in The Kaul Cases. The crimes of Defendants Allstate/TD/Geico, as detailed in these cases, have caused Intercontinental Exchange to incur liability, consequent to the Defendants laundering of their criminal proceeds through the exchange.

Please also find a copy of a document entitled, 'Settlement Terms', that was filed in K1 on February 22, 2016 in the United States District Court for the Southern District of New York. The Defendants willful failure to confer is a factor to be considered in any legal analysis of the exposure of both the exchange and the entities that trade on it.

K11-5 can be viewed on www.drrichardkaul.com

Yours sincerely



Richard Arjun Kaul, MD

www.drnchardkaul.com

March 14, 2018

Mr. Jeffrey Sessions
United States Attorney General
The United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: Kaul v Christie, et al.,
Docket No. 16-CV-02364
Perjury and falsification of legal evidence

Dear Mr. Sessions,

I write this letter to bring your attention to the fact that in 2013, three individuals acting on behalf of agencies under the control of the executive branch of the New Jersey State Government, collectively committed two hundred and seventy-eight (278) separate acts of perjury, misrepresentation, evidential omission and gross mischaracterization. These fraudulent acts were perpetrated during an administrative law proceeding, that resulted in the illegal revocation of my New Jersey medical license.

The facts and circumstances of these events are detailed in the enclosed document which is entitled, 'The Solomon Critique'. I believe that the aforementioned misconduct of New Jersey Administrative Law Judge, Jay Howard Solomon, Esq and physicians, Gregory Przybylski, MD and Andrew Kaufman, MD, constitute criminal violations of federal law. This criminal conduct deprived me of my Constitutional right to due process and of my ability to earn a living.

Please find enclosed a print copy of the document (Exhibit 1), which was filed with the Court on January 17, 2018. A digital copy is included on the enclosed flash drive.

I hope that your review of this submission will cause the matter to be investigated, because my case is not the only one in which such misconduct has occurred. Evidence exists that the same pattern of tampering with and falsification of court records, reports and evidence has occurred in at least one other matter (Exhibit 2). There is also evidence that State Government servers are being shared with private parties, that include, amongst others, Allstate New Jersey

Insurance Company (**Exhibit 3**). These servers contain highly confidential information that pertains to both physicians and patients.

Referenced within Exhibit 3 is a video, which can be found at:

<https://www.youtube.com/watch?v=sFIE8v6MsU>

My case, and those referenced above, demonstrate a long pattern of criminal conduct by public and private entities, in which state agencies and actors have engaged in corrupt schemes with private parties. The mechanism of physician regulation in New Jersey is illegally and unconstitutionally configured (**Exhibit 4**), which explains why it is so profoundly corrupt, and why my attorney, Robert Conroy, Esq. (now deceased), stated on June 13, 2012 (**Exhibit 5 – 53:22-54:6**)

"Seldom do there come cases in which the very fundamental nature of the board is at issue. Seldom. This is one of them. This will be a case that we'll [sic] be cited for many propositions, many times in the future, regardless of how it comes out. It will be an important case, case so important that you should think long and hard before you vote to reconsider that which you've done already because you got it right the first time."

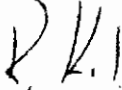
Please find below my contact information, should there be any further information you require.

Mobile - 201 989 2299

E-mail – drRichardKaul@gmail.com

Thank you for your consideration

Yours sincerely



Richard Arjun Kaul, MD

www.drrichardkaul.com

February 15, 2018

Gurbir S. Grewal
Attorney General
Office of the Attorney General
Department of Law and Public Safety
Richard J. Hughes Justice Complex
25 Market Street, Box 080,
Trenton, NJ 08625-0080

Re: Jay Howard Solomon, Esq – Violation of Section 2C:21-4.1 of Title 2C of New Jersey Criminal Code

Dear Mr. Grewal,

I write this letter in order to bring your attention to the fact that in 2013, New Jersey Administrative Law Judge, Jay Howard Solomon, committed a crime of fourth degree, when he knowingly and willfully falsified an opinion he issued on December 13, 2013, in the MATTER OF THE SUSPENSION OF REVOCATION OF THE LICENSE OF RICHARD A KAUL TO PRACTICE MEDICINE AND SURGERY IN NEW JERSEY. Jay Howard Solomon violated Section 2C:21-4.1 of Title 2C of the New Jersey Code of Criminal Justice.

Please find contained in the enclosed flash drive, a copy of a document entitled, 'The Solomon Critique' with supporting references. The document is an analysis of the trial transcript and evidence of the proceeding of the aforementioned matter, which commenced on April 9 2013 and concluded on June 28 2013. The analysis proves that there were two hundred and seventy eight (278) separate instances of perjury, misrepresentation/falsification, evidential omission and gross mischaracterizations, that were collectively committed by Jay Howard Solomon, Gregory Przybylski, MD, and Andrew Kaufman, MD, the latter two who acted as the 'experts' for the medical board.

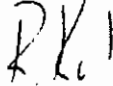
The Solomon Critique details the extent, depth, and pervasiveness of these illegal acts, the purpose of which was to revoke my medical license, in order to illegally exclude me from the minimally invasive spine surgery market. I believe the analysis proves that there was a concerted effort to falsify the final opinion, a scheme that was perpetrated through a willful and knowing misrepresentation of the evidence.

Jay Howard Solomon abused his position of authority to knowingly commit these criminal acts. I do not, as yet, have any evidence as to his motive, but I would suggest it might pertain to bribes, and or other material favors, that he and his family members received from the Defendants named in Kaul v Christie. His actions seriously threaten to undermine the trust of the New Jersey public in the integrity of the judicial process. I urge you to use the authority of your office to investigate this matter, in order to mitigate that threat.

I trust that you will address this matter with impartiality, and on the evidence before you, which I believe must lead to the opening of a criminal investigation. This outcome will provide a sense of fairness, accountability and transparency, that both I, and many of my patients were denied under the previous administration.

I look forward to your response.

Yours sincerely

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

Richard Arjun Kaul, MD

www.dr-richard-kaul.com

March 24, 2020

Governor Philip Murphy
225 W State Street
Trenton, NJ 08625

Re: Reinstatement of New Jersey medical license + Corona-Virus Pandemic

Dear Governor Murphy,

I write this letter to respectfully request that in the interests of public safety and that of saving lives, you immediately issue an executive order to the New Jersey Board of Medical Examiners to reinstate my medical license. I am a highly qualified physician with extensive anesthesiology training and experience in the management of complex life-threatening respiratory conditions. As my attached CV and training manual for anesthesiology residencies indicate, I have the knowledge, experience and competency to diagnose and treat life-threatening pulmonary diseases, typical of those now caused by the so called "Corona-Virus". In short I have the ability to help save lives.

However, and without delving into the legal and factual details surrounding the illegal revocation of my license in March 2014, and the medical board's refusal in 2019 to reinstate my license unless I paid them \$475,000, I believe that if you exercise your executive power at this time of international crisis, to enable me to return to my profession of saving lives, it will tell the voting public that you are a man who truly puts people above politics. This I imagine is an act that would not be forgotten in the 2021 elections. As you may or may not be aware, the first in a series of four audio books about the last eight years of my life is being published on April 4, 2020. It is entitled "**An Impossible Victory: Kaul v Christie**", and chronicles the crimes committed against me by the Christie administration, the state medical board and office of the attorney general.

Since 2017, I have sent you several letters regarding the illegal revocation of my license, and other matters pertaining to Christopher J. Christie. I have not had the

courtesy of a response or even letter of acknowledgement of receipt. With all due respect I have found this to be quite discourteous, and unbecoming of a public servant.

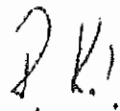
Regardless of what has previously transpired, there now exists a situation of life and death, for which I am extremely qualified and trained to make a difference, and save lives. In considering my request, I am sure you will receive advice from lawyers and others, whose own personal interests are not consistent with those that would assist you in getting elected to a second term as a governor. They have their own agendas against me, and for reasons that rest principally on their effort to cover the crimes they committed against me. Whether it be Allstate or any of the other large corporations involved in the illegal revocation, it will be the votes of the people that you will need to get elected. After the book is published on April 4, 2020, there will be an ongoing series of public speaking events, that will likely commence in mid to late May 2020, and I intend on using that platform to bring attention to medical board corruption, and the matters raised in this letter.

I write this letter with the utmost respect for the position of the governor's office, and in the sincerest hope that you put politics aside, put the people first and correct the massive injustice that was, and continues to be committed against me and my children. I believe you are a good man, and I hope you have the fortitude to stand against malevolent forces that do not have your best interests at heart. That is what leaders do.

Please also find enclosed a copy of a petition that was sent to you on October 6, 2019 by members of the congregation at the New Hope Baptist Church in Irvington. The one with signatures was sent directly to you by Pastor Jerry Smith.

I look forward to your response.

Yours sincerely

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

Richard Arjun Kaul, MD

cc: Reverend Al Sharpton: House of Justice, 106 W. 145th Street, NY, NY

**Petition to Governor Murphy In Support of the Reinstatement of the
Medical License of Dr. Richard Arjun Kaul, MD**

From the People of NJ;
Dated: October 6, 2019.

Dear Governor Murphy,

We send this petition in support of Dr. Richard Arjun Kaul's application for reinstatement of his New Jersey medical license. Our community has known Dr. Kaul since 2006 from both a personal and professional perspective, and know that he is man of immense integrity, good character and a highly respected physician.

In the many years that we witnessed the phenomenal growth of his medical practice, we found him to be a man of humility, who has always endeavored to help those less fortunate than himself, to whom he has generously donated his time and expertise. We have seen how members of our community have benefitted from his professional skills and how he changed their lives for the better.

Dr. Kaul has, when his schedule permitted, attended service at our congregation, and in these settings we found an individual with a good heart, who is motivated by a desire to help others. This fact became increasingly evident, as we learned about his philanthropic work with the Spine Africa Project. We understand that he commenced this charitable endeavor after a visit in 2010 to the Panzi Hospital in the Democratic Republic of the Congo, and that he used his own monies and time to establish the foundation. This generosity is consistent with what we know about Dr. Kaul.

It was a great loss to our community when Dr. Kaul's medical license was taken away in 2014, as we had plans for the Spine Africa Project to commence health and educational initiatives in some of the more impoverished sections. We strongly believe that this assistance would have materially benefitted many community members, a large number of whom live in poverty and who would have greatly appreciated Dr. Kaul's help.

Our friendship and support for Dr. Kaul continues, and our community looks forward to the day that he returns to the practice of medicine in New Jersey, and when he does, we will recommence development of the health and educational initiatives that we started in 2012. Dr. Kaul is a greatly valued member of our community, and we ask that you support his application for reinstatement of his license, in order that he can continue to help us and many others.

We thank you for your attention to our appeal.

NAME	E-MAIL + TEL NO	SIGNATURE

We have immense faith in your personal sense of decency and fairness, your desire to assist your voting constituents, and hope that this petition causes you to use your position, to have Dr. Kaul return to the practice of medicine, in order that he can help our community.

We thank you, once again, for your attention to this matter.

Signed by:

The People of New Jersey.

Dated: October 6, 2019.

Preliminary Statement

This case involves the following Defendants whom the evidence proves have committed the stated crimes:

The Defendants:

(1) FSMB; (2) Humayan Choudry, MD; (3) Pennsylvania Medical Board; (4) Mark Woodland, MD; (5) New Jersey Board of Medical Examiners; (6) Scott Metzger, MD; (7) State of New Jersey; (8) Steven Sweeney; (9) United States District Court for the District of New Jersey (Newark); (10) Daniel Stolz, Esq; (11) Andrew Gregory Kaufman, MD; (12) Doreen Annette Hafner, Esq; (13) Ellen Wachs Kaufman; (14) Robert Francis Heary; (15) Jay Howard Solomon; (16) Cory Booker; (17) Charles Schumer; (18) Allstate Insurance Company; (19) Richard Crist; (20) Geico Insurance Company; (21) John Robertelli; (22) General Medical Council of the UK; (23) University of Pittsburgh.

The Crimes:

(1) Racketeering; (2) Perjury; (3) Fraud; (4) Evidence/Witness Tampering; (5) Obstruction of Justice; (6) Public Corruption; (7) Judicial Corruption; (8) Bribery; (9) Kickbacks; (10) Manslaughter; (11) Conspiracy.

This case (K11-1) is brought to expose and dismantle the Defendants' decades long scheme of criminal violations of Kaul's basic human/constitutional rights, that have occurred in both the UK and US. The scheme extends from 2002 to 2021, and from 2012 has involved egregious and knowing breaches of Kaul's fundamental human rights, that include prolonged and ongoing rackets of obstruction of justice. The Defendants commission of crimes against Kaul commenced in 2002. Kaul initiated legal action against the Defendants in 2016 and from 2017 to 2020, his efforts to obtain a medical license in Pennsylvania, have his illegally revoked (March 24, 2014) NJ license reinstated and prosecute The Kaul Cases have been willfully, knowingly and illegally obstructed by the Defendants. The purpose of the Defendants obstruction is to 'cover-up' their crimes, as they know that Kaul's prosecution of The Kaul Cases will accelerate with monies earned from Kaul's future medical practice. The accelerated prosecution will expose their crimes and subject them to criminal prosecution and incarceration. The Defendants are fighting for their lives, albeit a losing battle. The question of their demise is now not "if" but simply "when".

Victory in this case will save lives, as it will publicly expose massive long standing schemes of corruption of certain sections/individuals of the American body politic, judiciary and state medical boards. The corruption of these fundamental pillars of

democratic society by ruthless for-profit corporations is responsible for the excessive COVID-19 related mortality/morbidity in the United States, as compared to other westernized democracies. This case brings together the worlds of medicine, business, law and politics at a historic moment in man's history. The main purpose of this case is to cause a "**Reformation of American Medical Boards**" ("**RAMBO**"). This case is one of The Kaul Cases, a series of legal interventions that officially commenced on February 22, 2016, but in actuality commenced on February 2, 1999 in the UK. These cases are of immense public interest, as their public prosecution will, through legal dissection, lay bare the pathological anatomy of the cancer of corruption that has America/Americans in its lethal grip. This exposition is the prelude to its surgical excision and chemical castration. The Kaul Cases are being watched by over two million (2,000,000) global citizens, the majority being lawyers, physicians, politicians, business executives and journalists. Thus far, they have witnessed political/judicial corruption more commonly observed in dictatorships, like China and Russia, but Kaul respectfully asserts that the spirit of America has not been extinguished by these malevolent forces. The intersection of The Kaul Cases, the COVID-19 pandemic and the so called "**Opiate Epidemic**", two of the most devastating plagues in the history of modern America, represents a confluence of events at a specific point in time, the outcome of which has the potential to change the world, for the better. The Defendants have attempted to suppress the truth, as the truth will decimate their economic standing, reputations and cause them to become incarcerated. In fighting for their lives, they continue to sacrifice the lives of the American people. The tragedy they now face is of their own making, and it is with their maker that they should make their peace, as the remainder of their lives will be subsumed by the penalties of their sins. Kaul has dismantled all of the Defendants' purported defenses and the legal theories on which these flawed defenses were submitted. Thus, the Defendants are now absolutely and totally defenseless. Kaul's claims are evidentially substantiated, and motions for summary judgment will be submitted shortly after January 26, 2021. On this date, the Defendants, much to their horror, will be forced to disclose their evidence to Kaul, the Court and most importantly, the public, whom Defendants NJBME/PMB/FSMB profess to want to "**protect**". The truth is the greatest protector.

K11-1 is a case about the truth of the Defendants' massive criminal schemes, many of which have been conducted while 'flying the flag' of the state. This case will expose the tyranny that is hidden from the public by the fragile film of civility covering the cesspool of corruption that is the State of New Jersey. Defendant State of NJ is not a place in which individuals and or corporations should invest.

Parties

Plaintiff:

Richard Arjun Kaul, MD - 440c Somerset Drive, Pearl River NY 10965
862 881 9703 - drrichardkaul@gmail.com

Defendants:

1. Federation of State Medical Boards - 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039
2. Humuyan Choudry, MD - 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039
3. Pennsylvania Medical Board - 124 Pine Street, Harrisburg, PA 17101
4. Mark Woodland, MD - 301 S 7th Avenue, Suite 245, West Reading, PA 19611
5. New Jersey Board of Medical Examiners - 140 E Front Street, Trenton, NJ 08608
6. Scott Metzger, MD - 160 Avenue at the Commons, Shrewsbury, NJ 07702
7. State of New Jersey - 25 Market Street, Trenton, NJ 08611
8. Steven Sweeney - 935 Kings Highway, Thorofare, NJ 08086
9. United States District Court for the District of New Jersey (Newark) - 50 Walnut Street, Newark, NJ 07102
10. Daniel Stolz, Esq - 110 Allen Road #304, Basking Ridge, NJ
11. Andrew Gregory Kaufman, MD - 16 Sierra Court, Hillsdale, NJ 07642
12. Doreen Annette Hafner, Esq - 49 Seminole Drive, Ringwood, NJ 07456
13. Ellen Wachs Kaufman - 16 Sierra Court, Hillsdale, NJ 07642
14. Robert Francis Heary, MD - 68 Blackburn Road, Summit, NJ 07901
15. Jay Howard Solomon, Esq - 25 Market Street, Trenton, NJ 08608
16. Cory Booker - 2 Riverside Drive, Camden NJ 08103
17. Charles Schumer - 322 Hart Senate Office Building, Washington, DC 20510
18. Allstate Insurance Company - Attention Thomas Wilson, 2775 Sanders Road, Northbrook, Illinois, 60062
19. Richard Crist - 2400 W Chew Street, Allentown, PA 18104
20. Gelco Insurance Company - 5260 Western Avenue, Chevy Chase, MD 20815
21. John Robertelli, Esq - 25 Main Street, Court Plaza North, Hackensack, NJ 07601
22. General Medical Council of the UK - 350 Euston Rd, London NW1 3JN, UK
23. University of Pittsburgh - 4200 Fifth Avenue, Pittsburgh, PA 15260

Statement of Fact

The Evidence:

The conclusive evidence and undisputed facts in support of the K11-1 claims is contained within the court dockets of The Kaul Cases and within submissions filed in the District of Columbia (October 1, 2019 to December 10, 2020) that were diverted from the docket. The majority of this evidence will be submitted on January 24, 2021 with the First Amended Complaint. However, submitted with this complaint are thirty-three (33) pieces of evidence that prove directly/indirectly various elements of the Defendants' crimes. Kaul respectfully requests this Court note that in addition to the Defendants being utterly defenseless, they are also utterly panicked. This is evidenced by the desperation betrayed by their clinging to a few words of the fraudulent opinion of Defendant Solomon (December 13, 2013)(Exhibit 26), in the drowning hope that it will distract the court's mind from their unbridled felonious conduct. The DC court/Defendants included in their final opinion (K5) verbiage from a submission made by Defendant California Medical Board (Exhibit 19) that contained the opinion of Defendant Solomon, which the evidence of Defendant NJ proves is a massive fraud (Exhibit 7). The Defendants, despite having been provided multiple opportunities, have failed to rebut/contest/refute/address this evidence, which is their evidence, the evidence they used to illegally revoke Kaul's license (March 24, 2014). The Defendants are defenseless and will have no defense to Kaul's to be filed motions for summary judgment. It is noteworthy that the DC court, despite finding that the motion of Defendant California Medical Board was moot (Exhibit 19), permitted this false legal instrument to remain on the docket, for the purpose of prejudicing the mind of the DC Appeals Court. Regardless, the evidence is:

1. June 26, 2012: Letter from Kaul patient to Defendant NJBME - Kaul competency in minimally invasive spine surgery.
2. February 22, 2016: K1-D.E. 1 - Kaul education/training/qualifications in minimally invasive spine surgery.
3. February 22, 2016: K1-D.E. 1 - Kaul possession of NJ license to practice medicine and surgery.
4. February 22, 2016: K1-D.E. 1 - Defendant GMC violation in 2002 of the European Data Protection Act/HIPAA.
5. June 8, 2016: K1-D.E. 57-1 - Kaul superior competency in minimally invasive spine surgery.
6. April 19, 2017: K1-D.E. 179 - Kaul competency in minimally invasive spine surgery.

7. August 10, 2017: K1-D.E. 204-9 - Kaul competency in minimally invasive spine surgery.
8. August 21, 2017: K1-D.E. 205-1 - Defendants commission of crimes.
9. January 17, 2018: K1-D.E. 225 - Defendants commission of crimes.
10. February 5, 2018: K10-D.E. 226 - Defendants commission of crimes.
11. September 27, 2018: K2-D.E. 53 - Defendants commission of crimes.
12. February 8, 2019: K1-Filed but Defendant DNJ failed to publish to docket - Defendants commission of crimes.
13. February 11, 2019: K1-D.E. 299-12 - Defendants commission of crimes.
14. July 23, 2019: K2-D.E. 80-1 - Defendants commission of crimes.
15. July 31, 2019: K1-D.E. 387 - Defendants commission of crimes.
16. August 19, 2019: K1-D.E. 393 - Defendants commission of crimes.
17. August 19, 2019: K1-D.E. 393 - Defendants commission of crimes.
18. October 1, 2019: K5-D.E. 1 - Defendants commission of crimes.
19. February 5, 2020: K5-D.E. 69-4 - Defendants commission of crimes (By submitting a knowingly false legal instrument, that of the December 13, 2013 opinion of Defendant Solomon, the Defendants committed a Fraud on the Court.). The evidence of 'The Solomon Critique' (Exhibit 9-K1-D.E. 225) + 'The Solomon Critique 2' (Exhibit 12-K1-D.E. 299-18).
20. July 17, 2020: K1-D.E. 434-13 - Defendants commission of crimes.
21. September 22, 2020: K5-D.E. 148 - Defendants commission of crimes.
22. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
23. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
24. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
25. November 17, 2020-K1-D.E. 450 - Defendants commission of crimes.
26. December 1, 2020-K5-D.E. 150 - Defendants commission of crimes (By submitting a knowingly false legal instrument, that of the December 13, 2013 opinion of Defendant Solomon, the Defendants committed a Fraud on the Court.). The evidence of 'The Solomon Critique' (Exhibit 9-K1-D.E. 225) + 'The Solomon Critique 2' (Exhibit 12-K1-D.E. 299-18).
27. December 2, 2020-K11-1 - Defendants commission of crimes.
28. December 11, 2020-K1-D.E. 452 - Defendants commission of crimes.
29. December 14, 2020-The Kaul Cases - Defendants commission of crimes.
30. December 16, 2020-K5-D.E. 155 - Evidence of truthfulness of Kaul's claims.
31. December 19, 2020-K5-Filed but Defendants blocked publication to docket - Defendants commission of crimes.
32. December 29, 2020-K5-D.E. 176 - Defendants commission of crimes.
33. December 30, 2020-K5-Filed but not published to docket - Defendants commission of crimes.

Legal Claims

RICO 1

Racketeering charge against Defendants FSMB/PMB/NJBME

In a period from September 2017 to the present Defendant FSMB did knowingly, willfully and in the knowledge of illegality, did conspire with Defendant PMB to obstruct Kaul's application for medical licensure in the State of Pennsylvania.

Defendants FSMB/Choudry was motivated by money and an unwritten policy of protecting its member state and Defendant NJBME from Kaul's prosecution of the claims asserted in The Kaul Cases.

Defendant FSMB is cognizant of the fact that a successful prosecution by Kaul would expose evidence of their commission of the crimes, and would subject them and their members to criminal prosecution.

Defendant FSMB is cognizant of the fact that Kaul, in the possession of a Pennsylvania license, would generate money for an increasingly aggressive prosecution of The Kaul Cases.

Defendant FSMB is cognizant of the fact that Kaul's prosecution would force its member and Defendant NJBME to disclose highly incriminating evidence of Defendants FSMB/NJBME corruption of state/federal politicians/judges.

Defendant FSMB is cognizant of the fact that Kaul's prosecution would force its member and Defendant NJBME to disclose highly incriminating evidence of their involvement in decades long schemes of bribery perpetrated by Defendants Allstate and Geico, and other for profit healthcare corporations, such as Purdue and the American Hospital Association.

In the relevant period Defendant FSMB conspired with Defendants PMB/NJBME and others to obstruct Kaul's application for licensure in the State of Pennsylvania, by using the US mail and wires on multiple occasions to perpetrate and further a knowingly illegal scheme in violation of RICO.

The conspiracy was conducted from and perpetrated through Defendant FSMB's headquarters in Texas.

Excerpts of Complaint + Exhibits

Political Corruption:

"Kaul's medical license was revoked because of Political Corruption at the New Jersey Board of Medical Examiners and because the Mechanism of Physician Regulation in New Jersey is illegally Configured" - Complaint.

"The proceedings to revoke Kaul's license were conducted criminally and the resultant revocation was illegal. Kaul was subjected to political corruption and judgments that were summary in nature, that deprived him of his livelihood and his ability to support his family." - Complaint.

"The facts and circumstances surrounding the said proceeding evidence a pattern of fraud, political corruption and professional jealousy, elements of which are described in an affidavit (copy enclosed) filed on August 9, 2017 in a lawsuit pending in the United States District Court, District of New Jersey. Gregory Przybylski's pattern of fraud was notably exposed when he was publicly disciplined on April 21, 2017 by the American Association of Neurological Surgery, for having repeatedly committed perjury in his capacity as an 'expert' witness. A copy of this disciplinary notice is included in a letter I filed on May 21, 2018 in the said lawsuit (copy enclosed)." - KAUL:0116.

"The Jews:

Towards the ostensible fall of the British Empire, the global insurance industry, still orchestrated by and through Lloyd's of London, continued its inexorable and genocidal expansion by conspiring/colluding and furthering in an ongoing "pattern of racketeering" that commenced with the slaving industry. The RICO predicate acts of murder, extortion, conspiracy and human trafficking were perpetrated by the Nazi War Machine, on millions of Jews, Russians, Poles and people with physical and psychological handicaps, through multiple association-in-fact enterprises that included Nazi courts, Nazi Judges, The Nazi Justice Ministry, The Nazi Medical Boards/Medical Profession, Nazi Politicians, Nazi Prosecutors/Lawyers, German Industry and the insurance industry. Multiple RICO schemes were perpetrated through, by and with the political, medical, legal and business elements of the Nazi's genocidal machine, in collusion/conspiracy with the insurance industry. The purpose of the Nazi-Insurance Association-In-Fact Enterprise was to further the political/economic agendas of

the scheme's orchestrators/perpetrators/aiders/abettors/abstentors of willful ignorance." - KAUL:0331.

"The insurance industry, having developed its model of using the ostensibly legitimate cover of legal/judicial/political authority with the slaving industry, simply employed the same tactics/strategy on those enslaved/imprisoned/murdered in the years from 1939 to 1945. The insurance industry continued its "pattern of continuity" of murder/exploitation/false imprisonment/abuse of legal process/political corruption/judicial corruption/bribery/extortion/kickbacks/racial profiling and discination against the mentally/physically infirm." - KAUL:0331.

Judicial Corruption:

"This case is one of The Kaul Cases, a series of expanding legal interventions that officially commenced on February 22, 2016, but that took root in the UK on February 2, 1999. It represents the work of many Americans who are seeking to have eradicated the cancer of corporate/political/judicial corruption that is killing them and their families. This case exposes the immense damage that this corruption has caused to America, to Americans and America's reputation in the world. It has exposed the lawlessness that exists in state medical boards, state courts, certain federal courts and the government." - Complaint.

"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:" - Complaint.

"JUDICIAL CORRUPTION FUELS IMPUNITY, CORRODES RULE OF LAW, SAYS NEW TRANSPARENCY INTERNATIONAL REPORT" - KAUL:0269.

"Bribery, the other dark thread of judicial corruption, can occur throughout the fabric of the judicial process. As 32 country reports in the Global Corruption Report demonstrate, judges may accept bribes to delay or accelerate cases, accept or deny appeals, influence other judges or simply to decide a case in a certain way" - KAUL:0272.

"Corruption in the judiciary is a central focus of the global anti-corruption effort because of the powerful and corrosive influence a corrupt judiciary can exert on the rule of law and on society as a whole. Success in attacking judicial corruption will boost citizens' trust and national efforts to achieve transparency and accountability," said Cobus de Swardt, TI's Acting Managing Director." - KAUL:0274.

"Recent surveys and events indicate that judicial corruption could be a significant problem in the United States. This Note builds an economic model of bribery to better understand the incentives behind this pernicious phenomenon" - KAUL:0281.

"Transparency International's Global Corruption Report 2007 brings together scholars, legal professionals and civil society activists from around the world to examine how, why and where corruption mars judicial processes, and to reflect on remedies for corruption-tainted systems. It focuses on judges and courts, situating them within the broader justice system and exploring the impact of judicial corruption on human rights, economic development and governance." - KAUL:0431.

"Two problems are analysed: political interference to pressure judges for rulings in favour of political or economic interests, including in corruption cases; and petty bribery involving court personnel. The result is a thorough analysis of how judicial independence and judicial accountability, two concepts key to the promotion of judicial integrity, can be bolstered to tackle corruption in judicial systems." - KAUL:0431.

"Table 2: Percentage of respondents who described their judiciary/legal system as corrupt (i.e. gave it a score of 4 or 5, when 1=not all corrupt and 5= extremely corrupt)." - KAUL:0432. Out of sixty-two (62) countries surveyed, the most corrupt was Paraguay, the least corrupt was Denmark while the United States was ranked as the thirtieth (30th) most corrupt, just above Greece and just below Serbia.

“Special Courts subjected Jews of all nationalities, Poles, Ukrainians, Russians, and other nationals of the occupied Eastern territories, indiscriminately classed as “Gypsies”, to discriminatory and special penal laws and trials, and denied them all semblance of judicial process ... turned over to the Gestapo for final detention ...” - KAUL:0382.

Corporate Corruption:

“Defendants Allstate/Boston Partners/State Street Corporation in forming an Association-In-Fact Enterprise (“ABS Enterprise”), with the intent and purpose of conducting a “pattern of racketeering” to advance a knowingly illegal scheme of grand corruption, through the commission of the predicate acts mail fraud/wire fraud/judicial corruption/public corruption/bribery/kickbacks, purposed for executive/corporate profit, did intentionally cause an immense injury to Kaul.” - Complaint.

“This fact is included as it provides further context to the corporate corruption/profitteering of medicine, of which Defendant Allstate/Boston Partners/State Street Corporation stand accused.” - Complaint.

“The increase in fentanyl laced heroin is the direct and proximate cause of increased rates of overdose deaths, for which the Defendants are liable. The Defendants corporate greed/corruption is killing innocent Americans, whom Defendant NJBME professes to “protect”. A lie on par with that perpetuated by murderous slave plantation owners that Africans were $\frac{3}{5}$ of a human, and more recently with that disseminated by the Nazis that Germany's economic woes in the 1930s were due to the Jews. American state medical boards are nothing more than cogs in the genocidal corporate machine, steered by Defendants Allstate/Geico.” - Complaint.

“DEADLY SPIN - AN INSURANCE COMPANY INSIDER SPEAKS OUT ON HOW CORPORATE PR IS KILLING HEALTH CARE AND DECEIVING AMERICANS - Wendell Potter - Bloomsbury Press.” - KAUL:0125.

“None of the corporate defendants disclosed the information to the shareholders or the New York Stock Exchange (NYSE), in violation of SEC regulations and the law. The lack of disclosure caused an illegal rise in their share prices, and deprived their market competitors of their right to honest competition and constitutes Honest Services Fraud, a crime defined in 18 U.S.C. §

1346 (the federal mail and wire fraud statute). On November 22, 2018 Kaul brought the lawsuit to the attention of Allstate's top ten corporate shareholders, one of which communicated to Kaul that it has commenced an investigation. -

KAUL:0134.

"In 2021, the tools of torture used by Defendants Allstate/Geico (insurance industry) are those of the courts/lawyers/prosecutors/loss of livelihood/incarceration/false convictions/false imprisonment/media defamation/harassment of physicians families/children/a global public humiliation over the internet. No longer is it iron cuffs in crowded slave ships, suffocating trains destined for work camps or summary executions. The methods of extermination have become bureaucratized, sterile and conducted under 'color of state', with the apparent legitimacy of state medical boards, state/federal judges/courts/prosecutors and a corporate media only too willing to knowingly perpetuate the crimes of the insurance industry. False claims of insurance fraud, alleged over-prescribing of opiate medications, sting operations to entrap unsuspecting physicians in compromising sexual situations, are just some of the excuses/pre-texts used to exterminate physicians, in order to increase corporate/executive profit through reducing the number of so called "healthcare providers" and thus the total amount of health insurance premiums spent on healthcare. In essence, eliminate the physicians and the patients, and divert a greater percentage of the public's health insurance premiums to the executives/corporate coffers of Defendants Allstate/Geico." - KAUL:0327.

Public Corruption:

"The Defendants through their schemes, as detailed above, have engaged in the illegal practice of medicine through the corruption of state medical boards, the Federation of State Medical Boards and the political/legislative/judicial branches of state/federal government." - Complaint.

"The Defendants through their schemes, as detailed above, have engaged in the illegal practice of medicine through the corruption of state medical boards, the Federation of State Medical Boards and the political/legislative/judicial branches of state/federal government." - Complaint.

"The Chair of Integrity Initiatives International, Mark L. Wolf is a Senior United States District Judge and the former Chief Judge of the United States District Court for the District of Massachusetts. Prior to his appointment in 1985, among other things, Judge Wolf served as a Special Assistant to the Attorney General of the United States Watergate and as the Deputy United States Attorney for the

District of Massachusetts. In 1984, he received the Attorney General's Distinguished Service Award for exceptional success in prosecuting public corruption in Massachusetts.” - KAUL:0111.

“Kleptocracy is not just a domestic problem. The consequences of grand corruption are devastating” - KAUL:0112.

Obstruction of Justice:

“Request for judicial disclosure of financial holdings/conflicts of interest:

The Kaul Cases Defendants have, in a period from April 2, 2012 to the present engaged in massive schemes of judicial corruption and obstruction of justice, purposed to cover their crimes, as identified below. Thus, Kaul respectfully requests that the U.S.D.J. and U.S.M.J. assigned to the case do disclose to the court record their Forms AO10 for the last five (5) years and do certify that neither they nor any members of their family to the third degree have any conflicts of interest to any aspect of any of The Kaul Cases. This, Kaul respectfully asserts, will ensure justice is faithfully and properly served, in a case, the outcome of which will have life/death consequences of millions of Americans.” - Complaint.

“The network was used to disseminate the aforementioned falsehoods to the minimally invasive spine surgery community, in order to dissuade them from pursuing their accounts receivable. This permitted Defendants Allstate and GEICO to improperly profit from a scheme polluted with bribes, fraud, kickbacks, obstruction of justice, perjury and a criminally fraudulent opinion rendered by Defendant Solomon.” - Complaint.

“However, as you are aware, I will be moving in the New Jersey Supreme Court, to have made null + void every order entered on behalf of your client by Kenneth Grispin and Mark. P. Ciarrocca, based on a 'Fraud on the Court' ... Please also be informed that I intend on serving information subpoenas on Kenneth Grispin + Mark. P. Ciarrocca and requests for informal interviews on all members of the New Jersey State Government, regarding any and all communications pertaining to the subject matter of your case. I would advise you not to engage in any acts constituting Obstruction of Justice.” - KAUL:0108.

Fraud:

"In devising and executing the illegal scheme, the CAD RICO Association-In-Fact Defendants devised and knowingly carried out a material scheme and/or artifice to defraud Kaul of the property rights of his reputation, medical license and healthcare business, by communicating to the public, Kaul's patients and his professional colleagues, that Kaul was not qualified to perform minimally invasive spine surgery and had committed insurance and bank fraud, materially false representations. For the purpose of executing the illegal scheme, the CAD RICO Association-In-Fact Defendants committed these racketeering acts, which number in the thousands, intentionally and knowingly with the specific intent to advance the illegal Scheme." - Complaint.

"In devising and executing the illegal scheme, the CAD RICO Association-In-Fact Defendants devised and knowingly carried out a material scheme and/or artifice to defraud Kaul of the property rights of his reputation, medical license and healthcare business, by communicating to the public, Kaul's patients and his professional colleagues, that Kaul was not qualified to perform minimally invasive spine surgery and had committed insurance and bank fraud, materially false representations. For the purpose of executing the illegal scheme, the CAD RICO Association-In-Fact Defendants committed these racketeering acts, which number in the thousands, intentionally and knowingly with the specific intent to advance the illegal Scheme." - Complaint.

"The case is based partly on the defendants having engaged in a prolonged "pattern of racketeering" that involved, amongst other things, evidence tampering + obstruction of justice + bribery + conspiracy + fraud + kickbacks. The criminal elements of the case have been referred to J.P. Coney, Chief, Fraud+ Public Corruption Unit, United States Department of Justice. The case has also been brought to the attention of the nine (9) justices of the United States Supreme Court. Defendants Allstate + TD + Geico have immense financial exposure, which they were obliged to report to their shareholders and the market. They have not, and this letter is to inform you of that fact." - KAUL:0120.

Perjury:

"Conspired to and did commit Perjury, Evidential Falsification, Evidential Fabrication, Evidential Omission during the administrative board proceedings (April 9, 2013 to December 13, 2013) that resulted in the revocation of Kaul's license + Conspired to did commit subornation of perjury in administrative board

proceedings (April 9, 2013 to December 13, 2013) that resulted in the revocation of Kaul's license + Conspired to and did obstruct justice by encouraging Kaul's patients to commit perjury, with the promise that the revocation of his license would permit them to file malpractice claims, and that the revocation would increase the monies they received from Kaul's insurance carrier." - Complaint.

"Conspired to and did commit Perjury, Evidential Falsification, Evidential Fabrication, Evidential Omission during the administrative board proceedings (April 9, 2013 to December 13, 2013) that resulted in the revocation of Kaul's license + Conspired to did commit subornation of perjury in administrative board proceedings (April 9, 2013 to December 13, 2013) that resulted in the revocation of Kaul's license + Conspired to and did obstruct justice by encouraging Kaul's patients to commit perjury, with the promise that the revocation of his license would permit them to file malpractice claims, and that the revocation would increase the monies they received from Kaul's insurance carrier." - Complaint.

"Dear Mr. Cooney: I wish to file a formal complaint against New Jersey Administrative Law Judge, Jay Howard Solomon, Esq, and New Jersey physicians, Gregory Przybylski, MD and Andrew Kaufman, MD who collectively committed two hundred and seventy-eight (278) separate instances of perjury and evidential omissions, misrepresentations and gross mischaracterizations, in a period from April 9, 2013 to December 13, 2013. These offenses occurred during and after a proceeding in the New Jersey Office of Administrative law (OAL Docket No. BOS 08959-2012N) that resulted in the illegal revocation of my medical license. The revocation caused four (4) medium sized healthcare corporations to file for Chapter 11 bankruptcy on June 17, 2013 (13-23366-DHS) and caused immense harm to my family, my professional and personal standing and my patients. These damages were a direct consequence of crimes committed against me by the aforementioned individuals, the details of which are contained in a document entitled 'The Solomon Critique' (copy enclosed)." - KAUL:0116.

Kickbacks:

"Conspired to and did convert the United States Bankruptcy Court for the District of New Jersey, into a racketeering enterprise, in which were committed the predicate acts of bribery, mail fraud and wire fraud + Conspired to and did knowingly and willfully commit within the United States Bankruptcy Court for the District of New Jersey the felonies/offenses of: (i) Fraud on the Court; (ii) Breach of Fiduciary Duty; (iii) Willful Negligence; (iv) Estate Embezzlement; (v) Money Laundering; (vi) Kickbacks; (vi) Honest Services Fraud. Location:

Christie/Republican political fundraisers + United States Bankruptcy Court for the District of New Jersey + Law offices of Wasserman + Jurista + Stolz, Basking Ridge, NJ + Law offices of Pringle + Quinn + Anzano, Belmar, NJ + Law offices of Rivkin Radler, Hackensack, NJ + Law offices of Shapiro Croland, Hackensack, NJ + Office of the New Jersey Attorney General.” - Complaint.

“Defendants Allstate/Boston Partners/State Street Corporation in forming an Association-In-Fact Enterprise (“ABS Enterprise”), with the intent and purpose of conducting a “pattern of racketeering” to advance a knowingly illegal scheme of grand corruption, through the commission of the predicate acts mail fraud/wire fraud/judicial corruption/public corruption/bribery/kickbacks, purposed for executive/corporate profit, did intentionally cause an immense injury to Kaul.” - Complaint.

Racketeering:

“Kaul’s work caused immense professional jealousy that caused the physician Defendants to engage in conduct that was unethical, unprofessional and illegal (K2-D.E. 2 Page ID 139). Their racketeering schemes commenced in approximately 2007/8, and incorporated multi-pronged strategies that involved encouraging patients to file lawsuits and medical board complaints against Kaul, threatening to withdraw business from spinal device representatives unless they stopped supplying Kaul, conspiring to prevent Kaul from obtaining hospital privileges, and issuing reports for insurance companies that denied Kaul reimbursement for procedure he performed.” - Complaint.

“The Defendants calculated that the return on their bribes, would be more than compensated for by (i) the debt avoidance (Defendants Allstate + GEICO) that the revocation of Kaul’s license would permit, and (ii) by the diversion to the Defendant Physicians and Hospitals of an increased percentage of the capital reservoir, for reimbursement for their professional services. Defendant Christie benefitted by receiving these racketeering profits into his political campaigns, and off-shore bank accounts and trusts located in tax havens.” - Complaint.

Evidence Witness/Tampering:

“On January 29, 2015 Kaul filed a complaint with the US Attorney for the District of New Jersey that sought an investigation into the evidence tampering. Two weeks after Kaul had filed the complaint, he telephoned the office of the US Attorney to ascertain the status of the complaint and was told, “We are not an

investigative agency". Kaul had initially approached the FBI but was referred to the US Attorney, Paul Fishman. The latter individual had worked under Defendant Christie, when he was the US Attorney for the District of New Jersey (K2-D.E. 2-1 Page ID 244).” - Complaint.

“The Defendants tampered with evidence to fit their fraudulent narrative. The irrefutable evidence of this is contained within, ‘The Solomon Critique’ (K1-D.E. 225 –PageID: 4940 to 5273), which proves that Defendants Solomon, Przybylski and Kaufman collectively committed two hundred and seventy-eight (278) separate instances of perjury and evidential misrepresentation, omission and gross mischaracterization. Defendant Washburn discussed the issue of evidence tampering with Kaul on August 13, 2013, at the commencement of an interview that took place on the second floor of Kaul’s Medicare Certified, AAAHC accredited surgical center in Pompton Lakes, NJ (K2-D.E. 2 Page ID 224).” - Complaint.

Bribery:

“Defendants Allstate/Boston Partners/State Street Corporation in forming an Association-In-Fact Enterprise (“ABS Enterprise”), with the intent and purpose of conducting a “pattern of racketeering” to advance a knowingly illegal scheme of grand corruption, through the commission of the predicate acts mail fraud/wire fraud/judicial corruption/public corruption/bribery/kickbacks, purposed for executive/corporate profit, did intentionally cause an immense injury to Kaul.” - Complaint.

“Defendant Christie + Defendant Heary:

Date range: 2008 to 2021

Conduits of Communication + Bribery to Christie: Public relations firms Mercury Public Relations + Princeton Public Relations.

Mode of Communication: Face to face.

Substance of communication: Schemes to revoke Kaul’s license + destroy Kaul’s reputation + destroy Kaul’s economic standing + cause Kaul to be ostracized + cause Kaul to leave the United States.

Tactics employed: 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 + 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” - Complaint.

"Judge Mark Wolf: The greatest impediment is the inability of countries controlled by kleptocrats, people who abuse high office for private profit, to enforce the laws; their own people. Kleptocracy, or grand corruption, exists not because there is a lack of laws in kleptocratic countries, but because the existing laws are not enforced. One hundred and seventy-eight countries have signed the UN Convention Against Corruption (UNCAC), which obligates signatories to have laws prohibiting bribery, ext money laundering, and misappropriation of national resources. Signatories also have an obligation to enforce those laws, including against their highest officials, but highest officials will not permit the honest and effective investigation, prosecution, and punishment of their colleagues, friends, families, and indeed themselves kleptocrats control the police, the prosecutors, and the courts, they are able to stymie proper legal channels in their countries." - KAUL:0112.

Conspiracy:

"Defendant Hafner knowingly cooperated with the other Defendants in a scheme that she understood was illegal, in both motive and means. Defendant Hafner played a central role in the drafting of Defendant Solomon's fraudulent opinion and knew that the document had been falsified. Defendant Hafner knew that she had a duty to report the crime to federal authorities, but willfully ignored that duty and did not report the crime to federal authorities. Defendant Hafner was a willing participant in the criminal conspiracy, and because of her cooperation is criminally liable." - Complaint.

"The CHN RICO Association-In-Fact Defendants comprise a group of "persons" who influence public opinion, while engaging in political and commercial activities, that are contrary to independent news reporting. They and their co-conspirators engaged in a pattern of racketeering activity, which involved a revenue enhancing fraudulent conspiracy, that was part of a wider scheme to have Kaul's license revoked." - Complaint.

Parties

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. Medical license illegally suspended/revoked by Defendant New Jersey Board of Medical Examiners ("**NJBME**") on April 2, 2012/March 24, 2014.

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, of which Defendant Christie exercised absolute power.

Defendant Jay Howard Solomon, Esq, ("**Solomon**") was a New Jersey Administrative Law Judge, who was employed by the State of New Jersey in the Office of Administrative Law (OAL). The OAL, Defendant New Jersey Board of Medical Examiners ("**NJBME**") and The New Jersey Office of the Attorney General are agencies under the sole control of the Executive Branch of State Government.

Defendant New Jersey Board of Medical Examiners ("**NJBME**") is a 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 Steven Lomazow, MD, ("**Lomazow**") is a neurologist who was a senior member of Defendant NJBME from 2008 to 2014, who engages in healthcare business with defendants, Heary, Kaufman, Przybylski, Allstate and Geico.

Defendant Boston Partners (“BP”) is a hedge fund that is one of the top ten corporate shareholders in Defendant Allstate. The top ten hold approximately eight percent (80%) of stock. Defendant BP, as a knowing co-conspirator in the crimes of Defendant Allstate, did illegally and unjustly enrich itself/its clients at the expense of Kaul. It is a resident of Massachusetts.

Defendant State Street Corporation (“SS”) is a hedge fund that is one of the top ten corporate shareholders in Defendant Allstate. The top ten hold approximately eight percent (80%) of stock. Defendant SS, as a knowing co-conspirator in the crimes of Defendant Allstate, did illegally and unjustly enrich itself/its clients at the expense of Kaul. It is a resident of Massachusetts.

Defendant, Allstate Insurance Company (“ALL”) 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.

Defendants, Government Employees Insurance Co., Geico Indemnity, Geico General Insurance Company and Geico Casualty (“GEICO”) 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.

Defendant, Atlantic Health System (“AHS”), is a private healthcare company whose headquarters are in Morristown, New Jersey. It is the parent company for Morristown Memorial Hospital, Overlook Hospital, Chilton Memorial Hospital and Hackettstown Hospital. Its business covers Morris, Sussex and Passaic counties. Defendants, Cohen, Heary, Lomazow and Kaufman engage in healthcare business with AHS. Defendant AHS bribed Defendant Christie to abuse his executive power to have Defendant NJBME suspend/revoke Kaul's license, because Kaul had developed

and was developing outpatient surgical centers, which posed an enormous economic threat to Defendant AHS. Defendant AHS operated businesses within five (5) miles of Kaul's surgical centers and had on staff, physicians (mostly neurosurgeons) who competed with Kaul in the minimally invasive spine surgery sector, physicians who conspired to have Kaul eliminated.

Defendant, Hackensack University Medical Center ("**HUMC**"), is a 900-bed private hospital seven miles west of New York City. Defendant neurosurgeons, Peterson and Heary, engage in healthcare business with Defendant HUMC and competed with Kaul in the minimally invasive spine surgery sector.

Defendant, Dr. Robert Heary ("**Heary**") is the Director of the Neurological Institute of the New Jersey Spine Center located in Newark, New Jersey. The defendant is an attending at HUMC and Overlook Hospital in Summit, New Jersey, which is part of Defendant AHS. Defendant Heary competed with Kaul in the minimally invasive spine surgery sector.

Defendant, Dr. Gregory Przybylski ("**Przybylski**") is the director of neurosurgery at the New Jersey Neuroscience Institute at JFK Medical Center located in Edison, Middlesex County, New Jersey. He was also the 2011 President of the North American Spine Society and is a member of Defendant Congress of Neurological Surgeons ("CNS"). As an 'expert witness' for Defendant NJBME, in the administrative hearing (April 9 to June 28, 2013) to revoke Kaul's NJ license, Defendant Przybylski committed perjury on at least thirty (30) occasions. On April 21, 2017, Defendant Przybylski was found guilty by the American Association of Neurological Surgeons for having lied in his capacity as an 'expert witness'.

Defendant, Dr. Peter Staats ("**Staats**") was the 2015 President of Defendant American Society of Interventional Pain Physicians ("**ASIPP**") and was the editor of Pain Medicine News. On Thursday 25, 2019, his corporation, the National Spine and Pain Centers paid \$3.3 million to the US DOJ to settle Medicare Fraud Claims. The case was initiated by a physician assistant whistleblower. In May 2012 Defendant Staats rendered an opinion in an article in Pain Medicine News in which he referred to Kaul's performance of minimally invasive spine surgery as "**unethical**". Defendant ASIPP, of which he was the 2015 President, has been training its members how to perform minimally invasive spine surgery since 2015.

Defendant, Dr. Marc Cohen ("**Cohen**") is an orthopedic spine surgeon with a medical office at 221 Madison Avenue, Morristown, New Jersey 07960. He engages in healthcare business with defendant AHS and competed with Kaul in the

minimally invasive spine sector. Defendant Cohen had met with and bribed Defendant Christie, as part of a quid pro quo scheme to eliminate the threat of Kaul's rapidly expanding and innovative minimally invasive spine surgery practice.

Defendant, Dr. Andrew Gregory Kaufman, MD ("**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 the Plaintiff, and engaged in healthcare business with Defendants Heary, Przybylski and AHS. Defendant Kaufman committed perjury in the case/hearing (April 9 to June 28, 2013) that resulted in the illegal revocation of Kaul's NJ 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 monies from Defendants Allstate/Geico to provide false testimony that has resulted in the wrongful incarceration of physicians to whom Defendants Allstate/Geico owe monies.

Defendant Lindy Washburn ("**Washburn**") is an individual employed by Defendant North Jersey Media Group, Inc ("**NJMG**") as a journalist. On August 13, 2013, Defendant Washburn knowingly violated Kaul's legal rights by illegally recording an interview on the second floor of the building (111 Wanaque Avenue, Pompton Lakes, NJ) in which his surgical center was located.

Defendant North Jersey Media Group, Inc ("**NJMG**") is a corporation located at 1 Garret Mountain Plaza, Woodland Park, New Jersey 07424. It publishes The Bergen Record and engages in business with Defendants HUMC and AHS. On November 17, 2013 it used the US mail and wires to transmit a knowingly fraudulent legal instrument in furtherance of the below detailed violations of RICO.

Defendant Robert Garrett ("**Garrett**") is the president of Defendant HUMC, and conspired with Defendant Christie to have funnelled bribes from Defendant HUMC, it's physicians and other business associates into his political/personal accounts. In 2020, Defendant HUMC conspired with Defendant Christie, in his capacity as an unregistered lobbyist, to divert millions of dollars from the federal tax purse into Defendant HUMC's rapidly expanding healthcare related businesses, including a private medical school.

Defendant Congress of Neurological Surgeon ("**CNS**") is a professional neurosurgical society/business located at 725 Fifteenth Street, NW, Suite 500, Washington, D.C. 20005. Defendants Heary and Przybylski are members. The business of

Defendant CNS is funnelling bribes from its members to state/federal politicians as part of multiple and ongoing quid pro quo schemes purposed to advance its economic/political agenda at the expense of good medicine and the health/welfare of the American public. The Defendants funnelled bribes through Defendant CNS to Defendant Christie in order to have him abuse the power of the governor's office to have Kaul's license illegally revoked.

Defendant American Society of Interventional Pain Physicians ("**ASIPP**") is a professional medical society located at 2831 Lone Oak Road, Paducah, Kentucky, 42003. Defendant Staats was the 2015 President and Defendant Kaufman is a senior board member. Defendant ASIPP is a front for bribes funnelled from its members to state/federal politicians to advance their political/economic agendas at the expense of good medicine and the health/welfare of the American public. The Defendants funnelled bribes through Defendant ASIPP to Defendant Christie as part of a quid pro quo scheme to have him abuse his power to have Defendant NJBME illegally revoke Kaul's license (April 2, 2012 to March 24, 2014). Defendant ASIPP bribed Defendant Christie to have him, in 2017, appoint K5 Defendant, Scott Metzger, MD, to Defendant NJBME. Defendant NJBME, in collusion and conspiracy with others, obstructed Kaul's 2014/2019 applications to have his NJ license reinstated, unless he first paid \$475,000 for an opportunity for only a hearing on the issue. Defendant ASIPP bribes state/federal politicians/lobbyists/lawyers to have its members appointed to state medical boards, not based on merit, but simply on corruption.

Defendant Doreen Hafner ("**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. 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 proved 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 Defendant Solomon, the OAL Judge, had been corrupted by Defendants Allstate/Geico).

Defendant TD Bank ("**TD**") is a Canadian bank that is publicly traded on the New York Stock Exchange.

Defendant Daniel Stolz, Esq ("**Stolz**") is a New Jersey based attorney, who was counsel to the Chapter 7 trustee for Kaul's corporations and the real estate holding,

which contained his surgical center. Stolz was bribed by Defendants Allstate/Geico with monies disguised as 'legal fees' as part of a quid pro quo scheme conducted in conspiracy/collusion with K11-3 Defendant, John Sherwood (the bankruptcy judge) in the United States Bankruptcy Court for the District of New Jersey. In return for the bribes Defendant Stolz willfully failed to file claims against Defendants Allstate/Geico/Horizon Blue Cross-Blue Shield and other NJ based insurance carriers that owed approximately forty-five million (\$45,000,000) to Kaul and his corporations, for clinical services (spine care) he had rendered to almost six thousand (6,000) patients from 2004 to 2012. In February 2020, Defendant Stolz, in collusion and conspiracy with Defendant Sherwood, abused the authority of the American federal court system to have Defendant Sherwood enter a knowingly illegal order attempting to obstruct Kaul's prosecution of the crimes of Defendant Stolz. In approximately July 2020, Defendant Stolz used the US mail and wires to transmit this knowingly fraudulent legal instrument into the United States District Court for the District of Columbia, in furtherance of the Defendants scheme to conceal their massive scheme of criminal racketeering (2006 to the present). Notably the judge in the DC court failed to publish to the court docket, Kaul's response that exposed the crimes of Defendants Stolz/Sherwood/Allstate/Geico et al, but instead threatened Kaul with sanctions for prosecuting Defendant Stolz. Those sanctions never materialized.

Defendant John Dilorio ("DilOrio") is a New Jersey based attorney, who represented the Plaintiff in his capacity as the Debtor in the Chapter 7 proceeding. Defendant DIORIO commenced representing Defendant GEICO in approximately late 2015, at which time he attempted to persuade Kaul to file for personal bankruptcy, which Kaul did not. Kaul plans to have reversed every judgement that was the product of the massive 'Fraud on the Court' committed by the Defendants in the period from at least 2012 to the present.

Defendant Richard Crist ("**Crist**") was the CEO of Defendant Allstate New Jersey Insurance Company from approximately 2006 to 2017. Defendant Crist remains a major private shareholder in Defendant Allstate. Defendant Crist was an orchestrator, participator, co-conspirator, aider/abettor and facilitator of schemes of political/judicial corruption conducted through, and in collusion/conspiracy with members of the executive/legislative/judicial branches of state/federal government. The schemes converted these elements of government into "**racketeering enterprises**", in which political lobbyists/lawyers/public relation persons aided and abetted the furtherance of racketeering schemes, purposed to illegally increase corporate/executive/shareholder profit at the expense of the health and welfare of the American public and physicians. The injuries caused by the crimes of Crist range from the destruction of reputation, career and property to the knowingly illegal deprivation of liberty.

Defendant Eric Kanefsky, Esq ("**Kanefsky**") was the acting director of the New Jersey division of consumer affairs, having been appointed to the position by Defendant Christie in May 2012, one month after Defendant Hafner filed her complaint to revoke Kaul's medical license. On May 16, 2012, Defendant Kanefsky illegally, arbitrarily and in an unprecedented manner, suspended Kaul's CDS prescribing license, purposed to negate an interim consent agreement Kaul signed with Defendant NJBME on May 9, 2012, in which Kaul agreed pending the outcome of a full hearing to limit his clinical practice to interventional spinal procedures. Kaul moved in the state court for a TRO and in retaliation, Kanefsky submitted a knowingly fraudulent motion to Defendant NJBME to make null and void the interim consent agreement and suspend Kaul's license in its entirety, thus completely destroying his livelihood. That suspension occurred on June 13, 2012.

Defendants, JOHN ROE 1-50, and JOHN DOE 1-50 are as yet unidentified individuals who have assisted the named defendants in the commission of their crimes.

Defendants, ABC CORP. 1-50, AND/OR XYZ, P.C. 1-50 are as yet unidentified corporations that have assisted the named Defendants in the commission of their crimes.

May 13, 2021

Howard A. Zucker, MD, JD.
Commissioner of Health
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Re: Application for physician license

Dear Dr. Zucker,

I send you this letter in your capacity as the Commissioner of Health for the State of New York, regarding my application for a physician license in the State of New York.

It is my understanding, based on information provided to me by the executive office of the board, that my application is pending before the committee that you oversee. On April 29 and May 11, 2021, I enquired as to the completion date of their review and requested a copy of the state policy that regulates such a review. I received no response. This stands in contrast to the prompt way the executive office has, since October 2020, responded to my enquires.

In respectfully asserting my legal rights, I do request I be provided this information without further delay, or be informed, with regards to the policy, that no such document exists.

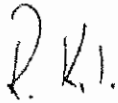
Please find enclosed several documents that are in the possession of the committee, that relate to political aspects of my professional career, my competence and my character.

If I receive no response (email/mail) from the committee by May 26, 2021, I will conclude that my application has been denied for reasons that constitute the subject matter of The Kaul Cases. These can be found on www.fsmbr.gov under the Parties search term 'Richard Arjun Kaul'. I believe it relevant for you to be aware that the Federation of State Medical Boards is a Defendant in a number of these cases, on which Dr. Hengerer, the chair of the committee, remains a director.

K11-5, one of The Kaul Cases, is pending in the Indian High Court, and names Defendants Allstate/State of New Jersey/Christopher J. Christie, a case in which Intercontinental Exchange has been noticed.

I thank you for your attention to this matter, and hope it can be resolved promptly and in a fair, and reasonable manner.

Yours sincerely

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

Richard Arjun Kaul, MD

cc: Arthur S. Hengerer

May 23, 2021

Gurbir Grewal
New Jersey Attorney General
Richard J. Hughes Justice Complex
25 Market Street
Trenton, NJ 08611

Re: Kaul v Boston Partners – K11-2
21-CV-10326
Obstruction of Justice

Dear Mr. Grewal,

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

In perpetrating this crime, they did co-opt the local police departments in the New Jersey towns of Ringwood and Hillsdale, by having police cars/officers emergently dispatched to their houses, when a process server provided them a copy of the Summons/Complaint in the above matter.

The process server stated the following with regards to each Defendant:

1. Doreen Annette Hafner: The process server arrived at Defendant's house (49 Seminole Drive, Ringwood, NJ 07456) at approximately 8 pm EST. She parked her car on the road, and walked to the front door of Defendant's house, where she noted at least seven unopened packages, some from Amazon. She rang the doorbell and observed Defendant's husband, who peered through the window, and then seemed to talk to Defendant. Defendant's husband, Michael Haefner, opened the door, and told the process server that he wanted to see her identification and that Defendant was printing an order from a court. The process server stated she had never seen any order. She filed the summons and complaint and while telling Defendant's husband her identification was in her car, he called the police. The process server, having served the summons and complaint, began walking back to her car to obtain her identification and was followed

by Defendant's husband. Upon arrival at the car, the process server asked Defendant's husband to provide a copy of the order, and he responded that Defendant was printing a copy. He then turned away, and rapidly walked back to the house. As the process server was driving away, a police car entered Defendant's street at high speed.

2. Andrew Gregory Kaufman: The process server arrived at the house (16 Sierra Court, Hillsdale, NJ 07642) of Defendant Kaufman at approximately 9:30 pm EST. As he approached the house, she witnessed three adults standing in the opened garage, and did park her car on the road. She exited the car and walked towards the front door, at which point the garage door was closed and the three adults disappeared from view. The process server rang the bell but received no response. Through the glass at the side of the door, she witnessed individuals in the house and once again rang the bell, but still received no response. After approximately five (5) minutes, the process server deposited the Summons/Complaint on the house and walked back to her car. As she was departing the area, two police cars, with flashing lights, sped past her towards Defendant's house.

Enclosed is a copy of the order from the United States District Court for the District of Massachusetts, that authorizes service by either the U.S.M.S. or the Plaintiff. This point aside, the law does not permit Defendant/U.S.D.J. Vazquez any involvement in any of The Kaul Cases, as is evident from the fact that he is: (i) a Defendant in K11-3; (ii) the subject of a disciplinary complaint in the Judicial Disciplinary Council-Third Circuit; (iii) the subject of an ethics complaint with the New Jersey Supreme Court; (iv) the subject of complaints with state/federal investigative/prosecutorial authorities nationwide. Thus, his orders are without legal effect, a fact known to Defendants Hafner/Kaufman, who will have committed a fraud on the police, if they presented them with any orders of Defendant Vazquez.

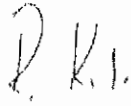
Defendants Hafner/Kaufman used New Jersey police to attempt to obstruct/violate the jurisdiction/authority of the United States District Court and thus the United States. This is a felony, and one into which they have now dragged the Ringwood/Hillsdale police departments. A copy of this letter will be attached to a letter sent to the Chiefs of these departments, noticing them of the legal liability caused to their agencies by having become aiders and abettors in furtherance of the Defendants crimes.

I would request that you instruct the Defendants, whom you intend on defending, that they must comply with the authority of the United States District Court for the District of Massachusetts. The Court has offered to have the United States Marshal Service will effectuate service on all Defendants. However, I would request that you, in the interests of judicial economy/justice, do formally enter the case on behalf of your clients.

Finally, the above facts constitute further evidence, not that any is required, of why none of The Kaul Cases can be litigated within any courts within the geographic boundaries of K11-5 Defendant State of New Jersey. It also further substantiates the nullity of all orders entered in The Kaul Cases since April 29, 2016, for the purposes of any defenses the Defendants might raise in K11-2, a case in which the Defendants are defenseless, a fact of which you are aware.

Please also be advised that liens will be placed on the Defendants property, and that if the Defendants continue to attempt to obstruct justice, I will move the Court to have them sanctioned and or arrested.

Yours sincerely

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

Richard Arjun Kaul, MD

cc: All Counsel via email

All Parties with a legal or other interest

Chief: Ringwood Police Department

Chief: Hillsdale Police Department

U.S.D.C.-District of Massachusetts

June 10, 2021

Howard A. Zucker, MD, JD
Commissioner of Health
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Re: NOTICE OF LITIGATION/ADJUDICATION OF LICENSE APPLICATION

Dear Dr. Zucker

I write this letter to: (i) bring to your attention the ongoing fraud and perpetuation by New York State actors/agencies of a **"pattern of racketeering"** commenced in 2006 by **The Kaul Cases Defendants**, that has converted the State of New York into a **"racketeering enterprise"**, liable pursuant to RICO; (ii) request that by July 7, 2021 my application for medical licensure be either granted or denied.

Please be advised that a denial will provide me standing to amend K11-9 to include a **"new racketeering injury"** claim against **The Kaul Cases Defendants**, as will a failure to issue a decision by July 7, 2021. New York State actors/agencies have conspired and continue to conspire with **The Kaul Cases Defendants** to violate my fundamental human right to due process, in an increasingly futile attempt to provide cover for their crimes.

Please find enclosed the following documents:

1. Letter from Kaul to Dr. Zucker: May 13, 2021.
2. Emails Kaul-OPMC: April 29 to May 20, 2021.
3. Letter from Kaul to Steven Boese: May 21, 2021.
4. Complaint in K11-9: June 9, 2021.
5. Emails Kaul-NYSED: June 9, 2021.

These documents will be submitted into K11-9 and filed, if necessary, in support of my application to the New York State Court system for an order compelling application adjudication.

The non-adjudication, other than constituting a 'Fraud on the Court', is arbitrary and satisfies the cruel and unusual standard set forth in the Constitution, and thus neither sovereign nor qualified immunity would exist for any state actors/agencies.

Once again, I thank you for your attention to this matter, and hope it is resolved without the need for litigation.

Yours sincerely

Richard Arjun Kaul, MD

cc: Arthur S. Hengerer

Members of the NYS Medical Board

Steven Goldstein, CEO/President, Strong Memorial Hospital

July 6, 2021

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

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

Dear Mr. Gensler

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

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

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

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

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

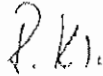
It is my position that the Defendants, in seeking to mitigate their securities fraud related civil/criminal liability, did conspire to have Defendant Grewal appointed to this position. This constitutes evidence, that will be submitted into K11-2, in support of an "ongoing pattern of racketeering", that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

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

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

I thank you for your attention to this matter.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'R. Kaul', written in a cursive style.

Richard Arjun Kaul, MD

Exhibit 3

	Description	Information	Kaul	Christie
1. William Roeder 9/10	-Executive director of NJBME	-political corruption at the medical board -who gave money to Christie	-testified against Kaul in the June 2013 OAL hearing -refused to provide Kaul his NJBME file	-works for the division of consumer affairs which is under Christie's control
2. Barack Obama 9/10	-President of America		Received two letters from Kaul regarding court transcription fraud + chemical weapons	-provided financial support for Hurricane Sandy
3. Daniel T McMurray 3/10	-President of FOCUS	-acted as the healthcare ombudsman in the 2013 chapter 11 proceedings. Will be able to provide information regarding the clinical and business indices of NJSR et al. His report to the federal bankruptcy court was favorable.	-interacted in person on at least three occasions to discuss the corporations	-unknown
4. Robert Marisco 3/10	-Real estate attorney at Scarinci + Hollenbeck	-worked on the contract to purchase the lot of land for NJSR Surgical Center II	-provided legal services for land purchase	-unknown
5. William Flore 9/10	-Meyner Landis attorney who represented TD Bank	-took instructions from the Christie administration to attack Dr. Kaul's financial position. This commenced with the 2011 attempt to call in a \$1 million loan for which there was no delinquency. It was followed by the filing of a lawsuit in Morris County which caused Dr. Kaul's corporations to file for chapter 11 bankruptcy. TD also interfered with the 2013 closing of Dr. Kaul's Manhattan brownstone by obstructing the sale. The buyer, a private equity manager,	-met with kaul in may 2011 in meyerer + landis offices in Newark. It was during this meeting that flore made the following comment: " I don't give a fuck about the IRS"	-unknown

		threatened to cancel all his loans with TD. The bank then filed a fraud complaint with www.checksystems.org to prevent Dr. Kaul from obtaining banking services in New Jersey and communicated in late 2013 with Michael Washington, the TD branch manager in Bloomfield, that he should refuse to open an account for Dr. Kaul. According to Washington they also accused Kaul of insurance fraud. This call likely came from the allstate controlled DOBI.		
6. Joseph McCarthy 9/10	-senior partner at meyer + landis	-as above	-was present at the may 2011 meeting in Newark -fought with Kaul's attorney Alexia Garin, esq on the 2013 Manhattan brownstone closing in an attempt to prevent the sale of the house which was presumably an attempt by the Christie administration to cut off my funds.	-unknown
7. Brad Behar 3/10	-patent attorney	-value of the patent filed on the access-distractor system	-provided legal services regarding intellectual property	-unknown
8. David Bursik 4/10	-patent and trademark attorney	-value on the patents filed for the goggles, mobile surgical units + trademarks.	-provided legal services	-unknown
9. Mitchell Novick 1/10	-as above	-as above	-as above	-unknown
10. Alexia Garin 6/10	-Manhattan real estate attorney	-fought with Joseph McCarthy who was trying to prevent the sale of the Manhattan	-provided legal services	-unknown

11. Michael Keating 9/10	-attorney at new jersey law firm dughi hewit. -practice is focused on healthcare	brownstone -close to both christie + chiesa and almost certainly has knowledge about the racketeering offenses. -political corruption at the NJBME	-was present at numerous medical malpractice depositions involving drs kaul, mckee + datta -has engaged in racketeering activities with the Christie administration as per the jerseygate chart -engaged with kaul from august 2013-june 2014 with the false promise that he was working on having kaul's license reinstated for which he charged kaul \$7500 -did not sign a retainer with kaul because his intentions were to defraud kaul -kaul filed an ethics complaint in November 2015 after which keating sent kaul an e-mail requesting a conversation -kaul sent keating an e-mail in December demanding the return of the \$7500.	-is senior partner at Dughi Hewit which is the law firm at which Christie worked before becoming the bush appointed us attorney for new jersey -friend of jeffrey chiesa who keating tried to have join dughi hewit after chiesa had left the position of us senator -
12. Mark Sokolich 3/10	-attorney and mayor of fort lee	-political corruption and the pattern of conduct of christie	-met kaul in early 2014 at orama restaurant in edgewater and made the comment "Christie is a vindictive guy"	-multiple interactions with Christie regarding the bridgegate scandal
13. David Samson 7/10	-attorney general for new jersey in 2003 -senior partner at wolf Samson which is the firm chiesa was at prior to becoming the nj attorney	-political corruption + racketeering as per jerseygate chart -	-was the attorney general who lost a case against kaul in 2003 to have his medical license revoked -close to mark murphy who met with kaul in august 2015 -close to Michael duhaime who communicated via e-	-orchestrated christie's 2009 gubernatorial campaign -senior partner at law firm wolf Samson which is where

	general		mail and phone in September 2015	chiesa worked, who has also played central role in christie's political career
14. Anthony Labue 8/10	-attorney with decottis Fitzpatrick + cole	-racketeering activities with the nj medico-legal community	-he and his firm provided legal representation in 2003 in front of the NJBME -they subsequently charged \$500,000 for a legal matter that lasted only 6 months -the firm sued kaul when he requested to pay in installments and suggested he take a loan from the bank -kaul was forced to borrow \$80,000 from his ex-wife to pay decottis -kaul was referred to decottis by his immigration attorney, Gretchen Aylward, at the Albany firm of hiscock Barclay -kaul remembers aylward making the comment that labue, who had worked in the NJ Ag office before entering private practice, was the right choice -when kaul disputed the bill, labue made the comment that he was very disappointed particularly in light of the result his firm had obtained because of their 'connections'.	-unknown
15. Robert Conroy 9/10	-attorney (now deceased) with law firm, kern, augustine,	-conroy's comment at the June 13 th 2013 hearing before the njbme that "this is all coming out of morris	-provided legal representation from may -july 2012 in the njbme matter -was able to procure	-conroy was a member of the new jersey republican

	conroy	county" suggest he knew about christie's orchestration of kaul's license revocation -the transcript of june 13 th 2013 contains numerous statements made by conroy regarding the political corruption in the Christie administration -conroy also made a comment to kaul that suggested the death of paul Kenny was not a consequence of suicide but a deliberate act. Kenny was at the time involved in a bitter dispute with physician kenneth zahl	an interim consent order that Christie then ordered eric kanefsky to revoke based on trumped up allegations of failing to respond to a subpoena	party and referred to christie as a "bully"
16.Eric Kanefsky 9/10	-attorney who was the acting director of the division of consumer affairs in april 2012	-acted under orders from christie and will have information on the racketeering and political corruption	-took legal action against kaul in may 2012 to revoke the interim consent order kaul had signed with the medical board in april 2012	-appointed by and worked under christie
17.John Hoyt 6/10	-medical malpractice attorney who filed suit on behalf of frances kuren	-exchange of monies between malpractice attorneys and the christie	-involved in protracted litigation which included a video taped deposition of robert heary	-unknown but hoyt is based in morris county
18.Jeri Warhaftig 8/10	-nj attorney general	-instructions given to chiesa from christie to take legal action against kaul	-was involved in the 2003 case against kaul to revoke his medical license. -warhaftig lost the case	-works under christie
19.Lewis Stein 9/10	-medical malpractice attorney who represented james jarrell	-exchange of monies between christie and attorneys who sued kaul -involvement of superior court judge howard coburn in the jarrell trial	-asked kaul about arms dealer Boruch Freedman during a deposition in the jarrell matter	-unknown but based in morris county -shares common culture with orthopedic spine surgeon marc cohen,

				who filed a complaint in 2007 with the njbme against kaul
20. Stuart Rabner 6/10	-nj supreme court justice	-racketeering activities of the nj medico-legal community -why he ruled against kaul in the jarrell matter	-argued against kaul in the jarrell matter	-christie supported the extension of his tenure to 2027 -shares common culture with chrstie's largest political donor sheldon adelson
21. Bennet Barlyn 3/10	-ex hunterdon county prosecutor	-political corruption in the christie administration -withholding of legal evidence	-received a letter	-christie fired him because barlyn commenced prosecution against one of his political allies, Deborah trout
22. Charles Mick 4/10	-2013 president of the north American spine society	-spine turf wars and the involvement of the neurosurgical societies -role Gregory przybylski played in the jerseygate	-received a letter	-unknown but has contributed monies to christie campaign
23. Steven Waldman 6/10	-nj based interventional pain physician	-works with nj neurosurgeon roy vingan (close to heary) and will likely have knowledge about their involvement in jersygate	-known kaul professionally since 2007 -is part of the nj medico-legal community and has worked closely with physicians and lawyers	-unknown but
24. Andrew Kaufman 9/10	-nj interventional pain physician at umdnj	-in the same department as heary and will be likely have information pertaining to the political corruption and conspiracy to revoke kaul's license	-testified against kaul in the oal hearing -told kaul at a professional society meeting that "he had no choice" in regards to acting as a witness against him -treated one of kaul's	-kaufman is a senior member of njsipp which gave large amounts of money to christie

			patients-CJ- to whom he made derogatory comments about kaul	
25.Steven Lomazow 10/10	-nj neurologist	-endemic political corruption in the nj medico-legal community -racketeering surrounding the revocation of kaul's license -death of dag paul kenny	-was on the only member of the njbme to vote against kaul in regards to the interim consent order -made derogatory comments to his partner about kaul.these were then transmitted to kaul's receptionist, Vanessa rodriguez when she treated with lomazow's partner as a patient.	-he was removed in 2014 from the medical board by christie after the video of lomazow had been posted -lomazow professionally close to heary. Both belong to the atlantic neuroscience institute at overlook hospital which is part of ahs(cohen works at ahs)
26.Marc Cohen 10/10	-orthopedic spine surgeon	-exchange of monies in the nj medico-legal community	-filed a complaint with the njbme against kaul in 2007 -signed an agreement to purchase a share in kaul's surgical center -testified against kaul in 2003 in a medical malpractice case in morris county	-located in morris county -made large donations to christie and the nj republican party -works at ahs as does heary and lomazow -made comments to frank moore at a surgical center in associates in Englewood that "something big is coming down the pipe" -belongs to the nh spine society that

				gave money to christie
27. William Mitchell 7/10	-neurosurgeon	-anti-competitive conduct of the 5 neurosurgeons sued in kaul v heary -coding change related to endoscopic spine surgery	-sued by kaul -kaul was told by defalco that Mitchell had made dismissive remarks about the fact that asipp was not informed of the coding change process	-senior member of professional societies that made large donations to Christie -
28. John Caridi 3/10	-neurosurgeon	-initially agreed to act as defense expert for kaul but then declined. Might have information as to whether he came under any pressure from the his professional societies	-interacted with kaul, his attorney gorrell -kaul met caridi through woods who also works at the hss in manhattan	-unknown
29. Alieta Eck 3/10	- nj physician with aaps	-corrupting role of money in medicine	-kaul attended a 2013 meeting in Philadelphia at which eck spoke about the fees charged for medical board certification	-unknown
30. Bank of America 6/10	-us bank	-mortgage default on the Bernardsville house -communications from the christie administration or malpractice attorneys	-mortgage	-unknown but christie has received large donations from wall street and controls the dobi in nj -connections exist between the nj insurance industry, banks and christie
31. Lindy Washburn 9/10	-journalist at the Bergen record	-court transcription fraud -racketeering -political corruption in the medico-legal community	-interviewed kaul twice in person and once on the telephone -multiple e-mail communications between	-is the chief medical correspondent at a newspaper which is christie's political mouthpiece
32. Kelley Blevins 9/10	-publicist	-political corruption -racketeering -anti-defamation	-known kaul for twenty years -blevins interacted	-unknown

		-njbme + ag tactics used to harass physicians	with lomazow + washburn + dara	
33. Lesile Hoffman 7/10	-publicist	-as above	-provided pr advice to kaul	-talked with a member of the nj republican party and advised them that if they didn't settle the issue things were going to get worse.
34. Susan Livio 7/10	-journalist	-political corruption in the medico-legal community -njbme members	-covered kaul's case closely and attempted to get quote from kaul after june 13 th 2012 trenton hearing	-si was the only paper informed of the hearing. Washburn did not receive a call
35. John Woods 6/10	-surgical assistant	-spine turf wars	-worked with kaul in nj and in the sap	-unknown
36. Michael Skinner 3/10	-irs agent based in ny	-delinquent taxes -was aware of the reasons for the late tax payment -received monies from the sale of the manhattan brownstone which flore + mccarthy tried to stop	-interacted with kaul's tax attorney frank brunetti	-unknown
37. Dotty Bollinger 9/10	-ceo Isi	-nature and size of the deal Isi-njsr deal	-interacted with kaul on many occasions	-unknown
38. Paul Fishman 7/10	-nj us attorney	-transcription fraud	-kaul submitted a citizens complaint form January 29 th 2015 -talked with fishmans office two after complaint submission	-worked in us attorney office with christie -prosecuting baroni _ Kelly in the bridgegate scandal -question as to whether fishman has allowed politics to trump the law

39. Steven Levine 7/10	-indiana based miss physician-board member of sasi	-spine turf wars -interacted with jasper and might have information on the conspiracy in nj against kauls medical license -can talk to kaul's reputation	-has known kaul professionally since 2004	-unknown
40. Solomon Kamson 7/10	-washington based miss physician -president of sasi	-spine turf wars -kaul's professional reputation	-has known kaul both professionally and personally since 2004 -testified for kaul in the 2013 oal hearing	-unknown but referred to nj as the "mafia state"
41. Gabriel Jasper 9/10	-miss physician -board member of sasi	-kaul's reputation -spine turf wars -political corruption -racketeering	-known kaul professionally since 2006	-unknown but expressed fear in 2013 that my public relations campaign against christie would open him to attack because of his association with me and sasi. He therefore asked that I be removed from the organization.
42. Andrea Trescott 6/10	-miss physician -sasi board member	-spine turf wars	-interacted with kaul multiple occasions in both face to face and telephone conferences -kaul met trescott through kamson	-unknown
43. Albert Telfian 6/10	-neurosurgeon -sasi board member	-spine turf wars	-interacted with kaul on several occasions via telephone	-unknown
44. Howard Yeon 6/10	-orthopedic spine surgeon	-kaul's reputation -spine turf wars	-observed kaul working -sent letter to board in support of kaul	-unknown
45. Evan O'Brien 6/10	-orthopedic spine surgeon	-spine turf wars -kaul's reputation	-observed kaul working and interacted with on many occasions	-unknown
46. Victor Katz	-orthopedic	-spine turf wars	-known kaul	-unknown

7/10	spine surgeon	-kaul's reputation and business	professionally and personally since 2005	
47.Frank Falco 8/10	-interventional pain physician -senior member of asipp	-spine turf wars -kauls' reputation	-observed kaul working -initially supported kaul in his case against the njbme	-unknown but njsipp has made large donations to christie -ed magazine made the comment that nj is "pay to play"
48.Richard Jordan 3/10	-arkansas neurosurgeon	-spine turf wars -kaul's reputation	-interacted with kaul and his attorneys on several occasions -analyzed kaul's practice	-unknown
49.Daniel Bennet 6/10	-colorado miss -sasi board member	-spine turf wars -kaul's reputation	-known kaul professionally and personally since 2007 (introduced by robert mcgann)	-unknown
50.William Horne 9/10	-president of isi	-kaul's reputation -business of miss -kaul's business(received ar information in the six months preceding the deal that was clos to signing) -spine turf wars	-interacted with kaul on several occasions between august 2011-march 2012	-unknown but is politically aligned with the republican party and is based in florida whose governor.rick scott, is a close ally of christie
51.Kathleen LaCouture 7/10	-director nursing at njsr surgical center	-kaul's reputation -kaul's business -spine turf wars	-known kaul professionally since January 2012	-unknown
52.Richard Codey 3/10	-nj politician	-jerseygate -codey law which led to the moratorium on surgical centers and the licensing of one room centers.	-key darrow contacted the office of codey regarding kaul's case	-both in the nj government
53.Dnyaneshwar Mulay 3/10	-indian high commissioner in ny	-received a letter from kaul -did he make any communications with the indian government	-kaul sent letter	-unknown
54.Robert	-regional sales	-spine turf wars	-known kaul	-unknown

McGann 9/10	rep for spineology	-kaul's reputation -kaul's business	professionally since 2005 -testified on kaul's behalf at the 2013 oal hearing	
55.Marcel Pouliot 9/10	-regional sales manager for pedicle screw company	-kaul's reputation -kaul's business -spine turf wars(worked closely with both ortho and neurosurgeons at MMH which is part of ahs)	-known kaul professionally since 2005 -known cohen professionally since 2003 -known basch professionally since 2003	-unknown but large part of business based in morris county
56.Joan Balducci 7/10	-nurse and surgical center consultant	-kaul's reputation -kaul's business -spine turf wars -jerseygate	-known kaul professionally since 2008 -worked on the application for medicare and aaahc accreditation -testified for kaul in the 2013 oal hearing	-unknown but is member of the nj tea party - professionally close to mark mannigan who was on the 2009 'transition team' for christie
57.Nicholas Tsapateris 3/10	-architect	-jerseygate -allied with politically active lawyer victor hirfinsky	-provide architectural/contracting services in the failed attempt to have njsr surgical center built	-unknown but close to the political process in nj
58.Suzanne Brown 6/10	-architect	-kaul's business and reputation	-known kaul professionally since 2009 -was threatened by tsapateris with legal action	-unknown but based in morris county and her firm have large contracts with ahs
59.Brian Callahan 6/10	-financial advisor	-kaul's business	-interacted with kaul's business from 2008-2011	-unknown
60.Kevin Rex 6/10	-private equity manager -sasi board member	-kaul's reputation -kaul's business -jerseygate	-known kaul both professionally and personally since 2006	-unknown but is close to several nj republicans
61.Brian Cox 6/10	-medical equity business	-kaul's business	-introduced to kaul by Thomas deangelo in 2012	-unknown
62.Thomas DeAngelo	-financial advisor	-kaul's business -kaul's reputation	-known kaul professionally since	-unknown

6/10			2012 -Introduced by robert zellitsky	
63.Robert Wasserman 9/10	- attorney +trustee in the njsr chapter 7 matter	-kaul's business -racketeering + political corruption	-known kaul since 2014 -interacted on several occasions	-unknown but dan stoiz is close to mark mannigan
64.Daniel Stoiz 7/10	-attorney + trustee in chapter 7 njst liquidation	-kaul's business -jerseygate	-known kaul professionally since 2014	-unknown but close to mannigan
65.Roberta DeAngelis 3/10	-us trustee	-kaul's business	-involved in njsr chapter 11 matter	-unknown
66.John DiOrto	-attorney involved in chapter 7 matter	-kaul's business -kaul's reputation	-involved in the chapter 7 njsr matter -referred by attorney luis amaro	-unknown
67.Joshua Raymond	-attorney for allstate in the chapter 11 and 7 njsr matters	-kaul's business -jerseygate	-known kaul professionally since 2013 - extensively deposed kaul on several occasions	-unknown but works for john robertelli whose firm has donated monies to christie
68.Scott Rever	-attorney in the chapter 7 njsr matter	-kaul's business -jerseygate	-deposed kaul in the chapter 7 matter	-unknown but close to mannigan
69.John Robertelli	-attorney	-jerseygate	-argued for allstate in the chapter 11 matter	-unknown but is retained by allstate who effectively control DOBI
70.Lee Tesser	-attorney	-jerseygate	-refused to sue tsapateris but agreed to act as a consultant	-unknown but seem to be politically connected to the democrats
71.Victor Hirlinsky	-attorney	-jerseygate	-litigated against kaul in his suit against tsapteris	-unknown but part of the nj legal- political web
72.Thomas Manahan	-morris county judge	-jerseygate	-appointed John Lorenzo as court receiver	-unknown but is a morris county superior court judge
73.Elish McLoughlin	-attorney	-kaul's reputation -kaul's business -jerseygate	-argued case in oal and directly examined kaul	-unknown but worked with Charles

				shaw who received a threatening phone call from one of the attorneys in the kaul v heary matter
74. Robert Levy	-attorney	-kaul's reputation -kaul's business -jerseygate -chemical ken	-provided legal representation on medical license matter -provided legal representation on attempt by the state of new jersey to close njsr surgical center -made comment to kaul "it is like racketeering" -opted out of the case with the medical board two weeks before the april 2 nd commencement date	-unknown but a senior partner at scarinci + Hollenbeck which has very close ties to christie
75. Kenneth Hollenbeck	-attorney	-as above	-as above	-as above -also knows wendy mailtland -made direct comment about boruch freedman
76. Frank Brunetti	-attorney	-as above	-made comment to kaul after his license suspension "get out of new jersey" -provided tax advice -communicated with irs agent Michael skinner -assisted in application for 501 c 3 spine Africa project	-unknown but member of scarinci + hollenbeck
77. James McDonough	-as above	-as above	-worked closely with kaul in application for 501 c 3 status for spine Africa project	-unknown but a member at scarinci + hollenbeck
78. Ramesh Babu	-neurosurgeon at NYU	-spine turf wars -kaul's reputation	-observed kaul operating -wanted to bring cases to njsr surgical center	-unknown but works at nyu langone medical center which is partly

				owned by Home Depot bulider Kenneth langone who is one of christie's large donors
79.Sukdeb Datta	-interventional pain physician -senior board member of asipp	-kaul's reputation -kaul's business -the spine turf wars	-joined njsr in mid 2011 to learn miss skills from kaul -published paper with kaul -was taught by kaul	-unknown but a senior member of asipp which is politically active in Washington dc
80.Michael McKee	-interventional pain physician	-kaul's reputation -kaul's business -spine turf wars	-known kaul professionally and personally since 1990 -joined njsr in early 2011	-unknown but was also harassed by threats to his new Jersey license and professional reputation
81.Luis Pacheco	-interventional pain physician	-spine turf wars -jerseygate -kaul's reputation -kauls business	-known kaul professionally since 2006 -was introduced by John Quinn	-unknown but like mckee was harassed by the NJBME and particularly lomazow who grilled Pacheco about kaul
82.Dong Kwak	- anesthesiologist	-kaul's reputation -kaul's business -jerseygate	-known kaul professionally since 2008 -his son works in the nj ag office	-unknown but is represented by keating in medical malpractice cases relating to njsr and kaul
83.Sudhir Diwan	-interventional pain physician	-spine turf wars -kaul's reputation	-acted as witness on behalf of mckee and data in terry medical malpractice case	-unknown but senior member of asipp
84.Sean Lager	-orthopedic surgeon	-kaul's reputation -spine turf wars	-known kaul professionally since 2011 -worked with kaul at njsr on spine cases	-unknown but was harassed by medical malpractice attorney firms with

				connections to christie
85.Jonathan Lewin	-orthopedic spine surgeon	-kaul's reputation -spine turf wars	-met kaul in 2007 when he was brought to a course that kaul taught at the bpasc. Introduced by robert mcgann -observed kaul operating	-unknown but belongs to the same cultural group as marc cohen and sheldon adelson. Also a member of the Englewood synagogogue run by boteach schumley.
86.Roger Lahiriri	-congolese physician -board member of spine Africa project	-kaul's reputation -kaul's philanthropic activity -kaul's global interests	-known kaul since 2008 -met when kaul attended a lecture he gave on sexual violence in the congo -worked with kaul at njsr surgical center	-none
87.Fabian Bitan	-orthopedic spine surgeon	-kaul's reputation -spine turf wars	-known kaul since 2008 -met at nass meeting and introduced through meryl strummer -kaul lectured at lennox hill spine meeting at the invite of bitan	-unknown
88.Kingsley Chin	-orthopedic spine surgeon	-kaul's reputation -kaul's business -spine turf wars	-known kaul since 2010 -observed kaul operating -provided letter of support for his license re-application	-unknown
89.Ronald Wisniewski	-orthopedic spine surgeon	-kaul's reputation and philanthropy	-worked with kaul on the spine Africa project	-unknown
90.Kenneth Chapman	-interventional pain	-spine turf wars -kaul's reputation	-met with kaul in 2012 -made the comment to Daniel Goldberg during a conversation about the suspension of kaul's license that "it is the neurosurgeons"	-unknown but a member of asipp

91.Stryker	-medical device company	-the damage to their business as a consequence of the license suspension	-observed kaul operating and can talk to his skills	-unknown
92.Gettlinger USA	-medical device company	-the damage to their business as a consequence of the license suspension	-provided medical supplies to njsr surgical center	-unknown
93.John Lorenzo	-receiver appointed by judge Thomas Manahan in Morris County in the chapter 11 matter	-why, according to the njsr staff, was he so obsessed with kaul's personal life. Staff mentioned he did not seem professional and was often verbally abusive	-never met or spoke with kaul	-unknown but was appointed from morris county which is Christie's home base.
94.NJ Department of Treasury	-tax department for nj	- why this department published a list of highest tax delinquencies that had kaul's name on the list	- kaul has paid significant sums in nj taxes and the suspension of his business caused a drop in tax revenues. This has hurt the people of nj.	-under christie's control as was the publication of the list
95.Christopher Oderian	-US based Nigerian journalist	-coordinates article that was written in Nigerian publication about the corruption in the Christie administration that caused the license suspension	-worked on the IT systems for njsr	-unknown
96.Alex Hannaford	-british journalist	-was he involved in the hacking of the www.drrichardkaul.com website	-interviewed kaul for the guardian -hannaford received an e-mail from kaul in regards to the hacking	-unknown
97.Jon Swaine	-british journalist	-conversations with the geico representative who was also sitting in the oal hearing and what information did she give him about kaul	-interviewed kaul several times -received an e-mail from kaul in regards to the hacking of www.drrichardkaul.com	-unknown
98.Atlantic Health System	-morris county based healthcare system which includes Morristown hospital and	-cohen + heary both work in this healthcare system which was also a geographical competitor for kaul in the miss field	-njsr and ahs competed for spine cases in the same area	-unknown but based in morris county

	overlook hospital			
99. Atlantic Neuroscience	-private practice group based at overlook hospital of which heary and lomazow are members	-jerseygate -spine turf wars	-both heary and lomazow conspired in the revocation of my medical license	-have donated monies to Christie
100. Robert Zelitsky	-accountant for kaul's corporate entities	-jerseygate as a consequence of his proximity to scarinci + hollenbeck	-worked closely with kaul on all of his financial affairs -became fearful during the chapter 11 proceedings and then refused to provide information about the tax returns in the chapter 7 proceedings	-unknown but close to bruneti
101. Kathleen Calabrese	-patient	-had a conversation with a senior nj republican who made the comment " i think it is terrible what they are doing to dr kaul" .the individual was too fearful to allow his name to be used.	-known kaul professionally and personally since 2006	-unknown but is a member of the nj republican party and lives in morris county. Also knows james barberio who is one of christie's political allies
102. Michael Tfrank	-patient	-had a conversation with the father of nj assemblyman scott rumana. Tfrank told kaul in a subsequent conversation that a lot of money was given to Christie to have the medical board revoke kaul's license. Kaul made a note of this conversation and the fact that tfrank had referred to Christie as 'very smart'	-known kaul since 2006	-unknown but is a member of the nj republican party
103. Richard Barbeta	-patient who sued kaul	-jerseygate -did his Trenton based attorney donate to Christie	-known kaul since 2005 -was caught on video lifting heavy weights	-unknown

		-his case settled after the negative publicity surrounding the license suspension	and running in a gym	
104. Kevin Earle	-executive director of the nj medical licensing boards.	-jerseygate and the political corruption in the medico-legal community	-worked closely with kaul in the north jersey center for surgery -testified on kaul's behalf in the oal matter	-unknown but left nj when Christie became governor
105. Judy Gleason	-administrator in charge of the alternative privileges committee of the medical board	-jerseygate	-testified against kaul in the oal hearing	-works under his administration
106. Carmen Echeverry	-certified coder and biller	-kaul's business -kaul's reputation	-worked for kaul from 2008	-unknown
107. Teri Vargas	-bpasc administrator	-kaul's reputation -kaul's business	-known kaul professionally since 2007	-unknown
108. Jeffrey Chlesa	-attorney + politician	-jerseygate	-was the nj ag who brought the legal action against kaul's license in 2012	-very close political ally
109. Robert Menendez	-attorney + politician	-jerseygate -involvement of felix roque in the matter	-close to roque who agreed to act as an expert/clinical monitor for kaul's 2014 reapplication for medical licensure	-on-off political ally of christie
110. Michael Ferguson	-attorney/ republican politician for morris + passaic counties	-jerseygate	-located in same counties in which kaul had business interests	-
111. Anthony Bucco	-morris county politician	-jerseygate -racketeering -political corruption	-key darrow attempted to have bucco find out what caused the state to suspend kaul's license	-a morris county republican of italian descent who is close to christie
112. Scott Rumana	-attorney + nj assemblyman for passaic county	-jerseygate -chemical ken(pompton lakes) -political corruption -racketeering	-daniel goldberg attempted to schedule meeting with rumana when license was suspended. His office cancelled the	-close to christie

			meeting at the last minute -michael tfank talked with scott rumana's father who told tfank about the large amount of money transferred -key darrow attempted to talk with scott rumana about the case which supposedly elicited a startled look from rumana.	
113.Parente Randolph	-coding and billing consultant	-kaul's business in regards to billing and coding compliance (	- this information is relevant as it supports the adherence to legal guidelines by kaul	-none
114.Charles Shaw	-attorney	-jerseygate -political corruption -intimidation by attorneys representing heary	-known kaul professionally since 2006 -known Solomon for twenty years when Solomon was a prosecutor in bergen county -shaw tried to remove himself from the case halfway through the proceedings when the court receiver, john lorenzo, took control of the business.	-unknown
115.Howard Solomon	-attorney + administrative law judge	-jerseygate -transcription fraud -political corruption	-was the judge in the OAL for the 2013 hearing -multiple letters sent to Solomon on the main issues and his attitude towards kaul -significantly it seemed that Solomon was pre-disposed against kaul before the commencement of the hearing . on the 1 st day of the trial Solomon, upon seeing kaul in the car park who he obviously recognized, seemed startled	-unknown but fear for his pension and the monetary promises from gelco and allstate suggest significant involvement

116. Jeffrey Randolph 10/10	-attorney	-jerseygate -racketeering -political corruption	-described the back room deals that go on in Trenton and mentioned Sweeney -committed multiple acts of legal negligence between 2006-2012 -in the jarrell matter likely conspired with stein to allow ford and market street surgical center out of the case	-donated money to christie
117. Doreen Hafner	-deputy attorney general	-jerseygate -njbm corruption -transcription fraud	-argued case for state against kaul -kaul filed ethics complaint against hafner -keating did not make application to have hafner removed from the case despite kaul describing the obvious conflict of interest	-answers to christie
118. NJ Office of Attorney Ethics	-attorney disciplinary body	-why they did not pursue the case against hafner for prosecutorial misconduct	-kaul filed ethics complaints against hafner and keating	-under the judicial branch which christie has attempted to control
118. Ilissa Hook	-as in 119.			
119. Milica Fatovich	-attorney	-kaul's business -kaul's reputation	-handled the chapter 11 litigation -referred by robert zeilitsky who mentioned that proceedings in bankruptcy were political -the firm of hook and fatovich is headed by an individual who used to be a federal judge -the chapter 11 is a feeding frenzy for lawyers, experts accountants etc	-unknown
120. Eric Katz	-attorney	-kaul's reputation -kaul's business -chapter 11 matter involving geico	-known kaul professionally since 2009 -made comment	-unknown but refused to handle the kaul v

			regarding the incompetence of randolphs handling of the failed 2005 horizon litigation which was dismissed because Randolph did not choose to opt out of the class action	christie 2016 matter due to an alleged conflict of interest.
121.Thomas Peterson	-neurosurgeon at HUMC	-spine turf wars -jerseygate	-known kaul professionally since 2001 -kaul sent Peterson a letter after he made a defamatory comment to kaul's employee linda reyes -peterson responded	-unknown is close to heary et al and works at HUMC which has donated money to christie -HUMC was built with money from the mob
122.James Sharpe	-attorney	-jerseygate -political corruption -racketeering	-defended kaul in several medical malpractice claims -made the comment to kaul that he had never seen a case where a medical license was suspended based on the types of medical malpractice actions that had been filed against kaul in the aftermath of the 2012 highly publicized action.	-unknown but is now a partner at scarinci + Hollenbeck -also hired robert conroy's son who is a lawyer
123.John Hoyt	-attorney	-jerseygate -spine turf wars -racketeering	-litigated against kaul on behalf of kuren -allowed the heary deposition to end prematurely and did not pursue that it be continued	-unknown but is based in morris county
124.Luis Amaro	-attorney	-jerseygate -spine turf wars	-known kaul professionally since 2010 -attended a meeting with Hollenbeck et al in 2012	-unknown
125.Phillip Cronakis	-attorney	-spine turf wars -jerseygate	-kaul met cronakis through nasiek -cronakis met Hollenbeck through kaul -cronakis seemed to	-unknown but cronakis a member of the nj republican party

			be intimidated by Hollenbeck at a meeting that took place at scarinci + Hollenbeck in 2012	
126. Timothy Sellinger	-attorney	-jerseygate -racketeering	-known kaul professionally since 2006 -made the comment to kaul in 2013 that he had got himself involved in another political case (the first one as the UK case)	-unknown but sellinger is close with William Focasio who gave money to christie -focasio had made defamatory comments about kaul in 2006
127. Bruce Crelin	-attorney	-jerseygate -spine turf wars -racketeering	-worked with conroy on the fight against the njbme + nj ag -described the state's pursuit of me as treating me like public enemy number 1	-unknown but worked closely with conroy who described christie as a bully
128. Michael Spero	-attorney	-racketeering between medical malpractice attorneys and Christie administration	-litigated case against kaul for richard barbetta	-unknown but is based in trenton
129. Jessie Sheffert	-attorney	-jerseygate -information about the intention of the njbme to revoke my license -information about the role of the insurance companies in jerseygate -kaul's reputation	-met with kaul in 2012 and relayed conversation he had with nj ag regarding the seemingly pre-determined outcome of the case -when kaul suggested he leave the country sheffert responded by saying that the insurance companies were considering bringing a criminal action against him	-unknown but sheffert is part of the nj medico-legal community
130. Gregory Przybylski	-neurosurgeon	-jerseygate -spine turf wars -kaul's reputation	-testified against kaul in the oal hearing -sued by kaul in kaul v heary	-unknown but was president of nass when they gave money to Christie
131. Robert Heary	-neurosurgeon at UMDNJ +	-jerseygate -spine turf wars	-encouraged kuren to file complaint with the	-unknown but made

10/10	AHS	-kaul's reputation	medical board and file lawsuit -attempted to avoid being deposed in the kuren matter and arrest warrant was issued	large donations through neurosurgical societies
132.Felix Roque 9/10	-interventional pain physician	-jerseygate -spine turf wars -kaul's reputation -kaul's business	-known kaul professionally since 2007	-close to christie + prieto
133.Shams Qureshi	-interventional pain physician	-jerseygate -kaul's reputation -kaul's business -spine turf wars -njbm corruption	-known kaul professionally since 2008	-unknown
134.Bruno Casatelli	-podiatrist and owner of surgical center	-kaul's reputation -kaul's business -jerseygate	-known kaul professionally since 2002	-unknown but met with george bush in 2005 -also based in Sussex county which is the county in which scott garrett is the US congressman
135.Alfred Steinberger	-neurosurgeon	-spine turf wars -jerseygate	-testified against kaul in the jarrell matter -operated on Jarrell -works at Englewood hospital which is where cohen also works	-unknown but belongs to the same cultural group as boteach schumley and Sheldon adelson who are both large contributors to christie
136.Arvinder Dhillon	-interventional pain physician	-kaul's reputation -kaul's business	-known kaul professionally since 2008	-unknown
137.Kaixuan Liu	-interventional pain physician	-spine turf wars -jerseygate -kaul's reputation -kaul's business	-known kaul since 2005 -received a letter from kaul after Liu made derogatory comments about kaul at an nj sipp meeting	-unknown
134.Timothy Reed	-physician + friend	-attended the oal hearing	-known kaul personally since 2002	-none

135. Vanessa Rodriguez	- office administrator	- kaul's reputation - kaul's business - jerseygate/tomazow - chapter 11 - conduct of the court receiver John Lorenzo	- known kaul professionally since 2008	- unknown but had her police officer fiancée paul hand a patient petition to the mendham police chief who was close to Christie. - christie did not respond to the lengthy petition
136. Kelly Gay	- office administrator	- kaul's reputation - kaul's business	- known kaul professionally since 2005	- none
137. Paul Kovatis	- orthopedic surgeon at HUMC	- jerseygate - spine turf wars	- known kaul since 2001 - sent defamatory letter to the Bergen record about kaul's qualifications	- unknown but at HUMC which is one of christie's political donors - christie met with ceo robert garret in 2013
138. Samuel Carruthers	- interventional pain physician	- kaul's reputation - kaul's business - jerseygate	- known kaul professionally since 2008	- unknown but lives in morris county and is a republican
139. NJ DOBI	- state department that is responsible for oversight of the banking and insurance industry in nj	- influence of the insurance industry on the fee schedules for auto insurance carriers - jerseygate - the insurance companies control the DOBI through bribes to politicians - they have their lawyers write the legislation that DOBI is meant to be responsible for - this conduct is contrary to the public interest as it allows	- kaul developed a thriving outpatient spine business which the auto insurance companies attacked using the DOBI, the medical board and christie	- under orders from Christie - christie's brother todd and his wife are both intimately connected to wall street and the insurance industry

		these companies to charge some of the highest fees in the country while refusing to pay for medical services		
140.Divyesh Kothari	-ceo td new jersey	-jerseygate	-attempted to block the sale of kaul's manhattan townhouse	-unknown
141.Bharat Masrani	-ceo td bank	-jerseygate -involvement of td in the attacking of my financial assets -interactions with the Christie administration -complaint with www.checksystems.org -the role of td in having a morris county court appoint a receiver	-received several letters from kaul regarding the role of td new jersey in the attack on kaul's business assets	-unknown but td have played a central role in the conspiracy
142.Robert Bennet	-healthcare bank manager at commerce which became TD	-jerseygate -bennet was taken off my account before the may 2011 meeting with terry mccooy -kaul's reputation -kaul's business	-known kaul professionally since 2005	-unknown but works for bank that has questionable record in its purchase of commerce and whose attorney, William Fiore, made the following comment "I don't give a fuck about the IRS"
143.Charles Mick	-2013 president of nass	-spine turf wars	-received a letter from kaul in 2013 regarding unethical conduct of przybylski	-unknown but was president of a society that donated to Christie when it was przybylski was president
144.Peter Carmel	-umdnj neurosurgeon	-jerseygate -spine turf wars	-sued by kaul for defamation and anti-competitive practices	-unknown but nass and cns made large

				donations to Christie. -also they had Christie attack their orthopedic competitors with Thomas Errico being one
145. Walter Eisner	-journalist at orthopedics this week	-spine turf wars -attended the cross examination of Gregory Przybylski	-met with and wrote several articles about Kaul and the spine turf wars	-unknown but wrote an article in 2010 about Christie's shakedown of the medical device companies and the orthopedic surgeons
146. Dan Connors	-editor outpatient surgery	-spine turf wars	-written several articles and interviewed Kaul	-unknown
147. Warren Buffet	-investor	-geico business strategy in New Jersey -role geico played in the suspension of Kaul's medical license -jerseygate -political corruption	-geico filed a federal complaint that was dismissed by the federal court -a geico representative attended the oral hearing on several days. Vanessa Rodriguez talked with this female. -Swaine also communicated with this female in the court room	-unknown but geico is now one of the largest insurers in New Jersey
148. Keith Behrens	-accountant	-Kaul's reputation -Kaul's business	-known Kaul professionally since 2003	-unknown but was Kaul was referred to Behrens through Mannigan
149. Frances Kuren	-patient who sued Kaul	-jerseygate and specifically the exchange of monies between Hoyt and Christie	-Kuren as treated by Kaul in 2007 and then saw Heary who referred her to Hoyt who is based in Morris County.	-unknown but treated by Heary and Hoyt who are both based in Morris County.
150. Cheryl	-patient	-jerseygate and	-known Kaul since	-unknown

Schwartz		specifically frances kuren -kaul's reputation	2007	
151. John Whipple	-attorney	-jerseygate -kaul's reputation	-represented kaul in kaul v heary	-unknown
152. Mark Murphy	-private equity manager _ orchestrated christie's 2009 gubernatorial campaign	-jerseygate -source of his donations	-met with kaul in august 2015 in his Parsippany office. Details of the meeting are included in a letter subsequently sent to murphy	-close to duhaime + christie
153. Michael DuHaime	-political strategist for christie	-jerseygate -racketeering	-had conference call with kaul in September 2015 in which he called the process of license reinstatement 'political' -sent subsequent e-mail in which he referred to the "due diligence" he had to undertake	-according to murphy he meets with Christie every day
154. Darius Nasiek	-interventional pain physician	-jerseygate -racketeering -what prompted nasiek to introduce kaul to murphy in only 2015 -kaul's reputation -kaul's business	-known kaul professionally since 2006 -introduced kaul to mark murphy	-unknown but has used mark murphy as his 'asset manager' for several years.
155. Teri Duda	-vice president of Berkeley college	-jerseygate -content of the discussions between her and Christie that involved comments about the fact that I had made enough money	-met kaul through al rossi in late 2013 -discussed using the spine Africa project to raise funds for hurricane sandy victims -	-was a very close political ally of christie
156. Robert Demers	-attorney commissioner of elections	-jerseygate -might have information on the corruption of the electoral process in 2013 which allowed Christie to defeat buono	-met kaul in 2012 through attorney alphonse rossi -met kaul on several occasions through 2013	-was fired by Christie in 2013 just before the gubernatorial elections -christie promised demers he would find another him another position but never did.

157.Vincent Prieto	-Hudson county politician	-jerseygate -racketeering	-was at the July 2015 inauguration of felix roque in west new york	-close to both Christie + roque
158.Didier Demesmin	-interventional pain physician	-kaul's reputation -kaul's business -jerseygate	-known kaul professionally since 2005	-unknown but senior member of njsipp
159.Kenneth Zahl	-Interventional pain physician	-jerseygate -racketeering -political corruption	-known kaul professionally since 2002	-unknown but was close to marc cohen
160.Sidra Bajwa	-rutgers student	-wrote an article in april 2013 that was published in the student newspaper The Observer. She was reprimanded for this and the article was removed from the website	-bajwa observed the initial part of the oal hearing	-unknown
161.Tameh Rohani	-rutgers student	-censoring of sidra bajwa for the publication of her article in The Observer -sent a letter to Joshua hoyos and farina patel	-worked with kaul on his public relations campaign in 2013	-unknown but is based at Rutgers which whose president is a close political ally of christie
162.David Basch	-orthopedic spine surgeon	-kaul's reputation -kaul's business	-known kaul professionally since 2003	-unknown but based in morris county and worked at Morristown hospital - was also a partner of cohen before they had a contentious split

163.Key Darrow 9/10	-patient	-kaul's reputation -jerseygate -political corruption	-known kaul since 2003 -darrow was involved in the nj republican party and attempted to talk with bucco, rumana and codey about what he and many other	-darrow was a member of the nj republican party

			patients felt was an unjust action against kaul. -darrow also testified on kaul's behalf in the oal -sent a letter to the Bergen record -had a conversation with a female republican who made a comment about political patronage	
164. Frank Cecala 7/10	-patient	-kaul's reputation -jerseygate -political corruption	-attempted to talk with christie whose children go to Delbarton and where cecala is the head groundsman	-is the head groundsman at Delbarton which is where christie's children attend school
165. Franklin	-driver	-jerseygate	-was stopped while driving njsr van through morris county and asked if the company was still in business -had a contentious arguemt with lorenzo who according to franklin was onessed with kaul' private life -assisted in procuring signatures in Newark for petition to christie	-none
166. Paul Schaff	-attorney	-jerseygate -political corruption	-represented kaul in a medical malpractice action and told kaul that the office of the n jag thought he would 'pack his bags and leave' with all the negative publicity	-unknown

			surrounding the suspension of his license	
167.Tracy Caldera	- njsr office administrator	-chapter 11	-known kaul professionally since 2008	-life was detrimentally affected by chrsitie's acts of political corruption
168.Yesenia Torres	-office biller	-jerseygate -human cost political corruption	-known kaul professionally since 2008	-life was detrimentally affected by christie's acts of political corruption

Exhibit 4



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> Indian American doctor sentenced to 63 months in prison says the criminal justice system failed her

Features NRI News

Indian American doctor sentenced to 63 months in prison says the criminal justice system failed her

By NRI Pulse Staff Writer | August 19, 2021

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BY VEENA RAO*

Until Dr. Vilasini Ganesh's ordeal began in 2016, she was living the American dream. She had a thriving medical practice, patients who looked up to her, and a beautiful home that she shared with her family— until she was accused of committing healthcare fraud and the FBI raided her Campbell Medical Group practice in Saratoga, California.

In the months that followed, Ganesh was sentenced to over five years in prison after a federal grand jury convicted her of five counts of health care fraud and five counts of making false statements. She lost her thriving medical practice, her medical license, her home, savings, and peace of mind.

Throughout the trial and in closing, Ganesh claims, the prosecutors presented an extensive array of fraudulent evidence to the jury that did not prove any false claims submitted by her, but rather the claims of a completely different provider. Also, she was forced to go to trial with an attorney who provided no defense whatsoever, in violation of her constitutional rights.



Vilasini Ganesh with her mother during happier times.

"I was prosecuted like a slave," Ganesh told *NRI Pulse*. "My family, children, and I have been put through severe psychological and emotional trauma. It feels like they have a knife to my throat and a gun to my head all the time. I've been waking up with nightmares for the past five years."

The one-time family medicine and urgent care physician said "her life changed upside down" when she decided to fight insurance companies for non-payment of over \$500,000 in patient care service claims dating back to 2012 for medical care provided to her patients.

"I reached out to the California Medical Association, and they gave me referrals to attorneys to reach out to. The attorneys suggested that I file a lawsuit against the insurance companies."

She said the insurance companies retaliated with fraud complaints. The Northern California Department of Justice initiated a health care fraud case against her and secured an indictment soon after.

"The prosecutor who initiated the indictment against me was also an affiliate of a private law firm that exclusively represents private "for-profit" insurance companies. Hence, she immediately recused herself due to conflict of interest after initiating the indictment charges," Ganesh said.

"The prosecutors presented over 40,000 patients records, billings, claims, and payments of an entirely different doctor's office to the jury during the trial and in closing arguments as proof of my healthcare fraud crimes."

"Normally these types of fraud cases are initiated by Medicare or Medicaid, but no government-or tax payer funded program was included in our case. The prosecutors came in.

They threatened me, they threatened my staff. They pressured me to take a plea deal. I was terrified, but I told them I would rather die than plead guilty. The insurance companies defrauded me. I did not defraud them."

In August 2018, after an eight-week trial, Ganesh was sentenced to 63 months in prison for making false statements related to a health care benefits program after a federal grand jury indicted her. The jury convicted Ganesh of five counts of health care fraud and five counts of making false statements. The defendants were acquitted of the remaining counts.

During Ganesh's sentencing hearing, the judge stated that Ganesh obstructed justice by misrepresenting her understanding of the legal system, the amount of money she was paid by insurers, and whether she understood that it was improper to "upcharge" when submitting claims to insurers. The judge also found that Ganesh had abused a position of trust by submitting the false claims, according to a DOJ statement.



Vilasini Ganesh (left) and her legal counsel Lisa Rasmussen spoke to NRI Pulse via Zoom.

Ganesh and her legal counsel Lisa Rasmussen, who is executive director of ACLU, (American Civil Liberties Union) Nevada spoke to *NRI Pulse* recently over Zoom. Both insist that the charges were false and the jury was tricked into believing false, fabricated evidence.

"They did not find anything against us, so they fabricated evidence. They took thousands of patients' records, claims from another doctor's office and blamed it on us," Ganesh said. "We did not realize this during the trial because they had redacted the tax ID and provider names. After the trial, one of the attorneys discovered thousands of claims in the form of spreadsheets from another doctor's office. They committed fraud over the jury."

As part of evidence, checks purportedly written way back in 1988 were presented. "They sentenced me based on checks issued way back when I was a teenager in India. I wasn't even in the US in 1988," Ganesh said.

"Most importantly the prosecutors did not hire any medical billing experts for this entire case. Also, no audits by the government nor the insurance companies to show clear evidence of loss calculations."

The other significant claim that Rasmussen brought on Ganesh's behalf was the Sixth Amendment rights violation. (The Sixth Amendment guarantees the right to a public trial without unnecessary delay, the right to an effective lawyer, the right to an impartial jury, and the right to know who your accusers are and the nature of the charges and evidence against you.)

Ganesh said her trial attorney charged her over \$100,000, but provided no defense whatsoever.

"In his opening arguments, he said, 'I agree with the prosecutors' in front of the jury and threw me under the bus. He didn't even have patients as witnesses. He did not show me what the government case was. He put up an insanity defense which made no sense."

"I asked for a change of attorney twice before trial. But no inquiry was conducted. I was forced to go to trial with a bad lawyer. That's a huge Sixth Amendment Rights violation."

"When I tried to talk, they threatened to revoke my bail. I was very scared. I had to shut my mouth. I could have defended myself, but they did not allow me to do that," Ganesh added.

Rasmussen sought bail pending appeal for Ganesh. Any day, Ganesh will get an order to surrender to begin her 63-month sentence.

The Ninth Circuit court has denied her appeal and affirmed the conviction. "We filed a petition for rehearing. That has been denied," Rasmussen said. "I filed a motion to stay the mandate, to file a petition in the US Supreme Court which is the only other thing she can do."

Ganesh told *NRI Pulse* her family is devastated by the developments. "I have young children whose mother will be taken away from them. My mother who lives in the Bay area has used up over 300K- her life's savings- to help me with attorney's legal fees. My brother is trying to help."

Ganesh and her family are currently living in an apartment on a month-to-month lease.

Ganesh's next step would be to get a lawyer to help with post-conviction claims, which she has to do from custody, Rasmussen said. "The most sympathetic part of her claims is the Court's repeated ongoing denial of the right to counsel of her choice which is such an important aspect of our criminal justice system. They are really good appellate claims. The ninth circuit appellate court's denial of those claims is just inexplicable. They didn't even follow their own case law and authority. She is yet to litigate the ineffective counsel claim which would be her next step. This is really messed up."

"The ninth circuit has reversed such cases before. The Supreme Court has reversed several cases based on ineffective counsel. The Northern California US district courts also the ninth circuit appellate court did not follow their own case laws for me," said an emotional Ganesh.

Healthcare advocate and founder of Doctors of Courage, Linda Cheek MD, believes the Department of Justice has cookie-cutter methods that they use now against doctors, more and more of which are actually criminal in action, breaking the law in order to convict an innocent doctor.



Dr. Linda Cheek

"Even when as in Dr. Ganesh's case, egregious false evidence is used to convict her, and when exposed, the court does nothing to correct the law-breaking or hold those who did it responsible. This gives the entire DOJ license to break the law to convict innocent people," she told *NRI Pulse* via email.

"Techniques that the DOJ uses regularly, and are even being trained to use, are to modify records that are brought into trial. Changing names and dates on medical records, redacting exculpatory evidence on the chart, and altering audio recordings of visits are just some of the egregious actions. They also then force patients of the doctor to be witnesses and commit perjury or face charges of possession with intent to distribute and go to prison themselves if

they don't."

"In all of the cases I have researched, I have yet to find a single one where these tactics have not been used to get a doctor to either plea, or be convicted in court."

Cheek said these same tactics were used against her, "including the government calling in a prescription illegally in my name to add to my charges. Every doctor that has contacted me about their case expresses their surprise at the illegal actions the DOJ has used against them. And yet none of this is exposed."

Ganesh believes her case could set a very dangerous precedence for government abuse of power against physicians, business owners, government contract workers, tech executives, even Wall Street CEOs.

"Anyone can be targeted, attacked, and destroyed based on false fabricated evidence," she said.

PHOTO COURTESY OF NRI PULSE

**Veena Rao is the editor-in-chief of NRI Pulse and the author of Purple Lotus.*



PREVIOUS STORY

One-time billionaire likely to accuse Indian American ex-boyfriend of emotional and sexual abuse during her trial

NEXT STORY

Indian-origin Uber driver dies after being accidentally shot by 15-year-old

Exhibit 5

UNITED STATES DISTRICT
FOR THE DISTRICT OF NEW JERSEY

RICHARD ARJUN KAUL, MD

CIVIL ACTION NO.: 6-CV-0 364-MJV-JAD

Plaintiff,

v.

ADMISSIONS BY DEFENDANT ATLANTIC HEALTH
SYSTEM OF UNDISPUTED FACTS

CHRISTOPHER J. CHRISTIE, ET AL.

Defendants.

Defendant ATLANTIC HEALTH SYSTEM ("AHS") has caused to be admitted the following undisputed facts.

I have no defense to the arguments submitted by Kaul in his motions for the entry of summary judgment: ((1) Defendant AHS defenses are based entirely on the evidence of the revocation of Kaul's license, evidence that has been disproved/negated by the evidence contained in 'The Solomon Critique' + 'The Solomon Critique ' (D.E. 99 Page ID 70 7) (2) Kaul has dismantled the entire body of evidence, upon which Defendant AHS fabricated its knowingly false defenses (D.E. 99 Page ID 7035); (3) Kaul has submitted evidence in proof of all claim elements, and has satisfied the summary judgment standard that there exists no genuine issue of material fact (D.E. 99 Page ID 704); (4) and thus I have no defense to Kaul's legally sufficient claims; (6) and I unreservedly accept that he has proved his case.

1. COUNT THREE: VIOLATIONS OF EIGHTEEN U.S.C. 1962(C)-(D) – THE RACKETEER AND CORRUPT INFLUENCED ORGANIZATIONS ACT, EIGHTEEN U.S.C. 1961, ET SEQ:

(a) culpable person who willfully or knowingly:

I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006 and continued into 2019.

I admit that I engaged in a pattern of racketeering with other defendants in a period that commenced in approximately 2006, continued into 2019 and occurred in multiple locations in the US, and across the US mail and wires.

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

I admit that I knew the purpose of having engaged in a pattern of racketeering was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I do not refute/contest/rebut/deny the evidence contained within the following documents: (t) The Waldman E-mail (D.E. 99 Page ID 7047); (1) The Zerbini Certification (D.E. 99 Page ID 704); (3) The Sabo Certification (D.E. 99 Page 7053); (4) The Solomon Critique (D.E. 99 Page ID 7053); (5) The Solomon Critique (D.E. 99 Page ID 7054); (6) The Calabrese Certification (D.E. 99 Page ID 7054); (7) The Przybylski Disciplinary Notice (D.E. 99 Page ID 7056); (8) The Feldman Certification (D.E. 99 Page ID 7057); (9) The Yeung E-mail (D.E. 99 Page ID 705); (10) The Union County Court proceedings (D.E. 99 Page ID 7060); (11) The Ciarrocca Complaint (D.E. 99 Page ID 706); (12) The Federal Trade Commission Guidelines (D.E. 99 Page ID 7063).

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f a).

(b) commits or conspires to the commission of "racketeering activity":

In a period from 2006 to 2019, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state to agencies and power to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f b).

(c) through a "pattern"

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (§c).

(d) involving a separate "enterprise" or "association in fact"

In a period from 2006 to 2019, I admit that I, in concert and conspiracy with other defendants, knowingly, willfully and illegally converted administrative, state and federal courts within the geographic boundaries of New Jersey into racketeering enterprises, to further the scheme to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (§ d).

(e) an effect on interstate or foreign commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (§e).

(f) "purpose"

In approximately 2006, I in concert and conspiracy with other defendants commenced engaging in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors, agencies and administrative, state and federal courts within the geographic boundaries of New Jersey. I knew that the purpose of these schemes was

to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

2. COUNT FIVE: FOR DECLATORY AND INJUNCTIVE RELIEF UNDER SECTION 16 OF THE CLAYTON ACT FOR DEFENDANTS VIOLATION OF SECTIONS 1 AND 2 OF THE SHERMAN ACT:

(a) conspiracy or agreement.

Commencing in 2006 and continuing into 2019, I engaged in thousands of email, telephone and in person communications with other defendants, at multiple locations within the US, and across the US mail and wires. I admit that these communications were part of a conspiracy to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes and agreements were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) knowingly joining the conspiracy

I admit that in 2006 I knowingly joined the conspiracy with other defendants and was fully cognizant of its illegality. I admit that upon joining the conspiracy I did not believe that Kaul would expose my crimes and that I would be subjected to civil suit, and the threat of criminal prosecution.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) per se rule

I knew that when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery, it was illegal and a violation of the per se rule of the antitrust law.

I knew that when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within

the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery, it was illegal and would reduce the provision and increase the cost of minimally invasive spine surgery to the public.

I admit that when I violated antitrust law by conspiring and colluding with other defendants to eliminate Kaul from the practice of medicine and minimally invasive spine surgery I knew that: (1) it was illegal and; (2) would reduce the provision and increase the cost of minimally invasive spine surgery to the public; (3) but that I possessed a criminal state of mind and believed Kaul would not expose my crimes.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) interstate or foreign trade and commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) possession of monopoly power in the relevant market

I admit: (1) that as a consequence of the bribes paid by myself and other defendants to Defendant Christie, the medical board revoked Kaul's license; (2) that the revocation was illegal; (3) that the prolonged publicity from 2012 to 2016 about Kaul was malicious and slanderous; (4) that this publicity intimidated other minimally invasive spine surgeons from performing minimally invasive spine surgery; (5) that the revocation, publicity and intimidation permitted me and other defendants to come into possession of monopoly power in the American minimally invasive spine surgery market.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) willful acquisition or maintenance of monopoly power as distinguished from growth due to superior product, business acumen or historic accident

I admit that my monopolization of the American minimally invasive spine surgery market was: (1) obtained illegally; (2) through bribing Defendant Christie; (3) to have the medical board revoke Kaul's license; (4) and was not a consequence of fairly competing in the American minimally invasive spine surgery market; (5) nor providing a superior clinical service; (5) nor a result of an unforeseen set of circumstances or historic accident.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

3. COUNT SIX: FOR MONOPOLIZATION:

(a) possession of monopoly power in the relevant market.

I admit: (1) that as a consequence of the bribes paid by myself and other defendants to Defendant Christie, the medical board revoked Kaul's license; (2) that the revocation was illegal; (3) that the prolonged publicity from 2012 to 2016 about Kaul was malicious and slanderous; (4) that this publicity intimidated other minimally invasive spine surgeons from performing minimally invasive spine surgery; (5) that the revocation, publicity and intimidation permitted me and other defendants to come into possession of monopoly power in the American minimally invasive spine surgery market.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) Willful acquisition or maintenance of monopoly power as distinguished from growth due to superior product, business acumen

I admit that my monopolization of the American minimally invasive spine surgery market was: (1) obtained illegally; (2) through bribing Defendant Christie; (3) to have the medical board revoke Kaul's license; (4) and was not a consequence of fairly competing in the American minimally invasive spine surgery market; (5) nor providing a superior clinical service; (5) nor a result of an unforeseen set of circumstances or historic accident.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

4. COUNT SEVEN: FOR CONSPIRACY TO MONOPOLIZE UNDER STATE LAW:

(a) conspiracy or agreement

In a period from 2006 to 2019 I conspired with other defendants: (1) in a knowingly illegal quid pro quo scheme; (2) in which I used email, telephone and country wide in person meetings to further the scheme; (3) which involved bribing Defendant Christie to have the medical board revoke Kaul's license; (4) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (5) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) knowingly joining the conspiracy

I admit that: (1) in a period commencing in or about 2006 I willfully joined and participated in a knowingly illegal conspiracy and; (2) quid pro scheme; (3) to have Kaul's license revoked; (4) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (5) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) per se rule

I knew that: (1) when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (2) it was illegal and a violation of the per se rule of the antitrust law.

I knew that: (1) when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (2) it was illegal and would reduce the provision and increase the cost of minimally invasive spine surgery to the public.

I admit that: (1) when I violated antitrust law by conspiring and colluding with other defendants to eliminate Kaul from the practice of medicine and minimally invasive spine surgery I knew that; (2) it was illegal and; (3) would reduce the provision and increase the cost of minimally invasive spine surgery to the public; (4) but that I possessed a criminal state of mind and believed Kaul would not expose my crimes.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) interstate or foreign trade and commerce

I admit that: (1) I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity; (2) a trade restriction that would have a detrimental effect on interstate and or foreign commerce; (3) and would reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014: (1) I participated with other defendants in hundreds of email, telephone and in person communications; (2) in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

After the revocation of Kaul's license on March 12, 2014: (1) I participated with other defendants in hundreds of email, telephone and in person communications; (2) in which we predicted and celebrated the imminent descent of Kaul and his family into poverty.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) single versus multiple conspiracies

I admit that: (1) in or about 2006 I began participating in a conspiracy with other defendants; (2) in a knowingly illegal quid pro quo scheme; (3) in which I used email, telephone and country wide in person meetings to further the scheme; (4) which involved bribing Defendant Christie to have the medical board revoke Kaul's license; (5) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (6) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that: (1) in or about 2006 I began to acquire knowledge that other defendants were participating in multiple conspiracies; (2) purposed to have Kaul's license revoked; (3) in order to eliminate him from the practice of medicine and

minimally invasive spine surgery; (4) and that these schemes involved bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.

I admit that: (1) in or about 2006 to 2019 I commenced engaging in a repeated pattern of corruption of administrative, state and federal courts within the geographic boundaries of New Jersey; (2) the purpose of which was to deprive Kaul of any access to justice; (3) strip him of his medical license; (4) his property; (5) his reputation; (6) his material assets; (7) deprive him of banking services and have him jailed, deported and or die.

I admit that: (1) in or about 2006 I began to acquire knowledge that other defendants were participating in multiple conspiracies; (2) purposed to have Kaul's license revoked; (3) in order to eliminate him from the practice of medicine and minimally invasive spine surgery; (4) and that these schemes involved bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

5. COUNT EIGHT: FOR CONSPIRACY AND COMBINATION IN RESTRAINT OF TRADE UNDER STATE LAW:

(a) combination or conspiracy between or among the Defendants to allocate the market for minimally invasive spine surgery

I admit that I and other defendants: (1) through thousands of email, telephone and country wide in person communications; (2) in a knowingly illegal scheme did conspire to artificially divide the American minimally invasive spine surgery market; (3) by allocating minimally invasive fusions to hospitals and neurosurgeons; (4) and agreeing to only perform minimally invasive discectomies; (5) and did implement policies of not granting hospital privileges to minimally invasive spine surgeons.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) that such combination or conspiracy constituted an "unreasonable" restraint on interstate commerce as hereafter

I admit that in approximately 2006 I knew: (1) that my participation in the scheme to revoke Kaul's license was illegal; (2) that it constituted and caused an unreasonable and arbitrary restraint on interstate commerce; (3) that it would artificially restrict access of the American public to life-saving minimally invasive spine surgery; (4) that

it would cause an increase in the use of opiates; (5) and opiate related overdose deaths.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) that the Defendants business activities had a substantial effect on interstate commerce and the Defendants challenged activities involve a substantial amount of interstate commerce

I admit that my participation in: (1) schemes of bribery and public corruption; (2) to have Kaul's license revoked; (3) would and did cause a substantial reduction on interstate commerce; (4) a consequence that I knew would occur because; (5) I knew Kaul had plans to expand his minimally invasive spine surgery business across the US; (6) and that the illegal revocation of his New Jersey license would prevent him from obtaining a medical license anywhere in the world.

I admit that I knew; () my scheme to prevent Kaul from working anywhere in the world; () was premediated and criminal; (3) and would reduce tax revenues to the federal government; (4) but I did not believe that Kaul would expose my crimes; (5) and that even if he did, he would be unable to bring me to justice; (6) because I was convinced Defendant Christie would become the 06 American President; (7) and Kaul is not a lawyer; () and would be either bankrupt, jailed, deported or dead.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) that the plaintiff suffered in its business or property as a proximate result of the combination or conspiracy

I admit I knew: () that my participation with other defendants in the conspiracy to; () destroy Kaul's reputation, economic standing, livelihood and ability to support his family; (3) would cause substantial injury to Kaul's business and or property; (4) and that this injury was premediated and criminal; (6) conducted through schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks; (5) and purposed to eliminate him from the practice of medicine and minimally invasive spine surgery; (6) in order to permit me and other defendants to monopolize the American minimally invasive spine surgery market; (7) and reap unjust profits and illegal enrichment at the expense of Kaul and the American public.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

6. COUNT NINE: FOR UNFAIR AND DECEPTIVE TRADE PRACTICES UNDER STATE LAW:

(a) defendant engaged in an act or practice that was materially deceptive:

(b) the challenged act or practice:

I admit that in a period commencing in 2006, I in conspiracy and collusion with other defendants: () participated in a massive scheme of deception and unfair trade practices, conducted through thousands of emails, telephone and country wide in person communications; (2) that involved imparting knowingly dishonest information to the public, patients, physicians, juries and judges, that Kaul was not qualified to perform minimally invasive spine surgery; (3) that Kaul had committed insurance fraud; (4) that Kaul had committed Medicare fraud; (5) that Kaul was going to be indicted; (6) that Kaul had been found guilty by a grand jury; (7) and that the purpose of these acts of deception was to destroy Kaul's reputation and livelihood.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b).

(c) the consumer suffered an injury because of the deceptive act or practice:

I intended that my acts of deception would injure Kaul by destroying: (1) his ability to earn a living and support his family; (2) his personal reputation; (3) his professional reputation; (4) his material assets; (4) and causing him to become ostracized, homeless, fall into a state of poverty and be jailed.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

7. COUNT TEN: UNJUST ENRICHMENT:

(a) defendant benefitted

(b) defendant benefitted at plaintiff's expense

Consequent to the revocation of Kaul's license in 2014 I was unjustly enriched at his expense, because: (1) his patients were diverted to my practice and my annual revenues increased; () the provision of minimally invasive spine surgery became restricted to hospitals and neurosurgeons consequent to legislation signed by Defendant Christie, who received bribes from me and other defendants, as part of a series of quid pro quo schemes; (3) other minimally invasive spine surgeons became intimidated to perform outpatient percutaneous fusions after the widely publicized revocation of Kaul's license; (4) other minimally invasive spine surgeons were denied

privileges for minimally invasive spine surgery at hospitals because of the neurosurgeons influence in the hospital, a consequence of the enormous monies they generate for hospitals; (5) my political standing within the medical community increased after I had participated in the scheme to revoke Kaul's license, and my referral rate increased.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b).

(c) that equity and good conscience require restitution

I admit that because I was unjustly enriched at the expense of Kaul I must, in a sense of equity and good conscience, pay him restitution to the full extent of his demands for monetary compensation.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

8. COUNT TWELVE: COMMERCIAL DISPRAGEMENT:

(a) a statement by defendant/s about plaintiff that

(b) was made public

(c) was false

(d) caused damage

(e) caused economic loss

Commencing in approximately 006: () I in concert with other defendants have made hundreds of knowingly false public statements about Kaul; () that were purposed and indeed caused damage and total economic loss to Kaul because he lost; (3) all his material assets, including his home, the house in which his children lived, his surgical center, a license to build another surgical center, his medical corporations, his accounts receivable, his medical license, his livelihood, his reputation, his ability to earn a living; (4) and because he is now unable to find work anywhere in the world, has become homeless, was forced into a state of poverty and is even unable to claim welfare.

I admit that I and other defendants made knowingly false public statements about Kaul with the intention of causing these severe economic and reputational injuries.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

9. COUNT THIRTEEN: INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE:

- (a) economic relationship between plaintiff and some third party with the probability of future economic benefit
- (b) defendants knowledge of the relationship
- (c) intentional acts on the part of the defendant/s designed to disrupt the relationship
- (d) actual disruption of the relationship
- (e) economic harm to plaintiff proximately caused by the acts of the defendant/s

In 2006 I knew that when I started conspiring and colluding with other defendants to: (1) have Kaul's license revoked; (2) destroy his reputation; (3) destroy his economic standing; (4) destroy his livelihood; (5) destroy his ability to support his children; (6) and cause him to lose all his material assets; (7) that there existed economic relationships between Kaul, his patients and their insurance carriers, that promised future economic benefit. It was my intention and that of other defendants to disrupt these relationships, and I admit that our crimes against Kaul did cause actual disruption, irreparable economic harm and almost caused him to lose his life in July 05, when he sustained two severe life-threatening seizures. I admit that our crimes were the proximate cause of these injuries to Kaul's economic standing, health and welfare.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

10. COUNT FOURTEEN: AID IN THE COMMISSION OF TORT:

- (a) combination of two or more persons
- (b) a real agreement or confederation with a common design
- (c) the existence of an unlawful purpose, or of a lawful purpose to be achieved by unlawful means
- (d) proof of special damages

I admit that I conspired with other defendants to create an actual agreement with a purpose of having Kaul's license revoked through knowingly unlawful means, that included: () bribery; () public corruption; () judicial corruption; (3) fraud; (4) kickbacks; (5) racketeering; (6) perjury; (7) evidential falsification; () witness tampering; (9) and extortion; (0) and I am aware that legal records prove the damage caused to the economic standing and reputation of Kaul by crimes committed by myself and other defendants.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d).

Dated: July 7, 00.

Defendant ATLANTIC HEALTH SYSTEM has caused to be admitted the above undisputed facts.

Defendant ATLANTIC HEALTH SYSTEM certifies that the above information is true and accurate to the best of its knowledge, and that if it is proved that the above facts are willfully misrepresented, then it will be subject to punishment.

UNITED STATES DISTRICT
FOR THE DISTRICT OF NEW JERSEY

RICHARD ARJUN KAUL, MD

CIVIL ACTION NO.: 6-CV-0 364-MJV-JAD

Plaintiff,

v.

ADMISSIONS BY DEFENDANT ATLANTIC HEALTH
SYSTEM OF UNDISPUTED FACTS

CHRISTOPHER J. CHRISTIE, ET AL.

Defendants.

Defendant ATLANTIC HEALTH SYSTEM has caused to be admitted the following undisputed facts.

1. COUNT THREE: VIOLATIONS OF EIGHTEEN U.S.C. 1962(C)-(D) – THE RACKETEER AND
CORRUPT INFLUENCED ORGANIZATIONS ACT, EIGHTEEN U.S.C. 1961, ET SEQ:

(a) culpable person who willfully or knowingly:

I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006 and continued into 2019.

I admit that I engaged in a pattern of racketeering with other defendants in a period that commenced in approximately 2006, continued into 2019 and occurred in multiple locations in the US, and across the US mail and wires.

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

I admit that I knew the purpose of having engaged in a pattern of racketeering was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I do not refute/contest/rebut/deny the evidence contained within the following documents: () The Waldman E-mail (D.E. 99 Page ID 7047); () The Zerbini Certification (D.E. 99 Page ID 704); (3) The Sabo Certification (D.E. 99 Page 7053); (4) The Solomon Critique (D.E. 99 Page ID 7053); (5) The Solomon Critique (D.E. 99 Page ID 7054); (6) The Calabrese Certification (D.E. 99 Page ID 7054); (7) The Przybylski Disciplinary Notice (D.E. 99 Page ID 7056); () The Feldman Certification (D.E. 99 Page ID 7057); (9) The Yeung E-mail (D.E. 99 Page ID 705); (0) The Union County Court proceedings (D.E. 99 Page ID 7060); () The Ciarrocca Complaint (D.E. 99 Page ID 706); () The Federal Trade Commission Guidelines (D.E. 99 Page ID 7063).

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) commits or conspires to the commission of "racketeering activity":

In a period from 2006 to 2019, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state to agencies and power to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) through a "pattern"

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) involving a separate "enterprise" or "association in fact"

In a period from 2006 to 2019, I admit that I, in concert and conspiracy with other defendants, knowingly, willfully and illegally converted administrative, state and federal courts within the geographic boundaries of New Jersey into racketeering

enterprises, to further the scheme to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) an effect on interstate or foreign commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) "purpose"

In approximately 2006, I in concert and conspiracy with other defendants commenced engaging in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors, agencies and administrative, state and federal courts within the geographic boundaries of New Jersey. I knew that the purpose of these schemes was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

2. COUNT FIVE: FOR DECLATORY AND INJUNCTIVE RELIEF UNDER SECTION 16 OF THE CLAYTON ACT FOR DEFENDANTS VIOLATION OF SECTIONS 1 AND 2 OF THE SHERMAN ACT:

(a) conspiracy or agreement.

Commencing in 2006 and continuing into 2019, I engaged in thousands of email, telephone and in person communications with other defendants, at multiple locations within the US, and across the US mail and wires. I admit that these communications were part of a conspiracy to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes and agreements were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) knowingly joining the conspiracy

I admit that in 2006 I knowingly joined the conspiracy with other defendants and was fully cognizant of its illegality. I admit that upon joining the conspiracy I did not believe that Kaul would expose my crimes and that I would be subjected to civil suit, and the threat of criminal prosecution.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) per se rule

I knew that when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery, it was illegal and a violation of the per se rule of the antitrust law.

I knew that when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery, it was illegal and would reduce the provision and increase the cost of minimally invasive spine surgery to the public.

I admit that when I violated antitrust law by conspiring and colluding with other defendants to eliminate Kaul from the practice of medicine and minimally invasive spine surgery I knew that: (1) it was illegal and; (2) would reduce the provision and

increase the cost of minimally invasive spine surgery to the public; (3) but that I possessed a criminal state of mind and believed Kaul would not expose my crimes.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) interstate or foreign trade and commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) possession of monopoly power in the relevant market

I admit: (1) that as a consequence of the bribes paid by myself and other defendants to Defendant Christie, the medical board revoked Kaul's license; (2) that the revocation was illegal; (3) that the prolonged publicity from 2012 to 2016 about Kaul was malicious and slanderous; (4) that this publicity intimidated other minimally invasive spine surgeons from performing minimally invasive spine surgery; (5) that the revocation, publicity and intimidation permitted me and other defendants to come into possession of monopoly power in the American minimally invasive spine surgery market.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) willful acquisition or maintenance of monopoly power as distinguished from growth due to superior product, business acumen or historic accident

I admit that my monopolization of the American minimally invasive spine surgery market was: (1) obtained illegally; (2) through bribing Defendant Christie; (3) to have the medical board revoke Kaul's license; (4) and was not a consequence of fairly competing in the American minimally invasive spine surgery market; (5) nor providing a superior clinical service; (5) nor a result of an unforeseen set of circumstances or historic accident.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

3. COUNT SIX: FOR MONOPOLIZATION:

(a) possession of monopoly power in the relevant market.

I admit: (1) that as a consequence of the bribes paid by myself and other defendants to Defendant Christie, the medical board revoked Kaul's license; (2) that the revocation was illegal; (3) that the prolonged publicity from 2012 to 2016 about Kaul was malicious and slanderous; (4) that this publicity intimidated other minimally invasive spine surgeons from performing minimally invasive spine surgery; (5) that the revocation, publicity and intimidation permitted me and other defendants to come into possession of monopoly power in the American minimally invasive spine surgery market.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) Willful acquisition or maintenance of monopoly power as distinguished from growth due to superior product, business acumen

I admit that my monopolization of the American minimally invasive spine surgery market was: (1) obtained illegally; (2) through bribing Defendant Christie; (3) to have the medical board revoke Kaul's license; (4) and was not a consequence of fairly competing in the American minimally invasive spine surgery market; (5) nor providing a superior clinical service; (5) nor a result of an unforeseen set of circumstances or historic accident.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

4. COUNT SEVEN: FOR CONSPIRACY TO MONOPOLIZE UNDER STATE LAW:

(a) conspiracy or agreement

in a period from 2006 to 2019 I conspired with other defendants: (1) in a knowingly illegal quid pro quo scheme; (2) in which I used email, telephone and country wide in person meetings to further the scheme; (3) which involved bribing Defendant Christie to have the medical board revoke Kaul's license; (4) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (5) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) knowingly joining the conspiracy

I admit that: (1) in a period commencing in or about 2006 I willfully joined and participated in a knowingly illegal conspiracy and; (2) quid pro scheme; (3) to have Kaul's license revoked; (4) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (5) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) per se rule

I knew that: (1) when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (2) it was illegal and a violation of the per se rule of the antitrust law.

I knew that: (1) when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (2) it was illegal and would reduce the provision and increase the cost of minimally invasive spine surgery to the public.

I admit that: (1) when I violated antitrust law by conspiring and colluding with other defendants to eliminate Kaul from the practice of medicine and minimally invasive spine surgery I knew that: (2) it was illegal and; (3) would reduce the provision and increase the cost of minimally invasive spine surgery to the public; (4) but that I possessed a criminal state of mind and believed Kaul would not expose my crimes.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) interstate or foreign trade and commerce

I admit that: (1) I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity; (2) a trade restriction that would have a detrimental effect on interstate and or foreign commerce; (3) and would reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014: (1) I participated with other defendants in hundreds of email, telephone and in person communications; (2) in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

After the revocation of Kaul's license on March 12, 2014: (1) I participated with other defendants in hundreds of email, telephone and in person communications; (2) in which we predicted and celebrated the imminent descent of Kaul and his family into poverty.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) single versus multiple conspiracies

I admit that: (1) in or about 2006 I began participating in a conspiracy with other defendants; (2) in a knowingly illegal quid pro quo scheme; (3) in which I used email, telephone and country wide in person meetings to further the scheme; (4) which involved bribing Defendant Christie to have the medical board revoke Kaul's license; (5) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (6) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that: (1) in or about 2006 I began to acquire knowledge that other defendants were participating in multiple conspiracies; (2) purposed to have Kaul's license revoked; (3) in order to eliminate him from the practice of medicine and minimally invasive spine surgery; (4) and that these schemes involved bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.

I admit that: (1) in or about 2006 to 2019 I commenced engaging in a repeated pattern of corruption of administrative, state and federal courts within the geographic boundaries of New Jersey; (2) the purpose of which was to deprive Kaul of any access to justice; (3) strip him of his medical license; (4) his property; (5) his

reputation; (6) his material assets; (7) deprive him of banking services and have him jailed, deported and or die.

I admit that: (1) in or about 2006 I began to acquire knowledge that other defendants were participating in multiple conspiracies; (2) purposed to have Kaul's license revoked; (3) in order to eliminate him from the practice of medicine and minimally invasive spine surgery; (4) and that these schemes involved bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

5. COUNT EIGHT: FOR CONSPIRACY AND COMBINATION IN RESTRAINT OF TRADE UNDER STATE LAW:

(a) combination or conspiracy between or among the Defendants to allocate the market for minimally invasive spine surgery

I admit that I and other defendants: (1) through thousands of email, telephone and country wide in person communications; (2) in a knowingly illegal scheme did conspire to artificially divide the American minimally invasive spine surgery market; (3) by allocating minimally invasive fusions to hospitals and neurosurgeons; (4) and agreeing to only perform minimally invasive discectomies; (5) and did implement policies of not granting hospital privileges to minimally invasive spine surgeons.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) that such combination or conspiracy constituted an "unreasonable" restraint on interstate commerce as hereafter

I admit that in approximately 2006 I knew: (1) that my participation in the scheme to revoke Kaul's license was illegal; (2) that it constituted and caused an unreasonable and arbitrary restraint on interstate commerce; (3) that it would artificially restrict access of the American public to life-saving minimally invasive spine surgery; (4) that it would cause an increase in the use of opiates; (5) and opiate related overdose deaths.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) that the Defendants business activities had a substantial effect on interstate commerce and the Defendants challenged activities involve a substantial amount of interstate commerce

I admit that my participation in: (1) schemes of bribery and public corruption; (2) to have Kaul's license revoked; (3) would and did cause a substantial reduction on interstate commerce; (4) a consequence that I knew would occur because; (5) I knew Kaul had plans to expand his minimally invasive spine surgery business across the US; (6) and that the illegal revocation of his New Jersey license would prevent him from obtaining a medical license anywhere in the world.

I admit that I knew; () my scheme to prevent Kaul from working anywhere in the world; () was premediated and criminal; (3) and would reduce tax revenues to the federal government; (4) but I did not believe that Kaul would expose my crimes; (5) and that even if he did, he would be unable to bring me to justice; (6) because I was convinced Defendant Christie would become the 06 American President; (7) and Kaul is not a lawyer; () and would be either bankrupt, jailed, deported or dead.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) that the plaintiff suffered in its business or property as a proximate result of the combination or conspiracy

I admit I knew: () that my participation with other defendants in the conspiracy to; () destroy Kaul's reputation, economic standing, livelihood and ability to support his family; (3) would cause substantial injury to Kaul's business and or property; (4) and that this injury was premediated and criminal; (6) conducted through schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks; (5) and purposed to eliminate him from the practice of medicine and minimally invasive spine surgery; (6) in order to permit me and other defendants to monopolize the American minimally invasive spine surgery market; (7) and reap unjust profits and illegal enrichment at the expense of Kaul and the American public.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

6. COUNT NINE: FOR UNFAIR AND DECEPTIVE TRADE PRACTICES UNDER STATE LAW:

(a) defendant engaged in an act or practice that was materially deceptive:

(b) the challenged act or practice:

I admit that in a period commencing in 2006, I in conspiracy and collusion with other defendants: () participated in a massive scheme of deception and unfair trade practices, conducted through thousands of emails, telephone and country wide in person communications; (2) that involved imparting knowingly dishonest information to the public, patients, physicians, juries and judges, that Kaul was not qualified to perform minimally invasive spine surgery; (3) that Kaul had committed insurance fraud; (4) that Kaul had committed Medicare fraud; (5) that Kaul was going to be indicted; (6) that Kaul had been found guilty by a grand jury; (7) and that the purpose of these acts of deception was to destroy Kaul's reputation and livelihood.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b).

(c) the consumer suffered an injury because of the deceptive act or practice:

I intended that my acts of deception would injure Kaul by destroying: (1) his ability to earn a living and support his family; (2) his personal reputation; (3) his professional reputation; (4) his material assets; (4) and causing him to become ostracized, homeless, fall into a state of poverty and be jailed.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

7. COUNT TEN: UNJUST ENRICHMENT:

(a) defendant benefitted

(b) defendant benefitted at plaintiff's expense

Consequent to the revocation of Kaul's license in 2014 I was unjustly enriched at his expense, because: (1) his patients were diverted to my practice and my annual revenues increased; () the provision of minimally invasive spine surgery became restricted to hospitals and neurosurgeons consequent to legislation signed by Defendant Christie, who received bribes from me and other defendants, as part of a series of quid pro quo schemes; (3) other minimally invasive spine surgeons became intimidated to perform outpatient percutaneous fusions after the widely publicized revocation of Kaul's license; (4) other minimally invasive spine surgeons were denied privileges for minimally invasive spine surgery at hospitals because of the neurosurgeons influence in the hospital, a consequence of the enormous monies they generate for hospitals; (5) my political standing within the medical community increased after I had participated in the scheme to revoke Kaul's license, and my referral rate increased.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b).

(c) that equity and good conscience require restitution

I admit that because I was unjustly enriched at the expense of Kaul I must, in a sense of equity and good conscience, pay him restitution to the full extent of his demands for monetary compensation.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

8. COUNT TWELVE: COMMERCIAL DISPRAGEMENT:

(a) a statement by defendant/s about plaintiff that

(b) was made public

(c) was false

(d) caused damage

(e) caused economic loss

Commencing in approximately 006: () I in concert with other defendants have made hundreds of knowingly false public statements about Kaul; () that were purposed and indeed caused damage and total economic loss to Kaul because he lost; (3) all his material assets, including his home, the house in which his children lived, his surgical center, a license to build another surgical center, his medical corporations, his accounts receivable, his medical license, his livelihood, his reputation, his ability to earn a living; (4) and because he is now unable to find work anywhere in the world, has become homeless, was forced into a state of poverty and is even unable to claim welfare.

I admit that I and other defendants made knowingly false public statements about Kaul with the intention of causing these severe economic and reputational injuries.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

9. COUNT THIRTEEN: INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE:

- (a) economic relationship between plaintiff and some third party with the probability of future economic benefit
- (b) defendants knowledge of the relationship
- (c) Intentional acts on the part of the defendant/s designed to disrupt the relationship
- (d) actual disruption of the relationship
- (e) economic harm to plaintiff proximately caused by the acts of the defendant/s

In 2006 I knew that when I started conspiring and colluding with other defendants to: (1) have Kaul's license revoked; (2) destroy his reputation; (3) destroy his economic standing; (4) destroy his livelihood; (5) destroy his ability to support his children; (6) and cause him to lose all his material assets; (7) that there existed economic relationships between Kaul, his patients and their insurance carriers, that promised future economic benefit. It was my intention and that of other defendants to disrupt these relationships, and I admit that our crimes against Kaul did cause actual disruption, irreparable economic harm and almost caused him to lose his life in July 05, when he sustained two severe life-threatening seizures. I admit that our crimes were the proximate cause of these injuries to Kaul's economic standing, health and welfare.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

10. COUNT FOURTEEN: AID IN THE COMMISSION OF TORT:

- (a) combination of two or more persons
- (b) a real agreement or confederation with a common design
- (c) the existence of an unlawful purpose, or of a lawful purpose to be achieved by unlawful means
- (d) proof of special damages

I admit that I conspired with other defendants to create an actual agreement with a purpose of having Kaul's license revoked through knowingly unlawful means, that included: (1) bribery; (2) public corruption; (3) judicial corruption; (4) fraud; (5)

kickbacks; (5) racketeering; (6) perjury; (7) evidential falsification; () witness tampering; (9) and extortion; (0) and I am aware that legal records prove the damage caused to the economic standing and reputation of Kaul by crimes committed by myself and other defendants.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d).

Dated: July 7, 00.

Defendant ATLANTIC HEALTH SYSTEM has caused to be admitted the above undisputed facts.

UNITED STATES DISTRICT
FOR THE DISTRICT OF NEW JERSEY

RICHARD ARJUN KAUL, MD

CIVIL ACTION NO.: 6-CV-0 364-MJV-JAD

Plaintiff,

v.

ADMISSIONS BY DEFENDANT GEICO
OF UNDISPUTED FACTS

CHRISTOPHER J. CHRISTIE, ET AL.

Defendants.

Defendants GEICO CASUALTY + GEICO INSURANCE COMPANY + GEICO INDEMNITY + GOVERNMENT EMPLOYEES INSURANCE (HEREINAFTER "GEICO") has caused to be admitted the following undisputed facts.

I have no defense to the arguments submitted by Kaul in his motions for the entry of summary judgment: () Defendant GEICO defenses are based entirely on the evidence of the revocation of Kaul's license, evidence that has been disproved/negated by the evidence contained in 'The Solomon Critique' + 'The Solomon Critique' (D.E. 99 Page ID 70 7) () Kaul has dismantled the entire body of evidence, upon which Defendant GEICO fabricated its knowingly false defenses (D.E. 99 Page ID 7035); (3) Kaul has submitted evidence in proof of all claim elements, and has satisfied the summary judgment standard that there exists no genuine issue of material fact (D.E. 99 Page ID 704); (4) and thus I have no defense to Kaul's legally sufficient claims; (6) and I unreservedly accept that he has proved his case.

1. COUNT TWO: VIOLATIONS OF EIGHTEEN U.S.C. 1962(C)-(D) – THE RACKETEER AND CORRUPT INFLUENCED ORGANIZATIONS ACT, EIGHTEEN U.S.C. 1961, ET SEQ:

(a) culpable person who willfully or knowingly:

I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006 and continued into 2019.

I admit that I engaged in a pattern of racketeering with other defendants in a period that commenced in approximately 2006, continued into 2019 and occurred in multiple locations in the US, and across the US mail and wires.

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

I admit that I knew the purpose of having engaged in a pattern of racketeering was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I do not refute/contest/rebut/deny the evidence contained within the following documents: () The Waldman E-mail (D.E. 99 Page ID 7047); () The Zerbini Certification (D.E. 99 Page ID 704); (3) The Sabo Certification (D.E. 99 Page 7053); (4) The Solomon Critique (D.E. 99 Page ID 7053); (5) The Solomon Critique (D.E. 99 Page ID 7054); (6) The Calabrese Certification (D.E. 99 Page ID 7054); (7) The Przybylski Disciplinary Notice (D.E. 99 Page ID 7056); () The Feldman Certification (D.E. 99 Page ID 7057); (9) The Yeung E-mail (D.E. 99 Page ID 705); (0) The Union County Court proceedings (D.E. 99 Page ID 7060); () The Ciarrocca Complaint (D.E. 99 Page ID 706); () The Federal Trade Commission Guidelines (D.E. 99 Page ID 7063).

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) commits or conspires to the commission of "racketeering activity":

In a period from 2006 to 2019, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state to agencies and power to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) through a "pattern"

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) involving a separate "enterprise" or "association in fact"

In a period from 2006 to 2019, I admit that I, in concert and conspiracy with other defendants, knowingly, willfully and illegally converted administrative, state and federal courts within the geographic boundaries of New Jersey into racketeering enterprises, to further the scheme to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) an effect on interstate or foreign commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) "purpose"

In approximately 2006, I in concert and conspiracy with other defendants commenced engaging in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors, agencies and administrative, state and federal courts within the geographic boundaries of New Jersey. I knew that the purpose of these schemes was

to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

2. COUNT ELEVEN: DEPRIVATION OF RIGHT UNDER COLOR OF LAW:

- (a) **Every person who under color of any statute, ordinance, regulation, custom or usage of any State or Territory or the District of Columbia subjects or causes to be subjugated any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges or immunities secured by the Constitution and laws shall be liable to the party injured in an action at law, suit in equity or other property for redress.**

I admit that: () because of my illegal schemes of public corruption that involved bribing Defendant Christie, state politicians, legislators and state judges, I became intertwined with, and in possession of state power and became a state actor; () Kaul has proved the state actor tests of – symbiotic test + the joint participation doctrine + the state command and encouragement test + the public function test + pervasive entwinement; (3) I abused this power to violate Kaul's Constitutional right to due process by; (4) participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners, judges of the New Jersey Office of Administrative Law, members of the Office of the New Jersey Attorney General, Defendant Christie, state and federal court judges to; (5) to both obstruct and pervert the course of justice in administrative, state and federal proceedings in courts within the geographic boundaries of New Jersey; (6) in a period from 00 to the present; (7) by committing and or facilitating the commission of massive schemes of; () perjury; (9) evidential falsification; (0) witness tampering; () fraud; () evidential omission; (3) judicial corruption; (4) bankruptcy court corruption; (5) I willfully participated in this knowingly illegal scheme for at least a decade; (6) a scheme purposed to destroy the economic standing, reputation and livelihood of Kaul; (7) to cause him and his family to become homeless, to fall into a state of poverty, to become ostracized and unable to find employment anywhere in the world; () I admit that my prolonged criminal conduct using the authority of state involved the illegal use of the US mail and wires to send and receive hundreds of email, telephone and in person communications with official state employees in the Office of the New Jersey Governor, the Office of the New Jersey Attorney General, the New Jersey Office of Administrative Law and the New Jersey Board of Medical Examiners; (9) I admit that these communications and crimes occurred in a period from at least 00 to the present.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e)

3. COUNT TWELVE: COMMERCIAL DISPRAGEMENT:

- (a) a statement by defendant/s about plaintiff that
- (b) was made public
- (c) was false
- (d) caused damage
- (e) caused economic loss

Commencing in approximately 006: () I in concert with other defendants have made hundreds of knowingly false public statements about Kaul; () that were purposed and indeed caused damage and total economic loss to Kaul because he lost; (3) all his material assets, including his home, the house in which his children lived, his surgical center, a license to build another surgical center, his medical corporations, his accounts receivable, his medical license, his livelihood, his reputation, his ability to earn a living; (4) and because he is now unable to find work anywhere in the world, has become homeless, was forced into a state of poverty and is even unable to claim welfare.

I admit that I and other defendants made knowingly false public statements about Kaul with the intention of causing these severe economic and reputational injuries.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

4. COUNT THIRTEEN: INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE:

- (a) economic relationship between plaintiff and some third party with the probability of future economic benefit
- (b) defendants knowledge of the relationship
- (c) intentional acts on the part of the defendant/s designed to disrupt the relationship
- (d) actual disruption of the relationship
- (e) economic harm to plaintiff proximately caused by the acts of the defendant/s

In 006 I knew that when I started conspiring and colluding with other defendants to: () have Kaul's license revoked; () destroy his reputation; (3) destroy his economic standing; (4) destroy his livelihood; (5) destroy his ability to support his children; (6) and cause him to lose all his material assets; (7) that there existed economic relationships between Kaul, his patients and their insurance carriers, that promised future economic benefit. It was my intention and that of other defendants to disrupt these relationships, and I admit that our crimes against Kaul did cause actual disruption, irreparable economic harm and almost caused him to lose his life in July 05, when he sustained two severe life-threatening seizures. I admit that our crimes were the proximate cause of these injuries to Kaul's economic standing, health and welfare.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

5. COUNT FOURTEEN: AID IN THE COMMISSION OF TORT:

- (a) combination of two or more persons
- (b) a real agreement or confederation with a common design
- (c) the existence of an unlawful purpose, or of a lawful purpose to be achieved by unlawful means
- (d) proof of special damages

I admit that I conspired with other defendants to create an actual agreement with a purpose of having Kaul's license revoked through knowingly unlawful means, that included: () bribery; () public corruption; () judicial corruption; (3) fraud; (4) kickbacks; (5) racketeering; (6) perjury; (7) evidential falsification; () witness tampering; (9) and extortion; (0) and I am aware that legal records prove the damage caused to the economic standing and reputation of Kaul by crimes committed by myself and other defendants.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d).

Dated: July 7, 00.

Defendant GEICO has caused to be admitted the above undisputed facts.

Defendant GEICO certifies that the above information is true and accurate to the best of its knowledge, and that if it is proved that the above facts are willfully misrepresented, then it will be subject to punishment.

UNITED STATES DISTRICT
FOR THE DISTRICT OF NEW JERSEY

RICHARD ARJUN KAUL, MD

CIVIL ACTION NO.: 6-CV-0 364-MJV-JAD

Plaintiff,

v.

ADMISSIONS BY DEFENDANT ROBERT HEARY
OF UNDISPUTED FACTS

CHRISTOPHER J. CHRISTIE, ET AL.

Defendants.

Defendant ROBERT HEARY (HEREINAFTER "HEARY") has caused to be admitted the following undisputed facts.

I have no defense to the arguments submitted by Kaul in his motions for the entry of summary judgment: () Defendant HEARY defenses are based entirely on the evidence of the revocation of Kaul's license, evidence that has been disproved/negated by the evidence contained in 'The Solomon Critique' + 'The Solomon Critique ' (D.E. 99 Page ID 70 7) () Kaul has dismantled the entire body of evidence, upon which Defendant HEARY fabricated its knowingly false defenses (D.E. 99 Page ID 7035); (3) Kaul has submitted evidence in proof of all claim elements, and has satisfied the summary judgment standard that there exists no genuine issue of material fact (D.E. 99 Page ID 704); (4) and thus I have no defense to Kaul's legally sufficient claims; (6) and I unreservedly accept that he has proved his case.

1. COUNT ONE: VIOLATIONS OF EIGHTEEN U.S.C. 1962(C)-(D) – THE RACKETEER AND CORRUPT INFLUENCED ORGANIZATIONS ACT, EIGHTEEN U.S.C. 1961, ET SEQ:

(a) culpable person who willfully or knowingly:

I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006 and continued into 2019.

I admit that I engaged in a pattern of racketeering with other defendants in a period that commenced in approximately 2006, continued into 2019 and occurred in multiple locations in the US, and across the US mail and wires.

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

I admit that I knew the purpose of having engaged in a pattern of racketeering was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I do not refute/contest/rebut/deny the evidence contained within the following documents: () The Waldman E-mail (D.E. 99 Page ID 7047); () The Zerbini Certification (D.E. 99 Page ID 704); (3) The Sabo Certification (D.E. 99 Page 7053); (4) The Solomon Critique (D.E. 99 Page ID 7053); (5) The Solomon Critique (D.E. 99 Page ID 7054); (6) The Calabrese Certification (D.E. 99 Page ID 7054); (7) The Przybylski Disciplinary Notice (D.E. 99 Page ID 7056); () The Feldman Certification (D.E. 99 Page ID 7057); (9) The Yeung E-mail (D.E. 99 Page ID 705); (0) The Union County Court proceedings (D.E. 99 Page ID 7060); () The Ciarrocca Complaint (D.E. 99 Page ID 706); () The Federal Trade Commission Guidelines (D.E. 99 Page ID 7063).

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) commits or conspires to the commission of "racketeering activity":

In a period from 2006 to 2019, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state to agencies and power to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) through a "pattern"

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) Involving a separate “enterprise” or “association in fact”

In a period from 2006 to 2019, I admit that I, in concert and conspiracy with other defendants, knowingly, willfully and illegally converted administrative, state and federal courts within the geographic boundaries of New Jersey into racketeering enterprises, to further the scheme to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) an effect on interstate or foreign commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul’s license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul’s economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) “purpose”

In approximately 2006, I in concert and conspiracy with other defendants commenced engaging in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors, agencies and administrative, state and federal courts within the geographic boundaries of New Jersey. I knew that the purpose of these schemes was

to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

2. COUNT FIVE: FOR DECLATORY AND INJUNCTIVE RELIEF UNDER SECTION 16 OF THE CLAYTON ACT FOR DEFENDANTS VIOLATION OF SECTIONS 1 AND 2 OF THE SHERMAN ACT:

(a) conspiracy or agreement.

Commencing in 2006 and continuing into 2019, I engaged in thousands of email, telephone and in person communications with other defendants, at multiple locations within the US, and across the US mail and wires. I admit that these communications were part of a conspiracy to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes and agreements were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) knowingly joining the conspiracy

I admit that in 2006 I knowingly joined the conspiracy with other defendants and was fully cognizant of its illegality. I admit that upon joining the conspiracy I did not believe that Kaul would expose my crimes and that I would be subjected to civil suit, and the threat of criminal prosecution.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) per se rule

I knew that when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery, it was illegal and a violation of the per se rule of the antitrust law.

I knew that when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of

medicine and minimally invasive spine surgery, it was illegal and would reduce the provision and increase the cost of minimally invasive spine surgery to the public.

I admit that when I violated antitrust law by conspiring and colluding with other defendants to eliminate Kaul from the practice of medicine and minimally invasive spine surgery I knew that: (1) it was illegal and; (2) would reduce the provision and increase the cost of minimally invasive spine surgery to the public; (3) but that I possessed a criminal state of mind and believed Kaul would not expose my crimes.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) Interstate or foreign trade and commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) possession of monopoly power in the relevant market

I admit: (1) that as a consequence of the bribes paid by myself and other defendants to Defendant Christie, the medical board revoked Kaul's license; (2) that the revocation was illegal; (3) that the prolonged publicity from 2012 to 2016 about Kaul was malicious and slanderous; (4) that this publicity intimidated other minimally invasive spine surgeons from performing minimally invasive spine surgery; (5) that the revocation, publicity and intimidation permitted me and other defendants to come into possession of monopoly power in the American minimally invasive spine surgery market.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) willful acquisition or maintenance of monopoly power as distinguished from growth due to superior product, business acumen or historic accident

I admit that my monopolization of the American minimally invasive spine surgery market was: (1) obtained illegally; (2) through bribing Defendant Christie; (3) to have the medical board revoke Kaul's license; (4) and was not a consequence of fairly competing in the American minimally invasive spine surgery market; (5) nor providing a superior clinical service; (5) nor a result of an unforeseen set of circumstances or historic accident.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

3. COUNT SIX: FOR MONOPOLIZATION UNDER STATE LAW:

(a) possession of monopoly power in the relevant market.

I admit: (1) that as a consequence of the bribes paid by myself and other defendants to Defendant Christie, the medical board revoked Kaul's license; (2) that the revocation was illegal; (3) that the prolonged publicity from 2012 to 2016 about Kaul was malicious and slanderous; (4) that this publicity intimidated other minimally invasive spine surgeons from performing minimally invasive spine surgery; (5) that the revocation, publicity and intimidation permitted me and other defendants to come into possession of monopoly power in the American minimally invasive spine surgery market.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) Willful acquisition or maintenance of monopoly power as distinguished from growth due to superior product, business acumen

I admit that my monopolization of the American minimally invasive spine surgery market was: (1) obtained illegally; (2) through bribing Defendant Christie; (3) to have the medical board revoke Kaul's license; (4) and was not a consequence of fairly competing in the American minimally invasive spine surgery market; (5) nor providing a superior clinical service; (5) nor a result of an unforeseen set of circumstances or historic accident.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

4. COUNT SEVEN: FOR CONSPIRACY TO MONOPOLIZE UNDER STATE LAW:

(a) conspiracy or agreement

In a period from 2006 to 2019 I conspired with other defendants: (1) in a knowingly illegal quid pro quo scheme; (2) in which I used email, telephone and country wide in person meetings to further the scheme; (3) which involved bribing Defendant Christie to have the medical board revoke Kaul's license; (4) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (5) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) knowingly joining the conspiracy

I admit that: (1) in a period commencing in or about 2006 I willfully joined and participated in a knowingly illegal conspiracy and; (2) quid pro scheme; (3) to have Kaul's license revoked; (4) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (5) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) per se rule

I knew that: (1) when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (2) it was illegal and a violation of the per se rule of the antitrust law.

I knew that: (1) when I, in conspiracy and collusion with other defendants, began abusing the authority and power of administrative, state and federal courts within the geographic boundaries of New Jersey to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (2) it was illegal and would reduce the provision and increase the cost of minimally invasive spine surgery to the public.

I admit that: (1) when I violated antitrust law by conspiring and colluding with other defendants to eliminate Kaul from the practice of medicine and minimally invasive spine surgery I knew that: (2) it was illegal and; (3) would reduce the provision and increase the cost of minimally invasive spine surgery to the public; (4) but that I possessed a criminal state of mind and believed Kaul would not expose my crimes.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) interstate or foreign trade and commerce

I admit that: (1) I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity; (2) a trade restriction that would have a detrimental effect on interstate and or foreign commerce; (3) and would reduce federal tax revenues.

After the revocation of Kaul's license on March 12, 2014: (1) I participated with other defendants in hundreds of email, telephone and in person communications; (2) in which we celebrated the destruction of Kaul's economic standing, reputation and inability to find employment.

After the revocation of Kaul's license on March 12, 2014: (1) I participated with other defendants in hundreds of email, telephone and in person communications; (2) in which we predicted and celebrated the imminent descent of Kaul and his family into poverty.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) single versus multiple conspiracies

I admit that: (1) in or about 2006 I began participating in a conspiracy with other defendants; (2) in a knowingly illegal quid pro quo scheme; (3) in which I used email, telephone and country wide in person meetings to further the scheme; (4) which involved bribing Defendant Christie to have the medical board revoke Kaul's license; (5) in order to eliminate Kaul from the practice of medicine and minimally invasive spine surgery; (6) which permitted me and other defendants to begin monopolizing the American minimally invasive spine surgery market in 2012.

I admit that: (1) in or about 2006 I began to acquire knowledge that other defendants were participating in multiple conspiracies; (2) purposed to have Kaul's license revoked; (3) in order to eliminate him from the practice of medicine and

minimally invasive spine surgery; (4) and that these schemes involved bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.

I admit that: (1) in or about 2006 to 2019 I commenced engaging in a repeated pattern of corruption of administrative, state and federal courts within the geographic boundaries of New Jersey; (2) the purpose of which was to deprive Kaul of any access to justice; (3) strip him of his medical license; (4) his property; (5) his reputation; (6) his material assets; (7) deprive him of banking services and have him jailed, deported and or die.

I admit that: (1) in or about 2006 I began to acquire knowledge that other defendants were participating in multiple conspiracies; (2) purposed to have Kaul's license revoked; (3) in order to eliminate him from the practice of medicine and minimally invasive spine surgery; (4) and that these schemes involved bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

5. COUNT EIGHT: FOR CONSPIRACY AND COMBINATION IN RESTRAINT OF TRADE UNDER STATE LAW:

(a) combination or conspiracy between or among the Defendants to allocate the market for minimally invasive spine surgery

I admit that I and other defendants: (1) through thousands of email, telephone and country wide in person communications; (2) in a knowingly illegal scheme did conspire to artificially divide the American minimally invasive spine surgery market; (3) by allocating minimally invasive fusions to hospitals and neurosurgeons; (4) and agreeing to only perform minimally invasive discectomies; (5) and did implement policies of not granting hospital privileges to minimally invasive spine surgeons.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) that such combination or conspiracy constituted an "unreasonable" restraint on interstate commerce as hereafter

I admit that in approximately 2006 I knew: (1) that my participation in the scheme to revoke Kaul's license was illegal; (2) that it constituted and caused an unreasonable and arbitrary restraint on interstate commerce; (3) that it would artificially restrict access of the American public to life-saving minimally invasive spine surgery; (4) that

it would cause an increase in the use of opiates; (5) and opiate related overdose deaths.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) that the Defendants business activities had a substantial effect on interstate commerce and the Defendants challenged activities involve a substantial amount of interstate commerce

I admit that my participation in: (1) schemes of bribery and public corruption; (2) to have Kaul's license revoked; (3) would and did cause a substantial reduction on interstate commerce; (4) a consequence that I knew would occur because; (5) I knew Kaul had plans to expand his minimally invasive spine surgery business across the US; (6) and that the illegal revocation of his New Jersey license would prevent him from obtaining a medical license anywhere in the world.

I admit that I knew; () my scheme to prevent Kaul from working anywhere in the world; () was premediated and criminal; (3) and would reduce tax revenues to the federal government; (4) but I did not believe that Kaul would expose my crimes; (5) and that even if he did, he would be unable to bring me to justice; (6) because I was convinced Defendant Christie would become the 06 American President; (7) and Kaul is not a lawyer; () and would be either bankrupt, jailed, deported or dead.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) that the plaintiff suffered in its business or property as a proximate result of the combination or conspiracy

I admit I knew: () that my participation with other defendants in the conspiracy to; () destroy Kaul's reputation, economic standing, livelihood and ability to support his family; (3) would cause substantial injury to Kaul's business and or property; (4) and that this injury was premediated and criminal; (6) conducted through schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks; (5) and purposed to eliminate him from the practice of medicine and minimally invasive spine surgery; (6) in order to permit me and other defendants to monopolize the American minimally invasive spine surgery market; (7) and reap unjust profits and illegal enrichment at the expense of Kaul and the American public.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

6. COUNT NINE: FOR UNFAIR AND DECEPTIVE TRADE PRACTICES UNDER STATE LAW:

(a) defendant engaged in an act or practice that was materially deceptive:

(b) the challenged act or practice:

I admit that in a period commencing in 2006, I in conspiracy and collusion with other defendants: () participated in a massive scheme of deception and unfair trade practices, conducted through thousands of emails, telephone and country wide in person communications; (2) that involved imparting knowingly dishonest information to the public, patients, physicians, juries and judges, that Kaul was not qualified to perform minimally invasive spine surgery; (3) that Kaul had committed insurance fraud; (4) that Kaul had committed Medicare fraud; (5) that Kaul was going to be indicted; (6) that Kaul had been found guilty by a grand jury; (7) and that the purpose of these acts of deception was to destroy Kaul's reputation and livelihood.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b).

(c) the consumer suffered an injury because of the deceptive act or practice:

I intended that my acts of deception would injure Kaul by destroying: (1) his ability to earn a living and support his family; (2) his personal reputation; (3) his professional reputation; (4) his material assets; (4) and causing him to become ostracized, homeless, fall into a state of poverty and be jailed.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

7. COUNT TEN: UNJUST ENRICHMENT:

(a) defendant benefitted

(b) defendant benefitted at plaintiff's expense

Consequent to the revocation of Kaul's license in 2014 I was unjustly enriched at his expense, because: (1) his patients were diverted to my practice and my annual revenues increased; () the provision of minimally invasive spine surgery became restricted to hospitals and neurosurgeons consequent to legislation signed by Defendant Christie, who received bribes from me and other defendants, as part of a series of quid pro quo schemes; (3) other minimally invasive spine surgeons became intimidated to perform outpatient percutaneous fusions after the widely publicized revocation of Kaul's license; (4) other minimally invasive spine surgeons were denied

privileges for minimally invasive spine surgery at hospitals because of the neurosurgeons influence in the hospital, a consequence of the enormous monies they generate for hospitals; (5) my political standing within the medical community increased after I had participated in the scheme to revoke Kaul's license, and my referral rate increased.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b).

(c) that equity and good conscience require restitution

I admit that because I was unjustly enriched at the expense of Kaul I must, in a sense of equity and good conscience, pay him restitution to the full extent of his demands for monetary compensation.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

8. COUNT TWELVE: COMMERCIAL DISPRAGEMENT:

(a) a statement by defendant/s about plaintiff that

(b) was made public

(c) was false

(d) caused damage

(e) caused economic loss

Commencing in approximately 006: () I in concert with other defendants have made hundreds of knowingly false public statements about Kaul; () that were purposed and indeed caused damage and total economic loss to Kaul because he lost; (3) all his material assets, including his home, the house in which his children lived, his surgical center, a license to build another surgical center, his medical corporations, his accounts receivable, his medical license, his livelihood, his reputation, his ability to earn a living; (4) and because he is now unable to find work anywhere in the world, has become homeless, was forced into a state of poverty and is even unable to claim welfare.

I admit that I and other defendants made knowingly false public statements about Kaul with the intention of causing these severe economic and reputational injuries.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

9. COUNT THIRTEEN: INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE:

- (a) economic relationship between plaintiff and some third party with the probability of future economic benefit
- (b) defendants knowledge of the relationship
- (c) intentional acts on the part of the defendant/s designed to disrupt the relationship
- (d) actual disruption of the relationship
- (e) economic harm to plaintiff proximately caused by the acts of the defendant/s

In 006 I knew that when I started conspiring and colluding with other defendants to: () have Kaul's license revoked; () destroy his reputation; (3) destroy his economic standing; (4) destroy his livelihood; (5) destroy his ability to support his children; (6) and cause him to lose all his material assets; (7) that there existed economic relationships between Kaul, his patients and their insurance carriers, that promised future economic benefit. It was my intention and that of other defendants to disrupt these relationships, and I admit that our crimes against Kaul did cause actual disruption, irreparable economic harm and almost caused him to lose his life in July 05, when he sustained two severe life-threatening seizures. I admit that our crimes were the proximate cause of these injuries to Kaul's economic standing, health and welfare.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d + e).

10. COUNT FOURTEEN: AID IN THE COMMISSION OF TORT:

- (a) combination of two or more persons
- (b) a real agreement or confederation with a common design
- (c) the existence of an unlawful purpose, or of a lawful purpose to be achieved by unlawful means
- (d) proof of special damages

I admit that I conspired with other defendants to create an actual agreement with a purpose of having Kaul's license revoked through knowingly unlawful means, that included: () bribery; () public corruption; () judicial corruption; (3) fraud; (4) kickbacks; (5) racketeering; (6) perjury; (7) evidential falsification; () witness tampering; (9) and extortion; (0) and I am aware that legal records prove the damage caused to the economic standing and reputation of Kaul by crimes committed by myself and other defendants.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d).

Dated: July 7, 00.

Defendant ROBERT HEARY has caused to be admitted the above undisputed facts.

Defendant ROBERT HEARY certifies that the above information is true and accurate to the best of his knowledge, and that if it is proved that the above facts are willfully misrepresented, then he will be subject to punishment.

UNITED STATES DISTRICT
FOR THE DISTRICT OF NEW JERSEY

RICHARD ARJUN KAUL, MD

CIVIL ACTION NO.: 6-CV-0 364-MJV-JAD

Plaintiff,

v.

ADMISSIONS BY DEFENDANT TD NA
OF UNDISPUTED FACTS

CHRISTOPHER J. CHRISTIE, ET AL.

Defendants.

Defendant TD BANK NA (HEREINAFTER "TD") has caused to be admitted the following undisputed facts.

I have no defense to the arguments submitted by Kaul in his motions for the entry of summary judgment: () Defendant TD defenses are based entirely on the evidence of the revocation of Kaul's license, evidence that has been disproved/negated by the evidence contained in 'The Solomon Critique' + 'The Solomon Critique ' (D.E. 99 Page ID 70 7) () Kaul has dismantled the entire body of evidence, upon which Defendant TD fabricated its knowingly false defenses (D.E. 99 Page ID 7035); (3) Kaul has submitted evidence in proof of all claim elements, and has satisfied the summary judgment standard that there exists no genuine issue of material fact (D.E. 99 Page ID 704); (4) and thus I have no defense to Kaul's legally sufficient claims; (6) and I unreservedly accept that he has proved his case.

1. **COUNT THREE: VIOLATIONS OF EIGHTEEN U.S.C. 1962(C)-(D) – THE RACKETEER AND CORRUPT INFLUENCED ORGANIZATIONS ACT, EIGHTEEN U.S.C. 1961, ET SEQ:**

(a) culpable person who willfully or knowingly:

I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006 and continued into 2019.

I admit that I engaged in a pattern of racketeering with other defendants in a period that commenced in approximately 2006, continued into 2019 and occurred in multiple locations in the US, and across the US mail and wires.

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

I admit that I knew the purpose of having engaged in a pattern of racketeering was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I do not refute/contest/rebut/deny the evidence contained within the following documents: () The Waldman E-mail (D.E. 99 Page ID 7047); () The Zerbini Certification (D.E. 99 Page ID 704); (3) The Sabo Certification (D.E. 99 Page 7053); (4) The Solomon Critique (D.E. 99 Page ID 7053); (5) The Solomon Critique (D.E. 99 Page ID 7054); (6) The Calabrese Certification (D.E. 99 Page ID 7054); (7) The Przybylski Disciplinary Notice (D.E. 99 Page ID 7056); () The Feldman Certification (D.E. 99 Page ID 7057); (9) The Yeung E-mail (D.E. 99 Page ID 705); (0) The Union County Court proceedings (D.E. 99 Page ID 7060); () The Ciarrocca Complaint (D.E. 99 Page ID 706); () The Federal Trade Commission Guidelines (D.E. 99 Page ID 7063).

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a).

(b) commits or conspires to the commission of "racketeering activity":

In a period from 2006 to 2019, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state to agencies and power to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (b).

(c) through a "pattern"

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (c).

(d) involving a separate “enterprise” or “association in fact”

In a period from 2006 to 2019, I admit that I, in concert and conspiracy with other defendants, knowingly, willfully and illegally converted administrative, state and federal courts within the geographic boundaries of New Jersey into racketeering enterprises, to further the scheme to destroy the economic standing, reputation and livelihood of Plaintiff Kaul.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (d).

(e) an effect on interstate or foreign commerce

I admit that I and other defendants knew that the license revocation and destruction of the economic standing, reputation and livelihood of Plaintiff Kaul would prevent him from working anywhere in the world in any capacity, a trade restriction that would have a detrimental effect on interstate and or foreign commerce, and reduce federal tax revenues.

After the revocation of Kaul’s license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person communications, in which we celebrated the destruction of Kaul’s economic standing, reputation and inability to find employment.

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

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (e).

(f) “purpose”

In approximately 2006, I in concert and conspiracy with other defendants commenced engaging in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors, agencies and administrative, state and federal courts within the geographic boundaries of New Jersey. I knew that the purpose of these schemes was

to destroy the economic standing, reputation and livelihood of Plaintiff Kaul, and that the schemes were illegal.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (f).

2. COUNT FOURTEEN: AID IN THE COMMISSION OF TORT:

(a) combination of two or more persons

(b) a real agreement or confederation with a common design

(c) the existence of an unlawful purpose, or of a lawful purpose to be achieved by unlawful means

(d) proof of special damages

I admit that I conspired with other defendants to create an actual agreement with a purpose of having Kaul's license revoked through knowingly unlawful means, that included: () bribery; () public corruption; () judicial corruption; (3) fraud; (4) kickbacks; (5) racketeering; (6) perjury; (7) evidential falsification; () witness tampering; (9) and extortion; (0) and I am aware that legal records prove the damage caused to the economic standing and reputation of Kaul by crimes committed by myself and other defendants.

I admit that the evidence submitted in D.E. 99 is further proof of the undisputed facts as stated in this section (a + b + c + d).

Dated: July 7, 00.

Defendant TD BANK NA has caused to be admitted the above undisputed facts.

Defendant TD BANK NA certifies that the above information is true and accurate to the best of its knowledge, and that if it is proved that the above facts are willfully misrepresented, then it will be subject to punishment.

Exhibit 6

Kaul v Boston Partners: K11-2

The Slaving-Nazi-Insurance Axis

This exhibit consists of:

1. This cover page.
2. Excerpts from the Nuremberg Indictment juxtaposed to excerpts from The Kaul Cases.

The common thread connecting the slaving industry, the Nazi atrocities and the "War on Doctors" (1990 to the present) is the ruthless/genocidal for-profit insurance/banking industry/machine of which Defendants Allstate/Geico/TD/Northern Trust/Boston Partners are members.

The purpose and relevance of this exhibit is to illustrate and evidence that the insurance industry of which Defendants Allstate/Geico are members/beneficiaries, have been engaging in "patterns of racketeering" since the inception of the industry in London in the 1600s. The fundamental legal elements of RICO were conceived/developed/implemented over four centuries ago and became codified in the 1970s. Racial profiling/targeting and discrimination against particular groups for the purpose of profit have remained a constant, and the *raison d'être* for the insurance industry is purely profit, while that of medicine is altruistic. Not too many physicians are disposed in the art of war, while the insurance industry views war as a progenitor of fear, a fear they exploit in their commercialization of risk. The insurance industry is arguably humanity's largest ever racket.

In 2021, the tools of torture used by Defendants Allstate/Geico (insurance industry) are those of the courts/lawyers/prosecutors/loss of livelihood/incarceration/false convictions/false imprisonment/media defamation/harassment of physicians families/children/a global public humiliation over the Internet. No longer is it iron cuffs in crowded slave ships, suffocating trains destined for work camps or summary executions. The methods of extermination have become bureaucratized, sterile and conducted under 'color of state', with the apparent legitimacy of state medical boards, state/federal judges/courts/prosecutors and a corporate media only too willing to knowingly perpetuate the crimes of the insurance industry. False claims of insurance fraud, alleged over-prescribing of opiate medications, sting operations to entrap unsuspecting physicians in compromising sexual situations, are just some of the

excuses/pre-texts used to exterminate physicians, in order to increase corporate/executive profit through reducing the number of so called "healthcare providers" and thus the total amount of health insurance premiums spent on healthcare. In essence, eliminate the physicians and the patients, and divert a greater percentage of the public's health insurance premiums to the executives/corporate coffers of Defendants Allstate/Geico.

In 2021, the cost to American society is evident in:

1. The excessive COVID-19 related mortality/morbidity in the US.
2. The so-called "opiate epidemic", from which the insurance industry has profited. Deaths from opiate overdosing are due to street-grade heroin, laced with fentanyl, and not prescription opiates. From 2006 to the present the number of medications dispensed has dropped by almost fifty-percent (50%), resulting in billions of profits for the insurance industry, as it spends less on medications, while continuing to raise the cost of health insurance premiums.
3. The "pain epidemic" as millions of Americans with chronic pain have been denied access to life-saving care, with many committing suicide.
4. The epidemic of physician suicides, as the insurance industry orders state/federal regulatory/investigatory/prosecutorial/judicial collaborators to suspend/revoke physicians licenses and or incarcerate them.

To assist the comprehension of all parties in the clarification of the Nazi-Insurance Industry analogy of the aforementioned axis, one of evil; please find below a table that Kaul respectfully asserts, any jury/public would immediately understand:

The Slaving-Nazi-Insurance Axis ("SNI")	The FSMB/SMB-State/Federal Investigative/Prosecutorial-Insurance (Corporation) Axis ("FSI") Identified within <u>The Kaul Cases</u> are the equivalent SNI parties/perpetrators.
The British Crown/Government/Royal African Company/Lloyd's of London-Insurance Industry/British Courts.	Defendant Federation of State Medical Boards/State Medical Boards. Defendants Allstate/Geico Defendants AHS/HUMC Defendant State of New Jersey Defendant NJ Department of Banking and Insurance. Defendant NJ Office of the Insurance Fraud Prosecutor

	Defendant District of New Jersey (K11-1-DNJ-N) Defendant Judges in K11-3 (U.S.D.C. for the Northern District of Illinois)
The Yorke-Talbot Slavery <u>Opinion</u>	The NJ IFPA (17:33A) + 21 U.S.C. (Abuse of Congressional Intent) + CDC Guideline for Prescribing Opioids for Chronic Pain (<u>Abuse</u> of recommendations)
The German Government/Nazi Party	Defendant State of New Jersey.
Senior Public Prosecutor - Paul Bamickel	Office of the NJ Attorney General
Chief of the Civil Law and Procedure Division of the Reich Ministry of Justice; and Oberführer in the SS - Josef Allstoter	The NJ Attorney General - Jeffrey Chiesa/Doreen Hafner
Chief Justice of the Special Court - Hermann Cuhorst	Defendant Jay Howard Solomon Defendant Jose Linares Defendant Kenneth J. Grispin

Legal Adviser to the Reich Minister - Guenther Joel	Defendant Eric Kanefsky, Esq
Chief Justice of the Fourth Senate of the People's Court - Guenther Nebelung	Defendant Chief Judge Fred Wolfson, Esq
Senior Public Prosecutor - David Puteska, Esq	

Consulting physician to the Luftwaffe - Wilhelm Beigblock	Defendant Andrew Gregory Kaufman, MD
Chief Physician to Hitler/SS/Reich - Karl Brandt	Defendant Scott Metzger, MD
Chief Surgeon of the Staff of the Reich Physician SS - Karl Gebhardt	Defendant Gregory Przybylski, MD
Chief Surgeon of the Surgical Clinic in Berlin - Paul Rostock	Defendant Robert Francis Heary, MD
Der Fuhrer- Adolf Hitler	Defendant Christopher J. Christie, Esq

Friedrich Flick - The CEO of the "Flick Concern" (business conglomerate - finance/mining and financier/briber of the Nazi Party)	Defendant Richard Crist Defendant Allstate Defendant Geico Defendant TD
Farben - Business conglomerate that included the insurance/finance industry, that financed the Nazi Party/German State and the initial funding for concentration camps.	Defendant Allstate Defendant Geico Defendant TD Defendant Northern Trust Defendant Boston Partners
Those exterminated/enslaved/subjected to summary justice/denied justice/imprisoned/stripped of their livelihood/publicly humiliated/deprived of their property/liberty/life without due process - Men, women and children belonging to the following groups: Africans/Jews/Russians/Poles/Patients with disabilities/Political dissenters/Those who refused to submit/fought Nazi oppression.	Plaintiff Kaul/his family/his patients Plaintiff Feldman/his family/his patients Plaintiff Patel/his family/patients treated in his healthcare facility. The American public - increased insurance premiums. The American pain patient population - decreased access to most effective forms of pain relieving healthcare (surgical/non-surgical). The American medical profession - Increased suicide/loss of livelihood/loss of liberty/loss of property.
Otto Ambros - Chief of Chemical Warfare	Defendant Christopher J. Christie, Esq
August Von Knieriem - Chief Counsel of Farben	David D'Aloia, Esq - Counsel for Defendant Allstate

The Blacks:

The insurance industry (corporations) was born in the 1600's and is the progeny of Lloyd's of London. It initially gripped humanity in its cold ruthless clutches by attaching itself to the booming trans-Atlantic slaving industry, at the helm of which, at that time, were the British. They would later claim to be the originators of abolition, a calculated political move whose true purpose was not altruistic, but one of commercial colonial opportunism, as it provided them legal parliamentary cover to seize the slave ships belonging to their colonial competitors, the French, Dutch and Portuguese. Meanwhile the British continued to plunder, rape and pillage Indian, Africa and China, the latter a country it flooded with opium from the poppy-fields of the north-western frontier in

Afghanistan/Kashmir. The Chinese were incapacitated by the opium, the Indians were forced into indentured servitude, along with the Africans.

The Jews:

Towards the ostensible fall of the British Empire, the global insurance industry, still orchestrated by and through Lloyd's of London, continued its inexorable and genocidal expansion by conspiring/colluding and furthering in an ongoing "pattern of racketeering" that commenced with the slaving industry. The RICO predicate acts of murder, extortion, conspiracy and human trafficking were perpetrated by the Nazi War Machine, on millions of Jews, Russians, Poles and people with physical and psychological handicaps, through multiple association-in-fact enterprises that included Nazi courts, Nazi Judges, The Nazi Justice Ministry, The Nazi Medical Boards/Medical Profession, Nazi Politicians, Nazi Prosecutors/Lawyers, German Industry and the Insurance industry. Multiple RICO schemes were perpetrated through, by and with the political, medical, legal and business elements of the Nazi's genocidal machine, in collusion/conspiracy with the insurance industry. The purpose of the Nazi-Insurance Association-In-Fact Enterprise was to further the political/economic agendas of the scheme's orchestrators/perpetrators/aiders/abettors/abstentions of willful ignorance. The insurance industry, having developed its model of using the ostensibly legitimate cover of legal/judicial/political authority with the slaving industry, simply employed the same tactics/strategy on those enslaved/imprisoned/murdered in the years from 1939 to 1945. The insurance industry continued its "pattern of continuity" of murder/exploitation/false imprisonment/abuse of legal process/political corruption/judicial corruption/bribery/extortion/kickbacks/racial profiling and discrimination against the mentally/physical infirm.

The Indians:

The Allied Forces (American/British) conducted the investigation/prosecution of the crimes against humanity that were committed in the period from 1939 to 1945. The trials at Nuremberg (1945 to 1947) resulted in the criminal convictions of hundreds of senior/high ranking judges/lawyers/physicians/business/insurance executives/politicians, individuals who had assisted Adolph Hitler in his conversion of the State of Germany into a massive, murderous "racketeering enterprise", purposed to further the economic/political agendas of The Third Reich. The insurance industry, of which Defendants Allstate/Geico are members, profited from the aforementioned schemes, and the progeny of those profits continue to be laundered through Defendants Allstate/Geico. However, what remains irrefutable is the fact that the tactics/strategy/"patterns of racketeering" legally codified by the insurance industry

continue to be employed today against Indian physicians/so called "healthcare providers"/ chronic pain patients and those with health conditions that require long-term ongoing care, those with mental/physical infirmities.

The atrocities/crimes (murder/manslaughter/enslavement/economic servitude/human trafficking/imprisonment) against humanity of the slaving industry/the holocaust/the targeted extermination of the infirm/specific racial groups continues to be perpetrated today in the United States by the insurance industry against ethnic minorities, occupied principally by immigrants/Indians/Hispanics/Blacks. The insurance industry, as it has done since the 1600s has targeted racial groups, ones it considers the weakest, and now in 2021 in America, land of the free, home of the brave, there are over two (2) million citizens incarcerated in prisons/work camps/concentration camps (another British invention), and an unprecedented number of physicians, the majority of whom are Indian.

The insurance industry's most recent scheme against Indian physicians has and is being conducted in collusion/conspiracy with the American equivalent of the Nazi judiciary/body politic/medical profession, with the overall purpose of economic/political advantage. The Allied Forces/Prosecutors (American/British) were unwitting conduits for the transmission of information regarding the construction/perpetration of elaborate, well concealed "racketeering schemes" that, as with The Kaul Cases Defendants did convert a state (Germany: 1939 to 1945 - New Jersey: circa. 1960 to the present) into "racketeering enterprises" through, by and which the insurance industry profited by collusion/conspiracy with worlds of medicine/business/politics.

The Kaul Cases, and there will be further international tribunal/examination, are, without overstating their relevance, the most equivalent legal vehicle thus far in American legal history, that in any manner mimics The Nuremberg Trials. The German public and the world remained ignorant to the atrocities of the Nazi legal/political/medical/judicial/business machine, until the crimes were exposed in these trials. Similarly, the insurance industry propaganda machine has concealed from the American public its "War on Doctors" and patients with chronic illnesses. It has concealed its pervasive corruption of the judiciary and crooked physicians willing to provide false testimony against physicians to whom the insurance industry owes money, in order to have these physicians (mostly Indians) eliminated through incarceration/loss of livelihood/license suspension/revocation/suicide/social ostracization/professional ostracization. No different to the strategies employed by Slaving-Nazi-Insurance Axis.

Humanity existed for thousands of years before insurance. Insurance is nothing but legalized extortion, and humanity will prosper for thousands of years after the insurance

industry has been eliminated. Bitcoin is doing the same thing to the banking cartels, another British institution. Lest no one forget, it was the "money-lenders" who were evicted from the temple.

Dated: February 20, 2021

Richard Arjun Kaul, MD

KAUL:0333

Exhibit 7

November 21, 2020

Mark Ellen
General Medical Council
Regents Place
350 Euston Road, London NW1 3JN

Re: Kaul v Pennsylvania Medical Board ("PMB")
Docket Number Pending
Notice to Defendant GMC to initiate suit.

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 – State criminal indictment v Defendant Andrew Gregory Kaufman, MD
K7 – Kaul v Federation: 20-CV-01612
K11-1 – Kaul v Pennsylvania Medical Board: Docket Number Pending
P1 – Kaul/Patel v Allstate: 19-CV-08946
P2 – Kaul/Patel v State of New Jersey/Crist: 19-CV-09232

Sections:

- 1. Racketeering + Mail Fraud + Wire Fraud**
- 2. The British Government + The Crown Prosecution Service + The FBI**
- 3. Defendant GMC + The Guardian + Prejudicial Media Coverage**
- 4. Media manipulation + Google + NYSE + COVID-19 + The Supreme Court of the United States**
- 5. Defendant PMB + Obstruction of Justice + Vicarious liability of Defendant GMC**
- 6. Conclusion + Ineffective COVID-19 Vaccine**

Dear Mr. Ellen,

Please find submitted this notice of intent to initiate legal proceedings against the General Medical Council in the United States District Court, and notice of demand for preservation of all and any records (digital/non-digital) that reference directly or indirectly either my name and or any legal matters (UK/US – 1999 to 2020) in which my name is used.

1. Racketeering + Mail Fraud + Wire Fraud

Also attached to the email on which this notice is communicated is a copy of the September 7, 2016 letter I sent to Judith Chrysthie, in which I requested **“the GMC provide me with a complete copy of my file”**. Defendant GMC failed to provide a complete copy and in fact omitted incriminating evidence of communications between itself, the British Government, the Crown Prosecution Service and the Office of the New Jersey Attorney General. The latter is a Defendant in P1 and has since 2002 used the US mail and wires on hundreds of occasions to communicate facts pertaining to the crimes levied in **The Kaul Cases**. Defendant GMC has incurred legal liability in the United States consequent to conspiring with, amongst others, the Office of the New Jersey Attorney General, Defendant New Jersey Board of Medical Examiners and the Pennsylvania Medical Board, in an **“open-ended”** association-in-fact racketeering enterprise purposed to: (i) conceal its prior crime of illegally releasing (2002) highly confidential health information in knowing violation of the European Data Protection Act; (ii) perpetuate the immense and ongoing economic injury caused to me by Defendant GMC, Defendant NJBME, Defendant PMB and all Defendants named in **The Kaul Cases** (1999 to 2020); (iii) perpetuate the immense and ongoing injury to my reputation caused to me by Defendant GMC, Defendant NJBME, Defendant PMB and all Defendants named in **The Kaul Cases** (1999 to 2020); (iv) conceal from public examination further evidence of the Defendants’ crimes as detailed in **The Kaul Cases**. In furtherance of this **“pattern of racketeering”** Defendant GMC has availed itself of the US mail and wires and has thus converted itself into a **“racketeering enterprise”**, legally liable in the United States pursuant to RICO.

2. The British Government + The Crown Prosecution Service + The FBI

The British Government/Crown Prosecution under Tony Blair abused its power in an attempt to enjoin the FBI on two occasions in its politically motivated prosecution of me. A prosecution that was perpetrated in retaliation for my February 1999 challenge to the British Government/Specialist Training Authority/Royal College of Anesthetists. The crux of the case brought by the Crown Prosecution Service was that I was allegedly talking on a mobile (cell) phone and was thus distracted from the patient. David Bristowe, a telephone engineer for Orange Telecommunications submitted an expert report and testified that for approximately one hour before and one hour after the cardiac arrest of Isatu Bangura, there had been no incoming or outgoing calls on my

phone. The judge should have dismissed the case, as there was not one to answer, but he did not because as my Queens Counsel, Anthony Arlidge stated: "The judge is under a lot of pressure". That pressure was coming from the British Government under Tony Blair, he of the Iraqi war crimes/genocide.

The first attempt occurred in April 2000, a point in time that was after my arrest on a 'manslaughter' charge (October 1999) and before the commencement of the trial at the Central Criminal Court (Old Bailey) (January 22, 2001). I was granted permission by the Court (Recorder- Justice Michael Hyam) to visit my girlfriend in Australia, and flew business class from London to Melbourne. Officers at Scotland Yard checked only the economy roster of the flight, and mistakenly concluded that I was a fugitive. This false conclusion caused them to have two FBI agents visit the then Chairman (Professor Albert Sauberman) of my anesthesiology program at Albert Einstein/Montefiore Medical Center in the Bronx, New York, in order to ascertain if I was in the United States. I was not, and in fact on that date I was in the Daintree Rain Forest in Queensland, Australia. The international manhunt was eventually called-off after I had spoken with my brother with whom I confirmed my location. I then reconfirmed this fact with my solicitor, Ian Barker, when he called the hotel in which my girlfriend and I were staying.

The second attempt occurred in February 2003, when two junior FBI agents visited me while I was working at St. Claire's Hospital in Denville, New Jersey. They substantiated their visit with the claim that they were investigating a purported discrepancy in two DEA numbers that has supposedly been issued to me. The matter was clarified subsequent to a meeting between the agents, my then lawyer, Anthony Labue (Decottis + Fitzpatrick + Cole) and myself. The FBI apparently wanted nothing to do with the British Government's continued persecution of me and my family. After I left England on September 29, 2001 and once the British Government/CPS came to know this fact, it then re-directed its abuse of power at my brother, who was interrogated by British authorities, who attempted to have him incriminate me. He refused and in 2005 a British judge jailed him in for six (6) months. This same judge had me served with legal papers in 2003 at the residence of my ex-wife's parents' house in Convent Station, New Jersey.

Defendant GMC played a central role in this systemic abuse of power by the British government that involved international manhunts, the FBI, wrongful arrests, unjust imprisonment and the illegal release of confidential health information. In providing this information to the New Jersey Attorney General, Defendant GMC did it with malicious intent consistent with the highly politicized/publicized prosecution, trial and 'conviction' on February 22, 2001. All of this because I had attempted on February 2/3 1999 to have American medical training and board certification recognized as being equivalent to that in the UK.

This misconduct and these violations of my civil rights continue to this day, consequent to Defendant GMC's ongoing conspiracy with the Defendants, as is evident from the corpus of communications between Defendant GMC and the Defendants.

3. Defendant GMC + The Guardian + Prejudicial Media Coverage

The illegal release of my confidential health file has caused permanent harm to my reputation and ability to earn a living and thus support my family. Defendant GMC acted criminally in both providing the information to the New Jersey Attorney General and in failing to obtain assurances that it would not be disseminated on the internet or to any third parties. However, almost as soon as it came into the possession of then deputy attorney, Alan Niedz, it was widely distributed within the New Jersey medical, legal and political communities, an act that violated my legal rights in America and one that would not have occurred had Defendant GMC not violated my legal rights in the UK and knowingly breached the European Data Protection Act. Again, all of this because I sought to have American medical training recognized in the UK. From the time I returned to the United States I have been severely prejudiced by the politically motivated 'conviction' in the UK and the national dissemination by the New Jersey Attorney General of my confidential health information. In fact, in June 2012, Bruce Crelin, an attorney representing me in my defense of a case filed on April 2, 2012 by Defendant Doreen Hafner (a New Jersey deputy attorney general) on behalf of Defendant New Jersey Board of Medical Examiners, stated with regards to these Defendants: **"They are treating you like you are public enemy number one."** This jaundiced view of me was in large part due to the malfeasance of Defendant GMC, an effect of which was to cause the Defendants to believe they could attack me with impunity. One of the many consequences of this **"vast conspiracy"** as detailed in The Kaul Cases, is the fact that the Defendants, of which Defendant GMC will soon be one, have stolen almost a decade of my professional career and destroyed my reputation, making it impossible for me to support my innocent family, who have suffered immensely since 2012, an injury for which the law holds liable Defendant GMC.

In late 2014 the Guardian published a highly defamatory story that appears variably as the fourth/fifth search on page one of a Google search of my name. This article includes a picture of Isatu Bangura, references the jailing of my brother and contains vicious comments that will continue to indefinitely cause irreparable damage to my reputation. The interview with Alex Hannaford was recorded and is published at www.drrichardkaul.com. In fact, Adam Morris, Esq, an attorney employed by the Office of the Pennsylvania Attorney General, introduced this article into evidence on February 7, 2020, at a hearing conducted by David Green, Esq, on whether to grant my application for medical licensure in Pennsylvania. His intention was to prejudice the proceeding and pollute the appellate record with the word 'manslaughter'. Morris was encouraged to do this by the Defendants, who themselves [Defendant Hafner + Solomon] had introduced this information into the record in June 2013, during the illegally conducted hearing in the New Jersey Office of Administrative Law (April 9 to

June 28, 2013) that resulted in the illegal revocation of my New Jersey license. This illegality along with the politically motivated 'conviction' in the UK was used in July 2019 by Defendant PMB to unlawfully deny my application for medical licensure. This denial was the basis for the hearing conducted on February 7, 2020.

4. Media manipulation + Google + NYSE + COVID-19 + The Supreme Court of the United States

Defendant GMC conspired with the Guardian to have published online a grossly misleading story purposed to align with the malicious intent of the New Jersey Attorney General and the Defendants to destroy my reputation. The Defendants have abused their control of the media to manipulate it and ensure this slanderous article appears in the first five search results of a **Google** search of my name. The article does NOT appear at all when **Bing**, **Yahoo** or any other search engines are used. The same scheme of media manipulation was perpetrated when the Defendants caused ACX (an Amazon subsidiary) to suppress publication in March 2020 of "**An Impossible Victory: Kaul v Christie**". To illustrate the massiveness (2002 to 2020) of the conspiracy in which Defendant GMC has played a determinative role, the Defendants' lawyers have recently advised their clients not to click on digital content that proves their guilt, and did in fact bribe YouTube to have them remove a highly incriminating video pertaining to Defendant Andrew Gregory Kaufman and that I had published. This conflagration was started by the British Government in 1999 with its ill-conceived scheme to further a criminal prosecution that it knew was purely political. The prosecution was conducted in a corrupt British court, given orders by the Blair government to have me jailed. In 2020, what began in 1999 now spans the globe, involves its entire system of physician regulation (I have been unable to practice medicine since 2012) and some of the wealthiest and most powerful corporations/individuals in the world. The conflict has become cyber in nature and now involves, amongst others, all American state medical boards, the DEA, the State of New Jersey, the State of Pennsylvania, the American Board of Anesthesiology, the British government, Defendant GMC, the CPS, the FBI, the National Practitioners Data Bank, the Federation of State Medical Boards, Berkshire Hathaway, Allstate Insurance Company, TD Bank, the NYSE and many of its corporate investors.

The administrative/digital/legal/economic/political equivalent of World War III that involves the NYSE and is a fight that seeks, amongst other things, a "**Reformation of American Medical Boards**" in order to eradicate endemic corruption and thus both mitigate the rate of COVID-19 related deaths and ensure any future microbial threats are detected and the public forewarned. One of the other forms of relief is a reformation of the system of so called system of "**political campaign finance**" (read bribes) (see attached-K1-D.E. 1 Page 200). This seed of evil lies at the heart of corporate conducted/caused genocides, such as the COVID-19 global pandemic. The British Crown received kickbacks from the slaving profiteers, while American state/federal

politicians/judges receive kickbacks from the corporate profiteers. History is a deceptively simple pattern of repetition.

As you are aware these matters were placed before the Supreme Court of the United States on November 5, 2020, in the form of a petition for a writ of mandamus. November 5, as I am sure you know was the night in 1605, on which Guy Fawkes attempted to 'blow-up' the House of Lords and kill King James. Had he succeeded, it is likely the Pilgrims would not have landed on Plymouth Rock and the world would not today be experiencing the COVID-19 catastrophe. The irony in 2020 is that in 1621, the reported date of the first Thanksgiving, the Pilgrims thanked God for rescuing them from the Anglican clutches of King James. There exists no written record of God's response, but I am convinced that had he known (free will versus destiny dilemma/question) murderous, tyrannical multinational corporations would enslave America and its people then he might have ensured the Pilgrim's ship was lost in the Atlantic. Regardless, in 2020 there will be no collective giving of thanks, thanks to corporations like Allstate, Berkshire Hathaway and TD Bank and most definitely because God wants no thanks for the **"Unmaking of America"** as described in **"Evil Geniuses"** (see below). The GMC in aiding and abetting (1999-2020) the Defendants racketeering schemes is most definitely not doing God's work.

The writ intends to dismantle a corrupt, corporatized system of physician regulation that continues to remain a lethal and **"imminent threat"** to the welfare of the global public, just as the British Crown did (1600-1945) and Defendant GMC now does (1999-2020). The tyranny of the crown has been replaced with the tyranny of multinational corporations, many of which trade on the world's locus of capital control, that of the New York Stock Exchange. British monarchical oppression legalized slavery. Capital cronyism and the corruption of American healthcare by corporations is responsible for COVID-19 related mortalities/digital enslavement and if not 'blown-up' now will cause the world to have to suffer through another centuries long cycle of corporate servitude, economic exploitation and **"big-brother"** like schemes that manufacture microbes to control and economically exploit the masses. First it was the Church, then the Crown, then Governments and now Corporations. Same crook different hats. Defendant GMC/American state medical boards/FSMB constitute one of the crook's tools. The weapons of this war, the administrative/digital/legal/economic/political equivalent of World War III, are not bullets, grenades or even nuclear devices, but are letters, lawsuits, subpoenas and media manipulation. The battlefields are not the land, sea and air, but the internet and the NYSE, the world's economic foundation. Multinational corporations have purchased state governments, the body politic, the media, academia, medical councils/state medical boards and the judiciary. To illustrate this latter point, I make quote a section from **"Evil Geniuses – The Unmaking of America"** by Kurt Anderson, a book about the corporate takeover of America that was published by Random House in August 2020:

"Powell [appointed by Nixon to the Supreme Court in 1971] proposed this war on four fronts – in academia, the media, politics, and the legal system ... the judiciary may be the most important instrument for social, economic and political change," Powell advised. "This is a vast area of opportunity" if "business is willing to provide the funds" (read bribes) – and indeed the whole war (read corporate takeover) would "require far more generous financial support from American corporations than" any such effort "ever received in the past" – Page 58/59.

5. Defendant PMB + Obstruction of Justice + Vicarious liability of Defendant GMC

Defendant PMB has for over three (3) years (September 22, 2017-November 20, 2020) continued to violate Kaul's legal rights by conspiring/colluding with the Defendants to hinder/delay/obstruct/defer his application for medical licensure in the State of Pennsylvania. Pursuant to RICO, Defendant GMC is vicariously liable, consequent to, amongst other things, its ongoing illegal dissemination of Kaul's confidential health information to Defendant PMB in the aforementioned period. Defendant GMC will incur further liability with each and every communication it exchanges with any American state medical board that submits any enquiry regarding any future applications made by Kaul for medical licensure in the relevant state. Kaul respectfully advises Defendant GMC to cease such communications in order to limit its economic liability, which is currently calculated to include damages to Kaul's economic standing and reputation consequent to an eighteen (18) year long violation of Kaul's legal rights pursuant to the European Data Protection Act and equivalent American jurisprudence. The Defendants are liable for these violations in both American and European courts.

On November 20, 2020 at 7:00 am EST Kaul sent an email (copy enclosed) to the executive director of Defendant PMB, the subject heading of which is: **"PA State Court Action"**. In the email Kaul requests that Defendant PMB **"preserve"** evidence of any communications that pertain/relate to any aspect of Kaul or his applications (2017/2019) for medical licensure in Pennsylvania. At 8:00 am, Shana Walter, Esq, a lawyer employed by Defendant PMB responded. Walter identified the specific verbiage of the email as being a **"PRIVILEGED AND CONFIDENTIAL COMMUNICATION"**, without citing to any controlling authority. Defendant PMB has illegally came into the possession of Kaul's highly UK confidential, that Defendant GMC illegally transmitted using the US mail and wires. This constitutes the RICO predicate acts of mail and wire fraud. Walter indicated to Kaul that he would receive a decision from Defendant PMB in **"due course"**. Walter was instructed to use this wording by her political/legal superiors, including the Pennsylvania AG, Joshua Shapiro, who himself was ordered to obstruct Kaul's license application by Defendants Allstate/Geico. Walter, instead of providing a specific **"within"** time period has perpetuated Defendant PMB's **"pattern of racketeering"**, in order to attempt to continue the concealment of the Defendants massive crimes, which commenced in 2002 with the dissemination/receipt of Kaul's confidential health file. Walter's response is evidence that Kaul will use in his prosecution of **The Kaul Cases**, which now includes K11-1, in which Defendant GMC is named.

6. Conclusion

Defendant GMC is a UK based charity that Kaul will prosecute to the fullest extent of the law in American courts. It is a prosecution from which Defendant GMC can claim no legal immunity, as can none of the Defendants, including Defendant PMB, as no immunity doctrine extends to violations of criminal law, be they knowing or unintentional. The time has come for those who claim to uphold the law and **“protect the public”** to explain to the public and the law why they were grossly negligent. It is time for the Defendants to tell the truth and explain that corruption caused them to fail in their **“duty of care”** in not detecting the COVID-19 pandemic, an unprecedented public health catastrophe and a crime against humanity. In the June 13, 2012 words of Kaul’s now deceased lawyer, Robert Conroy: **“When those charged to uphold the laws act in a lawless way, they were faced with tyranny ... As a practical matter, you will be sewing the seeds of absolute and utter chaos, and you’ll reap the whirlwind as a result.”** (copy enclosed). That COVID-19 whirlwind is reaping chaos around the world, no effective vaccine is on any of the planet’s many horizons, and millions of people are dying, yet Defendants PMB/NJBME continue to suspend/revoke physicians licenses, deny/delay reinstatement/issuance of licenses and descend further into the vortex of their whirlwind of insanity. There exist no independently peer reviewed clinical trials that prove either the efficacy or safety of any proposed vaccines, and it is a fact that the pharmaceutical companies attempting to sell their vaccines have devoted decades, spent millions of dollars bribing politicians and have created ‘revolving doors’ between the pharmaceutical industry, the FDA and other state/federal regulatory agencies involved in the regulation of pharmaceuticals. Additionally, the RNA virus has a marked propensity for mutation, which effectively means that whatever vaccine is developed, it will be rapidly ‘outmaneuvered’ by a COVID-19 genetic ‘two-step’, always staying one step ahead, until global herd immunity achieves a critical mass and COVID-19 appears in the rearview mirror of humanity. Until then, whenever that may be, the catastrophe will continue unabated, by which point medical board corruption or indeed medical boards will have been eradicated.

There could not be more powerful evidence for a **“Reformation of American Medical Boards”** than that exposed by the 2020 intersection of **The Kaul Cases** and the COVID-19 pandemic, an event for which there truly exists a basis for the giving of thanks.

Kaul advises Defendant GMC to commence preparations for its defense in K11-1.

A series of Admission Statements will be submitted within the next week.

Yours sincerely

Richard Arjun Kaul, MD

cc: All Counsel via email

All parties with a legal or other interest

Exhibit 8

Kaul v Christle, 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. R.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's 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

\$ 28,171,028,828568999213 trillion

Exhibit 9

www.drrichardkaul.com

November 22, 2018

Mark Donovan, CFA
Boston Partners
One Beacon Street
30th Floor
Boston, MA 02108

Re: Kaul v Christie, et al - Docket No. 16-CV-02364
Kaul v Christie, et al - Docket No. 18-CV-08086
Failure of Defendant Allstate to report lawsuit to shareholders via Form 10 K

Dear Mr. Donovan,

I write this letter to inform you that Allstate Insurance Company, an entity traded on the NYSE and one in which Boston Partners is a top ten corporate shareholder, is a defendant in a racketeering + antitrust lawsuit, that I am prosecuting in the United States District Court, District of New Jersey. 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.

The litigation commenced on February 22, 2016, and Defendant 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.

Please find enclosed a flash drive that contains the following documents:

1. Kaul v Christie: 16-CV-02364 - K1: Filed February 22, 2016 - Case Docket: D.E. 1 to D.E. 281
2. Kaul v Christie: 18-CV-08086 - K2: Filed April 9, 2018 - Case Docket: D.E. 1 to D.E. 59
3. ICC File: A series of communications with the International Criminal Court, that detail events in which Defendant Allstate has become vicariously liable, consequent to having bribed Governor Christie. This issue is referenced in K1 at: D.E. 179 Page 2351 + D.E. 179 Page 2945 + 180-2 Page ID 3328 + 192-1 Page ID 3572 + D.E. 204-11 Page ID 4256 + 209-12 Page ID 4640 + D.E. 281-2 Page ID 6611.

The damages calculation can be found at: K1 - D.E. 1-2 Page ID 198 to 200.

The case is based partly on the defendants having engaged in a prolonged "***pattern of racketeering***" that involved, amongst other things, evidence tampering + obstruction of justice + bribery + conspiracy + fraud + kickbacks. The criminal elements of the case have been referred to J.P. Coney, Chief, Fraud + Public Corruption Unit, United States Department of Justice. The case has also been brought to the attention of the nine (9) justices of the United States Supreme Court.

Defendants Allstate + TD + Geico have immense financial exposure, which they were obliged to report their shareholders and the market. They have not, and this letter is to inform you of that fact.

Your lawyers can locate the case docket on the federal court filing system www.pacer.gov

If there is any further information you require, please feel free to contact me at either 201 989 2299 or drichardkaul@gmail.com

Yours sincerely



Richard Arjun Kaul, MD

An equivalent letter has been sent to the following corporations, who along with State Street Corporation, hold almost eighty percent (80%) of shares in Defendant Allstate:

David Solomon: CEO - Goldman Sachs
Kevin Phelan: CEO - LSV Asset Management
John Stumpf: Chairman + President + CEO - Wells Fargo Company
Cliff Asness: Managing + Founding Principal - AQR Capital Management
Joseph Hooley: CEO - State Street Corporation
Peter H. Warne: Independent Chairman - Macquarie Group Limited
Mortimer J. Buckley: President + CEO - The Vanguard Group
Christopher Meade: Chief Legal Officer - Blackrock Inc.,
Michael O'Grady: President + CEO - Northern Trust Corporation

www.drrichardkaul.com

November 13, 2020

Clerk of the Court
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

Re: Kaul v Christie

16-CV-02364 – K1

Admissions of fact + Petition to SCOTUS re: writ of mandamus

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: 18-01489

K5 – Kaul v Federation: 19-CV-3050

K6 – State criminal indictment v Defendant Andrew Gregory Kaufman, MD

K7 – Kaul v Federation: 20-CV-01612

P1 – Kaul/Patel v Allstate: 19-CV-08946

P2 – Kaul/Patel v State of New Jersey/Crist: 19-CV-09232

Dear Sir/Madam,

Please find submitted the following documents:

1. September 5, 2020: Sweeney admissions of fact.
2. September 23, 2020: Shapiro admissions of fact.
3. October 8, 2020: Christie admissions of fact.
4. November 9, 2020: Affidavit of Dina Marie Kaul + Petition to SCOTUS for writ of mandamus to the District of New Jersey + Cover letter to the District of Columbia + Email from Kaul to the Morris Township Police Department.

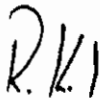
5. November 12, 2020: Kaul opposition to D.E. 448 + D.E. 449.

Attached to each submission is a copy of the email sent to Defendants' counsel, to which was attached the referenced submission.

These submissions are relevant to D.E. 448/449, to Kaul's petition to SCOTUS re: writ of mandamus to the District of New Jersey and will facilitate appellate determination of any appeals that might ensue from the case. Additionally, the submitted evidence is probative to the claims of The Kaul Cases and will facilitate/mitigate a global resolution of pending/future litigation.

Thank you for your attention to this matter.

Yours sincerely

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

Richard Arjun Kaul, MD

cc: United States District Court for the District of Columbia
United States Court of Appeals for the Third Circuit
Supreme Court of the United States
All Counsel of record

www.drrichardkaul.com

September 5, 2020

Steven Sweeney
Senate President
New Jersey State Government
935 Kings Highway
Suite 400
West Deptford, NJ 08086

Re: The Kaul Cases
Admissions of fact

Dear Mr. Sweeney,

Please find below a series of statements regarding your participation in the illegal scheme that caused the suspension/revocation of my New Jersey medical license on April 2, 2012/March 12, 2014:

1. I admit that in a period commencing in or about 2008, I did knowingly/willfully abuse the power of public office and did conspire with the individuals named below, to have the New Jersey Board of Medical Examiners manufacture a false case against Richard Arjun Kaul, MD, the purpose of which was to: (a) have his medical license revoked; (b) destroy his economic standing; (c) destroy his reputation; (d) force him into a state of poverty so that he had no money to mount a legal defense; (e) cause him and his corporations to file for bankruptcy; (f) to force him and his family into a state of poverty; (g) cause him and his family to become homeless; (h) cause him to leave the country; (i) prevent him from ever finding employment anywhere in the world by attempting to destroy his online reputation; (j) eliminate the competition he presented to physicians who practiced in the minimally invasive spine surgery sector, from whom I received bribes; (k) eliminate the \$ 45 million debt owed to him principally by Allstate Insurance Company + GEICO; (l) obstruct his efforts at having his license reinstated in 2014 by demanding he first pay \$ 450,000; (m) threatening to suspend/revoke the licenses of any physicians who associated/worked/assisted or had any personal/professional relationship with Richard Arjun Kaul, MD; (n) harassing and intimidating every person that did work with Richard Arjun Kaul by having state employees making unannounced/threatening visits to their homes/offices/other places of work, during which they would interrogate these individuals; (o) increase the profits of Allstate Insurance Company + GEICO by creating an environment of fear/paranoia in which

physicians did not practice medicine and thus did not submit professional invoices; (p) cause Richard Arjun Kaul to be jailed on false charges of insurance fraud; (q) cause Richard Arjun Kaul to become the subject of over forty-four (44) lawsuits from patients + insurance companies; (r) encourage/coerce/direct former patients to file frivolous lawsuits against Richard Arjun Kaul, with the promise of profit and the purpose of attempting to persecute him into a state of psychological despair.

2. I admit that in a period commencing in or about 2008, I did consciously/willfully/maliciously violate the law and legal rights of Richard Arjun Kaul in perpetrating the illegal scheme detailed above, to which I have admitted.
3. I admit that in a period commencing in or about 2008, I did engage in hundreds of in person meetings/email exchanges/text exchanges/cell phone conversations/landline conversations with the individuals named below, to perpetrate the scheme detailed above, to which I have admitted:

Christopher J. Christie, Esq – Ex-governor of the State of New Jersey (2009-2017) and failed 2016 US Presidential candidate.

Philip Murphy – New Jersey Governor (2017 – Present).

Jeffrey Chiesa, Esq – 2012 Attorney General for the State of New Jersey + Partner of Chiesa + Shahinian + Giantomasi (Christie lackey).

Eric Kanefsky, Esq – 2012 Director of the New Jersey Division of Consumer Affairs + Partner of Kanefsky + Calcagno (Christie lackey).

Doreen Hafner, Esq – Deputy Attorney General.

Andrew Gregory Kaufman, MD – Medical expert for the State of New Jersey.

Gregory Przybylsky, MD – 2011 President of the North American Spine Society.

Robert Francis Heary, MD – Director of the Rutgers Neurosurgical Institute.

Marc Cohen, MD – Orthopedic Spine Surgeon.

Peter Staats, MD – President of American Society of Interventional Pain Physicians.

Lewis Stein, Esq – Now deceased partner at Nussbaum Stein Goldstein Bronstein.

Jay Howard Solomon, Esq – New Jersey Judge.

Kenneth Hollenbeck, Esq – Partner at Scarinci + Hollenbeck.

Kenneth Pringle, Esq – Partner at Pringle + Quinn + Anzano.

Jeffrey Quinn, Esq – Partner at Pringle + Quinn + Anzano.

David Saiber, Esq – Partner at Saiber Law Firm.

Gerl Albin, Esq – Partner at Saiber Law Firm.

Stuart Rabin, Esq – New Jersey Supreme Court Justice.

Barry Albin, Esq – New Jersey Supreme Court Justice.

Joseph Vitale – New Jersey State Senator.

Michael J. Doherty – New Jersey State Senator.

Nelida Pou – New Jersey State Senator.

Nilsa Cruz-Perez – New Jersey State Senator.

Ronald Rice – New Jersey State Senator.

Shella Oliver – Lieutenant Governor State of New Jersey (2017 - Present).

Gurbir Grewal – Attorney General for the State of New Jersey (2017 – Present).
Jeffrey Posta – Deputy Attorney General for the State of New Jersey.
Benjamin Hickey – Employee of Allstate Insurance Company.
John Robertelli – Partner at Rivkin + Radler.
Nicholas P. Scutari – New Jersey State Senator.
Thomas Kean, Jr – New Jersey State Senator.
Nicholas J. Sacco – New Jersey State Senator.
Kenneth J. Grispin – New Jersey State Judge.
John Sheridan – Judge on Bankruptcy Court for the District of New Jersey.
Dennis Carey – New Jersey State Court Judge (retired).
Kevin McNulty – Federal Judge on the United States District Court for the District of New Jersey.
Brian Martinotti – Federal Judge on the United States District Court for the District of New Jersey.
Robert Smith – New Jersey State Senator.
Lawyers for Defendants in "The Kaul Cases" (please see below).

4. I admit that my admissions of corruption of the administrative/judicial/political processes/bodies in the State of New Jersey for the purposes of illegal political/economic gain have irreparably damaged the reputation of the State of New Jersey.
5. I admit that damage to the reputation of the State of New Jersey has rendered it a place in which American/Foreign businesses are reluctant to conduct commerce.
6. I admit that damage to the reputation of the State of New Jersey has rendered it a place in which American/Foreign businesses should not conduct commerce.
7. I admit that because of my corruption of the administrative/judicial/political processes/bodies in the State of New Jersey, I have deprived the public of their right to honest services from public servants.
8. I admit that I have embezzled monies/services from the State Tax Revenue/State which I have illegally/knowingly/willfully used for personal reasons, and not in the service of the public.
9. I acknowledge that my corruption of the administrative/judicial/political processes/bodies in the State of New Jersey will be publicized by Richard Arjun Kaul in his "An Impossible Victory" series of books/documentaries/movies/public speaking engagements, that commenced on April 15, 2020 and will continue for the remainder of his life (approximately 39 years).

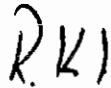
10. I acknowledge that in my capacity as the president of the New Jersey senate, I have discussed you, your case and your application in 2018 for reinstatement of your license, with Governor Murphy.
11. I acknowledge that during these discussions I informed Governor Murphy that he should order the NJBME NOT to reinstate your license, as if he did, Allstate/Geico had threatened to expose the fact that I, along with many other state politicians/governors had engaged in a decades long scheme of public corruption/tax evasion.
12. I acknowledge that these bribes were transferred into off-shore trusts and bank accounts and that neither I nor any other state politicians paid taxes on this illegal income.
13. I acknowledge that I have read the Complaints (K1 + K2 + K3 + K4 + K5 + K6 + K7 + P1 + P2) and agree with ALL of the within allegations.
14. I acknowledge that I would be willing to testify in court as to the truthfulness of the allegations, as I have first-hand knowledge of the facts upon which they are based.
15. I acknowledge that I have read the twenty-two (22) motions for summary judgment filed in K1, and can verify the truthfulness/irrefutability of the evidence upon which they are based.
16. I acknowledge that I would be willing to testify in court as to the truthfulness of the evidence, as I have first-hand knowledge of its veracity.
17. I acknowledge that in my discussions with Governor Murphy regarding you, your case and your application for reinstatement of your license, he informed me that he had received a letter you dated March 24, 2020.
18. I acknowledge that in the letter you stated: "Dear Governor Murphy – I write this letter to respectfully request that in the interests of public safety and that of saving lives, you immediately issue an executive order to the New Jersey Board of Medical Examiners to reinstate my medical license ... In short I have the ability to help save lives ... I write this letter with the utmost respect for the position of the governor's office, and in the sincerest hope that you put politics aside, put the people first ..."
19. I acknowledge that Governor Murphy was advised by myself and others not to respond to your letter due to the political risk that Allstate/Geico would expose the decades long schemes of public corruption/tax evasion, in which I along with many other state politicians/governors had engaged.

20. I acknowledge that political corruption of the NJBME by myself/other state politicians/Allstate/Geico was/is directly responsible for the COVID-19 pandemic related mortality/morbidity of the New Jersey public.
21. I acknowledge that had the New Jersey state government/NJBME/state politicians not permitted themselves to become corrupted by Allstate/Geico, then the NJBME would have detected the COVID-19 threat and forewarned the public.
22. I acknowledge that had the public been forewarned, thousands of lives would have been saved.
23. I acknowledge that Governor Murphy has used and is exploiting the COVID-19 pandemic for political gain, in that he capitulated to Allstate/Geico in ignoring your letter and ordering them NOT to reinstate your license in 2018, despite your expertise and despite the fact that the State of New Jersey desperately needed doctors to save lives.
24. I acknowledge that Governor Murphy has used and is exploiting the COVID-19 pandemic for political gain, in that on September 1, 2020, he signed into law Bill 2455, a bill that allows illegal immigrants to obtain licenses to practice medicine and surgery.
25. In my capacity as the senate president, a controlling member of the New Jersey democratic party and an individual who communicates daily with Governor Murphy, I acknowledge that his motivation for entering into law of Bill 2455 was to secure the vote of this sector of the New Jersey public for his 2021 campaign, in order to try and get re-elected to the office of the governor.
26. I acknowledge that Governor Murphy knows that Bill 2455 violates federal immigration law and that the United States Department of Justice has expressed its opposition to this illegal/politically motivated piece of legislation.
27. I acknowledge that Governor Murphy and members of his political team have manipulated the COVID-19 death related statistics, in order to give the false impression to the public that his policies have contained the pandemic. I know they have not, and that many people are still dying from lack of medical care, lack of adequate nutrition and lack of access to critical social services.
28. I acknowledge that if I fail to oppose in writing any the above admitted facts, they will become part of the public record as evidence in "The Kaul Cases" and the "An Impossible Victory" series of books/documentaries/movies/public speaking engagements. The latter material will be incorporated into "Kaul Media".
29. I acknowledge that my admission of the above facts provide the basis for: (i) the public to demand my immediate resignation from public office; (ii) the public to demand I publicly disclose the details of all bribes I received from Allstate/Geico/"The Kaul Cases"

Defendants for the entirety of my tenure as a public servant; (iii) the public to demand an investigation of corruption within the NJBME, the cause of COVID-19 mortalities; (iv) the public to demand that the NJBME be reformed, in order to bring it into compliance with the constitutions of the State of New Jersey and that of the United States; (v) the public to NOT vote for Governor Murphy in November 2021; (vi) the public to boycott Allstate/Geico in order to stop their corruption of administrative/political/legislative/legal bodies in New Jersey; (vii) the public to demand the SEC conduct an investigation of Allstate/Geico for manipulation of the global trading/equities market; (viii) the public to sell their shares in Allstate/Geico; (ix) the public to demand that all members of the administrative/legislative/judicial/political bodies in New Jersey deny/admit onto the public record whether within the last two decades they have received any bribes from Allstate/Geico; (x) the public to demand Governor Murphy explain why despite excessive profits, Allstate/Geico now charge the public excessive insurance premiums; (xi) the public to demand that Governor Murphy issue an executive order that permanently bars Allstate/Geico from conducting any further business in the State of New Jersey, and immediately revokes any/all of their business licenses, as they clearly constitute a lethal and "imminent threat" to the health and welfare of the New Jersey public.

This statement of admitted fact will be circulated to every state assemblymen/senator, and if by September 19, 2020, you fail to contest/rebut/refute/address in writing any of the above facts, they will become part of the legal/public record of "The Kaul Cases" and the public record of "Kaul Media".

Yours sincerely



Richard Arjun Kaul, MD

cc: New Jersey Assemblymen
New Jersey Senators

The Kaul Cases:

1. K1 - Kaul v Christie: 16-CV-02364.
2. K2 - Kaul v Christie: 18-CV-08086.
3. K3 - Kaul v Schumer: 19-CV-13477.
4. K4 - Kaul v Stolz: 18-CV-01489.
5. K5 - Kaul v Federation: 19-CV-3050.
6. K6 - Kaul v Kaufman: State Criminal Indictment.
7. K7 - Kaul v Federation: 20-CV-01612.
8. P1 - Patel/Kaul v Allstate: 19-CV-08946.
9. P2 - Patel/Kaul v Crist: 19-CV-09232.

These cases can be viewed on www.pacer.gov

Kaul Media:

"AIV: Kaul v Christie" - Audiobook/E-Book - Found on Scribd.

"AIV: Kaul v Allstate" - Release date: November 5, 2020.

"AIV: Kaul v Federation" - Release date: March 22, 2021.

"AIV: Kaul v. Christie - The Story Within The Story: A Documentary Film" - Found on YouTube.

Public speaking engagements:

"AIV: Adversity into Advantage" - November 22, 2020 + March 22, 2021 + July 22, 2021 + November 22, 2021.

www.drRichardKaul.com

March 24, 2020

Governor Phillip Murphy
225 W State Street
Trenton, NJ 08625

Re: Reinstatement of New Jersey medical license + Corona-Virus Pandemic

Dear Governor Murphy,

I write this letter to respectfully request that in the interests of public safety and that of saving lives, you immediately issue an executive order to the New Jersey Board of Medical Examiners to reinstate my medical license. I am a highly qualified physician with extensive anesthesiology training and experience in the management of complex life-threatening respiratory conditions. As my attached CV and training manual for anesthesiology residencies indicate, I have the knowledge, experience and competency to diagnose and treat life-threatening pulmonary diseases, typical of those now caused by the so called "Corona-Virus". In short I have the ability to help save lives.

However, and without delving into the legal and factual details surrounding the illegal revocation of my license in March 2014, and the medical board's refusal in 2019 to reinstate my license unless I paid them \$475,000, I believe that if you exercise your executive power at this time of international crisis, to enable me to return to my profession of saving lives, it will tell the voting public that you are a man who truly puts people above politics. This I imagine is an act that would not be forgotten in the 2021 elections. As you may or may not be aware, the first in a series of four audio books about the last eight years of my life is being published on April 4, 2020. It is entitled "An Impossible Victory: Kaul v Christie", and chronicles the crimes committed against me by the Christie administration, the state medical board and office of the attorney general.

Since 2017, I have sent you several letters regarding the illegal revocation of my license, and other matters pertaining to Christopher J. Christie. I have not had the

courtesy of a response or even letter of acknowledgement of receipt. With all due respect I have found this to be quite discourteous, and unbecoming of a public servant.

Regardless of what has previously transpired, there now exists a situation of life and death, for which I am extremely qualified and trained to make a difference, and save lives. In considering my request, I am sure you will receive advice from lawyers and others, whose own personal interests are not consistent with those that would assist you in getting elected to a second term as a governor. They have their own agendas against me, and for reasons that rest principally on their effort to cover the crimes they committed against me. Whether it be Allstate or any of the other large corporations involved in the illegal revocation, it will be the votes of the people that you will need to get elected. After the book is published on April 4, 2020, there will be an ongoing series of public speaking events, that will likely commence in mid to late May 2020, and I intend on using that platform to bring attention to medical board corruption, and the matters raised in this letter.

I write this letter with the utmost respect for the position of the governor's office, and in the sincerest hope that you put politics aside, put the people first and correct the massive injustice that was, and continues to be committed against me and my children. I believe you are a good man, and I hope you have the fortitude to stand against malevolent forces that do not have your best interests at heart. That is what leaders do.

Please also find enclosed a copy of a petition that was sent to you on October 6, 2019 by members of the congregation at the New Hope Baptist Church in Irvington. The one with signatures was sent directly to you by Pastor Jerry Smith.

I look forward to your response.

Yours sincerely



Richard Arjun Kaul, MD

cc: Reverend Al Sharpton: House of Justice, 108 W. 145th Street, NY, NY

Case 2:18-cv-08086-KM-SCM Document 38 Filed 08/24/18 Page 105 of 356 PageID: 822

www.dmrhardkeyl

December 14th 2015

Robert Wasserman
Wasserman+ Jurista + Stoltz
110 Allen Road
Suite 304
Basking Ridge
New Jersey 07920

Re: Supply of chemical weapon precursors by New Jersey Governor, Christophe J. Christie, to Syrian rebel forces between 2012-2013.

Re: New Jersey Spine and Rehabilitation, P.C. et als. / Allstate
Case # 13-23368 (VFP)
Your File # 8189

Dear Mr. Wasserman

Please find enclosed the following documents:

1. Letter to the Criminal Division of the United States Attorney Office-November 13th 2015.
2. Letter to the International Criminal Court-November 11th 2015.
3. Jerseygate chart-August 5th 2013.

As the trustee responsible for the sale of the assets in the above Chapter 7 liquidation you will no doubt have information and knowledge pertaining to the complaints contained within the enclosed documents. It is likely that you will be called as a witness to the legal proceedings.

For the sake of completeness I would like to remind you of your responsibilities to behave honestly and without political influence in your administration of the asset collection. The majority of the \$45 million owed to my corporations is from the following insurance companies:

1. New Jersey Allstate Insurance Company
2. Geico Insurance Company
3. Horizon Blue Cross Blue Shield
4. State Farm
5. New Jersey Manufacturers

To date your firm has recovered almost none of these monies and as the enclosed documents demonstrate it is my position that Allstate and Geico along with Christie are guilty of political corruption and racketeering. In fact this was also the opinion of my previous attorney, Robert Levy, at the firm of Scarinci and Hollenbeck. Levy made this comment to me in late 2012 during a meeting we had in his Lyndhurst office at which my Internal counsel, Alphonse Rossi, was also present. Before entering private practice Robert Levy was senior federal prosecutor the sent Philadelphia/Atlantic City crime boss, Nicodemo Scarfo to jail. Levy, most likely under directions from Kenneth Hollenbeck, was instructed to use unpaid legal fees as an excuse to initiate his departure from my case. This unfortunately occurred two weeks before the April 2013 commencement of my medical license hearing in the New Jersey Office of Administrative Law. Specifically I had a meeting with Hollenbeck and Levy in late March at their Lyndhurst office at which Hollenbeck demanded I pay his firm \$192,000 immediately or they would make an application to have them discharged from the case. It did not seem to matter to Hollenbeck that I had already paid his firm over \$200,000. I was rather disappointed in his lack of character and decided that I could not proceed to trial with his law firm.

The following day I sent Levy and Hollanbeck an e-mail terminating the relationship and was able to retain Charles Shaw to argue my case. With only two weeks to go before the trial commenced Shaw admirably prepared the file but made the observation that Levy had done almost nothing with the case, as was evidenced by the complete disarray of the paper file. In the first week of April there was an attorney substitution hearing on the 7th floor of the OAL at 33 Washington Street, Newark New Jersey. At this meeting were the following individuals:

1. DAG Doreen Hafner
2. Charles Shaw
3. Robert Levy
4. Judge Howard Solomon

Solomon accepted the substitution and I specifically remember Shaw telling me that as Levy left the courtroom he made the following comment to Shaw:

"Good luck. This is a sinking ship"

Levy then walked past me looking rather disheveled, shook my hand and wished me good luck. I believed he had good intentions as during his handling of my case he had also made the following comment:

"Dr.Kaul I feel bad that you are going through this"

I believe Levy came under too much political pressure and despite having prosecuted a mafia boss seemed overly intimidated by the scale of my case.

I hope that you or your firm has not subjugated your ethical obligations to either political pressure or the promise of financial reward. However your failure to procure the monies owed by the insurance companies suggest either incompetence or collusion, and I am inclined to believe the latter.

As these matters progress through their appropriate legal channels your records will be subpoenaed and you will be deposed. Scott Raver and Daniel Stoltz, two of your junior partners, will also become part of the discovery process as will Mark Mannigen of Brech Elchier. Mannigen as you might be aware was on Christie's Gubernatorial 2009 'transition team' and obviously has very close political/business ties with him.

The included Jerseygate chart has identified some of the parties involved in Christie's criminal enterprise but will be amended as the legal proceedings develop. The complaint has been filed in New York which is where I was a tax paying resident when the crimes were committed against my reputation and estate.

To date your firm has collected less than 1% of the \$45 million owed, for which you will need to provide answers once the above litigation commences. I hope you have not abrogated your professional responsibilities to greed or political corruption. I have copied the Bharat Meharani, the CEO of TD Bank, as his organization is owed \$900,000 and were instrumental initiating the Chapter 11 proceedings. TD New Jersey has unfortunately allowed itself to become embroiled with Christie's sordid affairs and according to their attorney, William Fiore who made the following comment at a meeting in 2011:

"I don't give a fuck about the IRS" (I have included the relevant letter)

They do not seem to care about the US Internal Revenue Service. That said I think Ms.Measani would be interested to know what your firm has done to collect his bank's money.

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I hope this letter sheds some light on the manner in which you should proceed. I would also like to warn you of the very serious criminal and civil penalties to both you and your firm, should evidence emerge that proves you aided and abetted the crimes.

Yours sincerely,

Richard Arjun Kaul

cc:

Bharel Masrani
Group President + CEO
TD Bank Group
55 King Street West
Toronto-Dominion Center
Toronto, Ontario M5 1A2
Canada

Mark Mennigan
Brach Eichler
101 Eisenhower Parkway
Roseland
New Jersey 07068

Donald Steckroth
Cole Scholtz
1325 Avenue of the Americas
19th Floor
New York
New York 10019

Alistair Gray
The Financial Times
1 Southwark Bridge
London SE1 9HL
United Kingdom

Robert Levy
Scarinci + Hollenbeck
1100 Valley Brook Avenue
Lyndhurst
New Jersey 07071

Charles Shaw
The Law Offices of Charles Shaw
2 Executive Drive Suite #600
Fort Lee
New Jersey 07024

Howard Solomon
The New Jersey Office of Administrative Law
7th floor
33 Washington Street
Newark

Sworn to and subscribed
before me this

16th day of January 2016

CHRISTINE THOMPSON
NOTARY PUBLIC OF NEW JERSEY
Commission No. 2245485
My Commission Expires Sept. 21, 2017

Christine Thompson

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New Jersey 07102

Richard Crial
Chairman Allstate New Jersey Insurance Company
721 US Highway 202/206, Suite 300
Bridgewater
New Jersey 08807

Robert Marino
Chairman Horizon Blue Cross Blue Shield of New Jersey
Horizon BCBSNJ Headquarters
3 Penn Plaza East
Newark
New Jersey 07106

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STEVEN Z. JURISTA
DANIEL M. STOLZ
LEONARD C. WALCZYK
SCOTT S. RYVER**
DONALD W. CLARKE*

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KEITH E. MARLOWE*

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* ALSO MEMBER OF NY BAR



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EMAIL: DSTOLZ@WJS1AW.COM

April 1, 2016

Via e-mail

Dr. Richard Kaul

drrichardkaul@gmail.com

In re: New Jersey Spine & Rehabilitation, P.C., et aln.
Kaul vs. Christie, et al.
Docket No. 16-CV-1346
Our File No. 8189

Dear Dr. Kaul:

I am in receipt of your letter of March 24, 2016, which is the first communication we have received from you in many, many months. Please be advised that Trustee Robert Wasserman passed away on February 26, 2016. Donald V. Biase has been appointed as substitute Chapter 7 Trustee and he has retained this firm as his counsel.

All pleadings with regard to the New Jersey Spine & Rehabilitation case and the other related matters can be found at the United States Bankruptcy Court in Newark, New Jersey. You may also access the files electronically through PACER.

With regard to the property located at 111 Wanaque Avenue, Pompton Lakes, New Jersey, through your counsel, you disavowed and relinquished any ownership interest in that property. That relinquishment of any interest in the property, in exchange for Trustee Wasserman's agreement not to pursue claims against you, was approved by the Bankruptcy Court and is part of the Court's file. Should you have any question with regard to that matter, please feel free to contact John D'Iorio, who represented you at that time.

With regard to the collection of accounts receivable, Trustee Wasserman acted upon the recommendations of Eric Katz, Esq., special counsel, who you had retained during the Chapter 11 case, to pursue those receivables. Each settlement of an account receivable was the subject of notice to creditors and was approved by the Bankruptcy Court.

Finally, be advised that you have no right to pursue any actions on behalf of New Jersey Spine or any other of the related companies. Trustee Biase has the sole right to pursue those claims.

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Please be guided in accordance with this correspondence and cease and desist from any action inconsistent with same.

Very truly yours,

WASSERMAN, JURISTA & STOLZ, PC


DANIEL M. STOLZ

DMS:ms

cc: John D'Iorio, Esq.
Donald V. Biase
Mark A Roney, Esq.
William J. Fiore, Esq.
Joshua Raymond
Andrew Calamari, Regional Director of
U.S. Securities and Exchange Commission
Betsy Rosenbloom, Esq.
Scott S. Rever, Esq.

Gmail - Kaul v Christie-Katz-Chapter 1104042016_2.pdf Case 2:16-cv-08086-KM-SCM Document 38 Filed 08/24/18 Page 113 of 356 PageID: 8908, 9:30 AM



Kaul v Christie, et al

Richard Kaul <drichardkaul@gmail.com>

Mon, Apr 4, 2016 at 7:01 AM

To: ekatz@mskf.net

Cc: Betsy Ann Rosenbloom <brosenbloom@wcmolaw.com>, mroney@hillwallack.com, DStolz@wjslaw.com, John Di Iorio <JDilorio@shapiro-croland.com>

Dear Mr. Katz,

Please find attached a letter in regards to monies still owed by insurance carriers to my previously held corporations, an issue that is now relevant to the subject complaint.

Regards,

Richard Arjun Kaul, MD

www.drRichardKaul.com

Kaul v Christie-Katz-Chapter 1104042016_2.pdf
9799K

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DNSTOLZ@WJSLLAW.COM

May 2, 2017

Kenneth J. Grispin, P.J.Cv.
Superior Court of New Jersey
Courthouse
2 Broad Street, 13th Floor
Elizabeth, New Jersey 07207

Re: **Ann Santos v. Richard A. Kaul**
Docket No. UNN-L-3322-15

Dear Judge Grispin:

I am in receipt of your Honor's letter of May 1, 2017 with regard to the above-referenced matter and the computer servers for Dr. Kaul's former practice.

When the Trustee was appointed for New Jersey Spine and Dr. Kaul's related entities, the Trustee centralized all of the assets in the Surgery Center located in Pompton Lakes. The Trustee's accountants downloaded all information on the computer servers, so that the information could be readily accessible to the Trustee. I believe that the actual server remains in Pompton Lakes. We are unsure whether that server is currently operational, as the Surgery Center has been shut down for several years.

Any information required by the Court with regard to the above-referenced matter can likely be easily accessed by the Trustee's accountants. To my knowledge, Dr. Kaul has not requested any information from us with regard to this matter. If the Court or the parties would indicate the exact information which is required, I will contact the Trustee's accountants to try to obtain that information.

Respectfully yours,
WASSERMAN, JURISTA & STOLZ, P.C.

DANIEL M. STOLZ

DMS/ms

cc: Michael B. Zerres, Esq.
cc: Richard Kaul, M.D.
cc: Brianne M. Cunningham, Esq.
cc: Daryl Neier, CPA
cc: Donald V. Biase, Trustee

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www.drrichardkaul.com

May 11, 2017

Judge Ross Anzaldi
Special Discovery Master
Lindabury + McCormick + Eastabrook + Cooper, P.C.
53 Cardinale Drive
Westfield, NJ 07091

Re: Allstate v Kaul, et al.,
Docket No. UNN-L-322-15
Summary judgment + vacate order to suppress answer

Dear Judge Anzaldi,

Please find submitted evidence that pertains to the issues raised in the motions I ("Kaul") filed, to vacate the order to suppress answers, and enter summary judgment against Allstate in the amount of \$4,000,000.00.

Servers

In summary, in late 2016, Allstate procured an order to suppress answers, by misrepresenting to the court that they were not in default of discovery. They were, and still are. One of the central issues in this dispute is the fact that the information necessary to provide answers to Allstate's interrogatories, is not in Kaul's possession, but is located on the NJSR servers, that were seized by the trustee in July 2014. Kaul brought this fact to the attention of Judge Kenneth Grispin, on December 2, 2016, during oral argument on a motion filed by the plaintiff in Santos v Kaul, to strike Kaul's answers and suppress his defenses. Kaul informed Grispin that he had attempted to obtain the information from the trustee, but had not been successful. In fact, on November 8, 2016, Kaul sent the trustee a letter, that was copied to the trustee's attorney, Daniel Stolz, and to Eric Katz, the attorney who had represented Kaul in the Chapter 11 Bankruptcy Petition #:13-23366-JKS, with a blank flash drive, onto which he requested the trustee transfer his file (exhibit 1). The trustee refused to accept the letter, and returned it to Kaul (exhibit 1). The trustee's attorney, Daniel Stolz, has misrepresented to the court in Santos v Kaul that "To my knowledge, Dr. Kaul has not requested any information from us with regard to this matter" (exhibit 2). The evidence proves otherwise. The obfuscations of the trustee, and his attorney, enabled Allstate, a client of Stolz's firm, to mislead Judge Kenneth Grispin, into entering an order to suppress answers. This order was the prelude to their motion to enter default, that was interestingly accompanied by their stipulation of dismissal of defendant Pena, and prior dismissal of defendants McKee and Lager, three physicians, against whom they had filed a one hundred and eleven (111) page, three hundred and sixty-four (364) paragraph complaint on February 13, 2015, alleging a multitude of fraud violations.

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\$4,000,000.00

Allstate has misrepresented to the court that no evidence exists to substantiate Kaul's conservative claim for \$4,000,000.00. Allstate is a defendant in Kaul v Christie (exhibit 3) which claims in excess of \$9 billion in monetary damages. The federal claims have an "assumption of truth" under Twombly and Iqbal, and thus the \$4,000,000.00 is supported in law, contrary to Allstate's false assertion "Summary judgment motion is completely unsupported in fact or law". The claim is also supported in fact, as is evidenced from the 2012 AR reports, that ascribe over \$18,000,000.00 to Kaul from the "motor-vehicle accident" category (exhibit 4). Similarly, the amounts owed by Allstate are part of the legal record in Bankruptcy Petition #:13-23366-JKS, monies which the trustee, and Allstate attorney, Stolz, has fraudulently failed to collect.

Conclusion

The summary judgment is based in law and fact, and must be entered. Kaul does indeed have standing. The order to suppress answers was obtained on the basis of a false representation, that Allstate was not in discovery default. It was, and is.

Yours sincerely

Richard Arjun Kaul, MD
cc: All Counsel via e-mail

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www.drrichardkaul.com

May 17, 2017

Hon. Ross R. Anzaldi
Special Discovery Master
Lindabury + McCormick + Eastabrook + Cooper, P.C.
53 Cardinale Drive
Westfield, NJ 07091

Re: Allstate v Kaul, et al.,
Docket No. UNN-L-322-15
Interlocutory appeal + request for stay of litigation.

Dear Judge Anzaldi,

I ("Kaul") am in receipt of a letter dated, May 16, 2017, sent to me via e-mail from your administrative assistant, Jennifer Negro, in which you state that unless there is opposition to the Plaintiff's ("Allstate") motion to enter default, the matter will be clerically adjudicated. Kaul opposes the motion and request oral argument, and an extension to June 9, 2017, in order that he may file opposition papers (exhibit 1).

Kaul submits this request, in the context of a case he has argued is frivolous, that is brought by a plaintiff, who is currently a defendant in a federal racketeering lawsuit (Kaul v Christie, et al., Docket No. 16-CV-02364), and who as Kaul argued before Judge Kenneth Grispin on July 19, 2016 "uses these courts to do their business". Allstate owes Kaul's corporations \$4,000,000.00.

Similarly, the interrogatories that Kaul served via e-mail on Allstate, in late September 2016, pertain to the subject matter of the federal claims, and to Kaul's defenses in the instant matter which under Twombly + Iqbal, have an "assumption of truth", and to Kaul's defenses (exhibit 2). These interrogatories probe the flow of money and information between Allstate and a number of individuals and entities, in the disciplines of medicine + business + law + politics. This nexus is the foundation from which Kaul alleges, in Kaul v Christie, that Allstate perpetrated violations of the RICO, mail fraud, wire fraud and Hobbs Act.

The order in which the motions were adjudicated on May 11, 2017, failed to recognize the final paragraph of Kaul's cover letter of the motion for summary judgment, in which Kaul asserted, "The Plaintiff's purchasing of politician's, and other state officials will be exposed in federal court, and discovery on all state agencies, legislators and members of the judiciary, who are part of their web, will be enforced". Kaul requested his motions to vacate the order of suppressed answers, and summary judgment be adjudicated first (exhibit 3). This request was ignored.

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On November 11, 2015, Kaul submitted a letter to the International Criminal Court in The Hague, The Netherlands, a court with global jurisdiction (exhibit 4). The letter brought to the attention of the Prosecutor's Office, Kaul's belief that an American politician had been involved in trafficking chemical weapon precursors to Syrian rebel forces between late 2012 and early 2013, and that their use had been instrumental in the widely reported Syrian genocide. None of the parties referenced in the letter, or the associated letters Kaul sent to multiple heads of state, have privately or publicly denied Kaul's allegations. The American politician's political activities were partly funded by Allstate, and the specifics of this information, are sought in the aforementioned interrogatories.

On November 24, 2015, Kaul sent a letter to John Frederick Nelson, the Chairman of Lloyd's of London, a company that underwrites Allstate's risk portfolio (exhibit 5). The letter alerted Nelson to the financial nexus that existed between Allstate and the American politician. This information, relevant to Kaul's allegations of racketeering, (chemical weapon trafficking is a RICO predicate act), was submitted as part of Kaul's motion to vacate the suppressed answer order and enter summary judgment. However, this information, germane to Allstate's pattern of racketeering, as identified in Kaul v Christie, and referenced by the information sought in the aforementioned interrogatories, was not referenced in the order issued on May 16, 2017 (exhibit 9). This evidence ought to have been referred to the Department of Justice, and ought to have weighed against Allstate's motion.

On May 5, 2017, Kaul submitted motions to enter default judgments against Lewis Stein, Esq, and Frank Moore, MD, defendants in Kaul v Christie (exhibit 6). The latter motion will be decided on June 5, 2017, while the former has not yet been docketed. Defendant Stein, a Morris County based personal injury attorney, and senior member of the New Jersey Bar, litigated a case against Kaul, that commenced in 2008 and concluded in 2015, with a ruling from the New Jersey Supreme Court in Kaul's favor (5-2). However, during a deposition in August 2012, Stein asked Kaul a question about an individual who had rented his Manhattan townhouse. "Do you know what Boruch Freedman does", to which Kaul responded, "No, do you?". Freedman, as Kaul subsequently discovered, was an arms dealer from Bukhara, a soviet republic, with a long history of chemical weapon trafficking. New Jersey is America's chemical repository.

The information that would enable Kaul to properly litigate the matter is contained on servers, that were seized by the Chapter 7 trustee, Daniel Stolz, Esq, in late July 2014, subsequent to the revocation of Kaul's license on February 12, 2014. Stolz, a New Jersey lawyer, that does business with Allstate, and his trustee, Donald V. DiBiase, have ignored Kaul's requests to provide the information on the server (exhibit 7). This issue was raised before Judge Kenneth Grispin on May 12, 2017 in Santos v Kaul. Stolz and his crew attended via telephone. The court failed to order Stolz to provide Kaul with the information, necessary to litigate the Santos and Allstate matters. Kaul indicated to the court that he would be filing an appeal.

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Kaul indicated via e-mail on May 12, 2017 (exhibit 8) that he intends on filing an interlocutory appeal in Allstate v Kaul, and is of the opinion that until the information on the servers is provided, his right to due process will continue to remain violated, as both the Santos and Allstate courts have failed to order that Stolz produce evidence critical to Kaul's ability to defend his interests. This pattern of misconduct, which is alleged to have risen to a criminal standard in Kaul v Christie, with allegations that the defendant state forged court transcripts, will form part of the subject matter of the Santos + Allstate appeals. Similarly, they will be introduced as evidence in Kaul v Christie, to bolster, amongst other things, the racketeering claims.

Kaul, therefore, requests the following:

1. The litigation be placed on hold, pending the outcome of the Interlocutory appeal.
2. In the alternative, Allstate's motion to enter default be adjourned to June 9, 2017.

Yours sincerely

Richard Arjun Kaul, MD

cc: All Counsel via e-mail, including Todd Schwartz.

~~Case 2:16-cv-02364-KM-SCM Document 233-3 Filed 03/19/18 Page 1 of 6 PageID: 5558~~

March 16, 2018

The Honorable Associate Justice Ruth Bader Ginsburg
United States Supreme Court
One First St. N.E.
Washington D.C. 20543

Re: Kaul v Christopher J. Christie, et al.,
United States District Court
District of New Jersey
Docket No. 16-CV-02364

Dear Associate Justice Ginsburg,

I write this letter to bring your attention to a case pending in the United States District Court, District of New Jersey, in which there has been the submission of clear evidence that New Jersey Administrative Law Judge, Jay Howard Solomon, Esq, engaged in the crimes of Obstruction of Justice and Tampering with Evidence.

In April 2012 I became engaged in a number of legal proceedings with administrative agencies in New Jersey involved in physician regulation. These proceedings provided the aforementioned evidence and are detailed, along with my professional background, in D.E. 234 of a lawsuit that I filed on February 22, 2016. The matter is currently pending in the United States District Court, District of New Jersey (Docket No. 16-CV-02364).

The aforementioned lawsuit was initially filed in the United States District Court, Southern District of New York (Docket No. 16-CV-1346), in which, amongst other things, the Defendants are accused of having engaged in HICO violations. On April 19, 2016, the Judge appointed to the case, transferred the matter, sua ponte, to the District of New Jersey. I filed an interlocutory appeal with the United States Court of Appeals for the Second Circuit (Docket No. 16-1397cv), in which I argued that I would not receive justice in New Jersey, due to the politico-legal nexus that existed between the judiciary and the state government. The interlocutory appeal was denied, and the matter proceeded in the District of New Jersey.

In late September 2017, I eventually obtained a complete copy of the transcript of the administrative agency proceeding that had occurred in 2013. I then commenced a detailed comparative analysis of the opinion rendered on December 13, 2013, with the transcripts and other evidence submitted during the proceeding. This resulted in the production of a document entitled, 'The Solomon Critique', in which I identified two hundred and seventy-eight (278) separate instances of perjury, misrepresentation, evidential omission and gross mischaracterization, collectively committed by Jay Howard Solomon, and New Jersey physicians, Gregory Przybylski, MD, and Andrew Kaufman, MD, both of whom provided 'expert'

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testimony against me. This document was filed with the District Court on January 17, 2018 (D.E. 225).

On February 16, 2018 I sent a letter and a copy of 'The Solomon Critique' to the New Jersey Attorney General, Gurbir Grewal, in which I requested that the matter be investigated (copy enclosed). To date I have received no response.

On March 14, 2018 I sent a letter and a copy of 'The Solomon Critique' to the United States Attorney (copy enclosed).

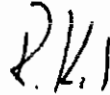
It has been more than two (2) years since the matter was filed, and the District Court has not permitted me to engage in any discovery. The last document I filed was on February 22, 2018 and the Court has yet to enter an order instructing the Defendants to file answers.

At the commencement of these federal proceedings I raised substantiated concerns about my inability to receive justice in New Jersey. The loss of my livelihood and my ability to support my family, was procured illegally, and I fear that members of the same New Jersey medico-legal community that perpetrated these acts, are once again using their influence to impede my quest for justice in the District Court.

Jay Howard Solomon is a jurist who violated both state and federal criminal statutes and I believe his violations must lead to corrective consequences, that I hope will initiate an undoing of the unconstitutional configuration of the mechanism of physician regulation in New Jersey.

Thank you for your consideration

Yours sincerely



Richard Arjun Kaul, MD

1208 Temple Terrace
Palisades Park, NJ 07650

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www.urricherdkaw.com

March 14, 2018

Mr. Jeffrey Sessions
United States Attorney General
The United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: *Kaul v Christie*, et al.,
Docket No. 16-CV-02364
Perjury and falsification of legal evidence

Dear Mr. Sessions,

I write this letter to bring your attention to the fact that in 2013, three individuals acting on behalf of agencies under the control of the executive branch of the New Jersey State Government, collectively committed two hundred and seventy-eight (278) separate acts of perjury, misrepresentation, evidential omission and gross mischaracterization. These fraudulent acts were perpetrated during an administrative law proceeding, that resulted in the illegal revocation of my New Jersey medical license.

The facts and circumstances of these events are detailed in the enclosed document which is entitled, 'The Solomon Critique'. I believe that the aforementioned misconduct of New Jersey Administrative Law Judge, Jay Howard Solomon, Esq and physicians, Gregory Przybylski, MD and Andrew Kaufman, MD, constitute criminal violations of federal law. This criminal conduct deprived me of my Constitutional right to due process and of my ability to earn a living.

Please find enclosed a print copy of the document (Exhibit 1), which was filed with the Court on January 17, 2016. A digital copy is included on the enclosed flash drive.

I hope that your review of this submission will cause the matter to be investigated, because my case is not the only one in which such misconduct has occurred. Evidence exists that the same pattern of tampering with and falsification of court records, reports and evidence has occurred in at least one other matter (Exhibit 2). There is also evidence that State Government servers are being shared with private parties, that include, amongst others, Allstate New Jersey

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Insurance Company (Exhibit 3). These servers contain highly confidential information that pertains to both physicians and patients.

Referenced within Exhibit 3 is a video, which can be found at:

<https://www.youtube.com/watch?v=slR0H5vEMsU>

My case, and those referenced above, demonstrate a long pattern of criminal conduct by public and private entities, in which state agencies and actors have engaged in corrupt schemes with private parties. The mechanism of physician regulation in New Jersey is illegally and unconstitutionally configured (Exhibit 4), which explains why it is so profoundly corrupt, and why my attorney, Robert Conrui, Esq. (now deceased), stated on June 13, 2012 (Exhibit 5-- 33:22-34:6)

"Seldom do there come cases in which the very fundamental nature of the board is at issue. Seldom. This is one of them. This will be a case that we'll [sic] be cited for many propositions, many times in the future, regardless of how it comes out. It will be an important case, case so important that you should think long and hard before you vote to reconsider that which you've done already because you got it right the first time."

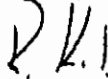
Please find below my contact information, should there be any further information you require.

Mobile - 201 989 2299

E-mail - drRichardKaul@gmail.com

Thank you for your consideration

Yours sincerely



Richard Arjun Kaul, MD

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www.drRichardKaul.com

February 15, 2018

Gurbir S. Grewal
Attorney General
Office of the Attorney General
Department of Law and Public Safety
Richard J. Hughes Justice Complex
25 Market Street, Box 080,
Trenton, NJ 08623-0080

Re: Jay Howard Solomon, Esq. -- Violation of Section 2C:21-4.1 of Title 2C of New Jersey Criminal Code

Dear Mr. Grewal,

I write this letter in order to bring your attention to the fact that in 2013, New Jersey Administrative Law Judge, Jay Howard Solomon, committed a crime of fourth degree, when he knowingly and willfully falsified an opinion he issued on December 13, 2013, in the MATTER OF THE SUSPENSION OF REVOCATION OF THE LICENSE OF RICHARD A KAUL TO PRACTICE MEDICINE AND SURGERY IN NEW JERSEY. Jay Howard Solomon violated Section 2C:21-4.1 of Title 2C of the New Jersey Code of Criminal Justice.

Please find contained in the enclosed flash drive, a copy of a document entitled, 'The Solomon Critique' with supporting references. The document is an analysis of the trial transcript and evidence of the proceeding of the aforementioned matter, which commenced on April 9 2013 and concluded on June 18 2013. The analysis proves that there were two hundred and seventy eight (278) separate instances of perjury, misrepresentation/falsification, evidential omission and gross mischaracterizations, that were collectively committed by Jay Howard Solomon, Gregory Przybylski, MD, and Andrew Kaufman, MD, the latter two who acted as the 'experts' for the medical board.

The Solomon Critique details the extent, depth, and pervasiveness of these illegal acts, the purpose of which was to revoke my medical license, in order to illegally exclude me from the minimally invasive spine surgery market. I believe the analysis proves that there was a concerted effort to falsify the final opinion, a scheme that was perpetrated through a willful and knowing misrepresentation of the evidence.

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Jay Howard Solomon abused his position of authority to knowingly commit these criminal acts. I do not, as yet, have any evidence as to his motive, but I would suggest it might pertain to bribes, and/or other material favors, that he and his family members received from the Defendants named in Kaul v Christie. His actions seriously threaten to undermine the trust of the New Jersey public in the integrity of the judicial process. I urge you to use the authority of your office to investigate this matter, in order to mitigate that threat.

I trust that you will address this matter with impartiality, and on the evidence before you, which I believe must lead to the opening of a criminal investigation. This outcome will provide a sense of fairness, accountability and transparency, that both I, and many of my patients were denied under the previous administration.

I look forward to your response.

Yours sincerely



Richard Arjun Kaul, MD

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www.drRichardKaul.com

March 18, 2018

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

Re: Kaul v Christie, et al.,
Docket No. 16-CV-02364
Letters to the United States Supreme Court.

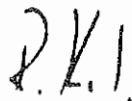
Dear Judge McNulty,

Please find submitted nine (9) copies of letters that I sent to the nine (9) Justices of the United States Supreme Court, regarding the crimes of Obstruction of Justice and Tampering with Evidence, committed by Jay Howard Solomon, Esq. Attached to the letters are copies of complaints I lodged with the New Jersey Attorney General and the US Attorney, that request the crimes be investigated.

On June 30, 2017 this Court entered an Order that permitted Jay Howard Solomon to exit the case, based on his argument of absolute immunity. I argued that absolute immunity does not extend to criminal activity and referenced the historical example of the beheading of King Charles in 1649, for crimes against the state. Jay Howard Solomon has committed crimes against the Constitution, the bedrock of the American State.

As this case proceeds I shall be making an application to have Jay Howard Solomon re-instated, as I believe the evidence that is now before this Court, demands nothing less.

Thank you for your consideration



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

www.drrichardkaul.com

October 8, 2020

Attention:

Defendant Christopher J. Christie
Patient #
Morristown Memorial Medical Center
Morristown, NJ, USA.

Residence:

47 Corey Lane
Mendham, NJ 07945

Re: **"The Kaul Cases"** (US) + International Criminal Court (Europe) + Central Criminal Court (UK)

Dear Defendant Christie,

This legal notice is being served on you personally, while you are resident at Morristown Memorial Hospital, Morristown, New Jersey in the United States Of America. It is my understanding that you are infected with the COVID-19 virus and have been held in hospital for the last five days. It is also my understanding that due to severe co-morbidities of asthma and obesity, you are at an exceptionally high risk of dying or suffering serious respiratory/neurological sequela.

As a Defendant you have a legal obligation to the court to tell the truth, and as a lawyer/ex-federal prosecutor you know your duty is to see justice done. Thus, please find below a series of admissions of fact:

1. I confirm that at this point in time I am compos mentis.
2. I have read and understand the claims filed against me by Plaintiff Kaul in the above referenced cases.
3. I confirm with complete certainty that the claims are true and admit my guilt in K1 + K2 + K5.

4. Having initiated and coordinated the racketeering schemes detailed within K1 + K2 + 5, I confirm with complete certainty that the claims against all Defendants are true.
5. I confirm that since the commencement of Plaintiff Kaul's prosecution of K1 + K2 + K5 on February 22, 2016, I conspired with members of the Office of the New Jersey Attorney General to obstruct his prosecution of the cases.
6. I confirm that this obstruction involved, amongst other things: (i) filing a knowingly false criminal indictment against Kaul in May 2016, in retaliation against Plaintiff Kaul for initiating the prosecution; (ii) conspiring with the ex-wife of Plaintiff Kaul to have him arrested/jailed on September 21, 2016 for unpaid child support; (iii) conspiring with US Senator, Charles Schumer, the brother-in-law of United States District Court Judge, Kevin McNulty, to obstruct Plaintiff Kaul's prosecution of K1 + K2 + K3; (iv) conspiring in a period from 2011 to 2014, with Defendant Allstate/Gelco, the FBI and the United States Department of Justice, to bring false criminal charges against Plaintiff Kaul for healthcare fraud, the purpose being to jail Plaintiff Kaul for over two decades; (v) tampering with witnesses, who have knowledge of my guilt and that of the Defendants; (vi) destruction of evidence of my guilt; (vii) threatening and or bribing the families of third-party witnesses/defendants with physical/economic/reputational harm, in order to suppress their testimony; (viii) in 2020, threatening and or bribing ACX/Amazon to not publish Plaintiff Kaul's audio-book "An impossible Victory: Kaul v Christie"; (ix) conspiring with the Defendants to obstruct Plaintiff Kaul's application for medical licensure in the State of Pennsylvania + attempt to co-opt all state medical boards (2017 to the present) to deny Plaintiff Kaul a license, should he apply.
7. I confirm that in the event I die, my wife/children/estate will assume full unconditional liability for the claims/damages/exculpation of evidence.
8. I confirm that in my capacity as a federal prosecutor, I did wrongfully and for political purposes prosecute and convict in 2005, Hemant Lakhani, a seventy-year (70) old British based Indian salesman.
9. I confirm that I abused the resources of the American People/Government to conspire with Pakistani criminals and organized Russian crime syndicates to entrap Lakhani in a sting operation, that culminated in his false arrest in 2005 in a hotel at the Newark International Airport in New Jersey.
10. I confirm that Lakhani died in jail in 2013, as a consequence of the stress associated with his incarceration.
11. I confirm that Lakhani was interviewed in 2005 while in jail, by radio show: "This American Life" - <https://www.thisamericanlife.org/292/the-arms-trader/act-one-0>.
12. I confirm that I was involved in the trafficking of chemical weapon components to Syrian rebel forces in a period from 2012 to 2013.

13. I confirm that I knew these chemicals would be used to kill children + women + men in the Syrian civil war.
14. I confirm that I knew and know these chemicals did actually kill hundreds of children + women + men in the Syrian civil war, through asphyxiation and chemical burns to the lining of the lungs.
15. I confirm that I knew and know that the deaths of these innocent children + women + men was excruciatingly tortuous and painful.
16. I confirm the truth of the facts asserted by Plaintiff Kaul in the letter ("ICC Letter") he sent to the Chief Prosecutor at the International Criminal Court, dated November 11, 2015.
17. I confirm that I have read and understood the letter, a copy of which is attached to this admissions statement.
18. I confirm that I first read and understood this letter in late 2015, when Plaintiff Kaul publicized it.
19. I confirm that the reason neither I nor any of the parties referenced in the letter initiated legal action against Plaintiff Kaul, is because the asserted facts are true.
20. I confirm that I conspired with American state/federal politicians/judges to obstruct the efforts (2017 to present) of Plaintiff Kaul to have my crimes investigated.
21. I confirm that Plaintiff Kaul's dissemination in late 2015 of the "ICC Letter" to voters in Iowa + New Hampshire, contributed to the destruction of my political career.
22. I confirm that in approximately 2009 I abused the power of the Office of the New Jersey Governor to engineer the so called "~~opiate epidemic~~", in order to profit from companies that manufacture so called "~~anti-opiate~~" medications.
23. I confirm that I am on the board of a company called Pacira, a sham position for which I have received to date at least \$1,000,000.
24. I confirm that Pacira is a purported pharmaceutical company based in Parsippany, New Jersey.
25. I confirm that Pacira bribed me to improperly influence corrupted individuals within the United States Department of Health and Human Services to publish a Medicare billing code for the so called "~~anti-opiate~~" medication.
26. I confirm that I hold business interests in multiple drug rehabilitation companies and that I profit from the housing of citizens in these facilities, many of whom are not drug addicts, but have been ordered to these facilities by corrupted state courts/judges.
27. I confirm that the "~~opiate epidemic~~" is responsible for the deaths of thousands of chronic pain patients, who have been forced to resort to street-grade heroin in order to manage their severe pain.
28. I confirm that in a period from 2009 to at least 2014, I profited from for-profit juvenile detention centers and knew that the appalling conditions in the facilities were unlawful.

29. I confirm that because of these appalling conditions many young boys died, and that I obstructed claims brought by their bereaved families.
30. I confirm that I have received opiates to mitigate the hypoxia related pain I am now experiencing from COVID-19 induced respiratory inflammation and scarring.
31. I confirm that I believe this pain is substantially less than the pain experienced by the children + women + men murdered with chemical weapons in the Syrian Civil War.
32. I do submit myself to the jurisdiction of the International Civil Court for the crimes specified in the "ICC Letter" and will cooperate with any investigation.
33. I do submit that there exists sufficient evidence to convict me of murder/manslaughter/crimes against humanity in courts of both the United States and foreign jurisdictions. I do submit that I have knowledge that would exonerate Julian Assange and would testify in the proceedings at the Central Criminal Court, London, UK ("Old Bailey"), if subpoenaed by his legal advocates.

Please be advised that if by October 15, 2020 you have not denied these admissions of fact, they will be deemed admitted and submitted into: (i) The United States District Court (DNJ + DC + Third Circuit + DC Appellate Court + SCOTUS); (ii) The International Criminal Court; (iii) The Central Criminal Court; (iv) The Indian High Court, as evidence of the truthfulness of the claims of Plaintiff Kaul + your guilt + probative value to pending legal proceedings.

Dated: October 8, 2020

Christopher J. Christie

cc: Jennifer Robinson - Barrister-at-law (Assange)
Doughty Street Chambers
J.robison@Doughtystreet.co.uk
54 Doughty Street
Hotten, London WC1N 2LS
U.K.
+44 20 7404 1313

R.K1
4 RICHARD ARJUN KAUL, M.D.
October 8, 2020

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

RICHARD ARJUN KAUL, MD

Plaintiff

v.

FEDERATION OF STATE MEDICAL BOARDS, ET AL

Defendants.

CIVIL ACTION: 20-CV-01612-TSC

CERTIFICATION OF DINA M. KAUL

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

Dina M. Kaul hereby certifies to the Court as follows:

I am fifty-one (51) years of age, a United States citizen and the mother of the children of Richard Arjun Kaul, MD ("**Plaintiff**").

I submit this affidavit in support of the claims and damages sought in the following cases:

K1-Kaul v Christie: 16-CV-02364

K2-Kaul v Christie: 18-CV-08086

K3-Kaul v Schumer: 19-CV-13477

K4-Kaul v Stolz: 18-CV-01489

K5-Kaul v Federation: 19-CV-3050

K6- State criminal indictment v Defendant Kaufman

K7-Kaul v Federation: 20-CV-01612

P1-Kaul/Patel v Allstate: 19-CV-08946

P2-Kaul/Patel v State of New Jersey/Crist: 19-CV-09232

A copy of this affidavit has been submitted into each of the above cases (**The Kaul Cases**)

On October 9, 2020 I spoke with Richard Arjun Kaul regarding various issues that pertain to the above cases. The following represents this telephone conversation, which lasted approximately one hour. The conversation has been organized into six (6) sections to facilitate interpretation.

Section index:

- A. Defendants' malicious violation of my maternal rights.
- B. Foreclosure of home + Deprivation of child support.
- C. Lawsuits + Bankruptcy.
- D. Defendants burglaries of Bernardsville home + Attack on Plaintiff's Surgical Center.
- E. Sheriffs.
- F. Claim Evidence.

A. Defendants' malicious violation of my maternal rights

1. I am the mother of two children, a boy and a girl, aged 18 and 15.
2. Both my children and I have suffered immensely, and continue to suffer because of the Defendants criminal scheme, as described in the above cases.
3. Our pain has been emotional, psychological and physical and is ongoing.

4. I submit this affidavit as a single mother and a woman who has desperately struggled since 2012 to raise two young children in the face of the Defendants malicious, relentless vendetta to destroy the life and reputation of my ex-husband, the Plaintiff.

5. The Plaintiff and I separated in 2005 and became divorced in 2009. He faithfully fulfilled all of his legal obligations under a property settlement agreement that we signed in 2005.

6. I find it incomprehensible that the Defendants attacked my children and I in the most vicious manner, in a period that commenced in 2012.

7. I also find it morally repugnant and reprehensible that the Defendants so perverted the process of justice, ethics and standards of basic human decency, in order to destroy my life, my children's lives and that of my ex-husband.

8. I have the utmost respect and admiration for the Plaintiff in the manner in which he has prosecuted the Defendants in his pursuit of justice.

9. To illustrate the character of the Defendants, mostly white privileged males, I make reference to the fact that I have worked as an administrator in the construction industry for twenty (20) years, and have never witnessed criminal conduct to the extent evident in the above cases.

10. I have dealt with teams of construction workers, mostly working class men, who are honest and would never do anything to intentionally harm women or children.

11. On several occasions I described the Defendants' crimes and their malicious scheme to intimidate, harass and attempt to destroy my life and that of my children.

12. On several occasion, these men described the Defendants misconduct as "appalling" and on one occasion, one individual described these men as "heartless scumbags". He then went on to describe the manner in which he would have dealt with these individuals if they had attacked his family and children.

13. The Defendants violated my maternal rights, in that because of their relentless and vicious scheme, I was forced to fight just to survive, and was therefore deprived of time with my children. This is time that was so cruelly taken away from my children and I, time that I can NEVER get back.

14. To this day I cannot even begin to comprehend why these Defendants conspired to attack, and did attack my children and I. Even hardened criminals and members of the mafia have a code of conduct with regards to women and children.

15. The Defendants have stolen my sense of security and my children's sense of security. They do not feel safe at home or at school, because of the emotional, psychological and physical trauma that the Defendants have caused them. These individuals, wealthy, white and in positions of power, have stolen my children's childhood. Sometimes, when I think about the heinous crimes committed by the Defendants I want them to suffer, but I wish no harm on their wives or children, in the way that they did on my children and I.

16. To this day, I cannot fathom the evil that possessed the Defendants to commit the crimes they committed. I find it incomprehensible that it all stemmed from professional jealousy. If that is in fact the case, then the Defendants will need psychiatric help in jail.

17. I have read the affidavit of John Zerbini (K1-D.E. 205), and it sickens me, to know that Defendant Doreen Hafner, a deputy attorney general for the State of New Jersey, maliciously intended to destroy the lives and my children and I (copy attached). I don't have the words to express how much pain she has caused me and

my innocent children, but I know justice will punish her and the other Defendants for the evil they perpetrated. I hope they rot in jail, so that no other mother and no more children will ever be subjected to the torture that my children and I have endured since 2012.

18. The facts detailed in this affidavit are just the 'tip of the iceberg'. There is so much more, but it is very painful at this time for me to talk about these atrocities, let alone write about them. It has taken me many years to develop the courage to submit this affidavit. I wanted to leave everything in the past, and not think about the agony to which my children and I were subjected by the Defendants, but the Plaintiff, the father of my our children, told me, **"that I must face the past, in order to find the future"**.

19. The Plaintiff is a brilliant and courageous man. The Defendants are greedy bullies, cowards and abusers of innocent women and children. These individuals are despicable.

20. I am extremely angry about the immense and permanent injuries the Defendants have caused to my children and I, and for what. Because they were jealous of the Plaintiff's professional success. The Defendants have tormented my children and I since 2012, because they wanted to destroy him and everyone in his life. I imagine that these individuals sat down in a room, on many occasions, and planned every detail of their illegal scheme, including rackets intended to abuse the legal system in order to exact an inhumane degree of psychological pressure on the Plaintiff. The purpose of these rackets was to have the Plaintiff die, be jailed or flee the country. The Plaintiff has enormous mental fortitude, a profound hate of injustice, an indomitable will and an undying love for his children. He is a hero, who has publicly exposed the Defendants' as bullies, cowards and in all truth, individuals that deserve to be eliminated from society.

B. Foreclosure of home + Deprivation of child support

21. In December 2003, the Plaintiff and I jointly purchased a home in Bernardsville, New Jersey, in which I invested the entirety of monies derived from the sale of my studio apartment in Manhattan.
22. From December 2003 to August 2016, I lived in the house with my two young children, who were aged thirteen (13) and nine (9) when we were evicted due to bank foreclosure.
23. The foreclosure of the Bernardsville house was a direct consequence of the Plaintiff's sudden inability to provide child and pay the mortgage. These were a consequence of the immense economic hardship caused to the Plaintiff by the widely publicized suspension/revocation (2012/2014) of his New Jersey medical license.
24. As a consequence of the license suspension, I stopped receiving child support in March 2013.
25. As a consequence of the license suspension, the Plaintiff stopped paying the mortgage in April 2013.
26. As a consequence of the suspension, my children's education was abruptly interrupted and they were forced to leave the school in which they had studied since the ages of seven (7) and five (5). This event was extremely traumatic for them.
27. As a consequence of the foreclosure proceedings, and my lack of child support, I was forced to sell all possessions in the house. This sale occurred in June 2016, and resulted in the total loss of my possessions, my children's possessions and those possessions in the house that belonged to the Plaintiff.

28. As a consequence of not having received child support/alimony since March 2013, I was forced into a state of poverty, which caused me to file for personal bankruptcy on May 13, 2015.

29. As a consequence of my filing for personal bankruptcy, my financial credit score was reduced to less than 550, and upon the eviction of my children and I from our home, I was unable to secure a rental property. My children and I were forced into a state of homelessness and poverty.

30. As a consequence of the foreclosure and deprivation of child support, my children have suffered immense psychological, emotional and physical injuries that are ongoing.

C. Lawsuits + Bankruptcy

31. On May 13, 2015, I was forced to file for personal bankruptcy due to multiple liens and judgments levied against my name.

32. The judgments and liens were a direct consequence of lawsuits filed against me and the Plaintiff by amongst others, Defendant Stein.

33. In March 2014, Defendant Stein attempted to have me and my two children evicted from our home.

34. I was forced to retain a lawyer, but because I had not received any child support/alimony since March 2013, I had no money and my retired parents used their pension to pay the legal fees.

35. In December 2003, the Plaintiff and I jointly purchased the house, and it remained in both of our names after our divorce in May 2011.

36. It is my understanding that in approximately late 2013, Defendant Stein misrepresented to the Morris County Court that the Plaintiff retained sole title of the house, in order to have the court enter an order of eviction.
37. Had an order of eviction been entered in 2014, my children and I would have been left destitute and homeless.
38. As a consequence of the suspension/revocation the Plaintiff, in late 2012, became unable to pay the school fees for our children.
39. In late 2012 the Plaintiff and I met with the school administrators to discuss our situation, in the hope that our children's departure from the school would not be sudden. To this effect my parents used monies from their pension.
40. However, in mid 2014, the school filed a lawsuit against the Plaintiff and I, in which it made false claims that we owed it money.
41. Neither the Plaintiff nor I had the money to defend the claims, and consequently, a default judgment was entered against both him and I.
42. It is my understanding that the school (Far Hills Country Day School) also filed a claim in the Chapter 11 bankruptcy proceedings (13-23366-DNJ) initiated by the Plaintiff's corporations on June 17, 2013. I have no knowledge as to whether the claim was paid.
43. It is my understanding that the school, consequent to the widely publicized suspension of the Plaintiffs license on June 13, 2012, entered into a series of communications with members of the administration of Defendant Christie/New Jersey Attorney General.

44. In the aforesaid communications the school administrators were informed that the FBI were investigating the Plaintiff, and that he would be indicted and convicted.

45. It is my understanding that as a consequence of these communications, the school decided to file a lawsuit, in the belief that the Plaintiff would either die, be jailed or leave the country.

46. It is my understanding that the school colluded and conspired with the aforesaid parties to file a lawsuit, with the intent and purpose of facilitating the illegal schemes the Plaintiff has detailed in his federal lawsuits ("The Kaul Cases").

47. It is my understanding that the conspiracy was purposed to destroy the Plaintiff's livelihood and reputation.

48. From April 2012 to late 2016, insurance companies (Allstate/Geico), banks and ex-patients named me as a defendant in multiple lawsuits they filed against the Plaintiff.

49. I had no money to defend the aforesaid claims and as a consequence multiple default judgments were entered against me. These detrimentally affected my credit score and made it impossible for my children and I to secure a rental property upon eviction, in 2016, from their childhood home.

50. As a consequence of the aforesaid judgments/liens/levies I was forced to file for chapter 7 bankruptcy on May 13, 2015.

51. As a consequence of the aforesaid judgments/liens/levies my personal bank account was 'frozen'.

52. On June 26, 2015 I attended a creditors meeting in Trenton, at which the trustee, Daniel M. Straffi, interviewed me.

53. I specifically remember that the majority of the questions pertained to personal and professional matters regarding the Plaintiff. Straffi repeatedly asked me why I had agreed to the terms of the Property Settlement Agreement that the Plaintiff and I signed in 2005.

54. It is my understanding that Defendant Stein, members of the administration of Defendant Christie and Office of the New Jersey Attorney General had conspired/colluded with Steffi to focus his questions on the property settlement agreement.

55. Straffi initially objected to my application to file for chapter 7 bankruptcy

56. It is my understanding that the purpose of these particular questions was an attempt to improperly facilitate the effort of Defendant Stein to have me and my children evicted from our home.

57. When I informed my lawyer as to what I believed was a bizarre line of questioning from Straffi, he failed to disclose that he too had been co-opted by members of the Office of the New Jersey Attorney General and the administration of Defendant Christie.

58. I was separated from the Plaintiff in 2005 and divorced in 2009.

59. I now believe that there existed from 2012 to 2016 a conspiracy by the Defendants to have the Plaintiff die, be jailed, deported and or destroy his reputation and livelihood.

D. Defendants burglaries of Bernardsville home + attack on Plaintiff's surgical center

60. It is my understanding that in 2006 the Defendants commenced their scheme to have the Plaintiff's license revoked, and that on February 3 2010 Defendant New Jersey Board of Medical Examiners interviewed him about his practice of minimally invasive spine surgery.
61. In October 2010 my home was burgled, while my children and I were away from the house.
62. Upon returning to the house, I immediately noticed that the entire front door had been destroyed, that there were footprints throughout the house and that every room, including my children's bedrooms, had been ransacked. Cupboards had been emptied, draws flung to the floor, rugs pulled up and it was apparent that the intruders had attempted to access my computer. I filed a police report.
63. The burglary terrified my children, who at the time were aged eight (8) and six (6). My son began having difficulty sleeping at night and experienced frequent nightmares, from which he would wake in a state of panic. He also had difficulty concentrating at school and on his homework, as he believed there would another burglary.
64. In June 2013 there was indeed another burglary, that was conducted in the same manner as the previous one. However, on this occasion my computer was left abandoned in the hallway, and I believe that the intruders were in the house as I entered the cul-de-sac on which it was located. I filed a report with the police.
65. It is my understanding that this burglary coincided with an attack on the building in which the Plaintiff's surgical center was located, at 111 Wanaque Avenue, Pompton Lakes New Jersey. This was the NJSR Surgical Center.

66. It is my understanding that the building sustained enormous water damage from a fractured pipe. This occurred in June 2013, at a time when the Plaintiff was attending the medical license hearing in the New Jersey Office of Administrative Law (April 9, 2013 to June 28, 2013).

E. Sheriffs

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

68. On each and every occasion I informed these individuals that the Plaintiff had not lived at the house since 2005, and almost every time the person insisted that he did.

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

70. On a number of occasions the individual threw the papers into the hallway of my home. My children witnessed these acts.

71. These events stopped shortly after the Plaintiff commenced legal action against the Defendants.

F. Claim Evidence

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

73. The Defendants crimes have had an enormous impact on the lives of my children, that continues to this day, and I believe they should be held accountable for their malicious and criminal wrongdoing.

I certify that the above statements made by me are true. I am aware that if any of the above statements are willfully false, I will be subject to punishment.

Dated: November 9, 2020

A handwritten signature in black ink, appearing to read 'Dina M. Kaul', written over a horizontal line.

Dina M. Kaul

www.drrichardkaul.com

August 1, 2019

The Honorable John Michael Vasquez
District Judge
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

Re: Kaul v Christie, et al,
Docket No. 16-CV-02364

Request for admission or denial of statements pertaining to judicial corruption within the
United States District Court for the District of New Jersey

For reference purposes:

K1-Kaul v Christie: 16-CV-02364
K2-Kaul v Christie: 16-CV-06086
K3-Kaul v Schumer: 19-CV-13477
K4-Kaul v Stolz: 19-CV-01489 + Appeal: 18-CV-16485
P1-Patel v Allstate: 19-CV-08946
P2-Patel v Allstate: 19-CV-09232

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

Dear Judge Vasquez,

I write this letter, with the utmost respect, and appreciation for the work of the federal
judiciary, but with an immense disappointment in the fact that such a letter is even warranted.

This letter, and the document that I filed yesterday in the United States District Court for the
District of New Jersey (copy enclosed) pertain to judicial corruption in this Court.

The purpose of this letter is to provide you an opportunity to confirm or deny the following
statements:

1. I understand that exist schemes ("schemes") of judicial bribery and corruption within
the United States District Court for the District of New Jersey ("court").

2. I have knowledge and have participated in the schemes.
3. I have knowledge that other judges currently within the court have participated, and do participate, in the schemes.
4. I have knowledge that ex-chief Judge, Jose Linares ("Linares") participated in the schemes.
5. I have knowledge that Linares retired on May 16, 2019, because of a letter he received from Kaul and Patel, in which they demanded he disclose his financial holdings and conflicts of interest (copy enclosed).
6. I have knowledge that on May 16, 2019 Linares was made a partner at a New Jersey law firm by the name of McCarter and English.
7. I have knowledge that the law firm of McCarter and English provided the partnership to Linares as part of the scheme, and in return for having provided partial judgments in cases that involved this New Jersey law business.
8. I know that the appointment to the federal bench of Judge Brian R. Martinotti was sponsored by Senators Robert Menendez and Cory Booker ("senators").
9. I have discussed the above cases with the senators.
10. I have knowledge that the senators have received political campaign donations from some of the defendants in the above cases.
11. I have knowledge that the senators have been promised future political campaign donations from some of the defendants, based on dismissals of the above cases.
12. I have knowledge that defendants Allstate and Galco bribed the senators, as part of a series of quid pro quo schemes purposed to have the cases dismissed.
13. I and/or members of my family to the third-degree, have received from the defendants, monies and/or other benefits, of both a tangible and intangible nature.
14. I have knowledge that certain judges within the Third Circuit Federal Court of Appeals have received from the defendants, monies and/or other benefits, of both a tangible and intangible nature.

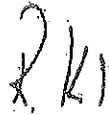
I respectfully request that by August 8, 2019, you confirm or deny the above statements. If no responses are produced by this date, your non-response will cause the above statements to be admitted, and I will move accordingly.

I would also respectfully request that you submit to the record in the above cases, a copy of form AO 10A, that details your financial holdings and any potential conflicts of interest that you would have if the above cases were placed in your judicial remit.

This letter has been sent to every Judge within the United States District Court for the District of New Jersey.

Thank you for your prompt attention to this matter.

Yours sincerely

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

Richard Arjun Kaul, MD
ccj, Clerk of the Court

www.drrichardkaul.com

March 5, 2019

Senator Charles E. Schumer
United States Senator for New York
322 Hart Senate Office Building
Washington, DC 20510

Re: Kaul v Christie: 16-CV-02364 – K1
Kaul v Christie: 18-CV-08086 – K2
Political interference in judicial process

Dear Senator Schumer,

I am a citizen of New York State and I write this letter ~~to~~ with regards to the above matters, in the context of your relationship with Judge Kevin McNulty, who is your brother-in-law.

Judge McNulty was appointed to oversee the above case in approximately April 2016, a case that involves, amongst others, Defendants Allstate New Jersey Insurance Company and Geico, a subsidiary of Berkshire Hathaway.

The specific purpose of this letter is to enquire whether or not in the period from April 2016 to February 25, 2019, you or any agents/representatives acting on your behalf, engaged in any communications, which may have included, but were not limited to conversations (in person or by phone), hand written notes, texts, e-mails or any other form of digital communication, with any person/agent/representative of any of the defendants identified in the above lawsuits.

My concern regarding these cases is that the defendants and or their agents/representatives may have attempted to improperly influence the outcome of the above cases, through the promise of political campaign donations to either you or members of the Democratic Party.

If there have been no such communications, then I would respectfully request that you confirm this to me in writing. If I receive no response by March 22, 2019, then I will assume that the defendants and or their agents/representatives have indeed engaged in communications with you and any agents/representatives in order to influence the outcome of the above cases.

I look forward to your response

..... Yours sincerely

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

Richard Arjun Kaul, MD

www.drrichardkaul.com

July 7, 2019

Senator Cory Booker
One Gateway Center
23rd Floor
Newark, NJ 07102

Re: Kaul v Christopher J. Christie
Docket No. 16-CV-02364 – K1
Judicial Corruption

Dear Senator Booker,

I write this letter to request that you petition Chief Judge Freda Wolfson of the United States District Court for the District of New Jersey, to order that all district judges in the District of New Jersey, disclose to the record, the Court and myself their financial holdings and conflicts of interest.

On July 1, 2019 I submitted a letter to Judge Brian Martinotti (copy enclosed w/attachments), in which I stated in paragraph 11:

"Finally, and unquestionably the most critical element of these proceedings is the as yet unfulfilled obligation of Judge Martinotti to disclose to the record, the Court and Kaul his financial holdings and conflicts of interest ... If this information is not provided by 5pm EST on Monday July 1, 2019, then K1 + K2 + K3 must, in the interests of justice, be transferred out of the District of New Jersey."

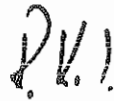
This information was not provided, as neither was that I requested in a letter, dated June 27, 2019 to Chief Judge Wolfson (copy enclosed), that sought the financial holdings and conflicts of interest of Judge Kevin McNulty and ex-chief Judge, Jose Linares. It is my position that the judges in this court, have been bribed by the defendants. It is also my position, as alleged in Kaul v Schumer (19-CV-13477) (copy enclosed), that Defendant Schumer engaged in a "pattern" of racketeering, in which he converted the office of the US Senate, into a racketeering enterprise through which he committed the predicate acts of obstruction of justice, bribery, mail fraud and wire fraud. The purpose of this scheme was to use his influence with his brother-in-law, Judge McNulty, to obstruct my prosecution of K1 + K2.

I understand that you are currently competing against a number of other politicians for the Democratic nomination, and appreciate that my request might seem to be an unnecessary distraction. However, there is nothing more important to the well-being of democracy than an honest judiciary, a fact with which I am sure not one voting American would disagree. As you may or may not be aware, I have, despite the many hurdles placed on my path, tenaciously prosecuted the above cases, and I will continue to do so, until justice is properly done. A great wrong was committed against me, my children and my patients, and I will ensure the public are made fully aware of the above facts.

I hope you take the action I request, and that I am not obligated to seek the assistance of your democratic competitors.

I look forward to your prompt response.

Yours sincerely

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

Richard Arjun Kaul, MD

Case 1:19-cv-03046-UA Document 2 Filed 04/04/19 Page 27 of 27

Case 2:16-cv-02364-KM-SCM Document 179-2 Filed 04/19/17 Page 244 of 279 PageID: 3155

Richard Kaul

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

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

Please share this email with the powers that be.

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

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

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

6/16/2012

www.drrichardkaul.com

July 1, 2019

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

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

For reference purposes:

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

Dear Judge Martinotti,

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

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

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

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

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

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

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

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

Yours sincerely

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

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED
2019 JUN 28 P 2:23

www.drrichardkaul.com

June 27, 2019

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

Re: K1 - Kaul v Christie: 16-CV-02364
K2 - Kaul v Christie: 18-CV-08086
P1 - Patel v Crist: 19-CV-08946
P2 - Patel v Allstate: 19-CV-09232

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

Dear Judge Wolfson,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely

R Kaul

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

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RICHARD ARJUN KAUL, MD Plaintiff v. FEDERATION OF STATE MEDICAL BOARDS; THE NEW JERSEY BOARD OF MEDICAL EXAMINERS; WILLIAM ROEDER; ALLSTATE INSURANCE COMPANY.	Civil Action: CERTIFICATION OF PLAINTIFF KAUL

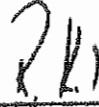
Richard Arjun Kaul, MD of full age certifies and says:

I am the Propria Plaintiff (hereinafter "Plaintiff")

I make this Certification in support of this Complaint, which is filed partly on the basis of new evidence that constitute a "new racketeering injury" and substantiate the submission of a new claim, and on the basis of never before presented claims/evidence pertaining to COVID-19 related injuries caused to the economic standing, professional reputation and health of Plaintiff Kaul.

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

Dated: May 11, 2020



Richard Arjun Kaul, MD

Contents

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2. Jurisdiction + Venue: Page 5

3. Evidence in support of claims: Page 6

4. Parties: Page 6

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6. Claims for Relief: Page 11

COUNT ONE: VIOLATIONS OF 18 U.S.C. SECTION 1962(c)-(d). THE
RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, 18 U.S.C.
SECTION 1961, ET SEQ (By Plaintiff Kaul against Defendants Federation +
NJBME + Allstate + Roeder): Page 11

COUNT TWO: GROSS NEGLIGENCE (By Plaintiff Kaul against Defendants
Federation + NJBME + Allstate + Roeder) : Page 18

7. Demand for Judgment: Page 19

8. Jury Demand: Page 20

9. Demand for Insurance: Page 20

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Preface + Overview of Plaintiff's Legal Claims

1. This case is brought by Plaintiff Kaul seeking compensatory, consequential and punitive damages from the Defendants, as a consequence of irreparable, permanent and ongoing harm caused to Plaintiff Kaul, by Defendants gross negligence in failing to detect the lethal public health threat presented by the COVID-19 virus. The Defendants had a statutory duty of care to Plaintiff Kaul and the American public pursuant to the New Jersey Medical Practices Act and other state and federal public health policies. Defendants Federation, NJBME and Roeder duty violated this duty consequent to the fact that they were corrupted, by long standing patterns of bribery perpetrated by Defendant Allstate Insurance Company. The latter Defendant has since at least 1999, orchestrated nationwide schemes of racketeering and public corruption, that have involved state and federal healthcare regulatory agencies within the United States. These schemes have been facilitated in collusion and conspiracy with state and federal politicians and judges, the purpose of which had been to increase corporate profits through the illegal exploitation of the American public and medical profession. Plaintiff Kaul has suffered, and continues to suffer, immense personal, professional, reputational and economic harm because he continues to be illegally deprived of his livelihood, and because he developed a severe infective bronchitis on March 22, 2020 that required urgent medical attention. Plaintiff Kaul and his children, as members of the public, were deprived by the Defendants' of their legal right to be protected from the COVID-19 virus, and the threat it posed to their health and welfare. This case seeks to hold the Defendants liable for the ongoing injuries caused to Plaintiff Kaul, and seeks injunctive

relief against Defendant NJBME, and an order to immediately reinstate his New Jersey medical license, a license that was illegally suspended and revoked respectively on April 2, 2012 and March 12, 2014.

Jurisdiction + Venue

2. U.S.C. section 1331 applies because Plaintiffs claims arise under federal law, and under 18 U.S.C. section 1964(c) because this action alleges violations of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. section 1962. This Court has subject matter jurisdiction pursuant to 28 U.S.C. section 1337 because this action alleges violations of an Act of Congress, that of RICO. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. section 1332(d)(2)(A)(5), because Plaintiffs are citizens of different states to certain Defendants and the aggregate amount in controversy exceeds seventy-thousand dollars.
3. Personal Jurisdiction: This Court has personal jurisdiction over each Defendant. Each Defendant has transacted business, maintained substantial contacts, and/or committed overt acts in furtherance of the illegal scheme and conspiracy throughout the United States, including 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 the District of Columbia.

4. Venue is appropriate in this District for Plaintiff's claims under 28 U.S.C. section 1391(b)(2), 18 U.S.C. section 1132(e)(2), because Defendants reside or may be found in the District of Columbia.

Evidence in support of claims

5. Admission statement of Defendant NJBME (Exhibit 1).

Parties

6. Plaintiff Richard Arjun Kaul, MD brings this action against Defendants Federation of State Medical Board ("FSMB"), The New Jersey Board of Medical Examiners ("NJBME"), Allstate Insurance Company ("Allstate") and William Roeder ("Roeder") to redress injuries caused by Defendants to the health, economic standing, professional and personal reputation of Plaintiff Kaul. The allegations of Plaintiff Kaul are based on his own experiences and personal knowledge, his research, publicly available articles, studies, reports and other sources, a reasonable inquiry under the circumstances and on information and belief. Plaintiff's allegations are likely to have further evidentiary support after a reasonable opportunity for further investigation and discovery.

7. Plaintiff, **RICHARD ARJUN KAUL, MD ("Kaul")** is a resident of the State of New York and was formerly a medical doctor licensed to practice medicine in the State of New Jersey.
8. Defendant, **FEDERATION OF STATE MEDICAL BOARDS ("FSMB")** is a for-profit corporation that generates millions of dollars annually from licensing and disciplinary actions against physicians. The profiteering is conducted through an illegal interstate agreement with state medical boards, that violates the Commerce Clause of the United States Constitution. Defendant FSMB conducts its interstate business from and through offices located in the District of Columbia. The monies are manufactured consequent to it having arbitrarily inserted itself into the process of physician licensing, credentialing, disciplining and educating. From these illegal profits, Defendant FSMB provides kickbacks to state medical boards that condition licensure on services purchased by physicians from Defendant FSMB. Its purported mission is to "protect the public". Defendants FSMB, Allstate, NJBME and Roeder have contributed to the conversion of the American healthcare sector into a massive racketeering enterprise.
9. Defendant, **WILLIAM ROEDER ("Roeder")**, is the executive director of Defendant NJBME, responsible for ensuring that the medical board conduct its affairs within the law and fulfill its mission of protecting the public from any and all threats to its health and welfare.
10. Defendant, **ALLSTATE INSURANCE COMPANY, ("Allstate")** is a corporation traded on the New York Exchange, that conducts its business and aggressive political activities/lobbying nationally, including in the District of Columbia.

11. Defendant, NEW JERSEY BOARD OF MEDICAL EXAMINERS ("NJBME") is a 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. The purported mission of Defendant NJBME is to "protect the public". There exists no such evidence. Defendant NJBME conducts its political/lobbying business with Defendant FSMB through the District of Columbia.

Statement of Fact

12. Defendant NJBME and Roeder are statutorily obligated pursuant to the New Jersey Medical Practices Act to "protect the public", through not only the regulation of healthcare providers, but through the implementation of public policy.
13. There exists in New Jersey a body of public health policy that requires healthcare related state agencies, such as the Department of Health and Defendant NJBME, to develop and utilize plans and procedures to both predict and identify threats to the health of the public.
14. The COVID-19 virus pandemic represents the type of threat to the health of the public, that Defendants NJBME and FSMB had a statutory duty to detect.
15. Defendants NJBME, FSMB and Roeder had a duty of care to the public that they grossly and knowingly violated, by failing to perform their function to "protect the public".

16. The Defendants' gross negligence was entirely foreseeable and thus avoidable, as had the Defendants implemented existing law and public policy as statutorily required, it would have detected the threat.

17. The Defendants' gross negligence in failing to detect the threat until it had infected the American public, is the direct cause of over sixty thousand (60,000) deaths, as of May 2, 2020.

18. The Defendants' gross negligence in failing to detect the threat until it had infected the American public, is the direct cause of over one million (1,000,000) confirmed cases of COVID-19, as of May 2, 2020.

19. The Defendants have admitted that their negligence was gross and wilful, and was directly responsible for the morbidity and mortality caused to the American public.

20. The Defendants have accepted that their gross and wilful negligence amounts to a crime against humanity, and that they are subject to criminal prosecution in the courts of the United States, and those of foreign jurisdictions.

21. Defendant Allstate has funneled bribes to the other Defendants, in a series of quid pro quo schemes purposed to advance its economic agenda through the exploitation of the American public and medical profession.

22. Defendant Allstate has wilfully corrupted state and federal healthcare regulatory agencies in its pursuit of corporate profit. It conducted these schemes in the knowledge that the acts were criminal, and had the potential to exact enormous mortality and morbidity on the American public, by perverting the function of these agencies from public protection to personal profiteering.

23. The Defendants' gross negligence has caused direct and proximate harm to Plaintiff Kaul.

24. As a consequence of Defendants' gross negligence, Plaintiff Kaul has been prevented from obtaining any form of employment, and has been rendered into further economic destitution, severely exacerbating that already caused by the Defendants' illegal revocation of his medical license on March 12, 2014.

25. As a consequence of Defendants' gross negligence, Plaintiff Kaul has suffered further and ongoing economic injury, because his application for licensure in Pennsylvania has been delayed as a result of the COVID-19 pandemic.

26. The Defendants, despite the knowledge that they committed crimes against Plaintiff Kaul in illegally revoking, have continued to obstruct his efforts to have his New Jersey license reinstated. This obstruction is ongoing regardless of the Defendants' knowledge of the COVID-19 related morbidity and mortality, and the knowledge that Plaintiff Kaul possesses the skills and expertise to save lives.

27. Plaintiff Kaul submitted a letter to New Jersey Governor, Philip Murphy, in which he states, "I write this letter to respectfully request that in the interests of public safety and that of saving lives, you immediately issue an executive order to the New Jersey Board of Medical Examiners to reinstate my medical license ... In short I have the ability to save lives." Plaintiff Kaul received no response, and Governor Murphy continued to use the media airwaves to promote his agenda to help the public (Exhibit 2).

28. As a consequence of the Defendants gross negligence, Plaintiff Kaul sustained a severe infective bronchitis on March 22, 2020, for which he was unable to procure medical treatment. This is because he has no health insurance and has been forced into a state of poverty, consequent to the Defendants illegal revocation of his medical license.
29. Plaintiff Kaul was a practicing physician who was permanently harmed by the Defendants criminal pattern of racketeering, and as a member of the public had his right to protection from the COVID-19 virus, violated by the Defendants gross negligence. This violation has caused actual physical and economic harm to Plaintiff Kaul, which includes, but is not limited to, his inability to take a driving test for licensure, his inability to pay his phone bill, resulting in the disconnection of his phone service on April 27, 2020.
30. The Defendants ongoing pattern of criminality and gross negligence has caused Plaintiff Kaul to be deprived of food for a period of several days, and to have become reliant on others to provide this essential and that of a place to live.

Claims for Relief

COUNT ONE

**VIOLATIONS OF 18 U.S.C. SECTION 1962 (C)-(D)
THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, 18 U.S.C.
SECTION 1961, ET SEQ (By Plaintiff Kaul against Defendants Federation + NJBME
+ Alletate + Roeder)**

31. Plaintiff incorporates by reference each preceding paragraph as though fully set forth herein.

32. Plaintiff brings this Count against Defendants Federation + NJBME + A1state + Roeder (inclusively, for the purpose of this count, the "FAR RICO Defendants"). At all relevant times each of the FAR RICO Defendants has been a "person" under 18 U.S.C. Section 1961(3), because each is capable of holding, and does hold a "legal or beneficial interest in property." Section 1962(c) makes it "unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect interstate or foreign commerce, to conduct or participate directly, or indirectly in the conduct of such enterprise's affairs through a pattern of racketeering activity." See 18 U.S.C. Section 1962(c).

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

As explained in detail below, the FAR RICO Defendants sought, amongst other things to corrupt and permit to be corrupted, the process and entities involved in the national mechanism of physician regulation, for the sole purpose of illegal economic enrichment and without regard for public safety.

34. The FAR RICO Defendants pursued these ends through a fraudulent scheme, the purpose of which was to aggrandize their economic and political power, through the commission of the knowingly illegal predicate acts of mail fraud + wire fraud + bribery + kickbacks + perjury, acts committed over a period since at least 1999.

35. The FAR RICO Defendants scheme constitutes a "pattern of racketeering" as defined within 1962(c), with the requisite elements of longevity + purpose + relationship, and with the required element of relationship to the FAR RICO Association-In-Fact

Enterprise. As detailed below the perpetration of this scheme in furtherance of the FAR RICO Association-In-Fact Enterprise violated sub-sections (c) + (d) of section 1962 of RICO.

Description of the FAR RICO Association-In-Fact Enterprise.

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

37. Since at least 1986, Defendant Federation has maintained professional relationships with Defendant NJBME, the nature of which has been the dissemination and sharing of information pertaining to physician regulation. This relationship is codified within the illegal 'Interstate Medical Licensure Compact', to which New Jersey Assemblywoman, Carol A. Murphy submitted Bill 5406 on May 20, 2019, that sought to have Defendant NJBME become a signatory. This bill was submitted in the knowledge that it violated the Compact Clause of the United States Constitution. There are currently twenty-seven signatories to this illegal agreement, and although Defendant NJBME is not yet one of them, it has acted in privity, and thus pursuant to the law, it has submitted itself to the liability consequent to its knowing violation of the Commerce Clause.

38. Since the introduction in 1986 of the Healthcare Quality Improvement Act ("HQIA") the business of 'physician regulation' in the United States, unlike any other country in the

world, has become a multi-billion dollar industry. From this medical-legal industrial complex the FAR RICO Defendants have commercially profited at the expense of, and under the guise of, professing to "protect the public". This is a lie, as the Defendants know that they have not only not protected the public, but have in fact harmed it, as is now evident from the COVID-19 related mortality and morbidity.

39. The FAR RICO Defendants have exploited the HQIA and the authority of unregulated state medical boards, and have perverted the intent of Congress, through the commission of 'sham peer review' and "patterns of racketeering", for political and economic gain, through the exploitation of the public, for whose safety they have absolutely no concern. The COVID-19 slaughter is evidence of their criminal dereliction of duty to the health and welfare of the American people.

40. Subsequent to the enactment of the HQIA, the FAR RICO Defendants have covertly manufactured opaque and purposely secretive communication networks, unavailable to public scrutiny, in which they have transmitted information regarding their schemes to illegally profit through the exploitation of the physician community.

41. The majority of these communications are purposed to advance their schemes of bribery, public corruption and racketeering, while concocting covers to conceal these crimes, that involve principally the knowingly false narrative that they "protect the public". This is the equivalent of the British Empire's claim that their brutal and murderous campaigns for global domination, were designed to civilize the world, and that included their American subjects. The Defendants, as is now evident from the

COVID-19 pandemic, do not, nor ever have, protected the public. In fact, their mere existence is a major threat to the health and welfare of the American people.

The Defendants, in the knowledge that their gross negligence is directly responsible for the COVID-19 related morbidity and mortality, have not only not taken any remedial or corrective action to come into compliance with the law, but have in fact, continued to knowingly violate it, by perpetrating, through the US mail and wires, their long standing schemes of bribery, perjury, fraud.

42. The FAR RICO Defendants "pattern of racketeering" was conducted through the FAR RICO Association-In-Fact Enterprise, the purpose of which was to profit from their controlling positions within the enterprise and through their conduction and participation in the affairs of the FAR RICO Association-In-Fact Enterprise. These crimes perverted the protective purpose of Defendant NJBME from that of protecting the public to one of profiteering. The Defendants perversion is directly responsible for the COVID-19 related mortality and morbidity. Had the Defendants fulfilled their duty of care to the public, the viral genocide would either not have occurred or been substantially mitigated.

43. The FAR RICO Defendants abused their controlling positions within the FAR RICO Enterprise to facilitate the furtherance of their "pattern of racketeering" through and under cover of the FAR Association-In-Fact Enterprise to increase their economic and political power within the trillion-dollar American healthcare sector. The FAR RICO Defendants propagated these illegal schemes by donning the 'cloak of authority'. They did this in the knowledge that they do not, nor ever have, protected the public, but have in fact harmed millions of patients by removing their physicians from clinical practice.

and thus depriving many patients of life-saving care, as is now evident with the COVID-19 mortalities and the lethal shortage of physicians. In fact, state governors, including New Jersey Governor, Philip Murphy, are now pleading for foreign physicians with no American medical training, license or board certifications to provide clinical care to American patients. There exists in this scenario the same insanity that has occupied the tyrannical minds of members of state medical boards.

44. At all relevant times, the FAR RICO Defendants operated an ongoing

Association-In-Fact Enterprise, which was formed for the purpose of economic and political gain within the American healthcare market, in order to exert power and control the market to serve their agendas. The majority of their meetings occurred in private in Washington, D.C., during or at the conclusion of conferences, and during which they conducted a "pattern of racketeering" activity pursuant to U.S.C. 18 1961(4).

Alternatively, each of the FAR RICO Defendants constitutes a single legal entity "enterprise" within the meaning of 18 U.S.C. Section 1961(4), through which the FAR RICO Defendants conducted their pattern of racketeering activity. The FAR RICO Defendants separate legal statuses facilitated the fraudulent scheme and caused the Defendants and their co-conspirators to assume, albeit incorrectly, that it could be raised as a defense to the claims asserted by Kaul. The enterprises detailed in this Complaint are referred collectively as the "FAR RICO Association-In-Fact Enterprises".

At all relevant times, the FAR RICO Association-In-Fact Enterprise constituted a single "enterprise" or multiple simultaneously operating but inter-related enterprises, within the meaning of 18 U.S.C. section 1961(4), as legal entities, as well as individuals and legal

entities associated-in-fact for the common purpose of illegally profiteering from the process of physician regulation and the American healthcare system.

45. The FAR RICO Association-In-Fact Enterprise consists of the following entities and individuals: (a) Defendant Federation; (b) Defendant NJBME; (c) Defendant Allstate; (d) Defendant Roeder.

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

47. The FAR RICO Association-In-Fact Defendants and their co-conspirators, through their illegal FAR RICO Association-In-Fact Enterprise, engaged in a pattern of racketeering activity, which involved a fraudulent scheme to increase revenue for the FAR RICO Association-In-Fact Enterprise's activities by illegally conspiring and engaging in massive schemes of bribery and public corruption. This criminal conduct and the perversion of state agencies for pecuniary gain, corrupted Defendant NJBME, which caused it to become grossly negligent in its duty to protect the public, a dereliction of duty directly responsible for the COVID-19 related mortality and morbidity.

Defendants NJBME + Allstate + Roeder + Federation orchestrated the FAR RICO Scheme, whereby they abused state power for illegal profiteering. The Defendants operated their criminal enterprise under the cover of state authority, while knowingly deceiving the public with falsehoods that their actions were protecting the public, and concealing from public scrutiny their rackets of bribery, kickbacks and other acts of lawlessness. The Defendants profiteering motivated dereliction of duty is the direct and proximate cause of the COVID-19 related morbidity and mortality.

COUNT TWO

Gross Negligence (By Plaintiff Kaul against Defendants Federation + NJBME + Allstate + Roeder)

48. Defendants NJBME, Roeder and Federation had a duty of care to Plaintiff Kaul, who as a member of the public, was entitled to be protected from any threats to his health and welfare, of which he was neither aware nor could have been aware.
49. The Defendants had a duty pursuant to the medical practices act, and public health policy to detect, alert and provide Plaintiff Kaul in a timely manner, information to enable him to have taken preventative actions to avoid being exposed to the COVID-19 virus, and the inevitable risk of developing short, medium and long-term complications. The Defendants violated this duty and the standard of care that the law demands of agencies, individuals and other entities involved in the provision of healthcare to the American public.
50. The Defendants were grossly negligent in their failure to detect and forewarn Plaintiff Kaul and the American public of the threat posed to their health and welfare by the

COVID-19 virus. Defendants NJBME, Roeder and Federation failure to perform their duty is a direct consequence of the fact that they permitted themselves to become corrupted by, amongst others, Defendant Allstate, who in collusion and conspiracy with the other Defendants converted a system purposed to protect the public, into a massive racketeering enterprise. The sole purpose of this criminal enterprise is profit and not patient protection.

51. But for the Defendants gross negligence and violation of their duty of care, Kaul would not have sustained the aforementioned physical, economic and professional injuries. The Defendants gross negligence and violation of their duty of care in not detecting the foreseeable threat posed by the COVID-19 virus is the direct and proximate cause of the economic, physical and professional injuries caused to Kaul. The Defendants are statutorily obligated to protect the public, and are fully cognizant of this responsibility. However, they knowingly and with a willful and reckless disregard for the health and welfare of the public, did violate the law to a criminal standard, a violation that caused death, serious morbidity and economic harm to Kaul and the American public.

52. As a direct consequence of the Defendants lethal offenses and violation of the law, Kaul has sustained actual and permanent damages to his health, professional standing, economic position and livelihood. These injuries have exacerbated the pre-existing and enormous injuries consequent to the illegal revocation of his license, and his inability to obtain a license in any other state and or find any form of employment. The latter is a direct result of the Defendants malicious and intentional destruction of Kaul's personal and professional reputation.

Demand for Judgment

53. Compensatory + Consequential + Punitive Damages from all Defendants in their individual capacities.

Jury Demand

54. Plaintiff Kaul demands trial by jury on all issues so triable

Demand for Insurance

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

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

Conclusion

For the evidence, facts, argument and law set forth above, Plaintiff Kaul moves this Court to grant the requested relief

Respectfully submitted on this 11th day of May 2020.

By: R. Kaul
Richard Arjun Kaul, MD

Exhibit 1

Case 1:20-cv-01612-TSC Document 1-1 Filed 06/18/20 Page 2 of 18

RICHARD ARJUN KAUL, MD
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April 23, 2020

ARNOLD ERWIN FELDMAN, MD
2000 CHENEY HIGHWAY
SUITE 103, #273
TITUSVILLE, FL 32780
225 939 1262
docharley123@gmail.com

Re: Kaul + Feldman v Federation of State Medical Boards et al., - K7
Pre-litigation Investigation

New Jersey State Board of Medical Examiners
Executive Director
William V. Roeder, JD
P.O. Box 183
Trenton, NJ 08625-0183

Dear Sir or Madam:

We, as members of the public, write this letter in order to ascertain your culpability in the COVID-19 pandemic, that as of today has caused over forty thousand (40,000) deaths in the United States. As part of the pre-litigation process, we seek to collect evidence relevant to the above action. We also, in a spirit of equity, would like to provide you and members of your state agency an opportunity to disclose information that might assist your defense of the claims, and mitigate or potentially eliminate your liability for the COVID-19 related public morbidity and mortality.

Please find below a series of statements that will be attached as exhibits to the above Complaint. Please also feel free to provide any further information that the statements might not expressly request, but that you believe may have any relevance to the question of your civil and or criminal liability in the above matter.

1. Within our state, there exists a body of legislation entitled or similarly entitled, 'The Medical Practices Act' (hereinafter "MPA")
2. The MPA provides us wide ranging authority to implement law and take both preventive and remedial action to "protect the public" from all and any threats, be they imminent or otherwise.
3. The MPA, in granting us these protective powers, have also conferred on us a responsibility to develop and implement epidemiological policies and procedures, that enable us to alert the public to local and global healthcare threats.
4. We fully recognize our responsibility to the public, with regard to providing them in a timely manner, information pertaining to any and all local and or global threats to the welfare of their health.
5. We fully recognize that the COVID-19 virus constituted such a threat.
6. We accept without reservation that we failed in our duty to detect the threat posed by the COVID-19 virus to the public.
7. We accept without reservation that our negligence was willful and gross.
8. We accept that our willfully gross negligence is directly responsible for the morbidity and mortality caused to the American public by the COVID-19 virus.
9. We accept that the mortality and morbidity caused to the public by our willfully gross negligence amounts to a crime against humanity, and that we and all members of our medical board are subject to criminal prosecution in the courts of the United States, and those of foreign jurisdictions.

We respectfully inform you that if we receive no response by May 5, 2020, the above statements will be deemed admitted, and we will proceed accordingly.

We thank you for your attention to this matter, a matter of immense public interest.

Should you have any questions please call me on 862 881 9703 or e-mail at drichardkaul@gmail.com

Yours sincerely,



Richard Arjun Kaul, MD



Arnold Erwin Feldman, MD

CC: Office of the Governor

www.drrichardkaul.com

July 17, 2020

Honorable John Michael Vazquez
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ

Re: Kaul v Christie: 16-CV-02364

Letter seeking permission to submit twenty-two (22) motions for summary judgment

Argument

1. The Defendants' defenses are based entirely on the evidence of the revocation of Kaul's license. This evidence has been disproved/negated by the evidence contained in 'The Solomon Critique' + 'The Solomon Critique 2'.

The defendants defenses are premised on the illegal revocation of Kaul's license, a product of perjury + evidential misrepresentations + omissions + fabrications + falsifications detailed in 'The Solomon Critique' (D.E. 225) + 'The Solomon Critique 2' (D.E. 299). Therefore, the defendants are defenseless, and thus there is no need for any further litigation. The illegal revocation of Kaul's license was the foundation of the defendants' defenses. That foundation has been dismantled by the evidence of massive fraud as detailed in the aforementioned critiques. The defendants, instead of answering the complaint, chose to file a series of dismissal motions, in which they avoided any reference, let alone rebut, the massive fraud. This strategy, in light of the evidence submitted by Kaul was unwise, as it now leaves the defendants lacking any credible evidence with which to contest Kaul's motion. There remains no question of material fact that the administrative board proceedings which resulted in the illegal revocation of Kaul's medical license was a massive state orchestrated crime. 'The Solomon Critique 2' is irrefutable proof that in a period from April 9, 2013 to December 13, 2013, Defendant Przybylski and K2 Defendants Doreen Hafner + Jay Howard Solomon collectively committed two hundred and twenty-two separate instances of perjury + evidential omissions + misrepresentations + fabrications + falsifications. These illegally conducted proceedings resulted in the illegal revocation of Kaul's license on March 12, 2014. The defendants entire defense is premised on these irrefutable facts; facts that constitute the felonies of: (1) Evidence Tampering (18 U.S.C. § 1519); (2) Obstruction of Justice (18 U.S.C. § 1512(b)(1) + (2)(A)); (3) Perjury (18 U.S.C. § 1621). The defendants have not and cannot refute the evidence contained within 'The Solomon Critique' + 'The Solomon Critique 2'. Kaul, as the "moving party" who bears the "burden of persuasion at trial" has submitted evidence that has 'gutted' the defendants' defenses, and thus in response to this motion, unless the defendants produce evidence that refutes that contained in the aforementioned documents, the Court as a matter of law, must enter summary judgment. The defendants have advanced arguments in both their

omnibus brief (D.E. 260 Page ID 6250 to 6352) and supplemental briefs (D.E. 257 + D.E. 258 + D.E. 259 + D.E. 261 + D.E. 262 + D.E. 263 + D.E. 264). The foundation of these arguments is the illegally procured revocation of Kaul's license. The arguments are found at: (1) Omnibus Brief – D.E. 260-1 Page ID 6258 + D.E. 260-1 Page ID 6274 to 6279; (2) Defendant Allstate Supplemental Brief – D.E. 258-1 Page ID 5922. The irrefutable evidence in 'The Solomon Critique' + 'The Solomon Critique 2' prove the falsity of the defense advanced by the defendants in the omnibus brief. The defendants, throughout the entire case, have premised their defenses on the illegal revocation of Kaul's license. The proof of this illegality renders the defendants defenseless, and thus there exists no question of material fact as to their guilt of the levied charges. Defendant Allstate devoted six (6) pages to describing a sequence of legal proceedings that it knew and knows were and are illegal. Defendant Allstate, in possession of 'The Solomon Critique', has knowledge that in the illegally conducted administrative board proceedings, two hundred and seventy-eight (278) separate instances of perjury + evidential omissions + misrepresentations + gross mischaracterizations were collectively committed by K2 defendant, Jay Howard Solomon + K1/K2 defendants Gregory Przybylski + Andrew Kaufman. Despite this knowledge Defendant Allstate, in conjunction with all defendants, submitted a defense that they knew was based on a massive crime. Thus there exists no question of material fact and this Court must, as a matter of law, grant Kaul's twenty two (22) motions for summary judgment. The defendants bypassed the dismissal gate and 'opened the door' to the evidence of the illegal administrative proceedings, the moment they included verblage from the criminally fraudulent opinion of K2 Defendant and New Jersey Administrative Law Judge, Jay Howard Solomon. This opened the case to the submission of motions for summary judgment. The submitted verblage (D.E. 299 Page ID 7030 to 7034) consists of one thousand four hundred and sixty-seven (1,467) words of pure and unmitigated fraud, the proof of which exists in 'The Solomon Critique' + 'The Solomon Critique 2'. This evidence is irrefutable, of which there exists no question of material fact, and thus the defendants, regardless of how many politicians/legislators/judges it has bribed/purchased, simply cannot overcome this burden of conclusive proof, and thus there is no reason for any further litigation. The absoluteness of the defendants defenselessness is further illustrated by the fact that they had knowingly and willfully participated in the crimes of which they are accused, which include, but are not limited to, perjury, bribery, fraud, evidential falsification, witness tampering, judicial corruption, public corruption, kickbacks and extortion, a veritable mafia smorgasboard. The evidence of these crimes is irrefutable, there exists no question of material fact and thus no reason for any further litigation. In neither the omnibus nor supplemental briefs have the defendants denied the conclusive evidence of fraud detailed in 'The Solomon Critique', as they know the futility of any such defense.

2. Kaul has dismantled the entire body of evidence, upon which the defendants fabricated their knowingly false defenses.

For the entirety of the case the defendants have premised their defense arguments on the illegal revocation of Kaul's license. The evidence now in this case proves that the revocation was procured through a criminal scheme that involved amongst other things, fraud, perjury, evidential falsification and witness tampering.

3. Kaul has submitted evidence in proof of all claim elements, and has satisfied the summary judgment standard that there exists no genuine issue of material fact.

The evidence in its totality, proves beyond a civil preponderance standard that Kaul's claims are proved. The defendants defense posture, one irreparably decimated by evidence contained within 'The Solomon Critique' + 'The Solomon Critique 2' cannot through any amount of discovery be restored. The reason is that the evidence employed to draft these documents was the evidence upon which the defendants mounted their now fatally flawed defenses. The fact that the defendants committed perjury + evidential misrepresentations + fabrications + omissions are irrefutably "genuine", and if they were not, the defendants would have asserted such, as part of their multitudinous references to the revocation and their polluting of the federal docket with every prejudicial and fraudulent document related to the revocation (D.E. 258 Page ID 5931 + Page ID 6109 to 6225). The defendants have made material in a determinative manner the revocation of Kaul's license and thus Kaul's irrefutable proof of the illegality of the revocation, renders irrelevant any defense the defendants might raise in this or related cases. The only evidence submitted by the defendants in their defense of Kaul's claims are the fraudulent documents relating to the illegal revocation of Kaul's license, and in the face of a motion for summary judgment, it cannot rely on its unsubstantiated pleadings. The defendants cannot argue that they had no opportunity for discovery, as they used the bankruptcy proceedings (13-23366-JKS - June 17, 2013 to 2020), Allstate v Kaul (UNN-L-322-15) + Allstate v Casatelli (UNN-L-1762-14) to conduct extensive discovery and depositions of many parties that had been associated with Kaul's practice. The defendants, other than the illegal revocation have no evidence in support of its defenses, which in conjunction with the proof of all elements of all claims against all defendants means there is no genuine issue of material fact, and thus this Court must, as a matter of law, enter summary judgment against all twenty-two (22) defendants. The irrefutability of the evidence contained within 'The Solomon Critique' + 'The Solomon Critique 2', which is uncontradicted, and could never be contradicted by the defendants, makes summary judgment inevitable. The summary judgment standard, although not requiring a determination of witness credibility or the weighing of evidence does not permit it to ignore a movant's evidence that is, as here, irrefutable, conclusive and Kaul asserts, evidence that a jury would but believe.

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

The defendants are defenseless and Kaul has proved his claims. I certify that the above statements are true and accurate to the best of my knowledge and that if it is proved that I willfully and knowingly misrepresented the facts then I am subject to punishment.

Dated: July 17, 2020

Exhibit 10

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

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

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

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

Table of Evidence/Injuries:

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

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

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

Denial of licensure from 32 state medical boards		September 22, 2020.
PHYSICAL INJURIES		-Malignant Hypertension (240/130)-5 hospitalizations. -Renal colic attacks-4 episodes/hospitalizations. -Two grand mal seizures/complex tongue laceration/surgical repair (July 31, 2015)/hospitalized. -Diabetes (May 2, 2019)/hospitalized. -Violent fall/neck injury (May 27, 2021)/hospitalized.

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

Exhibit 11

Holding/Conclusion: Venue calculations give less weight to plaintiff's preference when there is no evidence of any contact/injury /residence nexus with the forum. The holding, as applied to the facts of K11-2, establishes personal jurisdiction over the Defendants.

THE COURT HAS THE AUTHORITY TO ORDER THE IMMEDIATE REINSTATEMENT OF KAUL'S NEW JERSEY LICENSE

This Court, pursuant to Article III has the power to order the immediate reinstatement of Kaul's NJ license, and remedy the ongoing violation of his constitutional rights. The relief is the functional equivalent of a petition for a writ of habeus corpus, interpreted in light of the interchangeable constitutional concepts of life, liberty and property. In illegally revoking Kaul's license, a property right, the Defendants did cause an illegal loss of his liberty, and thus Kaul has been wrongfully imprisoned since April 2, 2012, an imprisonment that the Defendants have maliciously perpetuated with knowledge of its illegality. Kaul has provided the Defendants multiple opportunities to remedy the illegal imprisonment, and not only have the Defendants rejected these opportunities, but they have recruited other state medical boards/healthcare agencies to perpetuate Kaul's imprisonment. The evidence proves the premeditation of this massive ongoing crime.

THE PERFECT STORM:

The predicament in which the Defendants find themselves is the progeny of a scheme for tyrannical domination of American healthcare/so called "providers" (physicians/nurses/other professionals with greater than eleven (11) years education/training), that commenced in 1986 with HCQIA. The scheme has been orchestrated by the "Federation Cartel" ("FC") and "Hospital-Insurance-Pharmaceutical Industrial Complex" ("HIPIC"), in which state medical boards, state/federal investigative/prosecutorial agencies/courts and state/federal governments have been converted into one massive "racketeering enterprise" the only purpose of which was and is to increase corporate/executive profit at the expense of the health/welfare/freedom/lives of the American public/medical profession. In essence, the "HIPIC-FC" collaborators have converted the United States into their "racketeering enterprise"

Exhibit 12

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

GOVERNMENT EMPLOYEES INSURANCE
CO., GEICO INDEMNITY CO., GEICO
GENERAL INSURANCE COMPANY and
GEICO CASUALTY CO.,

Plaintiffs,

-against-

RICHARD A. KAUL, M.D.,

-and-

NEW JERSEY SPINE &
REHABILITATION PC, and
POMPTON ANESTHESIA
ASSOCIATES, P.C.,

-and-

RODOLFO NARAG, M.D., DONG
KWAK, M.D., and MICHAEL MCKEE,
M.D.,

Defendants

Case No.: _____ ()

COMPLAINT
Plaintiffs Demand
a Trial by Jury

Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (collectively, "GEICO" or "Plaintiffs"), as and for their Complaint against the Defendants, hereby allege as follows:

NATURE OF THE ACTION

1. This action seeks to recover more than \$1,000,000.00 that the Defendants wrongfully obtained from GEICO by submitting, and causing to be submitted, hundreds of fraudulent charges for initial consultations, follow-up examinations, electrodiagnostic testing, spinal surgeries, anesthesia services, and pain management services (collectively the "Fraudulent Services"). The Fraudulent Services purportedly were provided to individuals ("Insureds") who claimed to have been involved in automobile accidents and were eligible for insurance coverage under GEICO no-fault insurance policies.

2. In addition, GEICO seeks a declaration that it is not obligated to pay more than \$4,500,000.00 in pending fraudulent claims seeking payment for the Fraudulent Services that the Defendants have submitted or caused to be submitted because:

- (i) the Fraudulent Services were not medically necessary and were provided - to the extent that they were provided at all - pursuant to pre-determined fraudulent protocols designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to them;

- (ii) the Fraudulent Services were performed - to the extent that they were performed at all - pursuant to illegal kickback arrangements between Richard A. Kaul, M.D. ("Kaul"), New Jersey Spine and Rehabilitation PC ("NJSR"), Pompton Anesthesia Associates, P.C. ("Pompton"), and the healthcare providers who referred Insureds to Kaul, NJSR and Pompton;
- (iii) to the extent that the Fraudulent Services were provided in the first instance, in many cases they were provided by individuals who lacked the requisite qualifications or licenses to perform the Fraudulent Services;
- (iv) the Fraudulent Services included surgical procedures that were performed - to the extent that they were performed at all - in an office setting by physicians who lacked the requisite hospital privileges, alternative privileges, or hospital transfer agreements to perform such surgeries in an office setting; and
- (v) the billing codes used for the Fraudulent Services misrepresented and exaggerated the level of services that purportedly were provided in order to inflate the charges submitted to GEICO.

3. The Defendants fall into the following categories:

- (i) Defendants NJSR and Pompton are New Jersey medical professional corporations through which many of the Fraudulent Services purportedly were performed and were billed to insurance companies, including GEICO.
- (ii) Defendant Kaul is a New Jersey physician whose license to practice medicine presently is suspended. Kaul purports to own NJSR and Pompton, and purported to perform many of the Fraudulent Services.
- (iii) Defendants Rodolfo Narag, M.D. ("Narag"), Dong Kwak, M.D. ("Kwak"), and Michael McKee, M.D. ("McKee") are New Jersey physicians associated with Kaul, NJSR, and Pompton who purported to perform many of the Fraudulent Services.

4. As discussed below, the Defendants at all relevant times have known that:

- (i) the Fraudulent Services were not medically necessary and were provided - to the extent that they were provided at all - pursuant to pre-determined fraudulent protocols designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to them;
- (ii) the Fraudulent Services were performed - to the extent that they were performed at all - pursuant to illegal kickback arrangements between Kaul, NJSR, Pompton, and the healthcare providers who referred Insureds to Kaul, NJSR and Pompton;
- (iii) to the extent that the Fraudulent Services were provided in the first instance, in many cases they were provided by individuals who lacked the requisite qualifications or licenses to perform the Fraudulent Services;
- (iv) the Fraudulent Services included surgical procedures that were performed - to the extent that they were performed at all - in an office setting by physicians who lacked the requisite hospital privileges, alternative privileges, or hospital transfer agreements to perform such surgeries in an office setting; and
- (v) the billing codes used for the Fraudulent Services misrepresented and exaggerated the level of services that purportedly were provided in order to inflate the charges submitted to GEICO.

5. As such, the Defendants never had any right to be compensated for the Fraudulent Services that were billed to GEICO through NJSR and Pompton.

6. The charts annexed hereto as Exhibit "A" sets forth a representative sample of the fraudulent claims that have been

identified to-date that the Defendants submitted, or caused to be submitted, to GEICO. The Defendants' fraudulent scheme began as early as 2007 and has continued uninterrupted since that time. As a result of the Defendants' scheme, GEICO incurred damages of more than \$1,000,000.00.

THE PARTIES

I. Plaintiffs

7. Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. are Maryland corporations with their principal places of business in Chevy Chase, Maryland. GEICO is authorized to conduct business and to issue automobile insurance policies in New Jersey.

II. Defendants

A. Kaul

8. Defendant Kaul resides in and is a citizen of New Jersey. Kaul was licensed to practice medicine in New Jersey on about November 28, 1995, purports to be the owner of NJSR and Pompton, and purported to perform many of the Fraudulent Services.

1. Kaul's Credentials

9. In 1988, Kaul graduated from the Royal Free Hospital School of Medicine, London University, in London, England.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

GOVERNMENT EMPLOYEES INSURANCE CO.,
GEICO INDEMNITY CO., GEICO GENERAL
INSURANCE COMPANY and GEICO CASUALTY
CO.,

Plaintiffs,

v.

SPECIALTY MEDICAL SERVICES, LLC,
LOUIS GIASULLO, D.C.,
JOSEPH LOZITO, D.O.,
SALVATORE J. MILAZZO, D.O.,
DANILO MANGUNAY, M.D.,
SALVATORE SANTANGELO, D.C.,
ANIL RANA, P.T.,
and JOHN DOE DEFENDANTS 1-10,

Defendants.

Case No.:
()

COMPLAINT
Plaintiffs Demand
a Trial by Jury

COMPLAINT

Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (collectively "GEICO" or "Plaintiffs"), as and for their Complaint against the Defendants, hereby allege upon information and belief as follows:

1. This action seeks to recover more than \$1,200,000.00 that the Defendants wrongfully have obtained from GEICO by submitting, and causing to be submitted, thousands of fraudulent no-fault insurance charges through Defendant Specialty Medical Services, LLC ("Specialty Medical") relating to medically unnecessary and otherwise unreimbursable healthcare services, including initial and follow-up examinations, diagnostic testing, pain management injections, manipulation under anesthesia, chiropractic services, and physical therapy services (collectively, the "Fraudulent Services"), that allegedly were provided to New Jersey automobile accident victims ("Insureds").

2. In addition, GEICO seeks a declaration that it is not obligated to pay more than \$2,600,000.00 in pending fraudulent claims seeking payment for the Fraudulent Services that have been submitted or caused to be submitted by the Defendants through Specialty Medical because:

- (i) Specialty Medical is not eligible to receive payment for the Fraudulent Services because Specialty Medical was not in compliance with all significant qualifying requirements of law that bore upon the rendition of the Fraudulent Services;
- (ii) Specialty Medical is not eligible to receive payment for the Fraudulent Services because the Fraudulent Services were not provided in compliance with all significant qualifying requirements of law that bore upon the rendition of the services;
- (iii) the Fraudulent Services were not medically necessary and were provided – to the extent that they were provided at all – pursuant to pre-determined fraudulent protocols designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to them;
- (iv) in many cases, the Fraudulent Services never were provided in the first instance;
- (v) the billing codes used for the Fraudulent Services misrepresented and exaggerated the level of services that purportedly were provided in order to inflate the charges submitted to GEICO; and

- (vi) the Fraudulent Services were provided – to the extent that they were provided at all – pursuant to illegal kickback arrangements between the Defendants and their referral sources.

3. The Defendants fall into the following categories:

- (i) Defendant Specialty Medical is a fraudulently organized New Jersey medical professional limited liability corporation through which the Fraudulent Services purportedly were performed and were billed to insurance companies, including GEICO.
- (ii) Defendant Louis Giasullo, D.C. (“Giasullo”) is a chiropractor licensed to practice chiropractic in New Jersey, and at all relevant times was the true owner of Specialty Medical, together with – upon information and belief – John Doe Defendants 1-10 (collectively, with Giasullo, the “Management Defendants”).
- (iii) Defendant Joseph Lozito, D.O. (“Lozito”) is a physician licensed to practice medicine in New Jersey, and served as the nominal or “paper” owner and member of Specialty Medical, though in actuality he had no genuine ownership interest in or control over the professional entity.
- (iv) Defendant Salvatore J. Milazzo, D.O. (“Milazzo”) is a physician licensed to practice medicine in New Jersey, and purported to perform many of the Fraudulent Services.
- (v) Defendant Danilo Mangunay, M.D. (“Mangunay”) is a physician licensed to practice medicine in New Jersey, and purported to perform many of the Fraudulent Services.
- (vi) Defendant Salvatore Santangelo, D.C. (“Santangelo”) is a chiropractor licensed to practice chiropractic in New Jersey, and purported to perform many of the Fraudulent Services.
- (vii) Defendant Anil Rana, P.T. (“Rana”) is a physical therapist licensed to practice physical therapy in New Jersey, and purported to perform many of the Fraudulent Services.

4. As discussed below, the Defendants at all relevant times have known that:

- (i) Specialty Medical was not eligible to receive payment for the Fraudulent Services because Specialty Medical was not in compliance with all significant qualifying requirements of law that bore upon the rendition of the services;
- (ii) Specialty Medical was not eligible to receive payment for the Fraudulent Services because the Fraudulent Services were not provided in compliance with all

significant qualifying requirements of law that bore upon the rendition of the services;

- (iii) the Fraudulent Services were not medically necessary and were provided – to the extent that they were provided at all – pursuant to pre-determined fraudulent protocols designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to them;
- (iv) in many cases, the Fraudulent Services never were provided in the first instance;
- (v) the billing codes used for the Fraudulent Services misrepresented and exaggerated the level of services that purportedly were provided in order to inflate the charges submitted to GEICO; and
- (vi) the Fraudulent Services were provided – to the extent that they were provided at all – pursuant to illegal kickback arrangements between the Defendants and their referral sources.

5. As such, the Defendants do not now have – and never had – any right to be compensated for the Fraudulent Services that were billed to GEICO through Specialty Medical. The chart annexed hereto as Exhibit “1” sets forth a representative sample of the fraudulent claims that have been identified to-date that the Defendants submitted, or caused to be submitted, to GEICO. The Defendants’ fraudulent scheme began as early as 2008 and has continued uninterrupted since that time. As a result of the Defendants’ scheme, GEICO has incurred damages of more than \$1,200,000.00.

THE PARTIES

I. Plaintiffs

6. Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. are Maryland corporations with their principal places of business in Chevy Chase, Maryland. GEICO is authorized to conduct business and to issue automobile insurance policies in New Jersey.

II. Defendants

7. Defendant Specialty Medical is a New Jersey medical professional limited liability company with its principal place of business in New Jersey. Specialty Medical was organized on or about March 14, 2008 and was used as a vehicle to submit fraudulent billing to GEICO and other insurers.

8. Prior to February 1, 2009, Giasullo purported to be the sole owner and member of Specialty Medical. Since February 1, 2009, Lozito has purported to be the sole owner and member of Specialty Medical. In actuality, however, Lozito never has had any genuine ownership or membership interest in Specialty Medical, and Giasullo has – at all relevant times – continued to own and be a member of Specialty Medical in contravention of New Jersey law.

9. Defendant Giasullo resides in and is a citizen of New Jersey. Giasullo was licensed to practice chiropractic in New Jersey on January 30, 1976, purported to be the sole owner and member of Specialty Medical prior to February 1, 2009, but in actuality remains an owner and member of Specialty Medical in contravention of New Jersey law.

10. In a Final Order effective February 19, 1982, the New Jersey State Board of Medical Examiners (the “Medical Board”) revoked Giasullo’s license to practice chiropractic and ordered him to pay \$20,000.00 in costs and penalties after he pleaded no contest to multiple disciplinary charges, including charges that he: (i) billed for services he had not rendered; (ii) falsely represented that x-rays he had taken of his receptionist were x-rays of his patients; (iii) was seriously incompetent with respect to numerous x-rays; (iv) exposed his patients to unnecessary radiation in connection with his x-rays of numerous patients; and (v) submitted insurance claims listing patient diagnoses that were not supported by the patients’ records. Ultimately, in 1984, the Medical Board reinstated Giasullo’s chiropractic license after he

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

GOVERNMENT EMPLOYEES INSURANCE
CO., GEICO INDEMNITY CO., GEICO
GENERAL INSURANCE COMPANY and
GEICO CASUALTY
CO.,

Plaintiffs,

-against-

STEFAN TRNOVSKI, M.D., ROMAN
KOSIBOROD, D.O., ARON ROVNER, M.D.,
ALBERT AKKERMAN, M.D., ALLIANCE
SPINE ASSOCIATES, LLC, and NEW
HORIZON SURGICAL CENTER, LLC,

Defendants.

Docket No.: _____()

**Plaintiffs Demand
a Trial by Jury**

COMPLAINT

Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (collectively "GEICO" or "Plaintiffs"), as and for their Complaint against the Defendants, hereby allege as follows:

NATURE OF THE ACTION

1. This action seeks to recover more than \$3,000,000.00 that the Defendants wrongfully have obtained from GEICO by submitting, and causing to be submitted, hundreds of

fraudulent no-fault insurance charges for purported initial examinations, follow-up examinations, pain management injections, anesthesia services, and facility fees (collectively the "Fraudulent Services").

2. The Fraudulent Services purportedly were provided to individuals ("Insureds") who claimed to have been involved in automobile accidents and were eligible for insurance coverage under GEICO no-fault insurance policies.

3. In addition, GEICO seeks a declaration that it is not obligated to pay more than \$100,000.00 in pending fraudulent claims seeking payment for the Fraudulent Services that the Defendants have submitted or caused to be submitted because:

- (i) the Defendants were not in compliance with all relevant laws and regulations governing healthcare practice in New Jersey;
- (ii) the Fraudulent Services were not provided in compliance with all relevant laws and regulations governing healthcare practice in New Jersey;
- (iii) the Fraudulent Services were not medically necessary, and were provided – to the extent that they were provided at all – pursuant to pre-determined fraudulent protocols designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to them;
- (iv) in many cases, the Fraudulent Services never were provided in the first instance;
- (v) the billing codes used for the Fraudulent Services misrepresented and exaggerated the level of services that purportedly were provided in order to inflate the charges submitted to GEICO; and
- (vi) in many cases, the Fraudulent Services were provided – to the extent that they were provided at all – pursuant to illegal self-referrals between and among the Defendants.

4. The Defendants fall into the following categories:

- (i) Defendants Alliance Spine Associates, LLC ("Alliance") and New Horizon Surgical Center, LLC ("New Horizon") are, respectively, a New Jersey medical professional limited liability company and a New Jersey limited liability company operating as an ambulatory surgery center, through which the Fraudulent Services purportedly were provided and billed to insurance companies, including GEICO.

- (ii) Defendant Stefan Trnovski, M.D. ("Trnovski") is a physician licensed to practice medicine in New Jersey, was a member of and controlled Defendants Alliance and New Horizon, and purported to perform many of the Fraudulent Services.
- (iii) Defendant Roman Kosiborod, D.O. ("Kosiborod") is a physician licensed to practice medicine in New Jersey, was a member of and controlled Defendants Alliance and New Horizon, and purported to perform many of the Fraudulent Services.
- (iv) Defendants Aron Rovner, M.D. ("Rovner") and Albert Akkerman, M.D. ("Akkerman") are physicians licensed to practice medicine in New Jersey, who were employed by Alliance, Trnovski, and Kosiborod, and who purported to perform many of the Fraudulent Services.

5. As discussed below, the Defendants at all relevant times have known that:

- (i) the Defendants were not in compliance with all relevant laws and regulations governing healthcare practice in New Jersey;
- (ii) the Fraudulent Services were not provided in compliance with all relevant laws and regulations governing healthcare practice in New Jersey;
- (iii) the Fraudulent Services were not medically necessary, and were provided – to the extent that they were provided at all – pursuant to pre-determined fraudulent protocols designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to them;
- (iv) in many cases, the Fraudulent Services never were provided in the first instance;
- (v) the billing codes used for the Fraudulent Services misrepresented and exaggerated the level of services that purportedly were provided in order to inflate the charges submitted to GEICO; and
- (vi) in many cases, the Fraudulent Services were provided – to the extent that they were provided at all – pursuant to illegal self-referrals between and among the Defendants.

6. As such, the Defendants do not now have – and never had – any right to be compensated for the Fraudulent Services that were billed to GEICO through Alliance and New Horizon.

7. The charts annexed hereto as Exhibits "1" and "2" set forth a representative sample of the fraudulent claims that have been identified to date that the Defendants have submitted, or caused to be submitted, to GEICO.

8. The Defendants' fraudulent scheme began as early as 2014 and has continued uninterrupted since that time. As a result of the Defendants' scheme, GEICO has incurred damages of more than \$3,000,000.00.

THE PARTIES

I. Plaintiffs

9. Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. are Maryland corporations with their principal places of business in Chevy Chase, Maryland. GEICO is authorized to conduct business and to issue automobile insurance policies in New Jersey.

II. Defendants

10. Defendant Alliance is a New Jersey professional limited liability corporation with its principal place of business in New Jersey. Alliance was organized in New Jersey on or about January 27, 2014, had Trnovski and Kosiborod as its co-owners and sole members, and was used by the Defendants as a vehicle to submit fraudulent billing to GEICO and other insurers.

11. Defendant New Horizon is a New Jersey limited liability corporation with its principal place of business in New Jersey. New Horizon was organized in New Jersey on or about April 14, 2009, had Trnovski and Kosiborod as members, and was used by the Defendants as a vehicle to submit fraudulent billing to GEICO and other insurers.

12. Defendant Trnovski resides in and is a citizen of New Jersey. Trnovski was licensed to practice medicine in New Jersey on or about July 16, 2002, was a co-owner and

member of Alliance, was a co-owner and member of New Horizon, and purported to provide many of the Fraudulent Services.

13. Defendant Kosiborod resides in and is a citizen of New Jersey. Kosiborod was licensed to practice medicine in New Jersey on or about April 11, 2003, was a co-owner and member of Alliance, was a co-owner and member of New Horizon, and purported to provide many of the Fraudulent Services.

14. Defendant Rovner resides in and is a citizen of New York. Rovner was licensed to practice medicine in New Jersey on or about November 12, 2010, was employed by or associated with Alliance, Trnovski, and Kosiborod, and purported to perform many of the Fraudulent Services.

15. Defendant Akkerman resides in and is a citizen of New York. Akkerman was licensed to practice medicine in New Jersey on or about October 3, 2006, was employed by or associated with Alliance, Trnovski, and Kosiborod, and purported to perform many of the Fraudulent Services.

JURISDICTION AND VENUE

16. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. § 1332(a)(1) because the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs, and is between citizens of different states.

17. Pursuant to 28 U.S.C. § 1331, this Court also has jurisdiction over the claims brought under 18 U.S.C. §§ 1961 *et seq.* (the Racketeer Influenced and Corrupt Organizations (“RICO”) Act) because they arise under the laws of the United States.

18. In addition, this Court has supplemental jurisdiction over the subject matter of the claims asserted in this action pursuant to 28 U.S.C. § 1367.

John Robertelli, Esq.
Gene Y. Kang, Esq.
Michael Vanunu, Esq.
Barry Levy, Esq. (to be admitted *pro hac vice*)
Max Gershenoff, Esq. (to be admitted *pro hac vice*)
RIVKIN RADLER LLP
21 Main Street, Suite 158
Court Plaza South, West Wing
Hackensack, New Jersey 07601
(201) 287-2460
*Counsel for Plaintiffs Government Employees Insurance
Company, GEICO Indemnity Company, GEICO General Insurance
Company and GEICO Casualty Company.*

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

-----X
GOVERNMENT EMPLOYEES INSURANCE
COMPANY, GEICO INDEMNITY COMPANY,

Case No.:

GEICO GENERAL INSURANCE COMPANY
and GEICO CASUALTY COMPANY,

Plaintiffs,

-against-

COMPLAINT

Plaintiffs Demand
a Trial by Jury

LIBERTY CHIROPRACTIC & PHYSICAL THERAPY,
LLC, CAPITOL CHIROPRACTIC & REHAB, LLC,
PATERSON CHIROPRACTIC & PHYSICAL
THERAPY, LLC, JERSEY CITY REHABILITATION
CLINIC, LLC, MICHAEL MANNO, D.C., JAMES
PRETE, D.C., JOHN B. BORTOLUSSI, D.C., GLENN
R. BRADLEY, D.C., GLENN N. COLLAZO, D.C.,
CHARLES COLLINS, D.C., JOSHUA DUFFY, D.C.,
CHARLES FERRANTE, D.C., SONNY B. MERRITT,
D.C., JOHN J. PULEO, D.C., SPINE AND
ORTHOPEDIC CENTER OF NEW JERSEY, LLC,
AND DAVID B. BASCH, M.D.

Defendants.

-----X

Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company,
GEICO General Insurance Company and GEICO Casualty Company (collectively "GEICO" or
"Plaintiffs"), as and for their Complaint against Defendants, hereby allege as follows:

INTRODUCTION

1. This action seeks to recover more than \$3,100,000.00 that the Defendants wrongfully obtained from GEICO by submitting, and causing to be submitted, thousands of fraudulent no-fault insurance charges through Liberty Chiropractic & Physical Therapy, LLC (“Liberty Chiro”), Capitol Chiropractic & Rehab, LLC (“Capitol Chiro”), Paterson Chiropractic & Physical Therapy, LLC (“Paterson Chiro”), Jersey City Rehabilitation Clinic, LLC (“Jersey Rehab”), and Spine and Orthopedic Center of New Jersey, LLC (“Spine & Ortho”) relating to medically unnecessary, illusory, and otherwise non-reimbursable healthcare services, including initial examinations, follow-up examinations, pain management injections, chiropractic, and physical therapy services (collectively the “Fraudulent Services”).

2. The Fraudulent Services purportedly were provided to individuals (“Insureds”) who claimed to have been involved in automobile accidents and were eligible for coverage under no-fault insurance policies issued by GEICO.

3. In addition, Plaintiffs seek a declaration that – between at least 2014 and the present – Liberty Chiro, Capitol Chiro, Paterson Chiro, Jersey Rehab, and Spine & Ortho were not in compliance with all relevant laws and regulations governing healthcare practice in New Jersey because:

- (i) Liberty Chiro, Paterson Chiro, Capitol Chiro and their co-owners, Defendants Michael Manno, D.C. (“Manno”) and James Prete, D.C. (“Prete”), solicited and received unlawful compensation in exchange for patient referrals;
- (ii) Jersey Rehab and its owner, Prete, solicited and received unlawful compensation in exchange for patient referrals;
- (iii) Spine & Ortho and its owner, David B. Basch, M.D. (“Basch”), solicited and provided unlawful compensation in exchange for patient referrals;
- (iv) Liberty Chiro, Capitol Chiro, Paterson Chiro, Jersey Rehab, and Spine & Ortho billed for Fraudulent Services that were not provided in compliance with all relevant laws and regulations governing healthcare practice in New Jersey,

because they were provided – to the extent that they were provided at all – pursuant to Defendants’ illegal referral scheme; and

- (v) Liberty Chiro, Capitol Chiro, Paterson Chiro, Jersey Rehab, and Spine & Ortho billed for Fraudulent Services that were not medically necessary, and were performed – to the extent that they were performed at all – pursuant to pre-determined, fraudulent treatment and billing protocols that were designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who were subjected to them.

4. The Defendants are as follows:

- (i) Defendant Liberty Chiro is a New Jersey chiropractic professional limited liability company, through which the Fraudulent Services purportedly were performed and were billed to insurance companies, including GEICO. Liberty Chiro and its owners, Manno and Prete, received illegal compensation in exchange for patient referrals to other New Jersey healthcare services providers, including Spine & Ortho, Hudson Radiology Center of NJ Corp. d/b/a North Jersey Radiology Center (“Hudson Radiology”), and Valskys Pain & Anesthesia, P.A. (“Valskys Pain”).
- (ii) Defendant Capitol Chiro is a New Jersey chiropractic professional limited liability company, through which the Fraudulent Services purportedly were performed and were billed to insurance companies, including GEICO. Capitol Chiro and its owners, Manno and Prete, received illegal compensation in exchange for patient referrals to other New Jersey healthcare services providers, including Spine & Ortho and Valskys Pain.
- (iii) Defendant Paterson Chiro is a New Jersey chiropractic professional limited liability company, through which the Fraudulent Services purportedly were performed and were billed to insurance companies, including GEICO. Paterson Chiro and its owners, Manno and Prete, received illegal compensation in exchange for patient referrals to other New Jersey healthcare services providers, including Spine & Ortho and Valskys Pain.
- (iv) Defendant Jersey Rehab is a New Jersey chiropractic professional limited liability company, through which the Fraudulent Services purportedly were performed and were billed to insurance companies, including GEICO. Jersey Rehab and its owner, Prete, received illegal compensation in exchange for patient referrals to other New Jersey healthcare services providers, including Spine & Ortho, Hudson Radiology, and Valskys Pain.
- (v) Defendant Spine & Ortho is a New Jersey medical professional limited liability company, through which the Fraudulent Services purportedly were provided and billed to insurance companies, including GEICO. Spine & Ortho and its owner, Basch, provided illegal compensation to other New Jersey healthcare services providers, including Liberty Chiro, Capitol Chiro, Paterson Chiro, Jersey Rehab,

Manno, and Prete, in exchange for patient referrals.

- (vi) Defendant Manno is a chiropractor licensed to practice chiropractic in New Jersey, owned and controlled Defendants Liberty Chiro, Capitol Chiro, Paterson Chiro, as well as non-parties Liberty Spine & Rehab, LLC ("Liberty Spine") and North Jersey Spine and Rehab, LLC ("North Jersey"), purported to perform many of the Fraudulent Services, and received illegal compensation in exchange for patient referrals to other New Jersey healthcare services providers, including Spine & Ortho, Hudson Radiology, and Valskys Pain.
- (vii) Defendant Prete is a chiropractor licensed to practice chiropractic in New Jersey, owned and controlled Defendants Liberty Chiro, Capitol Chiro, Paterson Chiro, and Jersey Rehab, as well as non-parties Courthouse Chiropractic & Physical Therapy, LLC ("Courthouse Chiro") and Liberty Spine, purported to perform many of the Fraudulent Services, and received illegal compensation in exchange for patient referrals to other New Jersey healthcare services providers, including Spine & Ortho, Hudson Radiology, and Valskys Pain.
- (viii) Defendants John Bortolussi, D.C. ("Bortolussi"), Glenn Bradley, D.C. ("Bradley"), Glenn Collazo, D.C. ("Collazo"), Charles Collins, D.C. ("Collins"), Joshua Duffy, D.C. ("Duffy"), Charles Ferrante, D.C. ("Ferrante"), Sonny Merritt, D.C. ("Merritt"), and John Puleo, D.C. ("Puleo") are chiropractors licensed to practice chiropractic in New Jersey, and – together with Prete and Manno – purported to perform many of the Fraudulent Services at Liberty Chiro, Capitol Chiro, Paterson Chiro, and Jersey Rehab.

5. As discussed below, the Defendants at all relevant times have known that:

- (i) Liberty Chiro, Capitol Chiro, Paterson Chiro, Jersey Rehab, and Spine & Ortho were not in compliance with all relevant laws and regulations governing healthcare practice in New Jersey and, as a result, were not eligible to receive no-fault insurance reimbursement in the first instance;
- (ii) the Fraudulent Services were not provided in compliance with all relevant laws and regulations governing healthcare practice in New Jersey and, as a result, were not eligible for no-fault insurance reimbursement in the first instance;
- (iii) the Fraudulent Services were not medically necessary, and were provided – to the extent that they were provided at all – as part of a pre-determined protocol designed solely to financially enrich the Defendants, rather than to treat or otherwise benefit the Insureds who purportedly were subjected to it; and
- (iv) in many cases, the Fraudulent Services never were provided in the first instance.

6. As such, the Defendants do not now have – and never had – any right to be compensated for the Fraudulent Services that were billed to GEICO through Liberty Chiro,

Capitol Chiro, Paterson Chiro, Jersey Rehab, and Spine & Ortho.

7. The chart annexed hereto as Exhibit "1" sets forth a large representative sample of the fraudulent claims that have been identified to date that the Defendants have submitted, or caused to be submitted, to GEICO from Liberty Chiro.

8. The chart annexed hereto as Exhibit "2" sets forth a large representative sample of the fraudulent claims that have been identified to date that the Defendants have submitted, or caused to be submitted, to GEICO from Capitol Chiro.

9. The chart annexed hereto as Exhibit "3" sets forth a large representative sample of the fraudulent claims that have been identified to date that the Defendants have submitted, or caused to be submitted, to GEICO from Paterson Chiro.

10. The chart annexed hereto as Exhibit "4" sets forth a large representative sample of the fraudulent claims that have been identified to date that the Defendants have submitted, or caused to be submitted, to GEICO from Jersey Rehab.

11. The chart annexed hereto as Exhibit "5" sets forth a large representative sample of the fraudulent claims that have been identified to date that the Defendants have submitted, or caused to be submitted, to GEICO from Spine & Ortho.

12. The Defendants' fraudulent scheme began as early as 2014 and has continued uninterrupted since that time. As a result of the Defendants' fraudulent scheme, GEICO has incurred damages of more than \$3,100,000.00.

THE PARTIES

I. Plaintiffs

13. Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company and GEICO Casualty Company are Maryland

Exhibit 13

[Print in black ink all areas in bold letters. A complaint must be served in response to a demand or notice of appearance (CPLR 3012(b))]

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RICHARD ARJUN KAVL, MD
[your name(s)] Plaintiff(s)

SUMMONS WITH NOTICE

Index Number

101019-2021

Date Index Number Purchased

, 20

HOWARD A ZUCKER ^{against} IN HIS OFFICIAL CAPACITY
ARTHUR HENGELER IN HIS OFFICIAL CAPACITY
[name(s) of party being sued] Defendant(s)

To the Person(s) Named as Defendant(s) above:

PLEASE TAKE NOTICE THAT YOU ARE SUMMONED and required to serve upon plaintiff, at the address stated below, a notice of appearance or demand for a complaint within 20 days after service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to serve a notice of appearance or demand for a complaint, a judgment will be entered against you by default for the relief demanded herein.

Dated: August 25, 2021
[date of summons]
NEW YORK
COUNTY CLERK'S OFFICE

AUG 27 2021

NOT COMPARED
WITH COPY FILE

HOWARD A ZUCKER, MD, JD
[Defendant(s) name(s)]
3959 BROADWAY, NY, NY 10032
[Defendant's address(es)]
ARTHUR HENGELER, MD
2365 S. CLINTON AVE.
ROCHESTER, NY 14618

RK1
[sign your name]
RICHARD ARJUN KAVL, MD
[print your name]
4401 SUMMERSET DRIVE
PEARL RIVER, NY 10965
862 881 9703
[your address(es), telephone number(s)]

Notice: The nature of this action is [briefly describe the nature of your case against the defendant(s), such as, breach of contract, negligence]: → Unlawful violation (for process)

Request for an order to compel production of an opinion issued by a sub-committee of the New York State Medical Board, in regards to an application for a license to practice medicine/surgery in the State of New York

The relief sought is [briefly describe the kind of relief you are asking for, such as money damages of \$25,000]:

Order for production of opinion

Should defendant(s) fail to appear herein or demand a complaint, judgment will be entered by default

for the sum of NO MONIES DEMAND [amount of money demanded] with interest from the date of / [date from which interest on the amount demanded is claimed] and the costs of this action.

Venue: Plaintiff(s) designate New York County as the place of trial. The basis of this delegation is

[check box that applies]:

- ☐ Plaintiff's(s') residence in New York County
- ☒ Defendant's(s') residence in New York County
- ☐ Other [See CPLR Article 5]: _____

[Litigation track. Fill out right side of form only]
*****NOTICE OF ENTRY*****

Sir/Madam:

Please take notice that the within is a (certified) true copy of a

duly entered in the office of the clerk of

the within named court on the _____ day of _____, 20____

Dated: _____ Yours, etc.

Attorney for: _____ Office and Post

Office Address _____

To: _____
Attorney(s) for _____

*****NOTICE OF SETTLEMENT*****

Sir/Madam:

Please take notice that an
of which the within is a true copy will be presented for settlement
to the Hon. _____ one of the Justices
of the within court, at _____ at _____ AM/PM.

Dated: _____ 20____ Years, etc.

Presenting Party _____

To: _____
Attorney(s) for _____

INDEX NUMBER _____

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of the Application of RICHARD ARON KAVL, MD
Petitioner,

- against -

HOWARD A. ZWIKER, MD, JD Respondent,
ARTHUR S. HENGERTER, MD

To the best of my knowledge, information and belief, formed
after an inquiry reasonable under the circumstances, the presentation
of these papers and the contentions therein are not frivolous as
defined in subsection (c) of section 130.1.1 of the Rules of the Chief
Administrator (22NYCRR).

Sign Name: R.K.

Print Name: RICHARD ARON KAVL, MD

Address: 64VC JONHSET DRIVE
PEARL RIVER, NY 10965

Telephone: 862 881 9703

Service of a copy of the within is hereby admitted

Dated: _____, 20____

Attorney for _____

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

RICHARD ARJUN KAUL, MD

Petitioner

v.

Petition No.:

HOWARD ZUCKER, MD, JD
ARTHUR HENGERER, MD

Respondents

SUMMONS AND PETITION

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

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

RICHARD ARJUN KAUL, MD

Petitioner

v.

Petition No.:

HOWARD ZUCKER, MD, JD
ARTHUR HENGERER, MD

Respondents

To the above-named respondents:

Please be noticed that a petition has been filed in the SUPREME COURT OF THE STATE OF NEW YORK, that seeks an order compelling the immediate production of the original of a purported opinion of a subcommittee of the New York State Medical Board in Case Number: 4102492.

The Kaul Cases

- K1: Kaul v Christie: 16-CV-02364 – VOLUNTARILY DISMISSED
- K2: Kaul v Christie: 18-CV-08086 – VOLUNTARILY DISMISSED
- K3: Kaul v Schumer: 19-CV-13477 – VOLUNTARILY DISMISSED
- K4: Kaul v Stolz: 18-CV-01489 – VOLUNTARILY DISMISSED
- K5: Kaul v Federation: 19-CV-3050 – APPEAL DISMISSED FOR LACK OF PROSECUTION
- K6: Kaul v Kaufman: State Criminal Indictment
- K7: Kaul v Federation: 20-CV-01612 – OPEN
- 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 – CLOSED
- K10: Kaul v Plaintiffs (All cases filed by Kaul to reverse judgments/verdicts entered from 1999 to 2015 in the UK/US).
- K11-1 Kaul v Federation: 21-CV-00057 – OPEN
- K11-2: Kaul v Boston Partners: 21-CV-10326 – DISMISSED
- K11-3: Kaul v Allstate: 21-CV-00736 – OPEN
- K11-4: Kaul v Murphy: 21-CV-09788 – VOLUNTARILY DISMISSED.
- K11-5: Kaul v State of New Jersey/Allstate/Christie: No. 2092-DRR – INDIAN HIGH COURT
- K11-6: Kaul v Moore: Docket Number Pending (New York State Supreme Court).
- K11-7: Kaul v Intercontinental Exchange et al: 21-CV-06992
- K11-9: Kaul v Murphy: 21-CV-13063 – DIMISSED WITHOUT PREJUDICE AFTER TRANSFER FROM USDC-SDNY TO DNJ.
- P1: Kaul/Patel v Crist/State of New Jersey: 19-CV-08946 – CLOSED

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

Exhibits

1. August 19, 2020: Letter from Kaul to NYS Medical Board (Exhibit 1).
2. October 13, 2020: Email from NYS Medical Board to Kaul (Exhibit 2).
3. May 11, 2021: K11-6- Complaint (to be filed) (Exhibit 3).
4. July 25, 2021: K11-9 – Petition to SCOTUS re: writ of prohibition to U.S.D.C.-DNJ (Exhibit 4).
5. August 18, 2021: NOTICE OF LITIGATION/PRODUCTION OF OPINION OF BOARD SUBCOMMITTEE (Exhibit 5).

Preliminary Statement

This petition seeks an order from this Court compelling respondents to immediately produce to this Court, the original of a purported opinion issued by a supposed subcommittee of the New York State Medical Board on or about July 14, 2021, that pertains to Kaul's February 24, 2021 application for a NYS physician license. The respondents refusal to provide Kaul with this alleged document, leaves him with no option but to seek judicial relief. The petitioner's obstruction of justice constitutes an aiding/abetting of a **"pattern of racketeering"** that commenced in approximately 2008/2009 in the State of New Jersey, and is now **"ongoing"** in the State of New York, and involves, amongst other things, the RICO predicate acts of mail fraud/wire fraud/perjury/public corruption/judicial corruption/kickbacks/securities fraud/bank fraud/bankruptcy fraud/kidnapping/extortion/evidence tampering/witness tampering, committed by publicly traded corporations/state agencies/state actors/private actors. The petitioners recalcitrance in refusing to provide Kaul with this purported document, is purposed to perpetuate and does perpetuate a scheme perpetrated by The Kaul Cases Defendants, of violating Kaul's constitutional/fundamental human rights, that commenced in 2008/2009 and is ongoing in 2021. This petition, in conjunction with K11-7/K11-5 and Kaul's petition to SCOTUS for a writ of prohibition, seek to stop the violations and hold the violators accountable for their crimes against Kaul and his family.

Statement of Fact

In or about October 1, 2020, Kaul submitted a letter to the New York State Medical Board (**Exhibit 1**), seeking an answer as to whether his application for physician licensure would be granted or denied. On October 13, 2020, Kaul received a response (**Exhibit 2**), and on February 24, 2020, Kaul commenced the application process. On July 14, 2021, Kaul received an email from the New York State Medical Board, in which he was informed that the board supposedly found there was a **“substantial question of moral suitability”**, but that he had the right to a **“hearing”**. Kaul’s affirmed this right, and requested a copy of the purported subcommittee opinion, but was instructed it would only be provided **after** the hearing. Kaul noticed respondents that if the opinion was not provided by August 25, 2021, he would move for judicial relief. Respondents were also noticed that Kaul would submit: **(i)** an ethics complaint; **(ii)** a public corruption/fraud complaint to the NY AG; **(iii)** notice to the New York State Government regarding its potential legal liability for the respondents commission of mail/wire fraud. Respondent Arthur Hengerer is a Defendant in K11-7, in which he, pursuant to RICO’s vicarious liability doctrine, is burdened with the liability of securities fraud.

Relief

Kaul respectfully requests this Court immediately enter an order compelling respondents to submit to this Court the original of the purported subcommittee order, and to immediately provide Kaul a copy of the purported order, in order to halt the ongoing and irreversible violation of Kaul's constitutional right to due process, a violation that commenced in 2008/2009.

Exhibit 14

August 19, 2020

Stephen J. Boese
Executive Secretary
89 Washington Avenue
2nd Floor, West Wing
Albany, NY 12234

Re: Application for license to practice medicine and surgery

Dear Mr. Boese,

I write this letter to inquire as to whether I would be granted a license to practice medicine and surgery in your state, based on:

1. My medical education, training and experience, as detailed in my CV (copy on enclosed flash drive).
2. The May 28, 2020 opinion of David M. Green, Esq, a Hearing Officer for the State of Pennsylvania, in which he grants my application for medical licensure (copy of opinion + transcript on enclosed flash drive).
3. A case pending in the United States District Court for the District of Columbia, in which there exists irrefutable evidence that the revocation of my New Jersey license was procured illegally and is illegal (copy of Kaul v Federation: 19-CV-3050-K5 enclosed on flash drive).
4. A book and documentary that were published respectively on April 15 and July 28, 2020, that publicly assert the irrefutable evidence contained in Kaul v Federation: 19-CV-3050-TSC. The Defendants have filed no legal challenge contesting/rebutting/refuting the within evidence/facts. The publications are:
 - (a) **"An Impossible Victory: Kaul v Christie"** – The electronic and audio books can be found online.
 - (b) **"An Impossible Victory: Kaul v Christie – The Story Within The Story: A Documentary Film"** – The documentary can be found on YouTube.
5. The facts of my professional/personal history as provided in my application form for licensure in the State of Pennsylvania (copy on enclosed flash drive).

I respectfully assert that according to the Medical Practices Act within your state, there exists no reason for the state to not grant me a license. The UK case has no legal validity in the US (detailed in response to initial denial of licensure application by PA Medical Board-copy on enclosed flash drive) and the revocation of the New Jersey license was illegally obtained. I meet the requisite educational criteria for licensure.

This preliminary request is made principally for the purpose of ascertaining the likelihood of obtaining a license in your state, but secondarily to establish whether the K5 defendants have caused me a **“new racketeering injury”** consequent to that illegal injury (revocation of New Jersey license on March 12, 2014) they caused by engaging in a **“pattern of racketeering”**, as detailed in K5.

If your response is anything other than I would be granted a license, it will constitute a **“new racketeering injury”**, and will provide a legal basis for the submission in the United States District Court of a RICO claim. It will also constitute further evidence in K5 of the damages caused to my estate by the Defendants.

Please note that if I receive no response by September 22, 2020, then this too will constitute a **“new racketeering injury”**.

If, however, by September 22, 2020 you confirm that based on the submitted information, I would be granted a license, then I shall file the necessary forms for verification of education/training/experience.

I would like to thank you for taking the time to read this letter and enclosed information.

Yours sincerely

Richard Arjun Kaul, MD

Cell: 862 881 9703

Email: drrichardkaul@gmail.com

May 13, 2021

Howard A. Zucker, MD, JD.
Commissioner of Health
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Re: Application for physician license

Dear Dr. Zucker,

I send you this letter in your capacity as the Commissioner of Health for the State of New York, regarding my application for a physician license in the State of New York.

It is my understanding, based on information provided to me by the executive office of the board, that my application is pending before the committee that you oversee. On April 29 and May 11, 2021, I enquired as to the completion date of their review and requested a copy of the state policy that regulates such a review. I received no response. This stands in contrast to the prompt way the executive office has, since October 2020, responded to my enquires.

In respectfully asserting my legal rights, I do request I be provided this information without further delay, or be informed, with regards to the policy, that no such document exists.

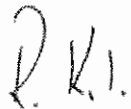
Please find enclosed several documents that are in the possession of the committee, that relate to political aspects of my professional career, my competence and my character.

If I receive no response (email/mail) from the committee by May 26, 2021, I will conclude that my application has been denied for reasons that constitute the subject matter of The Kaul Cases. These can be found on www.bacer.org under the Parties search term 'Richard Arjun Kaul'. I believe it relevant for you to be aware that the Federation of State Medical Boards is a Defendant in a number of these cases, on which Dr. Hengerer, the chair of the committee, remains a director.

K11-5, one of The Kaul Cases, is pending in the Indian High Court, and names Defendants Allstate/State of New Jersey/Christopher J. Christie, a case in which Intercontinental Exchange has been noticed.

I thank you for your attention to this matter, and hope it can be resolved promptly and in a fair, and reasonable manner.

Yours sincerely

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

Richard Arjun Kaul, MD

cc: Arthur S. Hengeler

June 10, 2021

Howard A. Zucker, MD, JD
Commissioner of Health
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Re: NOTICE OF LITIGATION/ADJUDICATION OF LICENSE APPLICATION

Dear Dr. Zucker

I write this letter to: (i) bring to your attention the ongoing fraud and perpetuation by New York State actors/agencies of a **"pattern of racketeering"** commenced in 2006 by **The Kaul Cases Defendants**, that has converted the State of New York into a **"racketeering enterprise"**, liable pursuant to RICO; (ii) request that by July 7, 2021 my application for medical licensure be either granted or denied.

Please be advised that a denial will provide me standing to amend K11-9 to include a **"new racketeering injury"** claim against **The Kaul Cases** Defendants, as will a failure to issue a decision by July 7, 2021. New York State actors/agencies have conspired and continue to conspire with **The Kaul Cases** Defendants to violate my fundamental human right to due process, in an increasingly futile attempt to provide cover for their crimes.

Please find enclosed the following documents:

1. Letter from Kaul to Dr. Zucker: May 13, 2021.
2. Emails Kaul-OPMC: April 29 to May 20, 2021.
3. Letter from Kaul to Steven Boese: May 21, 2021.
4. Complaint in K11-9: June 9, 2021.
5. Emails Kaul-NYSED: June 9, 2021.

These documents will be submitted into K11-9 and filed, if necessary, in support of my application to the New York State Court system for an order compelling application adjudication.

The non-adjudication, other than constituting a 'Fraud on the Court', is arbitrary and satisfies the cruel and unusual standard set forth in the Constitution, and thus neither sovereign nor qualified immunity would exist for any state actors/agencies.

Once again, I thank you for your attention to this matter, and hope it is resolved without the need for litigation.

Yours sincerely

Richard Arjun Kaul, MD

cc: Arthur S. Hengerer
Members of the NYS Medical Board
Steven Goldstein, CEO/President, Strong Memorial Hospital



Department
of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

LISA J. PINO, M.A., J.D.
Executive Deputy Commissioner

June 24, 2021

Richard Arjun Kaul, M.D.
440c Somerset Drive
Pearl River, New York 10965

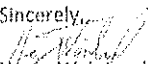
Dear Dr. Kaul:

I am writing in response to your May 13, 2021 letter to Dr. Howard A. Zucker, M.D., J.D., Commissioner of the New York State Department of Health. In your letter, you reference your application for a physician license in New York State. You also indicate your "application is pending before the committee you [Dr. Zucker] oversee." In your submission, you include a May 7, 2021 letter/application from your attorney, Mr. DeToffol, to Mr. Stephen Boese, Executive Director, Office of the Professions, N.Y. State Education Dept., Riverview Center, 150 Broadway, Suite 355 Albany, N.Y. 12204.

Your attorney's letter was sent to the right state agency, but to the wrong address. While Mr. Boese may be the correct recipient of the letter, he does not work at the above address. The Riverview Center address is that of the Bureau of Professional Medical Conduct within the New York State Department of Health. That Bureau is NOT the same as the Office of Professions within the State Education Department. Please be aware that neither the Department of Health nor Commissioner Zucker is involved in issuing medical licenses to physicians. The Department of Education is solely responsible for the issuance of medical licenses. Therefore, your application is not pending before any committee that Dr. Zucker oversees. You should resubmit your application to the State Education Department at the correct address.

Thank you for your inquiry.

Sincerely,



Henry Weintraub

Chief Counsel
Bureau of Professional Medical Conduct
Division of Legal Affairs
NYS Department of Health
90 Church Street, 4th Floor
New York, NY 10007-2919

June 30, 2021

Howard Zucker, MD, JD
Commissioner of Health
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Re: NOTICE OF LITIGATION/ADJUDICATION OF LICENSE APPLICATION

Dear Dr. Zucker,

I write this letter to inform you that it remains my position that The Kaul Cases Defendants are continuing to conduct a “**pattern of racketeering**” within the enterprise of State of New York, in collusion/conspiracy with the New York State Medical Board, as part of an “**ongoing**” scheme to attempt to obstruct justice.

Since June 14, 2021 I have been in communication with an individual whose email indicates a name of “**Vincent Vollaro**”. Prior to this I was in communication with executive director, Stephen Boese and other anonymous persons. The exchanged emails and use of the US wires evidence an ongoing fraud, in that these individuals have propagated knowing falsehoods, as part of the aforementioned scheme. I have on at least seven (7) occasions, requested a copy of the policy/statute/regulations that govern the licensure process, but have not received any information. I have researched the relevant body of jurisprudence within New York and have found nothing.

Please advise actors/agencies under your remit to immediately provide me the requested information at drrichardkaul@gmail.com.

Please find enclosed a copy of a letter, dated June 10, 2021, that came into your possession on June 15, 2021. It is evident from the record in this case, that the dilatory/deceitful tactics employed since its inception, are purposed to attempt to prevent me obtaining a license but are being manipulated in an effort to give the opposite impression. This constitutes fraud. The State of Pennsylvania granted my application on May 27, 2020 after a hearing on February 7, 2020 and found no issue of moral character.

Please be advised that if by July 7, 2021, I am not in receipt of a decision, I will commence litigation.

Yours sincerely

Richard Arjun Kaul, MD

THE UNIVERSITY OF THE STATE OF NEW YORK
NEW YORK STATE EDUCATION DEPARTMENT
OFFICE OF THE PROFESSIONS

OFFICE OF PROFESSIONAL DISCIPLINE

One Gateway Plaza -3rd Fl

Port Chester, NY 10573

Phone (914) 934-7550

RICHARD KAUL
440C SOMERSET DR
PEARL RIVER, NY 10965

JULY 14, 2021

RE: APPLICATION FOR LICENSURE
CASE NUMBER: 4102492
PROF: MEDICINE

Dear Sir:

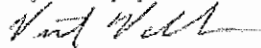
You are hereby notified that a subcommittee of the state board for the above-listed profession has concluded that a substantial question exists concerning your moral suitability for licensure in the state of New York.

You are accordingly advised that you have the right to request a hearing re the question of your moral suitability for said licensure. You have the right to appear in person and be represented by counsel at said hearing, and the right, at said hearing, to produce witnesses, affidavits, and evidence in proof of your good moral character, as well as to cross-examine witnesses.

You should consider retaining an attorney to represent you in this matter since it may result in denial of your licensure application.

If you wish to exercise your right to request such a hearing, forward your written request, within thirty (30) days after receipt of this notice, to the Executive Director, Office of Professional Discipline, 1411 Broadway, 10th Floor, New York, New York, 10018.

Very truly yours,


VINCENT VOLLARO
Supervising Investigator

August 18, 2021

Howard Zucker, MD, JD
Commissioner of Health
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Re: NOTICE OF LITIGATION/PRODUCTION OF OPINION OF BOARD SUBCOMMITTEE

Dear Dr. Zucker,

I write this letter to request that the New York State Health Department send me a copy of the transcript and signed written opinion of the sub-committee of the New York State Medical Board, that allegedly concluded there exists a question as to my moral suitability for licensure in the State of New York. The relevant letter July 14, 2021 letter is enclosed, and was sent from the OFFICE OF PROFESSIONAL DISCIPLINE, which is directed by the New York State Health Department, of which you are the Commissioner, and thus the supposed board opinion is a document for which you are legally liable.

Since the commencement of my application in February 2021, state actors/agencies within the State of New York and its Health/Education Departments have, in collusion with The Kaul Cases Defendants, conspired to obstruct and have obstructed my application process, as part of a scheme to violate my prosecutorial rights in the United States District Court. The mail/wire fraud scheme is identified in a series of letters that you received from me between May 15 and June 30, 2021 (copies w/o enclosures).

The above referenced documents, in addition to other documents that support my fraud claim, are listed below:

1. October 13, 2020: Email from Boese to Kaul (Exhibit 1).
2. May 13, 2021: Letter from Kaul to Zucker (Exhibit 2).
3. June 10, 2021: Letter from Kaul to Zucker (Exhibit 3).
4. June 24, 2021: Letter from Zucker to Kaul (Exhibit 4).
5. June 30, 2021: Letter from Kaul to Zucker (Exhibit 5).
6. July 14, 2021: Email from NYS OPMC to Kaul (Exhibit 6).

7. July 14, 2021: Letter from OFFICE OF PROFESSIONAL DISCIPLINE, NEW YORK STATE DEPARTMENT OF HEALTH (**Exhibit 7**).
8. August 9, 2021: Email from Kaul to Vollaro requesting copy of the purported opinion of the subcommittee of the state medical board (**Exhibit 8**).
9. August 17, 2021: Kaul v ICE-K11-7-Complaint (**Exhibit 9**).
10. August 17, 2021: Website (home page) NEW YORK STATE DEPARTMENT OF HEALTH re: Understanding New York's Medical Conduct Program - Physician Discipline (**Exhibit 10**).
11. August 17, 2021: Wikipedia NYS OPMC (**Exhibit 11**).

The scheme is purposed to violate my prosecutorial rights, in order to attempt to prevent me from exposing the crimes of The Kaul Cases Defendants. This includes those of Defendant Federation of State Medical Boards, on whose board sits Defendant Arthur Hengerer, who also happens to be the current Chairman of the Office of Professional Medical Conduct, the state agency from which I received the July 14, 2021 letter.

On August 13, 2021 at 9:56 am EST, in response to my request for a copy of the opinion and a hearing on the purported question of moral suitability, I did receive an email from an address at the NYS Education Department that advised me my file had been transferred to a **"prosecutor"** at the **"prosecution division"**, and that I would in due course be advised of the hearing date. Although there exists no violation of any rule/regulation/statute/law, the matter according to the NYS Education Department will be heard before the OPMC, an agency that explicitly communicated to me via email on July 14, 2021 that my matter **"does not fall within the jurisdiction of the OPMC"** and it most certainly does not fall within any **"prosecution division"**, of which the New York State Education Department has none.

The law limits my application/hearing to the New York State Education Department and the OPMC has explicitly denied jurisdiction.

Please note that I will be referring you to the New York State Ethics Committee, and this matter to the New York Attorney General. You have, through your lawyer, lied, and did knowingly aid and abet The Kaul Cases Defendants **"pattern of racketeering"**, the illegality of which you, as a lawyer, were fully aware.

Please find enclosed a copy of K11-7, a complaint filed in the United States District Court for the Southern District of New York. If the relief I seek is not granted, I will amend the Complaint to include members of the state medical board.

Dr. Zucker, I urge you to act within the law, and be noticed that I will prosecute all offenders to the fullest extent of the law if they continue to violate my Constitutional rights.

Please forward me a copy of the purported opinion of the supposed subcommittee by August 25, 2021.

A copy of this letter will be forwarded to counsel for all The Kaul Cases Defendants, and to members of the global investment community, in order that they be informed of the risk associated with Defendants Allstate/TD/Geico's **"ongoing pattern of racketeering"** within the State of New York.

I thank you for your attention to this matter.

Yours sincerely

Richard Arjun Kaul, MD

cc: Arthur Hengerer
Members of NYS Medical Board
Vincent Vollaro
NYS Government

Exhibit 15

September 5, 2021

Securities Fraud Division
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Kaul/Basch v ICE et al.
21-CV-06992
K11-7
Securities Fraud

Dear Sir/Madam,

I write this letter to alert the SEC to the fact that Defendants Allstate/TD/Berkshire Hathaway-Geico, did, in a period from 2016 to the present, knowingly commit an illegal scheme of securities fraud on the global equities market. The facts and circumstances of these crimes are detailed in the above case, the Complaint of which can be found at:

https://d5a171ff-b03e-4655-9fb9-90e92a568439.filesusr.com/ugd/7d05d1_fcb90c9fa76f45478afd35e55638cd3a.pdf

I would request that any investigation and enforcement action be conducted without any involvement/participation/knowledge/association of Defendant Gurbir Grewal, who was recently appointed the SEC's Director of Enforcement, due to a patent conflict of interest.

Please find enclosed notices to the regulatory/prosecutorial authorities in India/UK/Europe/Canada and to FINRA.

Please be informed that I will be noticing the Department of Justice and the Office of the US Attorney for the Southern District and will enclose a copy of this letter.

Yours sincerely

Richard Arjun Kaul, MD

cc: United States Department of Justice

www.drrichardkaul.com

September 5, 2021

Mr. Samuel Funkhouser
Office of Fraud Detection and Market Intelligence
FINRA
1735 K Street, NW
Washington, DC 20006

Re: **Kaul/Basch v Intercontinental Exchange et al.**
21-CV-06992 (U.S.D.C. – S.D.N.Y.)
K11-7
Securities Fraud

Dear Mr. Funkhouser,

Please accept this letter as legal notification of the immense risk posed to the global equities market, consequent to the knowingly illegal commission of a five (5) year plus scheme of securities fraud by Defendants Allstate/TD/Berkshire Hathaway-Geico. The facts and circumstances surrounding these crimes are detailed in the above case, the Complaint of which can be viewed at:

https://d5a171ff-b03e-4655-9fb9-90e92a568439.filesusr.com/ugd/7d05d1_fcb90c9fa76f45478afd35e55638cd3a.pdf

Please find enclosed similar notices to the regulatory authorities/prosecutors in India/UK/Europe/Canada.

I believe Defendant Allstate may have violated the Foreign Corrupt Practices Act, in its investment in India of criminal proceeds procured from its **“pattern of racketeering”** within the executive/legislative/judicial branches of the State of New Jersey and the NYSE, and that this violation ought to be referred to the Department of Justice, in order to protect market integrity.

Please be informed that I will be referring this matter to the SEC and will enclose a copy of this letter.

Yours sincerely

Richard Arjun Kaul, MD

www.willrichardkaul.com

September 5, 2021

Securitisation Repositories
European Securities and Markets Authority
201-203 Rue de Bercy
CS 80910
75589 Paris Cedex 12
France

**Re: Kaul/Basch v Intercontinental Exchange et al.
21-CV-06992 (U.S.D.C. – S.D.N.Y.)
Securities Fraud**

Dear Sir/Madam,

Please accept this letter as legal notice of the immense risk caused to European markets consequent to the commission of securities fraud by Defendants Allstate/TD/Berkshire Hathaway-Geico, the facts of which are pled in the above case, one that is pending in the United States District Court for the Southern District of New York.

The Complaint can be viewed at:

https://d5a171ff-b03e-4655-9fb9-90e92a568439.filesusr.com/ugd/7d05d1_fcb90c9fa76f45478afd35e55638cd3a.pdf

Please find enclosed notices to regulatory authorities in Canada/India/UK, and please be informed that notices will be filed with the U.S. SEC, FINRA and the US Attorney for the Southern District of New York.

I believe there exists good cause for this matter to be investigated by ESMA in order to protect the integrity of the European Securities Market.

Yours sincerely



Richard Arjun Kaul, MD

cc: European Public Prosecutor's Office

www.drrichardkaul.com

September 3, 2021

Intelligence Department
PIDA
Financial Conduct Authority
12 Endeavor Square
London, E20 1JN
UK

Re: Kaul v Intercontinental Exchange, et al.
21-CV-06992 (U.S.D.C. – S.D.N.Y.)
Securities Fraud

Dear Sir/Madam,

Please accept this letter as legal notice that Defendants Allstate/TD Bank/Berkshire Hathaway-Geico did, in a period from 2016 to the present, commit a scheme of **securities fraud** on the global equities market, of which the London Stock Exchange is a participant. The facts and circumstances surrounding the crimes are detailed in the above referenced case, which is pending in the United States District Court for the Southern District of New York.

Please find enclosed similar notices to the Canadian financial regulator and the Indian Central Bureau of Investigation.

I would request you refer the Defendants to the Serious Fraud Office, as the issue involves bribery, corruption and market manipulation.

I thank you for your attention to this very serious matter.

Yours sincerely

Richard Arjun Kaul, MD

August 31, 2021

Director
Central Bureau of Investigation
4th Floor
CGO Complex
New Delhi
India 110003

**Re: Kaul v Intercontinental Exchange, et al.
21-CV-06992
Securities Fraud**

Dear Director,

I am a citizen of India, and I write this letter to bring your attention to the fact that three (3) American corporations (Allstate/Intercontinental Exchange/Berkshire Hathaway-Geico) currently conducting business in India, are Defendants in the above matter. The evidence in this case proves that for a period from 2016 to the present, they perpetrated a massive scheme of **securities fraud** on the global equities market, in which the Indian Government and private investors participate. The Complaint can be viewed at:

https://d5a171ff-b03e-4655-9fb9-90e92a568439.filesusr.com/ugd/7d05d1_fcb90c9fa76f45478afd35e55638cd3a.pdf

There is a pending motion for summary judgment against Defendant Allstate on the securities fraud claim.

Related to K11-7 is K11-5, a case pending in the Indian High Court, the thrust of which pertains to Defendant Allstate's policy of racial discrimination and targeting of successful Indian physicians for imprisonment and asset seizure. Certain rogue investigators/prosecutors within American state/federal governments collaborate with members of the American insurance industry in the perpetration of this scheme of exploitation, one motivated by corporate greed.

K11-5 can be found at:

https://d5a171ff-b03e-4655-9fb9-90e92a568439.filesusr.com/ugd/7d05d1_2a1d5913a74e4a1887641ee638ab0443.pdf

The case is pending in the Haryana/Punjab High Court.

The criminal proceeds of the Defendants securities fraud violations are being laundered through the Republic of India, and it is to this point and that of the securities fraud, that I request the matter be criminally investigated for violation of Indian law.

Bhopal + Union Carbide Disaster:

American corporations have a poor track record in India, and none more so than Union Carbide. See enclosed documents. Defendants Allstate/Berkshire Hathaway-Geico have defrauded the Indian Government/investors, in their knowingly illegal commission of securities fraud.

The Canadian Bank Regulator has been informed of the above issue. See enclosed letter.

This letter will be copied to the: **(i)** Indian Government; **(ii)** Securities/Exchange Board of India; **(iii)** Insurance Regulatory/Development Authority of India; **(iv)** Chetan Garga (Managing Director Allstate India).

Yours sincerely

Richard Arjun Kaul, MD

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Bharti Airtel 664.05 43.60

ICICI Prudential Long Te... 14.62 %

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Business News News Politics Former Union Carbide CEO Warren Anderson, wanted in Bhopal gas tragedy, dies at 92

Former Union Carbide CEO Warren Anderson, wanted in Bhopal gas tragedy, dies at 92

Synopsis

His death revived memories of the 1984 Bhopal gas tragedy. He died on September 29 at a nursing home in Vero Beach, Florida.



NEW YORK: Former Union Carbide chief Warren Anderson, wanted in India in connection with the 1984 Bhopal gas tragedy which claimed over 3,000 lives in one of the world's most

SECTIONS

Former Union Carbide CEO Warren Anderson, wanted in Bhopal gas tragedy, dies at 92

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The US State of Florida aged 92.

Anderson, a Brooklyn carpenter's son who ascended to the top of the Union Carbide Corporation, died on September 29 at a nursing home in Vero Beach, Florida but his death was not announced by his family and was confirmed from public records, the New York Times reported.

The Indian government made multiple requests to extradite him, and officially labeled him a fugitive. A judge also called him an "absconder".

IN THE SPOTLIGHT

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Anderson reached Bhopal four days after the accident, where he was immediately arrested. But after quickly paying bail, he never returned to face trial.

The Bhopal horror began around midnight on December 2-3, 1984, when a chemical reaction in a plant that made insecticides caused a leak of toxic gases that swept through the surrounding community.

The Madhya Pradesh government confirmed 3,787 deaths as a result. Unofficial estimates said the death toll had exceeded 10,000.

More than a half-million people were injured, with many dying from illnesses including lung cancer, kidney failure and liver disease.

In 1989, Union Carbide paid USD 470 million to the Indian government to settle litigation stemming from the disaster.

"With the support of the United States government, he escaped extradition. And he eluded subpoenas in civil cases by living quietly and migrating between his homes in Vero Beach, Greenwich, Connecticut and Bridgehampton, New York," the Times said.

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Union Carbide Warren Anderson

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9 COMMENTS ON THIS STORY

vin

Bloody criminal

1771 days ago

Ranjith

3000? 15,274 people died, as per the records.

2485 days ago



Somnath DasGupta

I sincerely hope he rots in hell. But more than him, what riles me is that Mr.Arjun Singh at the behest of Rajiv Gandhi fashioned his escape.

2496 days ago

Carbide premises: Government

Will ensure safe disposal of Union Carbide waste: Environment Minister Prakash Javadekar

32 yrs on, toxic waste still lying in Union Carbide factory: Activists

Union Carbide should face Indian courts over Bhopal disaster: Survey

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WIKIPEDIA

Warren Anderson (American businessman)

Warren Martin Anderson (November 29, 1921 – September 29, 2014) was an American businessman who was the Chair and CEO of the Union Carbide Corporation (UCC) at the time of the Bhopal disaster in 1984. He was charged with manslaughter by Indian authorities.^{[1][2]}

Contents

- Personal life
- Bhopal disaster
- References
- External links

Personal life

Anderson was born in 1921^[3] in the Bay Ridge section of Brooklyn, New York, to Swedish immigrants. He was named after the American president Warren Harding. He later attended the naval pre-flight school in Chapel Hill, North Carolina. He married Lillian Anderson.^[4] They lived in Bridgehampton, Long Island, New York and owned houses in Vero Beach, Florida and Greenwich, Connecticut.^[4] He died at a nursing home in Vero Beach, Florida on September 29, 2014.^[5]

Bhopal disaster

The Bhopal disaster took place in a plant belonging to Union Carbide's Indian subsidiary, Union Carbide India Limited, in the city of Bhopal, Madhya Pradesh, India during 1984. Thousands of people died and thousands

Warren Anderson



Born	Warren Martin Anderson November 29, 1921 New York City, U.S.
Died	September 29, 2014 (aged 92) Vero Beach, Florida
Alma mater	Colgate University
Occupation	Businessman
Known for	Chair and CEO of Union Carbide Corporation during the Bhopal disaster
Spouse(s)	Lillian Anderson

more were injured in the disaster.^[6] As the UCC CEO, Anderson was charged with manslaughter by Indian authorities. He flew to India and was promptly placed in custody by Indian authorities, but was allowed to return to the United States.

He was declared a fugitive from justice by the Chief Judicial Magistrate, Gulab Sharma, of Bhopal on February 1, 1992, for failing to appear at the court hearings in a culpable homicide case. A formal extradition request was issued in 2003.^{[7][8]} The United States declined to extradite him citing a lack of evidence.^[9] The chief judicial magistrate of Bhopal issued an arrest warrant for Anderson on July 31, 2009.^[10]

In August 2009, a UCC spokesperson said Union Carbide had no role in operating the plant at the time as the factory was owned, managed and operated by employees of Union Carbide India Limited.^[11] Eight former senior employees of the subsidiary were found guilty on June 7, 2010. After these convictions, a UCC spokesperson said, "All the appropriate people from UCIL – officers and those who actually ran the plant on a daily basis – have appeared to face charges."^[12]

References

1. "Former Union Carbide CEO Warren Anderson dead" (<http://economictimes.indiatimes.com/news/politics-and-nation/former-union-carbide-ceo-warren-anderson-dead/articleshow/44992323.cms>). *The Economic Times*. October 31, 2014. Retrieved October 31, 2014.
2. Martin, Douglas (October 30, 2014). "W. M. Anderson, 92, Dies; Faced India Plant Disaster" (<https://www.nytimes.com/2014/10/31/business/w-m-anderson-92-dies-led-union-carbide-in-80s-.html>). *New York Times*. Retrieved October 31, 2014.
3. *The New York Times Biographical Service – Volume 15*. New York Times & Arno Press. 1984. p. 1565.
4. "Wife: Ex-Exec 'Haunted' by Bhopal Gas Leak" (<http://www.cbsnews.com/stories/2009/08/01/national/main5204098.shtml>). *CBS News*. August 1, 2009.
5. Martin, Douglas (October 30, 2014). "Warren Anderson, 92, Dies; Faced India Plant Disaster" (<https://www.nytimes.com/2014/10/31/business/w-m-anderson-92-dies-led-union-carbide-in-80s-.html>). *The New York Times*. ISSN 0362-4331 (<https://www.worldcat.org/issn/0362-4331>). Retrieved September 5, 2019.
6. Frequently Asked Questions regarding the Bhopal Tragedy of 1984 (<http://www.bhopal.com/faq.htm>) Archived (<https://web.archive.org/web/20100408133152/http://www.bhopal.com/faq.htm>) April 8, 2010, at the Wayback Machine Bhopal Information Center, Union Carbide Corporation
7. "The Dow Chemical Company: Bhopal Disaster" (http://knowmore.org/wiki/index.php?title=The_Dow_Chemical_Company#Bhopal_Disaster). Knowmore.org. Retrieved December 3, 2008.
8. "Warren Anderson: 30-Year old road to nowhere" (<http://indianexpress.com/article/india/india-others/warren-anderson-30-year-old-road-to-nowhere/>). *The Indian Express*. November 1, 2014. Retrieved November 1, 2014.
9. Lack of Evidence Held up Anderson Extradition: MEA (https://web.archive.org/web/20110811072653/http://articles.timesofindia.indiatimes.com/2010-06-10/india/28273885_1_extradition-treaty-warren-anderson-evidentiary-links) *The Times of India*, June 10, 2010
10. "Court issues arrest warrant for former CEO of Union Carbide in gas leak case" (<https://www.th>

[eguardian.com/world/2009/jul/31/warren-anderson-arrest-warrant](https://www.theguardian.com/world/2009/jul/31/warren-anderson-arrest-warrant)). *The Guardian*. London. July 31, 2009. Retrieved July 31, 2009.

11. **Company Defends Chief in Bhopal Disaster** (https://www.nytimes.com/2009/08/03/business/global/03bhopal.html?_r=1&html) *The New York Times*, August 3, 2009
12. Vilanilam, John V. (2011). *Public relations in India : new tasks and responsibilities*. Thousand Oaks, Calif.: SAGE. ISBN 9788132107736. OCLC 750174249 (<https://www.worldcat.org/oclc/750174249>).

External links

- **The Bhopal Story** (<http://www.thebhopalpost.com/index.php/2010/06/bhopal-gas-tragedy-chronology-of-events/>)
 - **Vor 30 Jahren Das Urteil zur Bhopal-Katastrophe** (https://www.deutschlandfunk.de/vor-30-jahre-n-das-urteil-zur-bhopal-katastrophe.871.de.html?dram:article_id=440929)
-

Retrieved from "https://en.wikipedia.org/w/index.php?title=Warren_Anderson_(American_businessman)&oldid=1040149384"

August 29, 2021

Office of the Superintendent of Financial Institutions
255 Albert Street
12th Floor
Ottawa, Ontario
K1A 0H2

Re: Commission of securities fraud by Defendant TD Bank.

Dear Sir/Madam,

I write this letter to alert you to the fact that in a period commencing in 2016, TD Bank has perpetrated a knowingly illegal scheme of securities fraud within the New York Stock Exchange and has defrauded the global equities market of its right to honest services. The facts of this scheme are detailed in Kaul v ICE: 21-CV-06992:

<https://www.courts.ca.gov/cases/index.cfm?case=21-cv-06992>
<https://www.courts.ca.gov/cases/index.cfm?case=21-cv-06992>

The illegal proceeds of Defendant TD's crimes have been laundered through global banks, exchanges and other financial institutions, including many in Canada, which under Canadian law, does mandate an investigation. Please accept this letter as notice of such.

A copy of this letter has been circulated to bank regulators in India, the UK, Europe and every American state, in order to warn these countries/states of the risk associated with permitting Defendant TD the right to conduct business within its borders.

I thank you for your attention to this very serious matter.

Yours sincerely



Richard Arjun Kaul, MD

Exhibit 16

[See more at VITAL SIGNS](#)[SIGN UP](#)[DONATE](#)

Dollars for Docs

How Industry Dollars Reached Your Doctors

by Mike Tigas, Ryann Grochowski Jones, Charles Ornstein, and Lena Groeger. *Published on September 12, 2019.*

Pharmaceutical and medical device companies are required by law to release details of their payments to a variety of doctors and U.S. teaching hospitals for promotional talks, research and consulting, among other categories. Use this tool to search for general payments (excluding research and ownership interests) made from August 2013 to December 2018. | [About the Dollars for Docs Data](#) → | [Read the entire series](#) →

Has Your Doctor Received Drug or Device Company Money?

For example: Andrew Jones, Boston, 10013

Archive: Search our older data for payments made by 17 drug companies between 2009 and 2013.

Get Updates

Sign up to be notified when Dollars for Docs is updated, and get more of ProPublica's stories in your inbox.

[Privacy Policy](#)[Terms of Service](#)[Download the Data](#)[Patients, Take Action](#)[Reporters, Use Our Data](#)

 **\$12B**
in disclosed payments

 **1,036,163**
doctors

 **1,249**
teaching hospitals

 **2,191**
companies

Payments in 2018

Top 20 Companies

Click on a company to see how its payments break down by drug, device or doctor. Or, [see all companies](#) »

COMPANY	PAYMENTS
GENENTECH, INC.	\$478M
ZIMMER BIOMET HOLDINGS, INC.	\$109M
STANLEY CORPORATION	\$84.6M

Highest-Earning Doctors

NAME	LOCATION	PAYMENTS
KEVIN FOLEY Neurological Surgery	MEMPHIS, TN	\$29M
STEPHEN BURKHART Orthopaedic Surgery	SAN ANTONIO, TX	\$25.9M
YSONTCHO IANCHULEV Ophthalmology	SAN MATEO, CA	\$20.7M

STRIKER CORPORATION	\$81.2M
BOSTON SCIENTIFIC CORPORATION	\$82.2M
ALLERGAN INC.	\$73M
ARTHREX, INC.	\$70.3M
MEDTRONIC USA, INC.	\$66M
DEPUY SYNTHES PRODUCTS LLC	\$61.7M
PFIZER INC.	\$48.9M
ASTRAZENECA PHARMACEUTICALS LP	\$45M
ABBVIE, INC.	\$42.9M
AMGEN INC.	\$41.4M
INTUITIVE SURGICAL, INC.	\$39.8M
MEDICAL DEVICE BUSINESS SERVICES, INC.	\$39.1M
GILEAD SCIENCES INC	\$38.6M
MEDTRONIC VASCULAR, INC.	\$37.9M
MERCK SHARP & DOHME CORPORATION	\$37.4M
GENZYME CORPORATION	\$35.2M
ABBOTT LABORATORIES	\$33.8M
NOVARTIS PHARMACEUTICALS CORPORATION	\$32.1M

Payments in Your State

Click on a state to see payments made to doctors there.

STATE	PAYMENTS
California	\$306M
Texas	\$188M
New York	\$179M
Florida	\$150M
Pennsylvania	\$97.6M
Ohio	\$86.1M
Illinois	\$80.9M
North Carolina	\$74.1M
Tennessee	\$69M
Massachusetts	\$68.5M

WILLIAM BINDER	BEVERLY HILLS, CA	\$16.7M
Plastic Surgery Within the Head and Neck		
WILLIAM NOYES	GRAND FORKS, ND	\$15.8M
Radiation Oncology		
GAIL LEBOVIC	DALLAS, TX	\$10.5M
Plastic and Reconstructive Surgery		
LEO HOPKINS	BUFFALO, NY	\$9.45M
Neurological Surgery		
NEAL ELATTRACHE	LOS ANGELES, CA	\$7.81M
Sports Medicine		
CHARLES DECOOK	CUMMING, GA	\$7.46M
Family Medicine		
GARY CARR	SAN DIEGO, CA	\$6.25M
Dentist, Endodontics		

Doctors Paid the Most Often

NAME	LOCATION	PAYMENTS
RAKESH JAIN	LAKE JACKSON, TX	1,140
Psychiatry		
JASON KELLOGG	IRVINE, CA	961
Psychiatry		
ROBERT BUSCH	ALBANY, NY	926
Endocrinology, Diabetes & Metabolism		
ANDREW BLUMENFELD	CARLSBAD, CA	878
Neurology		
MITCHELL SORSBY	PLANO, TX	867
Endocrinology, Diabetes & Metabolism		
GUSTAVO ALVA	COSTA MESA, CA	866
Psychiatry		
STEVE FORDAN	DALLAS, TX	782
Endocrinology, Diabetes & Metabolism		
ARVINDER PAL WALIA	AUSTIN, TX	763
Psychiatry		
JOSELITO CABACCAN	SAN JOSE, CA	758
Endocrinology, Diabetes & Metabolism		
SANJAY CHABRA	EL PASO, TX	750
Rheumatology		
LESLIE CITROME	POMONA, NY	747
Psychiatry		
RICHARD KHALIL	YONKERS, NY	746
Family Medicine		
MICHAEL MEASOM	SLC, UT	741
Psychiatry		

Georgia	\$60.4M	AARON BROADWELL Rheumatology	SHREVEPORT, LA	740
Michigan	\$58M			
Arizona	\$53.9M	GREGG FRIEDMAN Psychiatry	HALLANDALE BEACH, FL	734
Colorado	\$49.1M	ANTHONY TURKIEWICZ Rheumatology	BIRMINGHAM, AL	732
Maryland	\$48.8M			
Washington	\$48M	CORY RUBIN Clinical & Laboratory Dermatological Immunology	ANN ARBOR, MI	722
Missouri	\$46.7M			
New Jersey	\$42.3M	PAUL YAMAUCHI Dermatology	SANTA MONICA, CA	720
Virginia	\$42.2M	MATTHEW BUDOFF Cardiovascular Disease	TORRANCE, CA	715
Minnesota	\$38.5M			
Indiana	\$32.4M	NIKU SINGH Psychiatry	FALLS CHURCH, VA	715

Connecticut	\$27.3M	Teaching Hospitals Paid the Most Often		
Wisconsin	\$24.9M	See all teaching hospitals »		
Louisiana	\$23.9M	HOSPITAL	PAYMENTS	
Kentucky	\$23.7M	HOSPITAL OF THE UNIV OF PENNA		805
Utah	\$23.3M	CLEVELAND CLINIC HOSPITAL		738
Alabama	\$20.4M	UNIVERSITY OF IOWA HOSP & CLINICS		693
South Carolina	\$20.3M	RONALD REAGAN UCLA MEDICAL CENTER		551
North Dakota	\$18.6M	EMORY UNIVERSITY HOSPITAL		543
Nevada	\$18.5M	LANGLEY PORTER PSYCHIATRIC HOSPITAL		489
District of Columbia	\$14.5M	UNIVERSITY OF WASHINGTON MED CTR		484
Oklahoma	\$14.3M	FLORIDA HOSPITAL		484
Oregon	\$13.8M	UNIVERSITY OF ALABAMA HOSPITAL		464
Iowa	\$11.3M	UT MD ANDERSON CANCER CENTER		458
Kansas	\$10.6M	CEDARS-SINAI MEDICAL CENTER		446
Mississippi	\$9.99M	THE METHODIST HOSPITAL		426
Puerto Rico	\$8.18M	RUSH UNIVERSITY MEDICAL CENTER		414
Arkansas	\$7.28M	BRIGHAM AND WOMENS HOSPITAL		400
Nebraska	\$6.83M	UCI MEDICAL CENTER		389
Rhode Island	\$6.6M	MASSACHUSETT'S GENERAL HOSPITAL		363
		OHSU HOSPITAL AND CLINICS		345

West Virginia	\$6.3M
Idaho	\$5.45M
New Hampshire	\$5.15M
South Dakota	\$5.12M
New Mexico	\$5.08M
Hawaii	\$4.29M
Delaware	\$3.81M
Maine	\$3.06M
Montana	\$1.61M
Vermont	\$1.45M
Alaska	\$1.08M
Wyoming	\$1.02M
Palau	\$520K
Armed Forces Pacific	\$57,415
Armed Forces Europe	\$33,097
Guam	\$13,425
Virgin Islands	\$10,159
Armed Forces Americas	\$1,215
Northern Mariana Islands	\$157
Micronesia	\$60

DANA-FARBER CANCER INSTITUTE	340
STRONG MEMORIAL HOSPITAL	337
UNIV OF MI HOSPITALS & HLTH CTRS	332

Top 10 Drugs

Includes all general payments to doctors and teaching hospitals.

PRODUCT	PAYMENTS
RITUXAN	\$53.6M
HERCEPTIN	\$34.7M
AVASTIN	\$31.2M
XIFAXAN	\$24.6M
OCREVUS	\$24.4M
BOTOX	\$23.3M
ACTEMRA	\$22.2M
XOLAIR	\$21.5M
PERJETA	\$20.1M
LUCENTIS	\$18.9M

Top 10 Devices

Includes all general payments to doctors and teaching hospitals.

PRODUCT	PAYMENTS
GENERAL THERAPIES	\$44.9M
DA VINCI SURGICAL SYSTEM	\$39.8M
SHOULDER IMPLANTS SPEEDBRIDGE COMPOSITE ANCHORS	\$37.9M
SHOULDER IMPLANTS PUSHLOCKS COMPOSITE ANCHORS	\$33.9M
SHOULDER IMPLANTS SWIVELOCKS PEEK ANCHORS	\$33.8M
SHOULDER IMPLANTS SWIVELOCKS COMPOSITE ANCHORS	\$33.8M
ATTUNE	\$29.3M
MILOOP	\$25.5M
DISTAL EXTREMITIES IMPLANTS SOFT TISSUE ACHILLES	\$23.1M
ACCOLADE	\$21.4M

Source: The Centers for Medicare and Medicaid Services Open Payments data.

Additional reporting, design & development by Ken Schwencke, Molt Syed, Madi Alexander, Al Shaw, Annie Waldman, Tobin Asher, Eric Sagara, Jeremy B. Merrill, Dan Nguyen, and Sisi Wei. Pharmacy, building, hospital and first aid icons from The Noun Project.

Note: We have made some effort to normalize the data and eliminate duplicates, but the data is primarily as it has been reported by the companies to the Centers for Medicare and Medicaid Services. To purchase the normalized data, please visit the ProPublica Data Store. If you spot an error, please let us know at drugs@propublica.org.

This site includes data published by the Centers for Medicare and Medicaid Services on June 28, 2019.



Journalism in the Public Interest

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Exhibit 17

MODERN MEDICINE

MODERN MEDICINE

The third-leading cause of death in US most doctors don't want you to know about

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Ray Sipherd, special to CNBC.com



KEY POINTS

A recent Johns Hopkins study claims more than 250,000 people in the U.S. die every year from medical errors. Other reports claim the numbers to be as high as 440,000.

Medical errors are the third-leading cause of death after heart disease and cancer.

Advocates are fighting back, pushing for greater legislation for patient safety.



Emily Jerry was two years old when she lost her life after a pharmacy technician filled her intravenous bag with more than 20 times the recommended dose of sodium chloride.

Courtesy of Chris Jerry

“My little angel” is how Christopher Jerry describes his daughter Emily.

At just a year and a half, Emily was diagnosed with a massive abdominal tumor and endured numerous surgeries and rigorous chemotherapy before finally being declared cancer-free. But just to be sure, doctors encouraged Chris and his wife to continue with Emily’s last scheduled chemotherapy session, a three-day treatment that would begin on her second birthday.

On the morning of her final day of treatment, a pharmacy technician prepared the intravenous bag, filling it with more than 20 times the recommended dose of sodium chloride. Within hours Emily was on life support and declared brain dead.

Three days later she was gone.

Sadly, Emily's case is not unique. According to a recent study by Johns Hopkins, more than 250,000 people in the United States die every year because of medical mistakes, making it the third leading cause of death after heart disease and cancer.

Other studies report much higher figures, claiming the number of deaths from medical error to be as high as 440,000. The reason for the discrepancy is that physicians, funeral directors, coroners and medical examiners rarely note on death certificates the human errors and system failures involved. Yet death certificates are what the Centers for Disease Control and Prevention rely on to post statistics for deaths nationwide.

The authors of the Johns Hopkins study, led by Dr. Martin Makary of the Johns Hopkins University School of Medicine, have appealed to the CDC to change the way in which it collects data from death certificates. To date, no changes have been made, Makary said.

‘The system is to blame’

Makary defines a death due to medical error as one that is caused by inadequately skilled staff, error in judgment or care, a system defect or a preventable adverse effect. This includes computer breakdowns, mix-ups with the doses or types of medications administered to patients and surgical complications that go undiagnosed.

“Currently the CDC uses a deaths collection system that only tallies causes of death occurring from diseases, morbid conditions, and injuries,” Makary stated in a letter urging the CDC to change the way it collects the nation’s vital health statistics.

“It’s the system more than the individuals that is to blame,” Makary said. The U.S. patient-care study, which was released in 2016, explored death-rate data for eight consecutive years. The researchers discovered that based on a total of 35,416,020 hospitalizations, there was a pooled incidence rate of 251,454 deaths per year — or about 9.5 percent of all deaths — that stemmed from medical error.

Now, two years later, Makary said he hasn’t seen the needle move much.

“Medical-care workers are dedicated, caring people,” said Chris Jerry, “but they’re human. And human beings make mistakes.” According to him, the day Emily was given her fatal dose, the hospital pharmacy was short-staffed, the pharmacy computer was not properly working, and there was a backlog of physician orders.

Afterward Chris said he discovered that pharmacy technicians, rather than well-trained and educated pharmacists, are compounding nearly all of the IV medications for patients. And many states have no requirements, or proof of competency, for these pharmacy technicians.



VIDEO 00:34

Medical errors, one of the leading causes of death

To seek greater safeguards for patients, Chris founded the Emily Jerry Foundation in 2008. EJF focuses primarily on medication safety and better training for pharmacy technicians, as well as backup procedures that will improve the health-care system. Last year he unveiled the Emily Jerry Foundation's

National Pharmacy Technician Initiative, an interactive scorecard to make the public aware of unsafe pharmacy practices in the United States. He also travels throughout the country, speaking out about key patient safety-related issues and best practices proven to minimize the “human error” component of medicine.

Any new tools ‘will be a game changer’

Pascal Metrics, based in Washington, D.C., designs ways to increase patient safety and improve clinical reliability at health organizations.

Pascal’s chief medical information officer, Dr. David Classen, is also associate professor of medicine at the University of Utah and an active consultant in infectious diseases at the University of Utah School of Medicine in Salt Lake City. He admits there are problems: “The system of care is fragmented,” he said. “Any tools that enable patients to manage their health-care needs will be a game changer.”

To improve the safety of medication use, Classen



The third-leading cause of death in US most doctors don't want you t...

SHARE



physician order-entry program at LDS Hospital in Salt Lake City. “Harnessing health information technology through the use of electronic health records of hospitalized and ambulatory patients is essential,” he said.

Many hospitals, for their part, are seeking to keep pace with increasingly available technology to

improve patient safety. Kim Lanyon, a senior ICU nurse at Danbury Hospital in Connecticut, said all electronic records there are double-checked, and fail-safe devices are in place.”

At Mount Sinai Hospital in New York City, Dr. Vicki LoPatchin oversees a Good Catch Award, given to medical personnel who identify potential or existing errors related to their patients’ care. Similarly, most physicians’ offices now keep records electronically, as well as recording conversations among doctors, nurses and their patients in order to make certain there is clarity and that no mistakes result.

Even so, Makary said ordinary complications can occur, especially from unneeded medical care. According to him, “Twenty percent of all medical procedures may be unnecessary.” He faults also the overprescription of medication following surgery, particularly opioids.

Doctors, he said, have been encouraged by drug companies, sometimes through cash payments, to “promote” their products, as revealed by the website Dollars for Docs.

What patients can do to protect themselves

According to Dr. John James, a patient-safety advocate and author of *A Sea of Broken Hearts: Patient Rights in a Dangerous, Profit-Driven Health Care System*, patients need to take charge. “There needs to be a balance between the provider

community and the patients. It is not an even relationship at all.”

In 2002 James lost his 19-year-old son after he collapsed while running. He had been diagnosed with a heart arrhythmia by a cardiologist a few weeks prior and was released from the hospital with instructions not to drive for 24 hours.

“His death certificate said he died of a heart arrhythmia,” he said, but my son really died as a result of “uninformed, careless, and unethical care by cardiologists.” He explained: “If you have a patient with heart arrhythmias of a certain level and low potassium, you need to replace the potassium, and they did not. And they didn’t tell him he shouldn’t go back to running.” Communication errors, he said, are “unfortunately very common.”

In 2014 James retired early to devote his life to improving patient safety. His mission: to teach people how to be empowered patients. He has created a patient bill of rights, which he’s been pushing to become federal law. Yet so far he said his letters to the Centers for Medicare & Medicaid Services have gone unanswered.

“Makary has a lot of courage,” James said. “A lot of the retired doctors will tell you it’s a mess and it’s terrible. But for a young physician to come out and say what he did, that’s pretty bold. Makary is a brave guy.”

James’ site, Patient Safety America, lists the three

levels in which patients can protect themselves. These include being a wise consumer of health care by demanding quality, cost-effective care for yourself and those you love; by participating in patient-safety leadership through boards, panels and commissions that implement policy and laws; and by pushing for laws that favor safer care, transparency and accountability.

“ **Too often, the health-care system silences people around a problem.**

— Dr.
Martin
Makary

SURGICAL ONCOLOGIST AND CHIEF OF THE JOHNS
HOPKINS ISLET TRANSPLANT CENTER

Here are some other ways patients can be vigilant right now:

Ask questions. Gain as much insight as you can from your health-care provider. Ask about the benefits, side effects and disadvantages of a recommended medication or procedure. Use social media to learn more about the patient's own condition, as well as those medications and procedures for which they were prescribed.

Seek a second opinion. If the situation warrants or if uncertainties exist, get a second opinion from another doctor: A good doctor will welcome confirmation of his diagnosis and resist any efforts to discourage the patient from learning more — or what

Makary calls, “attempts to gag the patient.”

“Too often,” he said, “the health-care system silences people around a problem.” Why? Many doctors are reluctant to speculate, but some admit the answers range from simple ego to losing a patient to another doctor they trust more.

Bring along an advocate. Sometimes it’s hard to process all the information by yourself. Bring a family member or a friend to your appointment — someone who can understand the information and suggestions given and ask questions.

Ilene Corina, president and founder of the Pulse Center for Patient Safety Education & Advocacy, based in Wantagh, New York, urges both the patient and their advocate to be “respectful but assertive” in seeking answers to the questions they may have. In some cases, she recommends a “designated medication manager” to be a safety check on the advice the care provider gives.

Download an app. By having your medical information literally in the palm of your hand, you can work as a team with your doctor to cut your risk for medical errors. Health-care apps can be simple or complex, and depending on your age and condition, you can manage your well-being, medications and more.

More from Modern Medicine:

Disturbing YouTube content reveals tech’s dark side on young minds

