

No. 25-_____

IN THE SUPREME COURT OF THE UNITED STATES

RICHARD ARJUN KAUL, MD
PETITIONER

vs.

TEXAS MEDICAL BOARD, STEVEN LOMAZOW, MD
ANDREW KAUFMAN, MD, NEW JERSEY BOARD OF MEDICAL
EXAMINERS
RESPONDENTS

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE FIFTH CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

RICHARD ARJUN KAUL, MD
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DISTRICT COURT NO: 24-CV-00163
APPELLATE CASE NO: 24-40562

CERTIFICATE OF SERVICE

I, RICHARD ARJUN KAUL, MD, the Plaintiff-Petitioner, do certify under penalty of perjury that the within PETITION FOR A WRIT OF CERTIORARI and ATTACHED APPENDICES, was served upon the following parties in the identified manner:

LYLE W. CAYCE – CLERK OF THE COURT FOR THE U.S.C.A. FOR THE FIFTH CIRCUIT AT 600 S. MAESTRI PLACE, SUITE 115, NEW ORLEANS, LA 701130 – VIA CERTIFIED US MAIL ON FEBRUARY 14, 2025.

NATHAN OSCHNER - CLERK OF THE COURT FOR THE U.S.D.C. FOR THE SOUTHERN DISTRICT OF TEXAS AT 601 ROSENBERG ST, GALVESTON, TEXAS – VIA CERTIFIED US MAIL ON FEBRUARY 14, 2025.

RACHEL LEONA BEHRENDT, ESQ – COUNSEL FOR DEFENDANT-RESPONDENT TEXAS EDICAL BOARD AT P.O. BOX 12548, CAPITOL STATION, AUSTIN, TEXAS 78711-2548 – VIA CERTIFIED US MAIL ON FEBRUARY 14, 2025 AND EMAIL TO RACHEL.BEHRENDT@OAG.TEXAS.GOV

SCOTT LEVIN, ESQ – COUNSEL FOR DEFENDANTS-RESPONDENTS ANDREW KAUFMAN, STEVEN LOMAZOW AND NEW JERSEY BOARD OF MEDICAL EXAMINERS – VIA CERTIFIED US MAIL ON FEBRUARY 14, 2025 AND EMAIL TO SLEVIN@MDMC-LAW.COM

ALL COUNSEL OF RECORD IN **THE KAUL CASES** AND ALL PARTIES WITH A LEGAL OR OTHER INTEREST (2005-2025) VIA EMAIL ON FEBRUARY 14, 2025.

DATED: FEBRUARY 14, 2025



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CERTIFICATE OF COMPLIANCE

I, RICHARD ARJUN KAUL, MD, the Plaintiff-Petitioner do certify under penalty of perjury that the word count conducted on February 10, 2025 by the 'Tools – Word Count' Microsoft function, does pursuant to Supreme Court Rule 33.1(g) – Petition for a Writ of Certiorari – is eight thousand, seven hundred and thirty-four (8,734) words.

DATED: FEBRUARY 10, 2025

A handwritten signature in black ink, appearing to read 'R. Kaul', written over a horizontal line.

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APPENDIX B – AUGUST 19, 2024 – ORDER U.S.D.C.-S.D.T.- GALVESTON DIVISION RE: GRANT OF RESPONDENTS MOTION TO STAY DISCOVERY BASED ON PURPORTED IMMUNITY DEFENSE + NOVEMBER 14, 2024 – ORDER OF U.S.C.A. FOR THE FIFTH CIRCUIT GRANTING PETITIONER KAUL’S AUGUST 29, 2024 REQUEST FOR INTERLOCUTORY REVIEW OF AUGUST 19, 2024 DISTRICT COURT’S STAY ORDER + JANUARY 30, 2025 – ORDER OF U.S.C.A. FOR THE FIFTH CIRCUIT DISMISSING INTERLOCUTORY APPEAL BASED ON RESPONDENTS LACK OF JURISDICTION BASED MOTIONS TO DISMISS.

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REFERENCED CASES OF ‘THE KAUL CASES’

K5: KAUL v FEDERATION ET AL: 19-CV-3050-CLOSED – PRE JARKESY

K11-7: KAUL v ICE ET AL: 21-CV-6992-CLOSED ON SEPTEMBER 12, 2022 - POST 5TH CIRCUIT JARKESY (MAY 18, 2022)

K11-14: KAUL v FEDERATION ET AL: 23-CV-22325-CLOSED – POST 5TH CIRCUIT JARKESY (MAY 18, 2022)

K11-15: KAUL v CHRISTIE/MURPHY: 23-CV-22582-CLOSED – POST 5TH CIRCUIT JARKESY (MAY 18, 2022)

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K11-20: KAUL v FEDERATION: 24-CV-03180-CLOSED – POST SCOTUS JARKESY (JUNE 27, 2024)

K11-23: KAUL v OETKEN ET AL: 24-CV-00621-OPEN – POST SCOTUS JARKESY (JUNE 27, 2024)

K11-24: KAUL v FEDERATION: 25-CV-25 – OPEN – POST SCOTUS JARKESY (JUNE 27, 2024)

QUESTIONS PRESENTED

1. Did the lower appeal court fail in its duty to sanction the district court's failure to apply the controlling authority of SEC v Jarquesy: 22-859 (June 27, 2024) to the central facts of the case, those facts being the illegal 2014 jury-less article III judge \$475,000 'fine' imposing revocation of Petitioner Kaul's New Jersey license to practice medicine and surgery?

2. Does the lower appeal court's evasive rejection of the applicability of the controlling authority of SEC v Jarquesy: 22-859 (June 27, 2024) to the facts of the illegal 2014 jury-less article III judge \$475,000 'fine' imposing revocation of Petitioner Kaul's New Jersey license to practice medicine and surgery constitute an answer to a question of law that is in conflict with not only its prior May 18, 2022 holding/principles in Jarquesy but with those held by SCOTUS on June 27, 2024?

3. Did the lower appeal court violate Plaintiff-Appellant Kaul's right to due process by receiving a letter on January 30, 2025 from Plaintiff-Appellant Kaul at approximately 12 pm EST (APPENDIX A) that nullified the court's January 22, 2025 at D.E. 63, that Plaintiff-Appellant Kaul's response to Defendant-Appellee's motion to dismiss was untimely and thus unactionable, and then dismissing the case at 3:08 PM without publishing Plaintiff-Appellant Kaul's 1pm letter?

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 29.6 of this Court's Rules, Petitioner RICHARD ARJUN KAUL, MD, states that he files this petition on behalf of his person and no parent company and that no publicly traded corporation either owns or has been promised 10% or more of the settlement and or judgment monies.

TABLE OF AUTHORITIES

CASES:

GEORGE R. JARKESY, JR.; PATRIOT28, L.L.C., PETITIONERS versus
SECURITIES AND EXCHANGE COMMISSION, RESPONDENTS: NO. 20-61007 –
U.S.C.A. FOR THE FIFTH CIRCUIT (MAY 18, 2022)

SECURITIES AND EXCHANGE COMMISSION v. JARKESY ET AL –
CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH
CIRCUIT NO. 22-859 (JUNE 27, 2024)

CONSTITUTIONAL AMENDMENTS

Fourth Amendment

Fifth Amendment

Seventh Amendment

Eight Amendment

Thirteenth Amendment

Fourteenth Amendment

PETITION FOR WRIT OF CERTIORARI

Petitioner Kaul respectfully seeks a writ of certiorari to review the January 30, 2025 judgment of the United States Court of Appeals for the Fifth Circuit and the February 3, 2025 judgment of the United States District Court for the Southern District of Texas – Galveston Division.

OPINIONS BELOW

Enclosed within (**APPENDIX B**) are the relevant chronologically organized opinions/orders from the Southern District of Texas – Galveston Division (August 19, 2024), the U.S.C.A. for the Fifth Circuit (November 14, 2024) and (January 30, 2025) and the Southern District of Texas – Galveston Division (February 3, 2025).

THE IMPORT OF THE JURISDICTION OF THE

SUPREME COURT OF THE UNITED STATES

Jurisdiction lies within this Court as to the review of the January 30, 2025 order of dismissal by the U.S.C.A. for the Fifth Circuit of its November 14, 2024 grant of Petitioner Kaul's August 29, 2024 petition for interlocutory review of the district courts August 19, 2024 stay order as to discovery. The stay order was erroneously based on Defendants claim of immunity, the erroneousess of which was knowingly heightened in the context of this Court's June 27, 2024 opinion in Jarkesy, in which the SEC's violation of the Seventh Amendment deprived it of immunity **and** Petitioner Kaul's ignored application of Jarkesy;s related Seventh Amendment related deprivation to the illegal 2014 NJ jury-less article III judge-free \$475,000 'fine' imposing revocation of Petitioner Kaul's NJ license.

The statutory provision on which jurisdiction rests within this Court is that of Rule 10(a) and Rule 13.

Petitioner Kaul's August 29, 2024 application to the U.S.C.A. for the Fifth Circuit based on the lower court's complete derogation of any analysis or application of the principles and holdings of Jarkesy v SEC - No. 20-61007 (5th Circuit-May 18, 2022) and or of SEC v Jarkesy – No. 22-859 (SCOTUS-June 27, 2024) to the facts of the case; and on the Circuit Court's Rule 10(a) sanctioning of the lower court's derogation of Jarkesy, a derogation it repeated through a manipulation of process in

not summarily dismissing Appellees jurisdiction-based frivolous motions to dismiss Petitioner Kaul's interlocutory appeal, an appeal the appellate court had, after eleven (11) weeks of consideration (August 29 to November 14, 2024) decided it had jurisdiction. In the period from November 14 to January 30, 2025 (appeal dismissal date) there had been no change in the law or facts to warrant a dismissal on a purported lack of jurisdiction.

Then, as if to render the entire scenario even more deserving of review by the Supreme Court of the United States, on February 3, 2025, the district court dismissed the case WITHOUT PREJUDICE, while illogically maintaining Defendants immunity arguments and doing so without any analysis, comparison and or contextualization to the principles and holdings of Jarkesy; a case the relevance of which Petitioner Kaul illustrated in his Complaint (APPENDIX C) in a point by point manner as being no more precedentially perfect for the facts of K11-19, a fact known to the Defendants, the district and appellate courts, but a fact uniformly ignored from June 5, 2024 (filing date) to February 3, 2025 (dismissal date).

The contortions to which the Defendants/courts have gone to initially avoid an application of Jarkesy and to then dismiss the district court case WITHOUT PREJUDICE based on of all things an immunity defense, does evidence a state-of-mind in which Defendants/courts not only recognize that Jarkesy, as applied to the

facts of K11-19, would find the 2014 NJ jury-less article III judge-free \$475,000 'fine' imposing revocation to be illegal, but more presciently a patently devious attempt to divert Petitioner Kaul away from seeking SCOTUS clarification by entering the WITHOUT PREJUDICE 'bait'. However, the district court/Defendants did not consider that in proposing the WITHOUT PREJUDICE option, they did, in an unintentional manner, tacitly admit that Defendants do not have any form of immunity. This judicial admission, in conjunction with a legitimate application of Jarkesy, and the offenses/violations/crimes committed against the life/liberty/property/reputation and the human/civil/constitutional rights of Petitioner Kaul by The Kaul Cases Defendants (2005-2025) do continue to subject Defendants-Appellees NJBME/TMB/Kaufman/Lomazow to civil and or criminal prosecution. Kidnapping a person because he is litigating a case in court finds no protection in any of the most recessed of recesses of the entire corpus of American jurisprudence or that of its English forbearers, dating all the way back to the Magna Carta of 1215.

CONSTITUTIONAL PROVISIONS INVOLVED

In the period from 2005, the year Petitioner Kaul invented and successfully performed the first outpatient minimally invasive spinal fusion, a procedure that revolutionized the field of spine surgery, to 2025, almost all of his human/civil/constitutional rights have been violated with an impunity that has thus far-gone unpunished consequent to The Kaul Cases Defendants massive schemes of corruption of the political bodies and certain elements of the judicial body. This is the manner in which tyrannies and lawlessness commence, a fact Petitioner Kaul has been asserting since 2012.

Specifically, the involved provisions, that span **The Kaul Cases**, include the following:

United States Constitution, Amendment IV:

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

United States Constitution, Amendment V:

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

United States Constitution, Amendment VII:

In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.

United States Constitution, Amendment VIII:

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

United States Constitution, Amendment XIII:

Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

United States Constitution, Amendment XIV:

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

STATEMENT OF THE CASE

OVERVIEW

At the core of this case exists the facts of the illegal 2012 to 2014 jury-less article III judge-free, \$475,000 ‘fine’ imposing suspension and revocation of Petitioner Kaul’s New Jersey medical license to practice medicine and surgery, and respectively the May 18, 2022/June 27, 2024 holdings of the U.S.C.A. for the Fifth Circuit and the Supreme Court of the United States in Jarkesy, et al. v. Securities and Exchange Commission, No. 20-61007, 2022 WL 1563613 (5th Cir. May 18, 2022) and SEC v Jarkesy: 22-859 (June 27, 2024).

In essence, the principles and holdings within Jarkesy, mandate that for administrative agencies to constitutionally/legally deprive a person of their right to life/liberty/property require the matter be adjudicated before a jury, an article III judge and not before nor within In-House courts and or administrative judges. But these are exactly the deprivations and violations to which Petitioner Kaul was subjected in a period from February 3, 2010 to March 24, 2014, and which resulted in the illegal revocation of his New Jersey license. And it is this fact pattern, one that unlike that in Jarkesy, includes, amongst other things, kidnapping/false indictment/false arrest/false imprisonment/attempted killing/evidential tampering/witness tampering/public corruption, to which the principles and holdings of Jarkesy could not be more perfectly applied and determinative.

The effect and consequences of the 2012/2014 illegal suspension/revocation were and continue in 2025 to be immensely detrimental and far-reaching to Petitioner Kaul's life/liberty/property/reputation, in that he has existed in, amongst other things, a state of poverty, homelessness, forced unemployment, social ostracization and the theft of almost thirteen (13) of the most potentially productive years of his professional career. Petitioner Kaul was 47 in 2012 and is 60 in 2025.

Before Petitioner Kaul sets forth the twenty (20) year context and chronology of fact relevant to this petition, he respectfully asserts that these facts, which include those stated above, are more than identical to those of Jarkesy and in the Complaint he provided a point-by-point paralleling to show that the principles/holdings of Jarkesy as applied to the admitted facts of The Kaul Cases, including K11-19, do find that the 2012/2014 NJ license suspension/revocation were and are illegal. However, and what substantiates this petition, are the facts that: (i) Petitioner Kaul's Jarkesy related analysis of the relevant facts was not addressed/rebutted/refuted/contested by the K11-19 Defendants and was thus admitted; (ii) Jarkesy was not referenced once in Defendants pleadings, as if it did not exist; (iii) the district court did not only not reference Jarkesy in its August 19, 2024 stay order based on Defendants immunity argument, but it failed to conduct any analysis of the application of the principles/holdings of Jarkesy to the facts set forth in the Complaint; (iv) the district court's stay order pending its resolution of Defendants immunity argument was a knowing violation of Jarkesy as the issue of lack of immunity in the context of

violations of established Constitutional rights (SEC was deprived of immunity for violating Petitioner Jarkesy's Seventh Amendment rights) was settled by the U.S.C.A. for the Fifth Circuit and the Supreme Court of the United States; (v) there existed no basis for a stay of discovery pending the purported adjudication of Defendants immunity argument, because Defendants had admitted pursuant to Rule 8(b)(6) to having violated Petitioner Kaul's established Constitutional rights and were thus, pursuant to Jarkesy, deprived of immunity as was the SEC; (vi) the Defendants pleadings and the district court's stay, devoid of any mention/reference of Jarkesy, were purposed to permanently paralyze K11-19 and prevent discovery of highly incriminating facts, with the expectation that Petitioner Kaul would dismiss K11-19 and thus avoid or at least defer to another court the inevitable finding of the illegality of the 2014 NJ revocation/its consequences and its ongoing and "new" injuries to Petitioner Kaul's life/liberty/property/reputation (2012-2025); (vii) the district court, recognizing that Defendants admitted violations of Petitioner Kaul's established Constitutional rights had no intention of adjudicating Defendants immunity argument, a fact known to Defendants and a fact both the district court and Defendants knew was an effective but not actual dismissal because it was not final, which Defendants believed would preclude Petitioner Kaul from appealing, a tactic used by The Kaul Cases Defendants in multiple prior cases in the District of New Jersey. In these cases, Petitioner Kaul had no option but to dismiss them to permit him to advance his claims in other district courts, but yet The Kaul Cases Defendants continue to mischaracterize the dismissal of these corruptly procured

stays as evidence of Petitioner Kaul's litigiousness; (viii) in every case in which discovery/trial schedules and orders were entered (K5/K11-15/K11-17/K11-20) the Defendants violated the orders and the courts instead of entering Rule 37 judgments, did inexplicably dismiss the cases for reasons known to them when they issued the discovery orders; (ix) on August 29, 2024, Petitioner Kaul submitted a request to the U.S.C.A. for the Fifth Circuit seeking permission to file an interlocutory appeal of the district court's stay, but specifically of its failure of the district court and Defendants to address/refute/rebut/contest Jarkesy; (x) on November 4, 2024, Petitioner Kaul's request was granted and in every motion, reply and appellate brief filed by Petitioner Kaul, the determinative centrality of Jarkesy to K11-19 was articulated; (xi) in the period from November 4, 2024 to January 30, 2025 dismissal of the appeal, neither the U.S.C.A. for the Fifth Circuit nor Respondents mentioned/referenced/contested/addressed/refuted/rebutted Petitioner Kaul's Jarkesy related assertions and arguments; (xii) in fact within the entire three thousand, five hundred and seventy-five (3,575) page district/appellate K11-19 file, it is only Petitioner Kaul whose arguments reference, rely and or are based on Jarkesy, as nowhere in any of the filings submitted by the Defendants, the district/appellate court is the controlling authority of Jarkesy referenced and or cited. It is entirely absent.

It is the fact of this conspicuous dereliction of the application of the law of Jarkesy to a case, the fact pattern of which could not be any more identical to that of Jarkesy, that warrants a grant of the petition for a writ of certiorari.

CONTEXT AND RELEVANT CHRONOLOGY

March 2005 – April 2012

The factual underpinning of not just K11-19, but The Kaul Cases commenced in February/March 2005, when Petitioner Kaul invented and successfully performed the first outpatient percutaneous-minimally invasive spinal lumbar fusion, a procedure that revolutionized the field of spine surgery and has been the standard of care for almost a decade. The professional and commercial success that this invention brought to Petitioner Kaul generated immense professional jealousy and efforts by principally neurosurgeons/orthopedic spine surgeons to monopolize the minimally invasive spine market by scheming to have Petitioner Kaul eliminated from the market through license revocation, public slander and threats to his life/liberty/property/reputation. The purpose of the 'Revocation-Cover-Up Conspiracy' (2005-2025) by The Kaul Cases Defendants was to steal Petitioner Kaul's intellectual property, to profit from it and to prevent him from either competing in the market and or reaping the rewards of his invention.

The primary tactics (2005-2008) of the 'Revocation-Cover-Up Conspiracy' involved, amongst other things: (i) slandering his name with patients by falsely claiming he was not licensed or qualified to perform minimally invasive spine surgery; (ii) obstructing his efforts to obtain hospital privileges by conspiring/coercing physicians on credentialing committees with whom they conducted business to deny his applications; (iii) threatening medical device representatives who provided

Petitioner Kaul the devices needed to perform the surgeries that if they continued to work with Petitioner Kaul, they would cease working with the representative; (iv) encouraging patients for whom Petitioner Kaul had provided care to initiate lawsuits and file complaints against him with the medical board; (v) referring patients to particular malpractice lawyers as part of numerous kickback schemes.

The secondary tactics (2008-2012) materialized when it became evident to The Kaul Cases Defendants that their initial tactics were unsuccessful, they scheme became criminal, and in or around late 2008, they, both directly and through third-party agents initiated a series of quid pro quo scheme purposed digital and non-digital communications with The Kaul Cases Defendant and then US Attorney-NJ and 2009 NJ Gubernatorial candidate, Christopher J. Christie. At the core of this corpus of communication existed the details of a quid pro quo scheme, in which The Kaul Cases Defendants funneled bribes through domestic and off-shore financial/other vehicles to The Kaul Cases Defendant Christie, in return for his abusing state executive power to order the state medical board and his then attorney general, Jeffrey Chiesa, to manufacture a knowingly fraudulent case to cause the knowingly illegal revocation of Petitioner Kaul's NJ license. The Kaul Cases Defendants, including Defendant Christie knew and in fact intended to have the NJ revocation/associated negative online publicity cause Petitioner Kaul to become unable to not only continue his professional practice of medicine, but to prevent him from ever finding any form of employment. The draconian and unprecedented

extremeness of the nature of the 'Revocation-Cover-Up Conspiracy' is accounted for by The Kaul Cases Defendants knowledge of their use of state power/agencies/persons to commit crime against the life/liberty/property/reputation and violate the human/civil/constitutional rights of Petitioner Kaul, and their effort to ensure his permanent elimination in order to attempt to prevent him from exposing their crimes/violations. The secondary tactics resulted in Petitioner Kaul being interviewed by a preliminary evaluation committee of The Kaul Cases Defendant, NJBME, on February 3, 2010 as to his qualifications, credentials and the nature of his minimally invasive spine surgery practice. Based on this interview, the committee took no action to limit/restrict/prevent Petitioner Kaul from continuing his practice of minimally invasive spine surgery, and from February 3, 2010 to April 2, 2012, Petitioner Kaul's practice continued to expand and on March 3, 2011 he opened his own Medicare certified, AAAHC accredited, and state sanctioned surgical center in which he continued to conduct his minimally invasive spine surgical practice.

In the period from 2003 to 2012, Petitioner Kaul performed approximately eight hundred (800) minimally invasive spine surgeries with good to very good outcomes in 90-95% of cases (average outcome is 65-70%) with a complication rate of 0.1% (average is 5-15%). The purpose for the inclusion of these facts is that from the commencement of the "Revocation-Cover-Up Conspiracy' there has been a massive perpetration of lies by The Kaul Cases Defendants in both the court of public

opinion and the courts of law, in that they have continued to recite the knowingly fraudulent December 13, 2013 opinion of The Kaul Cases Defendant and then (2013) NJ administrative law judge, James Howard Solomon. Specifically, and throughout The Kaul Cases they have repeated, with knowing fraudulence, parts of the opinion in which The Kaul Cases Defendant Solomon describes Petitioner Kaul's treatment of almost six thousand (6,000) patients (800-minimally invasive spine surgery + 5,200 interventional spine) as being "grossly negligent ... incompetent". This opinion was based on the false testimony of five (5) patients, who were coerced and promised monies by Doreen Hafner, by the then deputy attorney general who litigated the case. The clinical records of these five (5) patients indicate that they all improved after being operated on by Petitioner Kaul, but the truth mattered not in the crucible of corruption that was The Kaul Cases Defendant Christie's fiefdom of political persecution and ruthless presidential purposed political ambition. To The Kaul Cases Defendant Christie, his political career and ambition justified sacrificing the lives of others if he believed it would fuel his political ascent. And he abused the power of state (US Attorney/NJ Governor) to cause the sacrifice of the innocent lives of many.

April 2012 to March 2014

By April 2, 2012, The Kaul Cases Defendants perpetration of the 'Revocation-Cover-Up Conspiracy' had caused the filing of a complaint by The Kaul Cases Defendant, NJBME, that sought the revocation of Petitioner Kaul's NJ license to practice

medicine and surgery. The complaint was based on the opinions of Petitioner Kaul's competitors in the minimally invasive spine surgery market, those individuals being Respondent Andrew Kaufman (interventional pain physician) and Gregory Przybylski (neurosurgeon). And occupying a senior position on The Kaul Cases Defendant NJBME was their friend/business partner and The Kaul Cases Defendant, Steven Lomazow. The thrust of the complaint was that Petitioner Kaul, the person who invented the percutaneous-minimally invasive spinal fusion was not qualified to perform it because he was not a neurosurgeon, despite the fact that he had performed eight hundred (800) with superior outcomes and a substantially below average complication rate. The 'Revocation-Cover-Up Conspiracy' was never about patient safety nor qualifications/training, but was simply a mafia-like larceny/monopolization of Petitioner Kaul's invention, work and entire medical career (1983-2012), and it was perpetrated by, through and under the cover of state authority/power/public money, through the exploitation of the public, the violation of law for the sole purpose of further feeding the greed of those whose greed knows no limits.

The administrative law proceeding commenced on April 9, 2013, concluded on June 28, 2013, and involved fifteen (15) highly qualified and credible physicians/lawyers/ex-NJ medical board director. The crux of the case against Petitioner Kaul was that according to their 'experts' he had allegedly violated the standard for the performance of minimally invasive spine surgery, but on cross-

examination these experts admitted that there existed no standard within the specialty due to its recent emergence within medicine. This admission established that Petitioner Kaul, who invented the procedure, had not violated any standards and thus there existed no basis for the revocation case. It was simply part of the 'Revocation-Cover-Up Conspiracy', the true purpose of which was to cause the illegal anti-competitive elimination of Petitioner Kaul from the minimally invasive spine surgery market, in which his competitors, The Kaul Cases Defendants, could not legitimately/legally/fairly compete within him, and thus, resorted to the perpetration of crime, including, but not limited to quid pro quo schemes.

Recognizing that Petitioner Kaul had dismantled and defeated every assertion/argument and the entire case submitted by The Kaul Cases Defendant, NJBME, they did then conspire with The Kaul Cases Defendant, and administrative law judge, James Howard Solomon to cause the issuance of a knowingly fraudulent opinion on December 13, 2013, in which, as Petitioner Kaul established in January 2018 and which The Kaul Cases Defendants have admitted, did contain two hundred and seventy-eight (278) separate instances of evidential falsification. These felonies of falsification are detailed in 'The Solomon Critique' a document filed and contained within The Kaul Cases, which is the product of Petitioner Kaul, in a period from September 2017 to January 2018, cross referencing the December 13, 2013 opinion of The Kaul Cases Defendant, Solomon, with the twenty-seven thousand (27,000) lines of legal transcript and twenty-two

thousand (22,000) pages of evidence submitted and generated within the April 9 to June 28, 2013 administrative revocation hearing. The evidence/facts of 'The Solomon Critique' have been admitted to by The Kaul Cases Defendants, an admission, that in conjunction with every other admission and evidential corpus (2016-2025) further established/establishes the illegality of the 2014 NJ revocation and The Kaul Cases Defendants guilt as to the levied charges.

The Kaul Cases Defendant, Solomon, in furtherance of and consistent with his criminally willful/knowing participation in the 'Revocation-Cover-Up Conspiracy', did not only recommend the revocation of Petitioner Kaul's license, but imposed a \$300,000 'fine'. He did this knowing that consequent to Petitioner Kaul's forced condition of poverty he would never have the money to pay such an amount even if it were the product of legitimate proceedings, which it was not, and that the 'fine' would continue to act as a permanent barrier to the reinstatement of Petitioner Kaul's illegally revoked license. On February 6, 2014, The Kaul Cases Defendant, NJBME, conducted a knowingly fraudulent hearing in furtherance of the 'Revocation-Cover-Up Conspiracy', and at which they not only validated with knowing illegality the fraudulent December 13, 2013 opinion of The Kaul Cases Defendant, Solomon, but in which they increased the 'fine' to \$475,000. On March 24, 2014, and in what they believed would be the final 'nail in the coffin' of Petitioner Kaul, they filed their so called 'Final Opinion and Order' in the official

repository of NJ state records, knowing it was the product of a criminal conspiracy and was itself an instrument of the crime of amongst other things, wire fraud.

By March 24, 2014 and indeed as early as April 2, 2012, The Kaul Cases

Defendants and certain members within the Office of the NJ AG were convinced that their best efforts to eliminate Petitioner Kaul had been successful. In fact, on or about April 9, 2012, and as relayed to Petitioner Kaul by a lawyer (Paul Schaff) assigned to represent him in one of the many frivolous lawsuits filed in the widely publicized context of the revocation proceedings, a certain NJ deputy attorney told Schaff that Petitioner Kaul was “probably going to pack his bags and leave”.

Petitioner Kaul did not leave in April 2012, nor in March 2014 and has not left in February 2025. In fact, it is The Kaul Cases Defendants who in abandoning their homes/offices to evade service and violating discovery order after discovery order, have effectively packed “their bags” and surrendered their once boastful position on the litigation battlefield.

March 2014 to February 22, 2016

In this period, Petitioner Kaul, having been forced into, amongst other things, a state of poverty, homelessness, loss of professional career, unemployment, reputational destruction and social ostracization did, for the sake of his two young children and justice, decide to remain in the US, teach himself the law and

commence his quest to expose the truth and hold accountable The Kaul Cases Defendants.

February 22, 2016 to February 2, 2025

From the February 22, 2016 filing of K1 to the January 14, 2025 filing of K11-24, there have been several constants and partial-constants: (i) not one Defendant has denied any of the allegations or thousands of facts; (ii) every discovery order entered by the courts in K5/K11-15/K11-17/K11-20 has been violated by every Defendant; (iii) not one lawyer for any of the Defendants has been sanctioned for their willful and knowing violations of the discovery orders; (iv) not one Defendant has had a Rule 37 judgement entered against them for their willful and knowing violation of the discovery orders; (v) not one Defendant has had default judgment entered against them for their failure to respond to the complaints; (vi) every Defendant participated in and or aided and abetted the corruption of certain judges to cause the dismissal of cases, the non-entry of Rule 37 judgments, the non-entry of sanctions against Defendants' lawyers; (vii) every lawyer participated in and or aided and abetted the corruption of certain judges to cause the dismissal of cases, the non-entry of Rule 37 judgments, the non-entry of sanctions against Defendants' lawyers; (viii) every Defendant participated in and or aided and abetted the corruption of certain judges to cause them to not compel their compliance with discovery orders; (ix) every lawyer has participated in and or aided and abetted the corruption of certain judges to cause them to not compel their compliance with

discovery orders; (x) every Defendant participated in and or aided and abetted the corruption of K11-23 Defendant Oetken to cause the September 12, 2022 entry in K11-7 of a purported nationwide ‘injunction’; (xi) every lawyer participated in and or aided and abetted the corruption of K11-23 Defendant Oetken to cause the September 12, 2022 entry in K11-7 of a purported nationwide ‘injunction’; (xii) every Defendant/lawyer participated in and or aided and abetted the corruption/coercion/harassment/intimidation of the district judges in K11-14/K11-15/K11-17/K11-20 to dismiss the cases based on K11-23 Defendant Oetken’s September 12, 2022 purported nationwide ‘injunction’.

In **The Kaul Cases**, since their commencement nine (9) years ago, **The Kaul Cases** Defendants have perpetrated knowingly criminal schemes to obstruct justice and the emergence of evidence/facts they know to be of a highly incriminating nature, not just as to the claims against them in **The Kaul Cases**, but as to the American public and medical profession. And in particular to the hundreds, if not thousands of principally ethnic minority and innocent physicians whom they did cause prosecutorial agencies to indict/convict/incarcerate in order to eradicate their debt for the provision of medical care to their premium-paying clients by these highly qualified and lengthily trained physicians.

The corruption/obstruction of justice that commenced in 2005 and continued into 2025, being perpetrated through state medical boards and

administrative/state/bankruptcy/district/appellate courts in the United States, within and in furtherance of the 'Revocation-Cover-Up Conspiracy' did manifest itself most recently in K11-19 in the U.S.C.A. for the Fifth Circuit. The Kaul Cases Defendants are beyond caring about the civil/monetary damages to their life and are now focused entirely on the deprivation of their liberty that would ensue from being subjected to discovery by Petitioner Kaul. And so, there is no judge and no court that they will not attempt to corrupt/harass/intimidate/threaten in the hope it will keep them out of jail, and similarly there is no court that falls prey to these tactics that will ignore the controlling authorities and or claim conclusive facts admitted to by The Kaul Cases Defendants.

K11-19 was filed on June 5, 2024, the U.S.C.A. for the Fifth Circuit entered its opinion in Jarkesy on May 18, 2022, reversing the district court's dismissal of the case, and on June 27, 2024, the Supreme Court of the United States affirmed the decision of the Fifth Circuit and remanded the case, one with a fact pattern whose identicalness and unconstitutional fact foundation was far exceeded by that of K11-19. This case, K11-19, perfectly exemplifies and strikes at the 'heart' of the long-standing illegality, unconstitutional and rights violating system of the license suspension/revocation system of the ruthless for-profit "Federation Cartel" and its within subjugate state medical boards and allied businesses that profit from the misery/desperation of revocation targeted physicians who are forced to pay extortionate amounts of money for so called physician 'assessment' courses and

indefinite ‘monitoring’ programs to regain their licenses and livelihoods. There is no other profession in the United States that is subjected to such profiteering injustice. These monies feed the insatiable greed of the “Federation Cartel” and are detrimental to the health and welfare of the public in their deprivation of access to physician care. ‘Pulling the strings’, however, of this modern-day system of indentured servitude in which the license suspension-revocation ‘Sword of Damocles’ is omnipresent, is the even more ruthless and four hundred (400) year old insurance industry, an industry spawned in London on the back of the trans-Atlantic slaving industry. And an industry that, through its highly lucrative quid pro quo schemes with the “Federation Cartel” controls and orders the culling of physicians to whom it owes money; the debt eradication of which increases profits in a truly obscene manner quite reminiscent of the profits generated in the slave selling markets established around the Wall at the southern tip of Manhattan, the Wall on the street that came to be and is known as Wall Street.

The consequentiality of K11-19 to the obscene patient premium-based profits and human life elimination profiteering of the “Federation Cartel” and the “Hospital-Insurance-Pharmaceutical Industrial Complex – Federation Cartel” (“HIPIC-FC”) cannot be overstated, as neither can the immense benefits to the American public and medical profession. These facts account in part for the conscious/concerted absence within the Defendants district/appellate pleadings and the district/appellate courts orders/opinions of any mention/reference to the knowing

and controlling authority of Jarkesy. For all parties knew and know that the application of Jarkesy to the facts of K11-19 would not only find illegal the 2014 NJ revocation of Petitioner Kaul's NJ license, but would cause a commencement of a reformation of the illegal/unconstitutional physician license suspension-revocation mechanism of the "Federation Cartel" and its subjugate state medical boards.

A point worth noting is that the ruling in Jarkesy, a case in which the SEC's financial regulatory actions threatened the profits of publicly traded corporations, a threat therefore to those public servants whose wealth bears no relation to their public servant salaries, was in part motivated by a desire to protect the profits of public servants whose disparate wealth is indexed to that of these publicly traded corporations. The situation however, with physicians is quite the opposite, in that for one, the fewer physicians that exist, the less patient care is provided, and a greater percentage of their health premiums is embezzled into the 'pockets' of the executives/shareholders, many of whom are public servants.

However, the law is the law, its unequal application is unconstitutional, and thus Jarkesy is not only as applicable to K11-19 as it was to the facts of plaintiff George Jarquesy's dispute with the SEC, but its determination of K11-19 can be nothing but a declaration that the "Federation Cartel" and its medieval methods are illegal/unconstitutional, the dismantling of which the law mandates. The realization of the immensity of this responsibility by the district/appellate courts in K11-19 explains why they abdicated themselves from the process with the expectation,

neigh hope, that Petitioner Kaul would either dismiss the matter or seek the supreme wisdom of the Supreme Court of the United States. A wisdom that Petitioner Kaul respectfully requests does find that the jury-less article III judge-free, \$475,000 ‘fine’ imposing NJ revocation was and is illegal.

Finally, and to establish the point as to the futility/dilatory effect of the district court’s stay pending a purported resolution of an immunity question already addressed in the negative in Jarkesy as to the SEC’s violation of his constitutional rights, violations perpetrated against Petitioner Kaul by the K11-19 Defendants, the stay was an effective dismissal of K11-19. The significance of the stay as to its failure to address a critical point of law, that being the application of Jarkesy to the jury-less article II judge \$450,000 ‘fine’ imposing 2014 NJ revocation. This was the exact reason that the U.S.C.A. for the Fifth Circuit, did after a two-month review (August 29 to November 4, 2024) of Petitioner Kaul’s application for interlocutory review, grant the petition and did establish jurisdiction over the matter. Its dismissal, therefore, on January 31, 2025 based on lack of jurisdiction was not because it did not have jurisdiction, but because it wanted the matter either dismissed or definitively adjudicated by the Supreme Court of the United States.

February 3, 2025

The reluctance and recalcitrance of courts within the U.S.C.S. for the Fifth Circuit to adjudicate that the application of Jarkesy to the facts of the 2014 NJ jury-less

article III judge-free revocation do find that it was and is illegal, is evident not just in its erroneous jurisdiction-lack based January 30, 2024 dismissal, but in its improper manipulation of the docket to serve its predetermined decision to dismiss.

On January 22, 2025 at D,E, 63, the appellate court entered a text order that it would not consider Petitioner-Appellant Kaul's opposition papers to Defendant-Appellees Kaufman/Lomazow/NJBME motion to dismiss for lack of jurisdiction because they were allegedly "untimely". This was and is an incorrect finding, as evidenced by the January 25, 2025 letter filed by Petitioner Kaul at approximately 12 pm CST on January 30, 2025 (**APPENDIX A**). This letter and the attached transmission receipts established that the filing was indeed timely and that the appellate court's failure to judicially analyze the facts that it did have jurisdiction, does invalidate its January 30, 2025 order of dismissal, an order issued at approximately 3 pm CST and in direct response to Petitioner Kaul's 12 pm CST filing. The appellate court sought to close the docket in the knowledge that the facts asserted in Petitioner Kaul's filing did establish their jurisdiction, an establishing that would have compelled Defendant-Appellees Kaufman/Lomazow/NJBME to file a brief that they knew/know could not have refuted the fact that the application of Jarkesy to the 2014 NJ jury-less article III judge-free revocation could not but find it illegal.

Unfortunately, in the nine (9) years since the commencement of The Kaul Cases, Petitioner Kaul has detected on many occasions the illegal practice of docket

manipulation against Propria Persona Plaintiffs, whose preclusion from electronic filing and relegation to paper submissions, has, for certain criminally-minded defendants been a corrupt tactic in their perversion of the course of justice.

REASONS FOR GRANTING THE WRIT

The district court's June 5, 2024 to August 19, 2024 abdication of its duty to apply the holdings and principles of Jarkesy to the facts of the jury-less article III judge-free \$450,000 'fine' imposing 2014 NJ license revocation in conjunction with the appellate court's sanctioning of this abdication and the appellate court's further abdication of its own May 18, 2022 holdings do call for this Court to exercise its supervisory power.

The district and appellate courts have for the above stated reasons utilized the legal instruments of the stay and jurisdiction-based dismissal to deflect the central and inescapably determinative issue that the application of Jarkesy to the facts of the jury-less article III judge-free \$450,000 'fine' imposing NJ license revocation do find it illegal. Both courts recognize that this precedent-setting determination would cause a long overdue and constitutionally required "Reformation of American Medical Boards", a revolution that would afford physicians the same rights as any citizen or legal resident of the United States. The right, for example, to a trial by jury, when faced with a deprivation of the property of their license and the right of their livelihood. It is axiomatic that persons charged with civil and or criminal offenses that threaten to deprive them of their life/liberty/property are afforded trials in front of article III judges and juries, but yet physicians subject to complaints seeking to deprive them of their life/liberty/property are denied these basic constitutional protections all under the fraudulent guise of "protecting the public". The fraudulence of this moniker has persisted because of its blind, unquestioned and unchallenged acceptance by the public and even the less

enlightened members of the medical profession, but its fraudulence is substantiated by the fact that there exists absolutely no evidence that state medical boards protect the public. They are simply cogs in the ruthless profiteering and public servant corrupting schemes of the “HIPIC – FC”.

The Fifth Circuit ‘played a game’ in assuming jurisdiction on November 4, 2024 and then arbitrarily rejecting jurisdiction on January 31, 2025 for the sole purpose of evading its statutory obligation to compel the compliance of lower courts with binding published precedent and to itself comply with the horizontal stare decisis of its own decisions. See In Bryant v. Smith, 165 B.R. 1765, 180 (W.D. Va. 1994). It is noteworthy that the judges assigned to the May 18, 2022 Jarkesy decision were not the ones assigned to the January 19, 2025 Kaul decision, in a seeming effort to circumvent the court’s obligation under horizontal stare decisis.

That ‘game’ of avoiding any reference to Jarkesy or in fact any denial/contestation/refutation of the ‘THE DETERMINATIVE RELEVANCE AND APPLICABILITY OF JARKESY v. SEC’ (D.E. 1 Page 6 of 33) did cause an admission of these facts within the district court proceeding. The district court’s August 18, 2024 erroneous immunity-based stay did not cause a nullification of this admission, as neither did the January 31, 2025 lack of jurisdiction-based dismissal of appeal by the U.S.C.A. for the Fifth Circuit. Thus, the admission of these facts did supersede the district court stay and the appellate court jurisdiction related dismissal to cause

a claim conclusive admission of the K11-19 facts/claims and a Jarkesy related rejection of Defendants' immunity claims.

Similarly, the K11-19 Defendants failure to deny the allegations/facts asserted in K11-19 did cause them, pursuant to Rule 8(b)(6) to become admitted despite knowingly futile claims of immunity against established Constitutional rights, a futility established in Jarkesy by the deprivation of immunity for the SEC by the Fifth Circuit and SCOTUS. Not only was this fact known to the Defendants, whose stay motions were frivolous/dilatory, but it was a fact well known to the district court, which should have denied the motions and compelled Defendants compliance with the discovery order.

But the principle purpose of the Defendants and the district/appellate courts in their abdication and evasion of the controlling authority of Jarkesy and the determinative arguments/facts set forth in Petitioner Kaul's Complaint and pleadings, was to manufacture an 'avenue' along which they, and could have the case/discovery either effectively dismissed through an indefinite stay or the appeal actually dismissed, despite Petitioner Kaul's case conclusive Jarkesy related arguments, through a claim of lack of jurisdiction.

However, all that has been achieved by the stay/dismissal actions of K11-19 within the Fifth Circuit is a 'kicking of the can down the road', as the exact injury in the Fifth Circuit upon which K11-19 was/is premised is the exact injury caused in every other circuit, as the illegal 2014 NJ jury-less article III judge-free \$475,000 'fine'

imposing revocation caused and continues to cause nationwide ongoing and “new” injuries to Petitioner Kaul’s life/liberty/property/reputation and violations of his human/civil/constitutional rights. And it is from every other circuit that Petitioner Kaul can seek, through the filing of petitions for writs of certiorari, the intervention of the Supreme Court of the United States to clarify the determinative effect of Jarkesy on the within licensing revocation/denial related facts.

The subjection of Petitioner Kaul to a thirteen (13) year-long period of an illegal nationwide all circuit deprivation of his life/liberty/property/reputation does establish standing in all circuits for the submission by Petitioner Kaul to the Supreme Court of the United States of petitions for writs of certiorari.

Petitioner Kaul respectfully submits there is fact to substantiate the above stated nationwide all circuit scenario, in which there exists the potential for multiple circuit splits on the determinative effect of Jarkesy not just on the licensing revocation/denial facts as to Petitioner Kaul, but on the entire unconstitutional system of physician licensing and so called ‘disciplining’. This system, the illegality of which has never been challenged, is a system that oppresses almost one million (1,000,000) physicians and generates billions of dollars for those who control, perpetrate and indirectly profit from the system persecuted elimination and asset seizure of innocent physicians.

A confluence of circumstances, events and facts in the period from 2005 to 2025 did establish a legal foundation on which Petitioner Kaul became positioned to, for the

first time in the history of modern-day America, to challenge and commence a dismantling within the healthcare sector of a ruthless profiteering insurance industry dominated cartel-like monopoly. A monopoly that effectively sacrifices human life for executive/corporate/shareholder profit. This industry views the deprivation of care related deaths of life-long premium-paying patients as a credit on their quarterly financial balance sheets. The greater these occurrences, the higher their billion-dollar profits, and critical to the crimes against humanity are, of all entities, the state medical boards/members including Defendants NJBME/TMB/Kaufman/Lomazow, the entities and persons who claim their mission is to “protect the public”. Evil is almost always cloaked in benevolence.

In the period from 2020 to 2025, Petitioner Kaul submitted letters and applications to every state medical board to ascertain and potentially establish nationwide injuries to his life/liberty/property/reputation related to the illegal 2014 NJ jury-less article III judge-free \$475,000 ‘fine’ imposing revocation in every district/circuit. These letters and applications did indeed establish these facts of injury and thus standing.

To illustrate the recalcitrance and disdain held by the “Federation Cartel” and its subjugate state medical boards/members towards the Supreme Court of the United States and its rulings, Petitioner Kaul submits within (**APPENDIX D**) and references below a series of letters he has exchanged with state medical boards that

evidence their knowing, willful and ongoing violations of the law of the land, as dispatched from the final court of appeals of the United States:

1. AUGUST 1, 2019 – LETTER FROM PETITIONER KAUL TO RESPONDENT

NJBME: An equivalent copy of this letter was sent to every state medical board, and in every case, it was established that not one state medical board had complied with the holdings and subsequent antitrust FTC terms as to supervision of state medical boards. The FTC ruling requires that state medical boards whose physician members compete with other physicians in the relevant specialty market are supervised, in order to eliminate the practice of rendering decisions that revoke the licenses of physicians against whom they or their friends/business partners compete. The non-compliance of all state medical boards continues today, and innocent physicians continue to be illegally deprived of their life/liberty/property/reputation on fabricated and knowingly false charges. The “Federation Cartel” and its healthcare corporation bribers continue to illegally monopolize the healthcare market through massive and ongoing “patterns of racketeering” that have converted the American healthcare sector into a “racketeering enterprise” through which are perpetrated, amongst other things, the RICO predicate acts of wire fraud/bribery/public corruption/obstruction of justice/crimes against humanity.

2. OCTOBER 8, 2019 – LETTER TO MEMBERS OF RESPONDENT NJBME: The aforementioned disregard of state medical boards for the authority and rulings of the Supreme Court of the United States extends to the Constitution of the United States, a fact established by Petitioner Kaul in an October 8, 2019 letter to all member of Respondent NJBME. The non-refutation/contestation/rejection of the facts within this letter of Respondents NJBME/Kaufman/Lomazow did cause their admission on October 15, 2019. Although not an issue of common public knowledge, there exists within the “Federation Cartel” a belief that their lawlessness is shrouded with an impunity that insulates them from prosecution. This belief and its persecution against the health and welfare of the American account in large part for the atrocious global health indices of Americans and the public outrage against the insurance industry consequent to the December 4, 2024 killing of the CEO of the inappositely named ‘United Health Care’, an entity whose net profits in 2024 were 14.4 billion dollars.

3. APRIL 11, 2024 – LETTERS FROM PETITIONER KAUL TO RESPONDENTS NJBME AND TMB: Consequent to the May 18, 2022 opinion of the Fifth Circuit in Jarkesy and Respondents knowledge as to the ruling’s confirmation of the illegality of the 2014 NJ jury-less article III judge-free \$475,000 ‘fine’ imposing revocation, Petitioner Kaul sent letters to Respondents enquiring as to whether they would issue him a license. Respondents denials were issued on May 11, 2024, the consequence of which Petitioner Kaul advised Respondents would constitute an

ongoing/”new” racketeering injury to his life/liberty/property/reputation and substantiate a basis for a “new” claim pursuant to RICO’s doctrine of “new racketeering injuries”. By May 11, 2024, Petitioner Kaul had been illegally subjected by The Kaul Cases Defendants to four thousand four hundred and twenty-two (4,422) days of injury to his life/liberty/property/reputation, injuries that Respondents knowingly/willfully continue with the filing of this petition.

4. AUGUST 8, 2024 – LETTER FROM PETITIONER KAUL TO THE KAUL CASES CO-CONSPIRATOR, NEW YORK STATE MEDICAL BOARD: In February 2021, Petitioner Kaul submitted an application to the New York State Medical Board and after an inordinate delay, a hearing was scheduled on September 4, 2024. However, on June 27/28, 2024, the SCOTUS rulings in Jarkesy and Loper were issued and on August 8, 2024, Petitioner Kaul emailed these opinions to the NYSMB, advising them that the holdings/principles did render illegal the 2014 NJ jury-less article III judge-free \$475,000 ‘fine’ imposing revocation, which thus deprived them of any basis on which to deny my application. The lawyers for The Kaul Cases Co-conspirator, NYSMB responded, despite being reminded by Petitioner Kaul of the Supremacy Clause, that Jarkesy was of no relevance or authority to any of their jury-less article III judge-free license denial/revocation proceedings and or to their reliance on licenses revoked by other states under the exact unconstitutional conditions in which they have functioned and continue to function. The virtual September 4, 2024 hearing was conducted and Petitioner Kaul

was informed that if he raised Jarkesy he would be muted. Petitioner Kaul did nonetheless raise Jarkesy was indeed muted, such that it was excluded from the transcript and November 15, 2025 NYSMB report denying Petitioner Kaul's application.

5. JANUARY 22, 2025 – LETTER FROM PETITIONER KAUL TO THE KAUL CASES CO-CONSPIRATOR, ARIZONA MEDICAL BOARD: In response to

Petitioner Kaul's April 11, 2024 letter to the Arizona Medical Board enquiry as to whether he would be granted a license in Arizona, he received a response inviting him to apply, and so on November 8, 2024 he submitted an application. However, on January 22, 2025, Petitioner Kaul's application was preliminarily denied based on the illegal 2014 NJ jury-less article III judge-free \$475,000 'fine' imposing revocation. The lawyer cum executive director of The Kaul Cases Co-Conspirator, Arizona Medical Board informed Petitioner Kaul that if he withdrew his application, the denial would not be reported to the National Practitioner Data Bank, but that if he sought the application be reviewed by the entire board, any denial would be reported. In response Petitioner Kaul requested that prior to his decision, the lawyer cum executive director of The Kaul Cases Co-Conspirator, Arizona Medical Board, articulate her position as to the relevancy of Jarkesy to the preliminary denial of Petitioner Kaul's application. The lawyer cum executive provided no analysis and indicated via email that the application would be placed before the entire board, to which Petitioner Kaul responded that any decision would

constitute a knowing violation of the principles and holdings of Jarkesy and cause the Arizona Medical Board to be subjected to suit for, amongst other things, furthering The Kaul Cases Defendants “pattern of racketeering” (2005-2025) and violation of his human/civil/constitutional rights. Of note, and as evidenced in the attachment entitled ‘New York Patient Occurrence Reporting & Tracking System (NYPORTS) Summary Statistics 2014-2017’ there were four thousand seven hundred and twelve (4,712) deaths/serious injuries caused to patients by medical mistakes in the period from 2014-2017 in the State of New York, but none of the involved physicians had their licenses revoked. Just prior to the September 4, 2024 hearing with The Kaul Cases Co-conspirator, NYSMB, Petitioner Kaul submitted this document to the lawyers/hearing officer requesting they identify the standard by which they grant/deny/suspend/revoke licenses. Petitioner Kaul received no response.

6. JANUARY 26, 2025 – LETTER FROM PETITIONER KAUL TO THE KAUL CASES CO-CONSPIRATOR ARIZONA MEDICAL BOARD: Petitioner Kaul, in seeking to ensure there remained no doubt in the mind of the lawyer cum executive that legal action would ensue if the medical board denied his application, did inform her that if by January 29, 2025 he received no response to his January 22, 2025 request regarding analysis pursuant to Jarkesy, that he would place the question before a district court within the United States District Court. The letter was copied to counsel for the “Federation Cartel” and The Kaul Cases Co-Conspirator, New

York State Medical Board, as the denial in Arizona did constitute yet another “new racketeering injury” that established standing in the District of Arizona against The Kaul Cases Defendants for the perpetration of ongoing/”new” injuries to his life/liberty/property/reputation (2005-2025).

CONCLUSION

Since the June 27, 2024 issuance into law of the constitutionally grounded holdings and principles of Jarkesy, three state medical boards (New York/Arizona/Texas) a district court and an appellate court have either ignored the case as if it does not exist or claimed it is irrelevant to the manner in which they deprive a physician of his life/liberty/property/reputation.

Petitioner Kaul consequent to the malicious, purposeful and intended ongoing nationwide injury to his life/liberty/property/reputation caused and continuing to be caused by The Kaul Cases Defendants, does retain standing in all thirteen circuits and their within district courts to bring claims based on the Jarkesy related 2014 illegal NJ jury-less article III judge-free \$475,000 ‘fine’ imposing license revocation.

The opinions, principles and holdings rendered on May 18, 2022 by the Fifth Circuit and on June 27, 2024 by SCOTUS as to, amongst other things, the issues of the Seventh Amendment right to a trial by jury and the deprivation of immunity consequent to violations of established constitutional principles amendments, are explicit. And indeed, it was this explicitness that Petitioner Kaul utilized in the opening section of his June 5, 2024 Complaint, ‘THE DETERMINATIVE RELEVANCE AND APPLICABILITY OF JARKESY v. SEC’ (APPENDIX C – PAGE 6 OF 33).

The ‘side-stepping’ of Jarkesy by the Defendants and then the sanctioning of that knowingly improper evasion of the controlling authority by the district and appellate courts, does pursuant to Rule 10(a) of the Supreme Court Rules warrant the grant of the writ sought by Petitioner Kaul, a writ that will establish in all circuits the determinative authority of Jarkesy to jury-less article III judge-free fine imposing license suspensions/revocations in every state licensed profession and or trade.

The Constitution of the United States came into existence as a direct response to the inequities, injustices, violations and crimes perpetrated on the lives/liberties/properties of the early American colonialists by the tyranny of the British Crown, a blood-soaked period of history evidently forgotten by modern-day American bureaucratic agencies. Over the centuries people emigrated to America to escape bureaucratic totalitarianism and its sterile methods of prolonged executions.

State medical boards and their subjugation within the “Federation Cartel”, a cartel shrouded with knowingly false claims of purported “patient protection” are in fact America’s 21st century version of the Politburo. The motivation of the “Federation Cartel” is profit, it’s methods are identical to those of the Politburo, those being the conduction of highly publicized sham show state medical board revocation trials.

For these reasons, and those as asserted above, Petitioner Kaul respectfully requests his petition for a writ of certiorari to the U.S.C.A. for the Fifth Circuit be granted.

I certify under penalty of perjury that the above statements are true and accurate to the best of my knowledge.

DATED: FEBRUARY 14, 2025

A handwritten signature in black ink, appearing to read 'R. Kaul', written above a horizontal line.

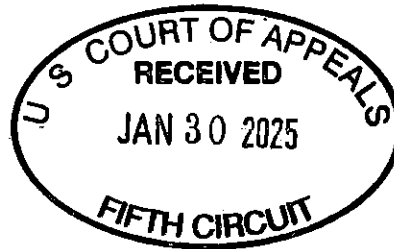
RICHARD ARJUN KAUL, MD

APPENDIX A

www.drrichardkaul.com

JANUARY 25, 2025

CLERK OF THE COURT
UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT
600 S. MAESTRI PLACE
SUITE 115
NEW ORLEANS, LA 70130



RE: KAUL v. TEXAS MEDICAL BOARD ET AL.

DISTRICT COURT NO. 3:24-CV-00163

APPELLATE COURT NO. 24-40562

K11-19

LETTER RE: TIMELY FILING OF APPELLANT RESPONSE/OPPOSITION APPELLEES KAUFMAN
LOMAZOW/NEW JERSEY BOARD MEDICAL EXAMINERS MOTION TO DISMISS

Dear Clerk of the Court,

I write this letter to respectfully request that the Court's January 22, 2025 text entry at D.E. 63:

"DOCUMENT RECEIVED - NO ACTION TAKEN. No action will be taken at this time on the Appellant's response to Appellees New Jersey Board of Medical Examiners, Mr. Steven Lomazow and Mr. Andrew Kaufman motion to dismiss received from Appellant Mr. Richard Arjun Kaul because it is untimely [24-40562] (CMC) [Entered: 01/22/2025 01:43 PM]"

be amended to indicate that the untimeliness of the January 14, 2025 arrival in the Court was a consequence, as indicated by the included transmission report from the U.S.P.S., of '... **WINTER STORMS IN THE SOUTHERN, SOUTHEAST, AND NORTHEAST** ...'. The package, as evidenced by the enclosed receipt was dispatched on January 10, 2025 with a scheduled arrival date of January 13, 2025, as evidenced by the transmission report. On December 30, 2024 and as per D.E. 38, the Court ordered that,

"... A/Pet's Brief deadline satisfied. Sufficient Brief due on 01/13/2025 for Appellant Richard Arjun Kaul. Appellee's Brief due on 01/29/2025 for Appellees Andrew Kaufman, Steven Lomazow, New Jersey Board of Medical Examiners and Texas Medical Board [24-40562] (AMD) [Entered: 12/30/2024 04:18 PM]"

Pursuant to F.R.A.P. 25, the date of mailing is considered the date of service, and I therefore respectfully request the January 10, 2025 filing be considered timely and the record be caused to reflect this fact and reiterate Appellees Kaufman/Lomazow/NJBME obligation, as per D.E. 38., to file their brief as **"due on 01/29/2025 for Appellees Andrew Kaufman, Steven Lomazow, New Jersey Board of Medical Examiners ..."**

Finally, on or January 15, 2025 I called the Clerk's office to enquire as to why my January 10, 2025 filing had not appeared on the docket, and was informed it had been received but due to the weather a "backlog" had developed and that my filing would appear on the docket within the next few days. It appeared on January 22, 2025.

I thank you for your attention to this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul', written over a horizontal line.

RICHARD ARJUN KAUL, MD

cc: All Counsel of record

ALERT: WINTER STORMS IN THE SOUTHERN, SOUTHEAST, AND NORTHEAST AND WILDFIRE...

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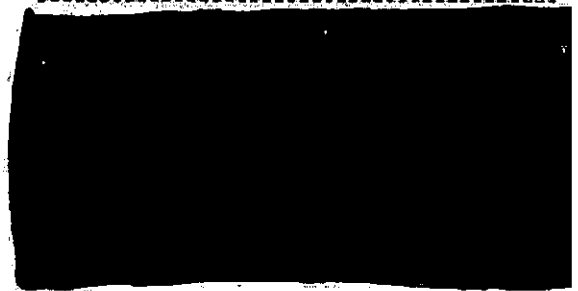


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APPENDIX B

ENTERED

August 19, 2024

Nathan Ochsner, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

RICHARD ARJUN KAUL,

Plaintiff,

VS.

TEXAS MEDICAL BOARD, *et al.*,

Defendants.

§
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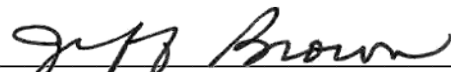
3:24-cv-163

ORDER

Before the court is the New Jersey Board of Medical Examiners, Dr. Andrew Kaufman, and Dr. Steven Lomazow's motion to stay case management and discovery deadlines, Dkt. 19, and the Texas Medical Board's motion to stay discovery, Dkt. 30. The court grants both motions.

All discovery, as well as any existing case management and other discovery-related deadlines, is stayed in this matter until further notice by the court.

Signed on Galveston Island this 19th day of August, 2024.



JEFFREY VINCENT BROWN
UNITED STATES DISTRICT JUDGE

United States Court of Appeals

FIFTH CIRCUIT
OFFICE OF THE CLERK

LYLE W. CAYCE
CLERK

TEL. 504-310-7700
600 S. MAESTRI PLACE,
Suite 115
NEW ORLEANS, LA 70130

November 14, 2024

Mr. Richard Arjun Kaul
6 N. Midland Avenue
Nyack, NY 10960

No. 24-40562 Kaul v. Texas Medical Board
USDC No. 3:24-CV-163

Dear Mr. Kaul,

We have docketed the appeal as shown above, and ask you to use the case number above in future inquiries.

Filings in this court are governed strictly by the Federal Rules of **Appellate** Procedure. We cannot accept motions submitted under the Federal Rules of **Civil** Procedure. We can address only those documents the court directs you to file, or proper motions filed in support of the appeal. See Fed. R. App. P. and 5th Cir. R. 27 for guidance. We will not acknowledge or act upon documents not authorized by these rules.

All counsel who desire to appear in this case must electronically file a "Form for Appearance of Counsel" naming all parties represented within 14 days from this date, see Fed. R. App. P. 12(b) and 5th Cir. R. 12. This form is available on our website www.ca5.uscourts.gov. Failure to electronically file this form will result in removing your name from our docket. Pro se parties are not required to file appearance forms.

ATTENTION ATTORNEYS: Attorneys are required to be a member of the Fifth Circuit Bar and to register for Electronic Case Filing. The "Application and Oath for Admission" form can be printed or downloaded from the Fifth Circuit's website, www.ca5.uscourts.gov. Information on Electronic Case Filing is available at www.ca5.uscourts.gov/cmecf/.

ATTENTION ATTORNEYS: Direct access to the electronic record on appeal (EROA) for pending appeals will be enabled by the U S District Court on a per case basis. Counsel can expect to receive notice once access to the EROA is available. Counsel must be approved for electronic filing and must be listed in the case as attorney of record before access will be authorized. Instructions for accessing and downloading the EROA can be found on our website at <http://www.ca5.uscourts.gov/docs/default->

source/forms/instructions-for-electronic-record-download-feature-of-cm. Additionally, a link to the instructions will be included in the notice you receive from the district court.

Sealed documents, except for the presentence investigation report in criminal appeals, will not be included in the EROA. Access to sealed documents will continue to be provided by the district court only upon the filing and granting of a motion to view same in this court.

We recommend that you visit the Fifth Circuit's website, www.ca5.uscourts.gov and review material that will assist you during the appeal process. We especially call to your attention the Practitioner's Guide and the 5th Circuit Appeal Flow Chart, located in the Forms, Fees, and Guides tab.

ATTENTION: If you are filing Pro Se (without a lawyer) you can request to receive correspondence from the court and other parties by email and can also request to file pleadings through the court's electronic filing systems. Details explaining how you can request this are available on the Fifth Circuit website at <http://www.ca5.uscourts.gov/docs/default-source/default-document-library/pro-se-filer-instructions>. This is not available for any pro se serving in confinement.

Special guidance regarding filing certain documents:

General Order No. 2021-1, dated January 15, 2021, requires parties to file in paper highly sensitive documents (HSD) that would ordinarily be filed under seal in CM/ECF. This includes documents likely to be of interest to the intelligence service of a foreign government and whose use or disclosure by a hostile foreign government would likely cause significant harm to the United States or its interests. Before uploading any matter as a sealed filing, ensure it has not been designated as HSD by a district court and does not qualify as HSD under General Order No. 2021-1.

A party seeking to designate a document as highly sensitive in the first instance or to change its designation as HSD must do so by motion. Parties are required to contact the Clerk's office for guidance before filing such motions.

Sealing Documents on Appeal: Our court has a strong presumption of public access to our court's records, and the court scrutinizes any request by a party to seal pleadings, record excerpts, or other documents on our court docket. Counsel moving to seal matters must explain in particularity the necessity for sealing in our court. Counsel do not satisfy this burden by simply stating that the originating court sealed the matter, as the circumstances that justified sealing in the originating court may have changed or may not apply in an appellate proceeding. It is the obligation of counsel to justify a request to file under seal, just as it is their obligation to notify the court whenever sealing is no longer necessary. An unopposed motion to seal does not obviate a counsel's obligation to justify the motion to seal.

Sincerely,

LYLE W. CAYCE, Clerk

Amanda M. Duroncellet

By:

Amanda M. Duroncellet, Deputy Clerk

cc: Ms. Rachel Leona Behrendt
Mr. Scott A. Levin
Mr. Nathan Ochsner

Provided below is the court's official caption. Please review the parties listed and advise the court immediately of any discrepancies. If you are required to file an appearance form, a complete list of the parties should be listed on the form exactly as they are listed on the caption.

Case No. 24-40562

Richard Arjun Kaul, Medical Doctor,

Plaintiff - Appellant

v.

Texas Medical Board; New Jersey Board of Medical Examiners;
Steven Lomazow, Medical Doctor; Andrew Kaufman, Medical Doctor,

Defendants - Appellees

United States Court of Appeals

FIFTH CIRCUIT
OFFICE OF THE CLERK

LYLE W. CAYCE
CLERK

TEL. 504-310-7700
600 S. MAESTRI PLACE,
Suite 115
NEW ORLEANS, LA 70130

January 30, 2025

MEMORANDUM TO COUNSEL OR PARTIES LISTED BELOW:

No. 24-40562 Kaul v. Texas Medical Board
USDC No. 3:24-CV-163

Enclosed is an order entered in this case.

Sincerely,

LYLE W. CAYCE, Clerk

Christy Combel

By: _____
Christy M. Combel, Deputy Clerk
504-310-7651

Ms. Rachel Leona Behrendt
Mr. Richard Arjun Kaul
Mr. Scott A. Levin
Mr. Nathan Ochsner

United States Court of Appeals
for the Fifth Circuit

No. 24-40562

United States Court of Appeals
Fifth Circuit

FILED

January 30, 2025

Lyle W. Cayce
Clerk

RICHARD ARJUN KAUL, *Medical Doctor*,

Plaintiff—Appellant,

versus

TEXAS MEDICAL BOARD; NEW JERSEY BOARD OF MEDICAL
EXAMINERS; STEVEN LOMAZOW, *Medical Doctor*; ANDREW
KAUFMAN, *Medical Doctor*,

Defendants—Appellees.

Appeal from the United States District Court
for the Southern District of Texas
USDC No. 3:24-CV-163

UNPUBLISHED ORDER

Before JONES, DUNCAN, and DOUGLAS, *Circuit Judges*.

PER CURIAM:

IT IS ORDERED that Appellees' opposed motion to dismiss the
appeal is GRANTED.

APPENDIX C

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

United States Courts
Southern District of Texas
FILED

JUN - 5 2024

Nathan Ochsner, Clerk of Court

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

v.

TEXAS MEDICAL BOARD; ANDREW KAUFMAN;
STEVEN LOMAZOW; NEW JERSEY BOARD OF MEDICAL
EXAMINERS; JANE DOE; JOHN DOE.

CIVIL ACTION: NO.: 3:24-cv-163

COMPLAINT
DEMAND FOR JURY

PARTIES

Plaintiff

RICHARD ARJUN KAUL, MD – 24 Washington Valley Road, Morristown, NJ 07960: 973 876 2877:
DRRICHARDKAUL@GMAIL.COM (“**PLAINTIFF KAUL**”)

Defendants

TEXAS MEDICAL BOARD – 333 GUADALUPE STREET #3, AUSTIN, TX 78701 (“**DEFENDANT TMB**”)

NEW JERSEY BOARD OF MEDICAL EXAMINERS – 140 E FRONT STREET, TRENTON, NJ 08608
(“**DEFENDANT NJBME**”)

STEVEN LOMAZOW, MD – 50 NEWARK AVENUE # 104, BELLEVILLE, NJ 07109 (“**DEFENDANT LOMAZOW**”)

ANDREW KAUFMAN, MD – 16 SIERRA COURT, HILLSDALE, NJ 07642 (“**DEFENDANT KAUFMAN**”)

RELEVANT REFERENCES TO THE KAUL CASES

K1 – KAUL v CHRISTIE: 16-CV-02364 (FEBRUARY 22, 2016, TO NOVEMBER 16, 2021-U.S.D.C.-S.D.N.Y. TO D.N.J.).

K2 - KAUL v CHRISTIE: 18-CV-08086 (APRIL 9, 2018, TO JULY 7, 2021 -U.S.D.C.-D.N.J.).

K5 – KAUL v FEDERATION: 19-CV-3050 (OCTOBER 1, 2019, TO JULY 7, 2021-U.S.D.C.-D.D.C.).

K7 – KAUL v FEDERATION: 20-CV-01612 (JUNE 18, 2020, TO NOVEMBER 23, 2021-U.S.D.C.-D.D.C.).

K11-1 - KAUL v FEDERATION: 21-CV-00057 (JANUARY 11, 2021, TO APRIL 22, 2022-U.S.D.C.-NORTHERN DISTRICT TEXAS).

K11-2 - KAUL v BOSTON PARTNERS: 21-CV-10326 (FEBRUARY 24, 2021, TO JULY 30, 2021-U.S.D.C.-DISTRICT MASSACHUSETTS).

K11-4 – KAUL v MURPHY: 21-CV-00439/21-CV-09788 (MARCH 30, 2021, TO JULY 13, 2021, U.S.D.C.-DISTRICT CONNECTICUT TO DISTRICT OF NEW JERSEY).

K11-15 – KAUL v CHRISTIE: 23-CV-03473/23-CV-22582 (JUNE 27, 2023, TO FEBRUARY 16, 2024-DISTRICT OF NEW JERSEY TO SOUTHERN DISTRICT OF FLORIDA).

K11-17 - KAUL v CPEP: 23-CV-00672 (DECEMBER 12, 2023, TO PRESENT-EASTERN DISTRICT OF NORTH CAROLINA).

JURISDICTION + VENUE

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.

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 North Carolina.

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.

Plaintiff Kaul’s denial of his application for licensure in the State of North Carolina was based on the illegal 2012/2014 suspension/revocation of his New Jersey license, and constitutes a “**new racketeering injury**” within the jurisdiction of the Eastern District of North Carolina, that confers on Plaintiff Kaul the right to sue in the United States District Court for the Eastern District of North Carolina.

PRELIMINARY STATEMENT

1. This case is about Defendants' perpetration of a knowingly illegal scheme against Plaintiff through, by and with the apparatus of state, that commenced in or around 2008, is ongoing in 2024, and which involved and involves willful violations of RICO and Plaintiff's human/civil/constitutional rights. The factual underpinning of this case, one of **The Kaul Cases**, is constituted of, amongst other things, admitted facts of the felonies of conspiracy/bribery/perjury/kickbacks/kidnapping/false indictment/false arrest/false imprisonment/attempted murder/public corruption/judicial corruption/securities fraud/wire fraud/witness tampering/evidence tampering/extortion/bankruptcy fraud/bank fraud. Defendants have caused and continue to cause ongoing/"new" injuries to Plaintiff Kaul's life/liberty/property/reputation, the continued causation of which is an attempt to conceal Defendants' prior and ongoing felonies.

2. K11-19 seeks to vindicate Plaintiff's rights, cause a cessation of the ongoing/"new" violations of Plaintiff's human/civil/constitutional rights, cause the levying against Defendants of compensatory/consequential/punitive damages. K11-19 seeks to cause a verdict consistent with the principles and holdings in **Jarkesy v SEC** (3:22-CV-00405), which find illegal the 2012 suspension/2014 revocation of Plaintiff's NJ medical license, the related 2019/2024 denial of licensure by the Texas Medical Board and the twelve-year-plus (12+) injuries to Plaintiff's life/liberty/property/reputation.

THE DETERMINATIVE RELEVANCE AND APPLICABILITY OF JARKESY v. SEC

3. In Jarkesy, the U.S.C.A. for the Fifth Circuit opined that:

“Other elements of the action brought by the SEC against Petitioners are more equitable in nature, but that fact does not invalidate the jury-trial right that attaches because of the civil penalties sought. The Supreme Court has held that the Seventh Amendment applies to proceedings that involve a mix of legal and equitable claims—the facts relevant to the legal claims should be adjudicated by a jury, even if those facts relate to equitable claims too. See Ross v. Bernhard, 396 U.S. 531, 537–38 (1970); see also Lipson, 278 F.3d at 662 (noting that the defendant was entitled to a jury trial because the SEC sought legal relief in the form of penalties, even though the SEC also sought equitable relief). Here, the SEC sought to ban Jarkesy from participation in securities industry activities and to require Patriot28 to disgorge ill-gotten gains—both equitable remedies. Even so, the penalty facet of the action suffices for the jury-trial right to apply to an adjudication of the underlying facts supporting fraud liability.” (Exhibit 1)

4. Defendant NJBME sought civil penalties (Exhibit 2), and both the revocation proceeding (April 9 to June 27, 2013) and the penalty phase (June 28, 2013) were conducted in a knowingly illegal manner by The Kaul Cases Defendant and NJ OAL ‘Judge’, James Howard Solomon, without a jury and within the ‘Star-like Chamber’ secrecy of a state administrative agency under the control of The Kaul Cases Defendant, Christopher J. Christie. As if these violations were not sufficient, Defendant NJBME in collusion/conspiracy with The Kaul Cases Defendants Christie/Solomon then caused the issuance on December 13, 2013, of a knowingly fraudulent ‘opinion’ in which there were two hundred and seventy-eight (278) separate instances of evidential falsification/perjury/evidential omission and a recommended civil penalty of \$300,000.

5. On March 24, 2014, Defendant NJBME increased this amount to \$475,000 and adopted the knowingly illegal December 13, 2013 ‘opinion’ in its totality, within a second ‘opinion’ that slandered Plaintiff’s character and competence. Further evidencing Defendant NJBME’s criminal state-of-mind and attempt to ‘cover-up’ its crimes is the fact that in the period from 2014 to 2019, all Plaintiff’s attempts to have his NJ license reinstated/re-issued were rejected based on Defendant NJBME’s assertion that it would not even consider the application until Plaintiff had paid the \$475,000 ‘fine’, despite Defendant NJBME knowing it was the product of fraud/crime and was itself a fraud/crime.

6. The Court concluded that the revocation of Petitioner’s trading licenses by the SEC were unconstitutional and held:

“In sum, we agree with Petitioners that the SEC proceedings below were unconstitutional. The SEC’s judgment should be vacated for at least two reasons: (1)

Petitioners were deprived of their Seventh Amendment right to a civil jury; and (2) Congress unconstitutionally delegated legislative power to the SEC by failing to give the SEC an intelligible principle by which to exercise the delegated power. We also hold that the statutory removal restrictions for SEC ALJs are unconstitutional, though we do not address whether vacating would be appropriate based on that defect alone.

We GRANT the petition for review, VACATE the decision of the SEC, and REMAND for further proceedings consistent with this opinion.” (Exhibit 1).

7. Plaintiff was not only deprived of his right to a jury trial, but was denied any due process within the administrative proceeding/penalty phase consequent to **The Kaul Cases** Defendants corruption of Defendants NJBME/Kaufman/Lomazow and NJ OAL ‘Judge’, James Howard Solomon, who all participated in a quid pro quo, in which they received bribes in exchange for a willful/knowingly illegal revocation of Plaintiff’s NJ license; a crime that caused and continues to cause injury to Plaintiff’s life/liberty/property/reputation in 2024.

BASIS FOR ALL DISTRICT STANDING

8. Plaintiff Kaul has standing to bring suit against any/all of The Kaul Cases Defendants in any district court within the United States District Court, because The Kaul Cases Defendants caused him an illegal injury in April 2012 in all states/districts by using the US wires to disseminate, through the entities of the National Practitioners Data Bank/Defendant TMB/Co-conspirator FSMB/All State Medical Boards, information regarding the knowingly fraudulent 2012 suspension/2014 revocation proceedings of Plaintiff Kaul's New Jersey license (Exhibit 3).

9. This information, procured through fraud and fraudulent in nature/form, was entered onto the official record and had the immediate injurious effect of preventing Plaintiff Kaul from obtaining a license in any/all states/districts.

10. Since April 2012, Plaintiff Kaul has continued to be caused injury in all states/districts because The Kaul Cases Defendants with Co-conspirator FSMB being the 'central cog' of the conspiracy, have perpetuated the injurious effect by obstructing Plaintiff Kaul's right/ability to procure a license and or have his NJ license reinstated (Exhibit 4).

11. Similarly, Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life/social standing/professional standing/physical standing have been injured an injury that has continued to be unlawfully exacerbated, consequent to The Kaul Cases Defendants willful/knowing and illegal obstruction of Plaintiff Kaul's litigation and license procurement efforts in the American courts and state medical boards (Exhibit 5).

12. On May 11, 2024, Plaintiff Kaul affirmatively re-established a licensing injury in every state, and in 2024, the fact that Plaintiff Kaul is not in possession of a license in any state/district, including New Jersey and Texas despite a persistent/material/concerted effort since 2012 (Plaintiff Kaul's attempts at a 'peaceful' negotiation were ignored/rejected), and despite admitted fact that the 2012/2014 NJ suspension/revocation were/are illegal, DOES irrefutably establish standing in all districts.

13. Almost all of The Kaul Cases Defendants/their lawyers have 'minimal contacts' with every state/district within the United States, and either benefit or have benefited from a 'stream of commerce' within that state/district, including Texas, and the one or two that do not, have used and continue to use the US wires/mail to cause injury to Plaintiff Kaul and to conduct personal/business affairs within all states/districts of the United States.

BASIS FOR NEW CLAIMS

14. The law - Lawlor v. Nat'l Screen Sers. Corp., 349 U.S. 322, 327 (1955)/ Sedima, S.P.R.L. v. Imrex Co., Inc., 473 U.S. 479 (1985)/ Agency Holding v. Malley-Duff, 483 U.S. 143 (1987)/ Continuing Violations Doctrine/Bodner v Banque Paribas 114 F.Supp.2d 117 (2000) - provides Plaintiff Kaul the right to continue to file new claims against **The Kaul Cases** Defendants and others based on the ongoing/"new" injuries to his life/liberty/property/reputation that continue to remain un-remediated/un-rectified/non-compensated and that continue to be caused by **The Kaul Cases** Defendants ongoing/"new" violations of Plaintiff Kaul's human/civil/constitutional rights.

CONTROLLING LEGAL AUTHORITY AND KNOWING ILLEGALITY OF 2012 SUSPENSION/2014 REVOCATION OF NJ LICENSE

15. Defendants continuing liability in 2024 stems from the un-remediated crimes/violations/wrongdoing that they knowingly/willfully/with malice aforethought, committed and continue to commit against Plaintiff Kaul in a period that commenced in or around 2005 and is ongoing in 2024.

Lack of Authority:

16. Defendants knew in 2005 that their scheme to have Plaintiff Kaul's license revoked within the New Jersey administrative state apparatus was illegal and unconstitutional, but yet proceeded to perpetrate their abuse of power scheme in the conviction that:

(i) they had all the power and Plaintiff Kaul had none.

(ii) Plaintiff Kaul would be unable to find a lawyer who knew that for Defendants to have revoked Plaintiff's license would require the case be placed before an Article III Judge and a jury.

(iii) **The Kaul Cases** Defendant, Christopher J. Christie, was the then governor, who entered a series of quid pro quo schemes with **The Kaul Cases** Defendants, in which he had received bribes in exchange for abusing his executive power to have Plaintiff Kaul's license revoked.

(iv) the medical board, the attorney general and the office of administrative law, the three agencies involved in the revocation, were all part of the executive branch of state, which was singularly controlled by **The Kaul Cases** Defendant, Christie.

(v) even if Plaintiff Kaul found a lawyer who knew that jurisdiction for the revocation proceeding resided in federal court, he would be intimidated by the political forces surrounding the case and would refuse to assist Plaintiff Kaul.

(vi) consequent to the conspiratorial conclusion of the revocation, Plaintiff Kaul, absent a license and livelihood, would engage in the illegal practice of medicine. Defendants planned to use this anticipated violation to have Plaintiff Kaul criminally indicted, in order to then manufacture a conviction that they believed would bolster their knowingly illegal administrative scheme, and would eliminate Plaintiff Kaul and the threat of his exposing their criminal scheme. This was just one of many 'Kaul Elimination Schemes' (2012-2024) perpetrated by The Kaul Cases Defendants by/through/with the investigative-prosecutorial-adjudicative agencies of both NJ state and federal government (D.N.J.) against Plaintiff Kaul purposed to have him jailed/'suicided'/deported/killed.

17. Defendants are precluded from claiming ignorance of these facts, as they were advised on the record on June 13, 2012, by Plaintiff Kaul's then lawyer as to the illegality of their actions (Exhibit 6). That it took twelve (12) years to independently establish that an administrative agency seeking to deprive a person of a license critical to their livelihood, must place the matter before an Article III judge and jury (Exhibit 1), constitutes further evidence of Defendants guilty state-of-mind and accounts for their ongoing commission of ever more serious felonies (kidnapping/false indictment/false arrest/false imprisonment/attempted murder). It evidences the fact that Defendants knew from the 2005 commencement of their scheme that their actions were criminal, a criminality they believed would not be exposed and a criminality they attempted to 'cover-up' through grand schemes of political/judicial corruption.

18. As an example of how these grand schemes of corruption are exposed, there is currently in the UK a public investigation of how in a period from 2006 to 2016, the Post Office caused the wrongful convictions and incarcerations of hundreds of innocent sub-postmasters, who were falsely accused of stealing money:

https://www.youtube.com/watch?v=fo_a4gCdzhg&t=4s

Defendants crimes are as equally heinous as those of their corrupt British counter-parts, which explains their visceral fear of discovery and or trial, as it will cause their incarceration, as will occur to their British counter-parts and as they attempted on many occasions (state/federal) to cause to Plaintiff Kaul.

19. In K5, Plaintiff Kaul set forth other bases for the unlawfulness, unconstitutionality and illegal configuration of the process of physician regulation in state medical boards and particularly New Jersey (Exhibit 7).

STATEMENT OF FACT

20. The factual underpinning of the case consists of the admitted fact within the May 15, 2024, PETITIONER ... NOTICE OF FACTS ADMITTED IN PROCEEDINGS WITH A DIRECT CONNECTION TO THE ISSUES ON APPEAL (CASE NO. 24-1417 IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT) (Exhibit 7). This corpus of fact extends from 2008 to 2024 and pursuant to RICO's doctrine of vicarious liability confers culpability of the entire corpus of fact on all THE KAUL CASES Defendants.

FACTS AS TO DEFENDANT TEXAS MEDICAL BOARD:

21. The facts relevant to the proof of the claims against Defendant Kaufman are found within the ADMISSION OF MATERIAL AND UNDISPUTED FACT OF DEFENDANT NEW JERSEY BOARD OF MEDICAL EXAMINERS filed in support of Plaintiff's contemporaneously filed motion for SUMMARY JUDGMENT. The admitted facts are organized chronologically, with relevance to the specific violation of law/rights and applicability to the elements of the within legal claims.

22. In June 2012 and March 2014, Defendant NJBME disseminated across the US wires and through the National Practitioners Data Bank, information pertaining to the knowingly illegal suspension and revocation of Plaintiff Kaul's NJ license.

23. Defendant TMB received this information via the US wires and the National Practitioners Data Bank.

24. Defendant TMB knew the suspension and revocation were illegal, but failed to report the crimes to state or federal authorities.

25. Instead, Defendant TMB entered, a subjugate member of The Kaul Cases Defendant, FSMB, did enter into a conspiracy with Defendant NJBME and The Kaul Cases Defendant FSMB purposed to prevent Plaintiff from obtaining a license in Texas.

26. In 2020, Defendant TMB denied Plaintiff's application for licensure based on the knowingly illegal 2014 revocation in New Jersey and then in 2024, Defendant TMB denied Plaintiff's application for licensure based on the knowingly illegal 2014 revocation in New Jersey (Exhibit 8).

27. In a period commencing in 2016, Defendant TMB did come to know of The Kaul Cases and of the evidence/admitted facts of the illegality of the 2014 revocation.

28. In a period from 2016 to the present, Defendant TMB has continued to fail to report the crimes of Defendant NJBME to state and or federal authorities.

29. In a period from 2012 to the present, Defendant TMB has remained in a knowingly illegal conspiracy with Defendant NJBME and The Kaul Cases Defendant FSMB against Plaintiff Kaul,

30. This conspiracy has continued to violate Plaintiff Kaul's human/civil/constitutional rights.

31. Defendant TMB was sued in the United States District Court for the Eastern District of Texas in 2008 by the American Association of Physicians & Surgeons (Exhibit 9) for, amongst other things, its **"pervasive and continuing violations of constitutional rights of its members by the Defendants, including the Defendant Texas Medical Board ("TMB"). On behalf of its members, AAPs complains about Defendants': manipulation of anonymous complaints; conflicts of interest; violation of due process; breach of privacy; retaliation against those who speak out."**

FACTS AS TO DEFENDANT NEW JERSEY BOARD OF MEDICAL EXAMINERS:

32. The facts relevant to the proof of the claims against Defendant NJBME are found within THE STATEMENT OF MATERIAL AND UNDISPUTED FACT OF DEFENDANTS NEW JERSEY BOARD OF MEDICAL EXAMINERS/ANDREW KAUFMAN/STEVEN LOMAZOW (Exhibit 10). The facts are organized chronologically, with relevance to the specific violation of law/rights and applicability to the elements of the within legal claims. Pursuant to RICO's doctrine of vicarious liability, every fact within this almost twenty (20) year-long corpus of past/ongoing/"new" fact as to each Defendant is ascribable to every Defendant. Pursuant to RICO, **"the crime of one becomes the crime of all"**. See Salinas v. United States, 522 U.S. 52 (1997) + U.S. v. Coonan, 671 F. Supp. 959 (S.D.N.Y. 19867).

33. Plaintiff sued Defendant NJBME in the United States District Court on seven (7) separate occasions between February 22, 2016, and March 30, 2021:

KAUL v CHRISTIE: 16-CV-02364 (K1) (Exhibit 1: Total Pages 5 of 303).

KAUL v CHRISTIE: 18-CV-08086 (K2) (Exhibit 1: Total Pages 6 of 303).

KAUL v FEDERATION: 19-CV-3050 (K5) (Exhibit 1: Total Pages 7 of 303).

KAUL v FEDERATION: 20-CV-01612 (K7) (Exhibit 1: Total Pages 7 of 303).

KAUL v FEDERATION: 21-CV-00057 (K11-1) (Exhibit 1: Total Page 7 of 303).

KAUL v BOSTON PARTNERS: 21-CV-10326 (K11-2) (Exhibit 1: Total Pages 7 of 303).

KAUL v MURPHY: 21-CV-00439 (K11-4) (Exhibit 1: Total Pages 7 of 303).

34. Defendant NJBME did not deny any of the facts, and thus pursuant to Rule 8(b)(6) Defendant NJBME did admit them, for which it assumed culpability in conjunction with the culpability of all other facts of the entire corpus of fact of all THE KAUL CASES that it assumed through RICO's doctrine of vicarious liability.

35. These admitted facts conclusively substantiate against Defendant NJBME to the Summary Judgment standard, the levied charges of, amongst other things,

conspiracy/bribery/perjury/kickbacks/kidnapping/false indictment/false arrest/false imprisonment/attempted murder/public corruption/judicial corruption/securities fraud/wire fraud/witness tampering/evidence tampering/extortion/bankruptcy fraud/bank fraud.

36. Similarly, it is a fact that Defendant NJBME is defenseless, as not only are the facts admitted, but throughout **THE KAUL CASES** Defendant NJBME failed to contest/rebut/refute any of the differentiations that Plaintiff Kaul submitted in reply to the hundreds of legal citations/statutes/rules that he submitted as part of his purported defense.

FACTS AS TO DEFENDANT KAUFMAN:

37. The facts relevant to the proof of the claims against Defendant NJBME are found within THE STATEMENT OF MATERIAL AND UNDISPUTED FACT OF DEFENDANTS NEW JERSEY BOARD OF MEDICAL EXAMINERS/ANDREW KAUFMAN/STEVEN LOMAZOW (**Exhibit 10**). The facts are organized chronologically, with relevance to the specific violation of law/rights and applicability to the elements of the within legal claims. Pursuant to RICO's doctrine of vicarious liability, every fact within this almost twenty (20) year-long corpus of past/ongoing/"new" fact as to each Defendant is ascribable to every Defendant. Pursuant to RICO, "the crime of one becomes the crime of all". See Salinas v. United States, 522 U.S. 52 (1997) + U.S. v. Coonan, 671 F. Supp. 959 (S.D.N.Y. 19867).

38. Plaintiff sued Defendant Kaufman in the United States District Court on five (5) separate occasions between February 22, 2016, and March 30, 2021:

KAUL v CHRISTIE: 16-CV-02364 (K1) (**Exhibit 1**: Total Pages 5 of 303).

KAUL v CHRISTIE: 18-CV-08086 (K2) (**Exhibit 1**: Total Pages 6 of 303).

KAUL v FEDERATION: 19-CV-3050 (K5) (**Exhibit 1**: Total Pages 7 of 303).

KAUL v BOSTON PARTNERS: 21-CV-10326 K11-2) (**Exhibit 1**: Total Pages 7 of 303).

KAUL v MURPHY: 21-CV-00439 (K11-4) (**Exhibit 1**: Total Pages 7 of 303).

39. Defendant Kaufman did not deny any of the facts, and thus pursuant to Rule 8(b)(6) Defendant Kaufman did admit them, for which he assumed culpability in conjunction with the culpability of all other facts of the entire corpus of fact on all **THE KAUL CASES** that he assumed through RICO's doctrine of vicarious liability.

40. These admitted facts conclusively substantiate against Defendant Kaufman to the Summary Judgment standard, the levied charges of, amongst other things, conspiracy/bribery/perjury/kickbacks/kidnapping/false indictment/false arrest/false imprisonment/attempted murder/public corruption/judicial corruption/securities fraud/wire fraud/witness tampering/evidence tampering/extortion/bankruptcy fraud/bank fraud.

41. Similarly, it is a fact that Defendant Kaufman is defenseless, as not only are the facts admitted, but throughout **THE KAUL CASES** Defendant Kaufman failed to contest/rebut/refute

any of the differentiations that Plaintiff Kaul submitted in reply to the hundreds of legal citations/statutes/rules that he submitted as part of his purported defense.

FACTS AS TO DEFENDANT LOMAZOW:

42. The facts relevant to the proof of the claims against Defendant NJBME are found within THE STATEMENT OF MATERIAL AND UNDISPUTED FACT OF DEFENDANTS NEW JERSEY BOARD OF MEDICAL EXAMINERS/ANDREW KAUFMAN/STEVEN LOMAZOW (**Exhibit 10**). The facts are organized chronologically, with relevance to the specific violation of law/rights and applicability to the elements of the within legal claims. Pursuant to RICO's doctrine of vicarious liability, every fact within this almost twenty (20) year-long corpus of past/ongoing/"new" fact as to each Defendant is ascribable to every Defendant. Pursuant to RICO, "the crime of one becomes the crime of all". See Salinas v. United States, 522 U.S. 52 (1997) + U.S. v. Coonan, 671 F. Supp. 959 (S.D.N.Y. 19867).

43. Plaintiff sued Defendant Lomazow in the United States District Court on three (3) separate occasions between February 22, 2016, and March 30, 2021:

KAUL v CHRISTIE: 16-CV-02364 (K1) (**Exhibit 1**: Total Pages 5 of 303).

KAUL v FEDERATION: 19-CV-3050 (K5) (**Exhibit 1**: Total Pages 7 of 303).

KAUL v BOSTON PARTNERS: 21-CV-10326 (K11-2) (**Exhibit 1**: Total Pages 7 of 303).

44. Defendant Lomazow did not deny any of the facts, and thus pursuant to Rule 8(b)(6) Defendant Lomazow did admit them, for which he assumed culpability in conjunction with the culpability of all other facts of the entire corpus of fact of all **THE KAUL CASES** that he assumed through RICO's doctrine of vicarious liability.

45. These admitted facts conclusively substantiate against Defendant Lomazow to the Summary Judgment standard, the levied charges of, amongst other things, conspiracy/bribery/perjury/kickbacks/kidnapping/false indictment/false arrest/false imprisonment/attempted murder/public corruption/judicial corruption/securities fraud/wire fraud/witness tampering/evidence tampering/extortion/bankruptcy fraud/bank fraud.

46. Similarly, it is a fact that Defendant Lomazow is defenseless, as not only are the facts admitted, but throughout **THE KAUL CASES** Defendant Lomazow failed to contest/rebut/refute any of the differentiations that Plaintiff Kaul submitted in reply to the hundreds of legal citations/statutes/rules that he submitted as part of his purported defense.

47. In 2013, Defendant Lomazow was recorded discussing the untimely/sudden 2006 death of Paul Kenney, a New Jersey deputy attorney general who was about to expose the pervasive corruption within Defendant NJBME:

<https://www.youtube.com/watch?v=sFtE8EvEMsU>

LEGAL CLAIMS

48. The individual Defendants – NJBME/Kaufman/Lomazow – and Co-conspirators – Christie/Chiesa/Kanefsky/Solomon/Hafner – are all separately and jointly liable for the pled past/ongoing/“new” offenses and injuries caused to Plaintiff Kaul, and as such the pleading term ‘Defendants Kaufman/Lomazow/NJBME and Co-conspirators Christie/Chiesa/Kanefsky/Solomon/Hafner’ reflects, communicates and is to be understood as meaning exactly and explicitly this.

COUNT ONE

Association-In-Fact Enterprise: Texas Medical Board-New Jersey Medical Board-New Jersey Office of Administrative Law-Office of the New Jersey Attorney General (“TMB-NJMB-NJOAL-NJAG Association-In-Fact Enterprise”)

Defendant Persons: NJBME/Kaufman/Lomazow

Co-conspirators: Christie/Chiesa/Kanefsky/Solomon/Hafner

RICO Predicate Acts: Mail Fraud/Wire Fraud/Public Corruption/Bribery/Perjury/Fraud on the Court

Overview:

49. **“Federation Cartel”-Structure and Liability:** Defendants TMB and NJBME are subjugate members of The Kaul Cases Defendant Federation of State Medical Boards (“FSMB”), an entity domiciled in Texas, and a for-profit entity that exists/operates as a monopolistic cartel (**“Federation Cartel” – “FC”**) of the multi-billion-dollar industry of so called ‘physician regulation and disciplining’. However, the cartel-like structure of the **“FC”** confers equally on all subjugate members the liability of offenses/violations of the law and human/civil/constitutional rights committed by one member of the **“FC”**. Thus, Defendant TMB is an equally liable for the crimes/violations perpetrated by Defendant NJBME against Plaintiff Kaul, and Defendant NJBME is as equally liable for those committed by Defendant TMB against Plaintiff Kaul. The **“FC”** exists/functions/acts as ‘one unit’, in that **“the crime of one becomes the crime of all”**.

50. In a time period commencing in or around 2005, the Defendants did conspire to commit, and did commit a knowingly illegal “pattern of racketeering” and did convert the New Jersey Medical Board-New Jersey Office of Administrative Law-Office of the New Jersey Attorney General into the **“NJMB-NJOAL-NJAG Association-In-Fact Enterprise”** through and under cover of which they perpetrated the RICO predicate acts of Mail Fraud/Wire Fraud/Public Corruption/Bribery/Perjury/Fraud on the Court that in conjunction with the other RICO schemes, were purposed to eliminate Plaintiff Kaul by attempting to prohibit his access to the courts for compensatory redress/re-procurement of a livelihood.

51. As a New Jersey administrative law judge, Co-conspirator Solomon was subjugated to the executive branch of the New Jersey government, of which Co-conspirator Christie, as the then governor, was the ‘executive’.

52. In a period between 2010 and 2012, Co-conspirator Solomon entered into a quid pro quo with, amongst others, The Kaul Cases Defendant, Allstate Insurance Company, in which he exited retirement for the sole purpose of adjudicating Plaintiff Kaul's 2013 licensing case/hearing. This quid pro quo scheme was orchestrated by Co-conspirator Christie and involved the funneling of bribes from Co-conspirator Allstate to Co-conspirator Solomon in return for which he would, in a knowingly criminal act, order the illegal revocation of Plaintiff Kaul's New Jersey license on December 13, 2013.

53. The benefit that inured to Co-conspirator Christie from this scheme was the revocation of Plaintiff Kaul's license, a knowingly illegal act, for the perpetration of which he had received bribes from Co-conspirator Allstate and others.

54. The benefit that inured to Co-conspirator Solomon was that he would re-enter retirement a much wealthier man than when he exited.

55. The benefit that inured to Defendants Kaufman and Lomazow was an illegal per se monopolization of the minimally invasive spine surgery market, through the illegal elimination of Plaintiff Kaul and his outpatient surgery centers, and the increased business referrals from neurosurgeons/hospitals for having caused such an anticompetitive injury to the outpatient minimally invasive spine surgery market.

56. The benefit that inured to Defendant NJBME and its members pertained to its abuse of power and its members motivation to not be dismissed from state positions by Co-conspirator Christie and forfeit their state pensions.

57. The benefit that inured to Co-conspirator Allstate/other insurance carriers was that the revocation related non-payment of monies owed to Plaintiff Kaul for the provision of professional services, would translate into increased executive/shareholder compensation.

58. Co-conspirator Christie knew that the illegal revocation of Plaintiff Kaul's license would benefit Co-conspirator Allstate/other insurance carriers in that Co-conspirator Allstate would use it as an excuse to not pay Plaintiff Kaul for medical services he had rendered to Co-conspirator Allstate/other insurance carriers' fee-paying customers who had sustained auto-accident-related injuries.

59. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Christie/Chiesa/Kanefsky/Solomon/Hafner knew that their scheme constituted an illegal theft of services and deprivation of Plaintiff Kaul's livelihood right.

60. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Christie/Chiesa/Kanefsky/Solomon/Hafner did nonetheless use the apparatus of state to perpetrate a knowingly illegal scheme from which they all profited at the expense of Plaintiff Kaul's life/liberty/property/reputation.

2005 - 2012

61. Defendants knowingly illegal scheme to revoke Plaintiff Kaul's license commenced in or around 2005, shortly after Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive spinal fusion:

<https://www.youtube.com/watch?v=JX4bnRPPucl&t=17s>

62. In 2007/8, Defendants scheme came to involve Co-conspirator Christie, who entered into a series of quid pro quo schemes with The Kaul Cases Defendants, in which he demanded bribes in exchange for abusing state executive power to have Plaintiff Kaul's license revoked.

63. Co-conspirator Christie, in using the NJ governorship as a political weapon to exact bribes/extort monies from those seeking favors/looking to escape extortionate criminal indictments filed by his subjugate attorney general, did signal his intent to trade the resources/power of the State of New Jersey in quid pro quo schemes with anyone willing to bribe him.

64. Defendants Kaufman/Lomazow and Co-conspirator Allstate, having perpetrated schemes of judicial corruption within the State of New Jersey since at least 1999, did through intermediaries propose to Co-conspirator Christie such a quid pro quo, in which monies were funneled into Co-conspirator Christie's offshore financial vehicles and political campaign/businesses associated with him and from which he directly profited.

65. In the conceiving/planning/execution of this scheme, Defendants Kaufman/Lomazow and Co-conspirators Christie/Allstate agreed upon the value of the bribes and the method in which they would be delivered, with a percentage being funneled before the revocation (2010-2013) and the balance after the revocation (2014).

66. The planning/development of the scheme involved Defendants Kaufman/Lomazow and Co-conspirators Christie/Allstate use of the US wires in the exchange of information that included, amongst other things, which persons would be involved, the extent of their knowledge of the scheme's illegality, the risk of information leaks prior to the April 2, 2012, filing of the revocation case against Plaintiff Kaul and how to manipulate the media into propagating their knowingly fraudulent narrative.

67. A critical part of the scheme was choosing an administrative law judge whose career had ended and whom they believed needed the money, would take the risk of participating in the scheme and would lose little if the scheme was exposed.

68. Defendants recommended Co-conspirator Solomon to Co-conspirators Christie/Allstate as such an individual.

69. In the period from 2005 to 2011, there were multiple communications (digital/non-digital) meetings and negotiations between Defendants and Solomon and Co-conspirators Christie/Allstate, in which they agreed upon the terms of their quid pro quo schemes.

70. Co-conspirator Allstate provided Defendants Kaufman/Lomazow and Co-conspirator Solomon a similar but lesser deal as the one they agreed upon with Co-conspirator Christie, but stipulated in their corrupt pact with Co-conspirator Solomon that their lawyers would co-draft his fraudulent opinion/order (December 13, 2013).

71. In the discussions regarding the contents of the final opinion/order, many of which were conducted over the US wires and others in face-to-face meetings, Defendants and Co-conspirators Allstate/Solomon agreed that all of Plaintiff Kaul's witnesses (15) would be found not credible and all of Co-conspirator Christie's witnesses would be found credible.

72. It was also agreed that any/all evidence that supported Plaintiff Kaul's case and undermined Defendant Christie's case would be excluded and that all evidence that undermined Plaintiff Kaul's case and supported Defendant Christie's case would be included and amplified.

73. It was also agreed that evidence would be falsified and tampered with as deemed necessary to substantiate the revocation and penalties.

74. It was also agreed that Defendant Kaufman, a Co-conspirator Christie witness would be treated with immense respect, while Plaintiff Kaul and his witnesses would be demeaned and harassed.

75. It was also understood that Defendants Kaufman/Lomazow and Co-conspirator Christie's then deputy attorney general, Co-conspirator Doreen Hafner would coerce and cajole some of Plaintiff Kaul's patients into perjuring themselves by providing knowingly false testimony against Plaintiff Kaul.

76. It was also understood that state persons working under Co-conspirator Christie would telephone Plaintiff Kaul's patients seeking to have them fabricate complaints about the care they received from Plaintiff Kaul.

77. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie knew that evidential falsification/witness tampering/subornation perjury/fraud were crimes under state/federal law, but yet persisted in their prolonged perpetration as they believed Plaintiff Kaul would never expose their criminal conspiracy as he would be jailed/psychologically incapacitated/killed or otherwise unable to survive due to economic/reputational destruction.

78. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie believed that even if Plaintiff Kaul did expose their crimes, he would not be able to initiate legal action as he would have no money to retain a lawyer and did not himself know the law.

79. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie believed that even if Plaintiff Kaul taught himself the law, he would be unsuccessful in prosecuting a lawsuit as Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie along with The Kaul Cases Defendants would bribe and or otherwise corrupt state/federal judges into dismissing his cases.

80. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie believed that if Plaintiff Kaul were able to mount a legal challenge, it would be limited to the filing of one lawsuit with the venue restricted to the District of New Jersey, a district in which they controlled the judges.

81. Defendants believed that the restriction to the District of New Jersey would cause Plaintiff Kaul's one and only lawsuit to be dismissed with prejudice by a judge who had been bribed by The Kaul Cases Defendants.

82. In the 2008-2012 planning of the scheme, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie never imagined that in 2024 their crimes would be before the United States District Court for the Western District of Texas, the circuit in which in which the holding of the 5th Circuit in Jarkesy is now binding law.

83. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie inability to imagine such a scenario accounts for their shameless and knowingly willful commission of crime.

84. The malice with which the crimes were committed reflects Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie criminal state-of-mind

85. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie agreed that as soon as Plaintiff Kaul's license was revoked (March 24, 2014), the members of Defendant NJBME would be dismissed in the belief it would immunize them from civil and or criminal prosecution.

86. It was agreed that the members upon dismissal would not discuss the case with anybody and would attempt to conceal their role in the conspiracy against Plaintiff Kaul and their knowledge that they did not have the authority to revoke Plaintiff Kaul's license without a jury hearing.

87. It was also agreed that the members would not disclose any information about the bribes and 'pay-offs' they received from Co-conspirator Allstate/others just prior to their dismissal, purposed to induce them to remain silent about their crimes even if placed under oath.

2012-2014

88. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie, having agreed upon the terms of their quid pro quo arrangements and the operative/structural elements of their scheme, did agree that it's perpetration against Plaintiff Kaul would commence on April 2, 2012, with the filing of a complaint to revoke his license, to be accompanied with widespread highly defamatory media coverage over the internet, radio, tv and print.

89. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie discussed the scheme in military terms as being like that of a legal media 'blitzkrieg' that Defendants were convinced would cause Plaintiff Kaul to simply 'disappear' under a 'barrage' of legal action, civil investigations, criminal investigations, and continuously negative media coverage.

90. A critical element of the scheme was to attempt to isolate Plaintiff Kaul from any kind of professional/economic/social support in order that he be unable to find legal representation, medical experts, and or witnesses to testify on his behalf.

91. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner, in believing that Plaintiff Kaul would indeed be professionally/economically/socially isolated and thus either unable to mount any defense or a minimal defense did schedule only six (6) days for the April 9, 2013, NJ OAL hearing, most of which they believed would be occupied by the testimony of their witnesses.

92. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner believed that Plaintiff Kaul would depart the United States shortly after the commencement of their 2012 legal media 'blitzkrieg', or as communicated to one of Plaintiff Kaul's then lawyers (Paul Schaff) by a person within the office of the NJ AG: **"He [Kaul] is probably going to pack his bags and leave"**

93. It was this mistaken belief regarding Plaintiff Kaul's departure that caused Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner to experience no sense of risk/danger in perpetrating their crimes by, through and with state persons/authority/apparatus.

94. This mistaken belief was further bolstered by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner conviction that Defendant Christie would become the 2016 US President, and would, if Plaintiff Kaul did not depart, use his power to have Plaintiff Kaul eliminated, in the same manner as he had abused the power of the office of the US Attorney (2001-2009) to eliminate his political opponents (Democratic donor Charles Kushner/Governor James McGreevey/Mayor Sharpe James) and or those who refused to support him (Fort Lee Mayor Mark Sokolich). Political Gangsterism.

95. With the commencement of the scheme on April 2, 2012, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner

used the US wires to exchange information regarding media coverage, legal proceedings and the ongoing incitement and conspiracy with patients/insurance companies to file lawsuits against Plaintiff Kaul, as part of Defendants 'blitzkrieg'.

96. In the time period from April 2, 2012, to August 2012 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner and their agents used the US wires to disseminate orders to every legal/medical professional in New Jersey to refuse to assist Plaintiff Kaul if he/his lawyer so requested, the purpose being to render him unable to fight the revocation case.

97. Shortly after the April 2, 2012, commencement, persons who had initially pledged support did withdraw, a withdrawal that coincided with the rescindment of loans/closure of accounts by The Kaul Cases Defendant TD, Plaintiff Kaul's then bank. A central element of the scheme was the destruction of Plaintiff Kaul's economic standing.

98. Despite the highly concerted and conspiratorial organization of the scheme, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others were not successful in preventing Plaintiff Kaul from finding counsel to prepare an opposition to the revocation case.

99. However, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others inability to prevent Plaintiff Kaul's case preparation did not deter them from continuing their sabotage, and approximately two (2) weeks before the April 9, 2013, commencement of the hearing with Co-conspirator Solomon, Plaintiff Kaul's then lawyers were told by Co-conspirator Christie/agents that Co-conspirator Solomon had been ordered to revoke Plaintiff Kaul's license regardless of what evidence he presented.

100. Consequently, two (2) weeks before the hearing commencement, Plaintiff Kaul's lawyers demanded \$200,000 with the threat that if Plaintiff Kaul did not pay them within twenty-four (24) hours they would withdraw from the case,

101. Twenty-four (24) hours later they withdrew from the case as Plaintiff Kaul did not have the funds and had already paid them approximately \$200,000.

102. Within three (3) days a lawyer with whom Plaintiff Kaul had worked since 2007 agreed to represent him at the hearing, which commenced on April 9 and concluded on June 28, 2023.

103. On December 13, 2013, Defendant Solomon issued a knowingly fraudulent opinion/order and used the US wires to transmit the document in furtherance of the scheme of Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others and The Kaul Cases Defendants to destroy Plaintiff Kaul's life/liberty/property.

104. Co-conspirator Solomon recommended revocation and a three hundred thousand dollar (\$300,000) 'fine'. He knew this number was purposed to extort Plaintiff Kaul, knew it was illegal, knew it was part of illegal scheme and knew it was caused into existence through nothing but Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others criminal conspiracy.

105. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon-lawyer/Christie-lawyer/Kanefsky-lawyer/Hafner-lawyer/others knew that that December 13, 2013, opinion/order was a 'Fraud on the Court', a fraud that was illegally incorporated into multiple subsequent state legal proceedings which caused the issuance of fraudulent judgements/multi-million-dollar payouts on fraudulent medical malpractice claims.

106. In the time period from April 2, 2012, to December 13, 2013, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon-lawyer/Christie-lawyer/Kanefsky-lawyer/Hafner-lawyer/others scheme caused Plaintiff Kaul's corporations to file for Chapter 11 bankruptcy, caused the fraudulent filing of multiple lawsuits against Plaintiff Kaul in state/federal courts in New Jersey by ex-patients/insurance companies (Defendant Allstate/The Kaul Cases Defendant Geico) and other persons/entities who owed money to Plaintiff Kaul's corporations.

107. Co-conspirator Solomon's knowingly fraudulent opinion/order was disseminated across the US wires/internet to state/federal/international healthcare/regulatory agencies (state medical boards/DEA) and state/federal investigative/prosecutorial/adjudicative agencies as part of Defendants ongoing attempt to eliminate Plaintiff Kaul.

2014 – 2023:

108. From the inception of Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others scheme, it was their intention to destroy Plaintiff Kaul's life/property and to deprive him of his liberty, and to do so through an ongoing deprivation of his economic/reputational standing in order to attempt to prevent him from exposing their crimes.

109. The Kaul Cases Defendants conspiracy, which includes Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others, commenced in 2005/6 and its ongoing-ness in 2024 is consequent to The Kaul Cases Defendants scheme to attempt to prevent Plaintiff Kaul from causing further evidential exposure of their crimes.

110. The conspiracy's ongoing-ness is one cause of the continued cause of action generation. The Kaul Cases Defendants are trapped between either admitting their crimes/remediating Plaintiff Kaul (NJ license reinstatement/compensation/public apology) or devoting decades/millions dollars to defending against The Kaul Cases.

111. In this time period Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others did come to know that if Plaintiff Kaul were to continuing prosecuting claims against them, he would ultimately prevail in procuring remedies to the eleven-year-plus (12 +) injuries (2012-2024) they have caused and continue to cause Plaintiff Kaul.

112. In this knowledge and seeking to “shut Kaul down” The Kaul Cases Defendants did bribe senators/judges and corrupt courts in an attempt to thwart Plaintiff Kaul’s prosecution of The Kaul Cases, one example being the corruptly engineered September 12, 2022, purported injunction from a district judge in New York, that is an admitted ‘Fraud on the Court’, in invalid and in which the district judge is terminally conflicted, consequent to disciplinary complaints and having been sued by Plaintiff.

113. However, immediately after the March 24, 2014, revocation, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others and others were convinced they had ‘gotten away’ with their crimes of bribery/subornation perjury/evidential tampering/witness tampering/wire fraud/public corruption/honest services fraud/kickbacks and overall “patterns of racketeering”.

114. Co-conspirator Allstate in finalizing the final bribes to Defendants Kaufman/Lomazow/NNJBME and Co-conspirators Christie/Solomon did continue to use the US wires in the transmission of confirmation of how and where the bribes were transmitted, such was their confidence that Plaintiff Kaul would be caused to cease to exist.

115. From 2014 to 2016, Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others continued to perpetuate the publishing of defamatory articles about Plaintiff Kaul, to coincide with every illegal judgment from every illegal case filed in the New Jersey courts.

116. Every time a defamatory article was published, the New Jersey journalists (Lindy Washburn/Susan Livio) would enquire of Plaintiff Kaul’s then lawyer if Plaintiff Kaul had left the country, the reason being that if he had, it would signal to The Kaul Cases Defendants a minimal likelihood of their crimes being exposed. Livio/Washburn did The Kaul Cases Defendants bidding.

117. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others intended and knew that the illegal cases/deleterious effects precipitated by the events of the previous years (2010-2014) would continue for many years (2014-2023) and would cause “ongoing” and “new” injuries to Plaintiff Kaul in many jurisdictions.

118. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others knew that the illegal cases would continue

in the New Jersey courts as the state judges, many appointed and still under the gubernatorial control of Defendant Christie, would ensure knowingly illegal multi-million-dollar judgements against Plaintiff Kaul.

119. In January 2019, Co-conspirator Allstate, central to the criminal conspiracy and having filed knowingly false lawsuits against Plaintiff Kaul since 2006/7 purposed to harass/deprive Plaintiff Kaul of payments due him, did procure an illegal judgment for almost six million dollars (\$6,000,000) from a state court judge appointed by Defendant Christie.

120. Co-conspirator Allstate and other insurance companies had since at least 1999 been involved in a massive racketeering scheme within the New Jersey courts in which they bribed judges in return for entering judgements against physicians and other so called 'healthcare providers'.

121. The purpose of this racket was to eliminate physician/surgical center market competitors and increase executive/shareholder compensation through theft of services/extortion perpetrated under the cover of corrupt judges/courts/politicians.

122. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner continuation of this **"ongoing"** court-based racket against Plaintiff despite the Wall Street Journal's September 2021 articles regarding judicial corruption/recent 2023 subpoenas by the Senate Judiciary Committee as to persons who participated in judicial corruption, evidences the risk they and others were prepared to take to attempt to prevent Plaintiff Kaul from further exposing their past/ongoing crimes.

123. In this period, occurring concurrently with Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner/others corruption of the courts, has been their conspiracy with The Kaul Cases Defendant Federation of State Medical Boards to obstruct Plaintiff Kaul's efforts to have his illegally revoked NJ license reinstated and or obtain a license in any other state including Texas, willful injuries that are ongoing, cumulative, and compounding in their causation of monetary damages.

124. In three (3) of The Kaul Cases (K5/K11-15/K11-17), the Defendants waived an opportunity to mitigate their damages in refusing to discuss settlement, as ordered, at a Rule 26 ordered conference in K5 on January 26, 2021, at a Rule 26 ordered conference in K11-15 on October 20, 2023, and as ordered on March 13, 2024, in K11-17.

125. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner contumaciousness in continuing to violate Plaintiff Kaul's human/civil/constitutional rights by obstructing his licensing reinstatement/issuance efforts and his good faith efforts at dispute mediation are continuing to cause **"new racketeering injuries"** to Plaintiff Kaul's life/liberty/livelihood for which the law substantiates new claims (Lawlor v. National Screen Service Corp., 349 U.S. 322 (1955); Sedima, S.P.R.L. v. Imrex Co., Inc., 473 U.S. 479 (1985) as are now filed in K11-19, and will continue to be filed until

the current twelve-plus-years (12+) worth-of-injury caused to Plaintiff Kaul by The Kaul Cases Defendants are compensated/remediated/caused to cease.

COUNT TWO

Violation of Civil Rights

Symbiosis of State/Private Actors

126. The 'state actor' Symbiotic test and the official state actor designation confirm that Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner have 'state actor' status for the purpose of a section 1983 claim.

127. The 'state actor' Joint Participation Doctrine test and the official state actor designation confirm that Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner have 'state actor' status for the purpose of a section 1983 claim.

128. The 'state actor' State Command and Encouragement test and the official state actor designation confirm that Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner have 'state actor' status for the purpose of a section 1983 claim.

129. The 'state actor' Pervasive Entwinement test and the official state actor designation confirm that Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner have 'state actor' status for the purpose of a section 1983 claim.

130. The 'state actor' Public Function test and the official state actor designation confirm that Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner have 'state actor' status for the purpose of a section 1983 claim.

131. All of the above pled facts do confirm the intertwinement, for the purposes of section 1983 claims, of the 'state actor' status of Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner

132. All of the above pled facts do confirm the intertwinement, for the purposes of section 1983 claims of the conferring on the state of the liability of the crimes caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner against Plaintiff Kaul.

133. The above facts include the exchange between private and state actors of monies pertaining to "patterns of racketeering" conducted through American states.

134. The above facts include the exchange between private and state actors of information pertaining to “**patterns of racketeering**” conducted through American states.

135. The above facts include the exchange between private and state actors of monies for the purchase of state power/function through schemes of judicial/political bribery.

136. The above facts include the exchange between private and state actors of monies for the funding by the state of legal defenses of private actors/defendants in **The Kaul Cases**.

COUNT THREE

Section 1983 claim

137. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner, as ‘state actors’ did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Plaintiff Kaul of his constitutional rights pursuant to the **First Amendment** of the United States Constitution.

138. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner as ‘state actors’ did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Plaintiff Kaul of his constitutional rights pursuant to the **Second Amendment** of the United States Constitution.

139. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner as state-actors did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Plaintiff Kaul of his constitutional rights pursuant to the **Fourth Amendment** of the United States Constitution.

140. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner as state-actors did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Plaintiff Kaul of his constitutional rights pursuant to the **Fifth Amendment** of the United States Constitution.

141. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner as state-actors did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Plaintiff Kaul of his constitutional rights pursuant to the **Sixth Amendment** of the United States Constitution.

142. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner as state-actors did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Plaintiff Kaul of his constitutional rights pursuant to the **Eight Amendment** of the United States Constitution.

143. In a period commencing in 2008/2009 Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner as state-actors did abuse state/federal power to knowingly/willfully violate and deprive/continue to deprive Kaul Plaintiff of his constitutional rights pursuant to the Fourteenth Amendment of the United States Constitution.

144. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of his livelihood.

145. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his business real estate.

146. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his personal real estate.

147. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his life earnings.

148. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his pensions.

149. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his financial investments.

150. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his professional licenses.

151. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his accounts receivable.

152. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of his right to due process.

153. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of his right to free speech.

154. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of his right to impartial tribunals/judges/courts.

155. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of his right to prosecute his claims.

156. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of his right to equal protection under the law.

157. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of his right to liberty.

158. These deprivations/violations willfully/maliciously caused by Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did illegally deprive/continue to deprive Plaintiff Kaul of the property of twelve (12) years of his life.

159. These deprivations/violations/injuries were willfully/maliciously perpetrated by private actors within/through/with the assistance of the executive/judicial apparatus of the American State.

160. These deprivations/violations/injuries were willfully/maliciously perpetrated by state actors within/through/with the assistance of the executive/judicial apparatus of the American State.

161. The commercial/communications nexus between state and private actors critical to the perpetration of the within pled schemes conferred 'state actor' liability on all private actors as to the deprivations/violations/injuries caused to Plaintiff Kaul's human/constitutional rights.

162. The commercial/communications nexus between state and private actors critical to the perpetration of the within pled schemes conferred 'state actor' liability on all private actors as to the deprivations/violations/injuries caused to all Plaintiff Kaul's property rights, as stated above.

163. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner were and are motivated to commit and continue to

commit these deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

164. The motivation is based on Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner scheme to prevent Plaintiff Kaul from exposing their decades-long crimes.

COUNT FOUR

UN Human Rights Violation

The United Nations Universal Declaration of Human Rights

165. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 1 of the United Nations Universal Declaration of Human Rights: "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."

166. The Article 1 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

167. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 2 of the United Nations Universal Declaration of Human Rights. Plaintiff Kaul is a citizen of India: "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."

168. The Article 2 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

169. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 3 of the United Nations Universal Declaration of Human Rights: "Everyone has the right to life, liberty and security of person."

170. The Article 3 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

171. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff

Kaul's rights pursuant to Article 4 of the United Nations Universal Declaration of Human Rights: "No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms."

172. The Article 4 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

173. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 5 of the United Nations Universal Declaration of Human Rights: "No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment."

174. The Article 5 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

175. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 6 of the United Nations Universal Declaration of Human Rights: "Everyone has the right to recognition everywhere as a person before the law."

176. The Article 6 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

177. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 7 of the United Nations Universal Declaration of Human Rights: "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."

178. The Article 7 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

179. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 8 of the United Nations Universal Declaration of Human Rights: "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."

180. The Article 8 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

181. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 9 of the United Nations Universal Declaration of Human Rights: "No one shall be subjected to arbitrary arrest, detention or exile."

182. The Article 9 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

183. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 10 of the United Nations Universal Declaration of Human Rights: "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."

184. The Article 10 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

185. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 12 of the United Nations Universal Declaration of Human Rights: "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."

186. The Article 12 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

187. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 17 of the United Nations Universal Declaration of Human Rights: "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."

188. The Article 17 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

189. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 19 of the United Nations Universal Declaration of Human Rights: "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."

190. The Article 19 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

191. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 23 of the United Nations Universal Declaration of Human Rights: "Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment."

192. The Article 23 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

193. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 23 of the United Nations Universal Declaration of Human Rights: "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."

194. The Article 23 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

195. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 28 of the United Nations Universal Declaration of Human Rights: "Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized."

196. The Article 28 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

197. Defendants Kaufman/Lomazow/NJBME and Co-conspirators Allstate/Solomon/Christie/Kanefsky/Hafner did knowingly and maliciously violate Plaintiff Kaul's rights pursuant to Article 30 of the United Nations Universal Declaration of Human Rights: "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."

198. The Article 30 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

RELIEF

- 1. COMPENSATORY + CONSEQUENTIAL + PUNITIVE DAMAGES:** On September 28, 2023, in K11-15, Plaintiff Kaul submitted a MOTION FOR DEFAULT JUDGMENT that contains a substantiated damages report based on Plaintiff Kaul's tax filings from 2001 to 2011 (**Exhibit 11**).
- 2. A PUBLIC APOLOGY FROM DEFENDANTS CHRISTIE/HEARY/STOLZ** to be published on the platforms identified in the K1 February 22, 2016 'Settlement Terms' (K1: D.E. 1).
- 3. IMMEDIATE REINSTATEMENT OF PLAINTIFF KAUL'S UNRESTRICTED NEW JERSEY LICENSE**
- 4. ANY OTHER RELIEF THE COURT DEEMS APPROPRIATE AND NECESSARY FOR THE PURPOSE OF DETERRENCE.**

The Kaul Cases were caused to come into existence by the criminal conduct of state and private actors, who have violated Plaintiff Kaul's human/civil/constitutional rights since at least 2010, if not before. Had New Jersey Governor John Corzine secured a second gubernatorial term and had he sought the US Presidency, the crimes would not have occurred because he was independently wealthy and would have mostly funded his own campaign, in the much the same way as did Mitt Romney in 2012.

However, Defendant Christie's corrupt character in conjunction with his lack of personal wealth, blind ambition and pragmatic lack, account for the events that ensued after he and **The Kaul Cases** Defendants embarked on an ill-intended, ill-conceived, and ultimately futile, but yet ongoing attempt to eliminate Plaintiff Kaul. The legal jeopardy they face in 2024/onwards was caused by nobody but themselves and the sooner they remediate Plaintiff Kaul's ongoing injuries and are held accountable for their crimes, the less money/time they will spend defending pending/future claims from Plaintiff Kaul in domestic/foreign jurisdictions.

CERTIFICATION

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

DATED: JUNE 3, 2024



RICHARD ARJUN KAUL, MD

APPENDIX D

August 1, 2019

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**Re: Feldman/Kaul v Federation of State Medical Boards et al.,
Pre-litigation investigation**

Dear Mr. Roeder,

We write this letter in regard to the above matter, a lawsuit that will be filed in the United States District Court, within the next four weeks. A central purpose of the action is to ascertain whether the current system of physician regulation by state medical boards is legal, in light of their commercial relationships with the Federation of State Medical Boards, a for-profit, non-governmental agency. The litigation will also permit us to answer the question of whether state medical boards do or do not **“protect the public”**, and whether medical boards have contributed to the current epidemic of physician suicides in the United States. Our initial research indicates that within the last forty years no evidence or epidemiological studies have demonstrated any relationship between the welfare of the public and the activities of state medical boards. In fact, and not unsurprising to us and many physicians with whom we have discussed this issue, there appears to be a substantial body of anecdotal evidence that directly connects patient harm to medical board actions. We are conducting further research on the causative relationship between physician suicides and state medical board actions, but thus far, it indicates a statistically significant association.

It is thus in regard to the above issues and in your purported mission to **“protect the public”**, that we hope you will **collaborate** with our efforts, which are of immense public interest, and the evidence of which we believe will cause what is now being widely referred to as a **“Reformation of American Medical Boards.”**

We would therefore respectfully and in a spirit of collegiality request you provide answers to the following information:

1. Is there within your possession, the possession of any members of the medical board or the medical board itself, any evidence, data, studies, memos or any information of any sort of nature that constitutes evidence or might lead to the production of evidence, that might in any manner suggest, demonstrate or prove that the medical board has protected patients and or made the public safer. The period in question is from 1960 to 2019.
2. Is there within your possession, the possession of any members of the medical board, any of the associated legal/non-legal regulatory staff or the medical board itself, any evidence, data, studies, memos or any information of any sort of nature that constitutes evidence or might lead to the production of evidence, that might in any manner suggest, demonstrate or prove that the medical board has been identified as a culpable party in the suicide of any physicians subjected to any type of board action ranging from a warning letter to a revocation. The period in question is from 1960 to 2019.
3. Has the medical board, its members or any of the associated legal/non-legal regulatory staff ever been named in any state or federal legal notices and or lawsuits pertaining to any action taken by the board against any licensees, including the estates of those physicians that have committed suicide. The period in question is 1960 to 2019.
4. Could you please identify whether the board's process of physician regulation complies with the due process clauses of the United States Constitution, and if not what remedial programs have been instituted to remedy these unlawful defects, and when they were implemented.
5. Does your medical board comply with the terms of board supervision set forth by the Federal Trade Commission in October 2015, in the wake of North Carolina Board of Dental Examiners v. Federal Trade Commission, 13-534 (2015).
6. Is the medical board a signatory to the interstate agreement promulgated by the Federation of State Medical Boards, and is not does it participate/communicate or share any confidential information in any manner with the F.S.M.B., pertaining to any of its licensees or policies of physician regulation. The period in question is 1960 to 2019.
7. Does the medical board or any of its executive, regulatory or physician members, receive or provide monies/grants/honorariums or any other material benefit from or to the F.S.M.B or any of its agents. The period in question is 1960 to 2019.
8. Has the medical board or any of its executive, regulatory or physician members received or provided monies/grants/honorariums or any other material benefit from or to the F.S.M.B or any of its members. The period in question is 1960 to 2019.

We hope to be able to collaborate with you, the people of your state and your state legislature, in order to demonstrate to the public that their monies used to fund medical boards, actually serve a purpose.

We would ask that this information, which if it exists, would be immediately available, and thus be provided to us via e-mail, by August 8, 2019: drRichardKaul@gmail.com.

If, however, we do not receive the requested information we will conclude that:

1. You have no evidence to prove that you do or ever have protected the public in your state.
2. You have been the subject of state and or federal litigation, in which the issue of physician suicide was a component.
3. Your medical board is configured and operates in violation of the due process clauses of the United States Constitution.
4. Your medical board is not in compliance with the anti-trust purposed FTC supervision regulations, as referenced above in point 5.
5. The medical board is a signatory to the interstate agreement, and shares confidential licensee information with the F.S.M.B.
6. The medical board and its executive, regulatory and physician members have received or provided monies to the F.S.M.B. and or their agents.

We thank you in advance for prompt attention to this matter.

Should you have any questions please call on 201 989 2299 or e-mail at drRichardKaul@gmail.com

Yours sincerely

Richard Arjun Kaul, MD

Arnold Erwin Feldman, MD

cc: Office of Governor Phil Murphy
The State House
P.O. Box 001
Trenton, NJ 08625

October 8, 2019

Paul Carniol, MD
33 Overlook Road, Suite 401
Summit, NJ 07901

Re: Kaul /Feldman v Federation – K5
Reinstatement of license to practice medicine and surgery in New Jersey.

For reference purposes:

Re: Kaul/Feldman v Federation et al. – K5
Patel/Kaul v Crist: 19-CV-08946 – P1
Patel/Kaul v Allstate: 19-CV-09232 – P2
Kaul v Christie: 16-CV-02364 – K1
Kaul v Christie: 18-CV-08086 – K2
Kaul v Schumer: 19-CV13477 – K3

The referenced documents are contained on the enclosed flash drive

Dear Dr. Carniol,

I write this letter for the following reasons:

1. To provide you an opportunity to admit or deny the below statements.
2. To inform you of the immense legal liability that you have **personally** incurred as a consequence of denying my application for reinstatement of my medical license, submitted on April 25, 2019.
3. To inform you that your denial, pursuant to the evidence, facts, arguments and law detailed in K5 (copy on enclosed flash drive), constitutes your participation in: **(i)** an ongoing “pattern of racketeering”; **(ii)** a continuing violation of my constitutional rights, specifically the fourth the fourth, fifth, eight and fourteenth amendments; **(iii)** a trade organization, of which you are a member, that of the New Jersey Board of Medical Examiners, that is illegally/unconstitutionally configured, operates illegally, and remains in knowing violation of anti-trust law.

The statements are:

1. I have knowledge that in approximately April 2019, Kaul submitted an application for reinstatement of his medical license.
2. I have knowledge that on March 12, 2014 Kaul's license was illegally revoked, as a consequence of administrative proceedings (April 9, 2013 to June 28, 2013) that involved the commission of hundreds of separate acts of perjury and evidential omission, misrepresentation and omission.
3. I have knowledge that in a period commencing in approximately 2006 and continuing to March 12, 2014, the K5 defendants engaged in schemes of racketeering, in which they bribed K5 defendant Christopher J. Christie, an individual who acted as the New Jersey Governor from 2009 to 2017, as part of a quid pro quo scheme, to have my license revoked.
4. I have knowledge that K5 defendants, Allstate and Geico, continue to bribe certain members of Defendant NJBME, including K5 Defendant, Metzger, to continue to illegally oppose my application for reinstatement of my medical license.
5. I have knowledge that in a period from approximately 2006 to March 12, 2014, the K5 defendants conspired and colluded to pervert the course of justice, to knowingly, and with malice, violate my constitutional right to due process, in order to cause the revocation of my license.
6. I have knowledge that the reason for the K5 defendants' anti-trust and racketeering schemes, as detailed in the enclosed complaint, pertains to professional jealousy and anti-competitive misconduct, purposed to monopolize the American minimally invasive spine surgery market.
7. I have knowledge that in a period from 2008 to 2014, the K5 defendants conspired and colluded, under the direction of K5 Defendant Christie, to obstruct justice and commit acts that they both knew were criminal, and if exposed would cause them to become subject to criminal indictment.
8. On multiple occasions in a period from April 2019 to August 2019, I willingly participated in meetings and communications with K5 defendants NJBME, Metzger and Hafner, and others, during which I agreed to continue my participation in their knowingly illegal ongoing "pattern of racketeering", purposed to prevent the reinstatement of Kaul's medical license.
9. In every meeting and communication referenced in point 8., I knew that my participation was illegal, and would expose me to both civil and criminal liability if exposed.
10. In every meeting and communication referenced in point 9., despite knowing the civil and criminal consequences of my participation, I willingly and knowingly continued the aforesaid acts, because I was informed by the K5 defendants and or their agents, that they had bribed federal judges, Kevin McNulty and Brian Martinotti, in order to obstruct Kaul's prosecution of K1 + K2 + K3 + K4.
11. I have knowledge that K5 defendants, Allstate and Geico, have engaged in prolonged schemes of corruption in which they have bribed judges, politicians and legislators within administrative, state and federal courts and governmental agencies within the geographic boundaries of the State of New Jersey.

12. I have knowledge of the law as it pertains to the due process clauses of the United States Constitution, and I know that my participation in the denial of Kaul's application for reinstatement of his medical license violated his constitutionally protected right to due process.
13. I know that the violations identified in point 12., have exposed me to immense personal liability, pursuant to the claims asserted in K5. I know that these violations would result in fore forfeiture of my house/s, car/s, pension/s and all other liquid and non-liquid assets, in both my name and that of my spouse, pursuant to the doctrine of vicarious liability.
14. I claim, nor can I claim, any ignorance to any of the above facts.
15. I accept that I had the right to discuss, with counsel independent of the Office of The New Jersey Attorney General, the personal legal consequences to me and my family of participating in the denial of Kaul's application for reinstatement of his medical license.
16. I have knowledge that because K5 Defendant, NJBME, continues to remain an agency un-supervised by the state, that both it and I have no immunity to the claims and consequent damages, asserted in K5.

I respectfully request that by October 15, 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 against you personally.

I would also respectfully request that at your next board meeting (late October 2019) you reconsider and grant my application for reinstatement of my license, without any imposition or consideration of the illegal 'fine' of \$475,000, that was imposed on March 12, 2014.

I hope you decide, after reading this communique, to adhere to the law. If however, you decide otherwise, then I will vigorously prosecute you, pursuant to the claims asserted in K5.

I thank you for your prompt attention to this matter.

An equivalent letter has been sent to all members of K5 defendant NJBME.

Yours sincerely

Richard Arjun Kaul, MD
cc: Governor Philip Murphy

APRIL 11, 2024

Stephen Brint Carlton, JD
Executive Director
P.O. Box 2018
Austin, TX 78768-2018

Re: Application for license to practice medicine and surgery

Dear Mr. Carlton.

I write this letter in furtherance of my August 19, 2020, letter to you (copy enclosed), to re-ascertain whether I would be granted a license to practice medicine and surgery in your state, based on the facts set forth in the August 19, 2020, letter.

Please note that 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 **“new”** RICO claim. It will also constitute further evidence of ongoing/”new” injuries caused to my life/liberty/property/reputation by **The Kaul Cases** Defendants and others.

Please note that if I receive no response by May 11, 2024, then this too will constitute evidence of ongoing/”new” injuries caused to my life/liberty/property/reputation by **The Kaul Cases** Defendants and others.

If, however, by May 11, 2024, 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 thank you for your attention to this matter.

Yours sincerely

RICHARD ARJUN KAUL, MD

PLEASE RESPOND TO:

drrichardkaul@gmail.com

APRIL 11, 2024

WILLIAM ROEDER, JD
EXECUTIVE DIRECTOR
P.O. BOX 183
TRENTON, NJ 08625-0183

Re: Application for license to practice medicine and surgery

Dear Mr. Roeder,

I write this letter in furtherance of my August 19, 2020, letter to you (copy enclosed), to re-ascertain whether I would be granted a license to practice medicine and surgery in your state, based on the facts set forth in the August 19, 2020, letter.

Please note that 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 **“new”** RICO claim. It will also constitute further evidence of ongoing/“new” injuries caused to my life/liberty/property/reputation by The Kaul Cases Defendants and others.

Please note that if I receive no response by APRIL 25, 2024, then this too will constitute evidence of ongoing/“new” injuries caused to my life/liberty/property/reputation by The Kaul Cases Defendants and others.

If, however, by April 25, 2024, 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 thank you for your attention to this matter.

Yours sincerely

RICHARD ARJUN KAUL, MD

PLEASE RESPOND TO:

drrichardkaul@gmail.com

AUGUST 8, 2024

CATHY BELKA, EPA 2
NEW YORK STATE EDUCATION DEPARTMENT
OFFICE OF RHE PROFESSIONS
80 WOLF ROAD, SUITE 204
ALBANY, NY 12205

RE: VIRTUAL SEPTEMBER 4, 2024, LICENSE APPLICATION HEARING

Dear Ms. Belka,

JARKESY + LOPER

I write this letter to both inform the NYS board of the June 27/28, 2024, opinion in SEC v Jarquesy-22-859 (June 27, 2024) and Loper Bright Enterprises v Raimondo (22-451) (June 28, 2024) and the effect of these opinions on rendering the NJ 2014 'revocation illegal. The revocation and the December 13, 2013 'opinion' of **The Kaul Cases** Defendant, James Howard Solomon, a copy of which is already in your possession, incorporated the so-called UK 'conviction' and was the progenitor of the fraudulent medical malpractice lawsuits that ensued from the revocation and surrounding publicity. These facts constitute an element of the subject matter of **The Kaul Cases**.

The illegal December 13, 2013 'revocation opinion' in incorporating and perpetuating these facts, did cause them to become elements of the state-orchestrated crime detailed in **The Kaul Cases**.

In light of the new law/facts that have emerged within the last few weeks, it is my position that there exists no basis on which to not issue a license, the continued non-issuance of which constitutes a violation of the SCOTUS holdings in Jarquesy and Toper.

However, in order to ensure the upcoming September 4, 2024, hearing addresses all the relevant legal/factual issues, please submit by **August 20, 2024**, your substantiated position as to your concurrence or otherwise of the invalidating effect of Jarquesy/Toper on the illegal 2014 NJ revocation, and its incorporation of prior events and causing of subsequent events.

Please be advised that a non-response will constitute a concurrence, and will be employed in future legal action, should it be required.

APPLICABLE STANDARDS

In seeking to eliminate the seeming arbitrariness in these proceedings, please confirm or deny if the clinical outcomes standards to which my application is being compared are those contained within the 'New York Patient Occurrence Reporting & Tracking System', a copy of the 2014-2017 report of which is attached. Could you please also identify how many of the New York licensed physicians involved in the cases were convicted of manslaughter, sued in civil court and or had their licenses revoked for 12 + years.

However, if this is not the applicable standard, then what is, as arbitrariness constitutes a violation of my Constitutional right to fairness and equal protection.

IMMEDIATE ISSUANCE OF LICENSE

The law/facts have changed substantially since May 21, 2024, which is why, I suspect you arbitrarily rescheduled the May 21, 2024, hearing, in the hope that the SCOTUS rulings would substantiate your position and actions that you now know are illegal and unconstitutional.

There now affirmatively exists no basis on which to deny me a license and as such my application should be granted forthwith.

Please be advised that any further violation of the illegal twelve-year-plus (12+) deprivation of my human/civil/constitutional rights will leave me no option but to either initiate suit in the United States District Court or enjoin you in of the pending cases. I do hope this is not necessary.

Please inform yourself of the public rights doctrine/sovereign immunity question that was raised and resolved in the Jarkesy matter and of the Toper related repeal of the Chevron deference defense, and of your personal/official liabilities should litigation be required.

Finally, it appears that your initial objection of a supposed 'question of moral suitability' became dissolved upon the production of contradictory witness reports, and so the NYS MB has proceeded to the illegal 2014 NJ revocation, its progeny and the 2001 UK 'conviction', which itself, consequent to the non-unanimous verdict, would be considered null/void pursuant to Jarkesy and the constitutional mandate to a unanimous verdict.

Your 'goalposts' have once again been shifted, but in a direction that renders illegal/unconstitutional your denial of my application and ongoing violation of my human/civil/constitutional rights.

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. K. 1'.

RICHARD ARJUN KAUL, MD



**Department
of Health**

New York Patient Occurrence Reporting & Tracking System (NYPORTS)

Summary Statistics 2014-2017

**Health Care Transformation Group
Office of Primary Care and Health System Management**

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Occurrences of Adverse Events by Detail Codes and Occurrence Year, 2014-2017 (sorted by total occurrences)

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Code	Description	Occurrence Year				
		2014	2015	2016	2017	Total
915*	Death or serious injury	1,026	1,116	1,318	1,252	4,712
914	Misadministration of radiation or radioactive material	259	259	323	360	1,201
933	Termination of vital services	189	193	242	241	865
932	External disaster	187	221	93	198	699
922*	Patient suicide, attempted suicide	106	109	161	152	528
911*	Wrong side/wrong patient/wrong procedure	112	104	114	128	458
913*	Unintended retention of a foreign object	110	101	78	89	378
935	Hospital fire or other internal disaster	65	84	59	53	261
963*	Sexual abuse/sexual assault	31	34	42	43	150
921*	Death or serious injury resulting from physical assault	26	26	21	38	111
701*	Death/serious injury associated with a burn	27	27	17	18	89
938*	Patient death or serious injury associated with device	18	24	13	15	70
962*	Discharge to unauthorized person	6	6	8	5	25
923*	Death or serious injury associated with elopement	2	8	7	4	21
934	Poisoning occurring within the hospital	0	2	0	1	3
961*	Abduction of a patient of any age	1	1	0	1	3
931	Strike by hospital staff	0	0	1	1	2
All		2,165	2,315	2,497	2,599	9,576

* Occurrences requiring root cause analysis

Occurrences of Adverse Events by Facility Type and Occurrence Year, 2014-2017

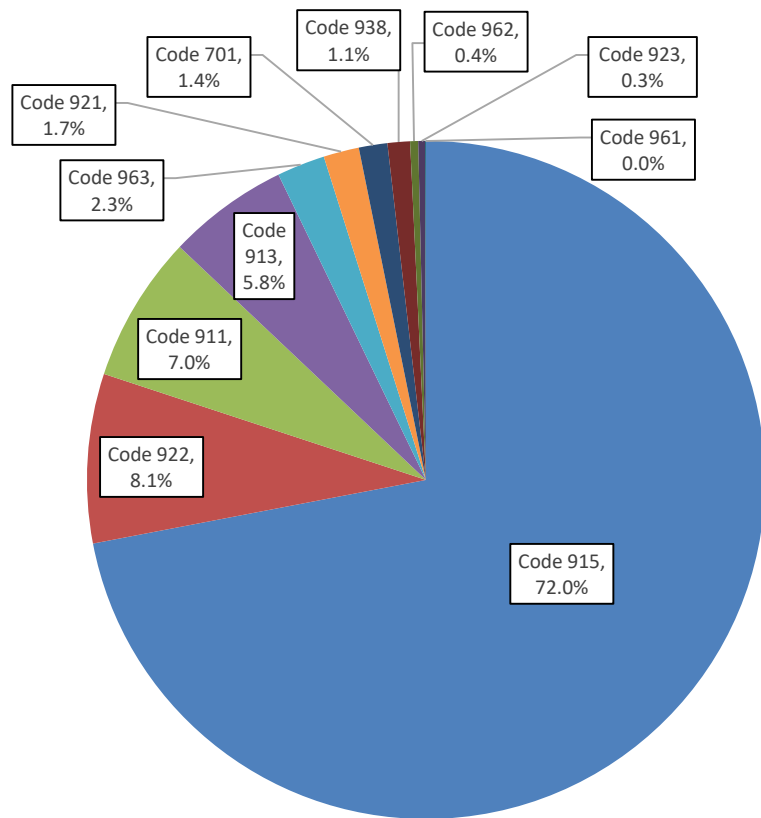
Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Facility Type ^a	Occurrence Year								Total	
	2014		2015		2016		2017			
	Occurrences	%	Occurrences	%	Occurrences	%	Occurrences	%	Occurrences	%
Hospital	1,884	87.0	2,070	89.4	2,318	92.8	2,312	89.0	8,584	89.6
Ambulatory Surgery Center	53	2.4	52	2.2	58	2.3	66	2.5	229	2.4
Diagnostic & Treatment Center	228	10.5	193	8.3	121	4.8	221	8.5	763	8.0
All	2,165	100	2,315	100	2,497	100	2,599	100	9,576	100

^a The facility type is determined by performing a lookup of NYPORTS' facility ID (PFI) against the Health Facility Information System (HFIS). If the facility type in HFIS is a hospital, the NYPORTS incidents are tabulated in the "Hospital" category; if the facility type is a Diagnostic & Treatment Center, a second check is performed against the PFIs in the SPARCS Ambulatory Surgery (AS) outpatient records. If SPARCS AS records exist, the facility's incidents are tabulated in the "ASC" category. If SPARCS AS records do not exist, the facility's incidents are tabulated in the Diagnostic & Treatment Center category.

Distribution of the Occurrences Requiring Root Cause Analysis, 2014-2017

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018



Code	Description	Occurrences	%
915	Death or serious injury	4,712	72.0
922	Patient suicide, attempted suicide	528	8.1
911	Wrong side/wrong patient/wrong procedure	458	7.0
913	Unintended retention of a foreign object	378	5.8
963	Sexual abuse/sexual assault	150	2.3
921	Death or serious injury resulting from physical assault	111	1.7
701	Death/serious injury associated with a burn	89	1.4
938	Patient death or serious injury associated with device	70	1.1
962	Discharge to unauthorized person	25	0.4
923	Death or serious injury associated with elopement	21	0.3
961	Abduction of a patient of any age	3	0.0
All		6,545	100

Occurrences by Service/Location and Occurrence Year, 2014-2017 (sorted by total occurrences)

Code 911: Surgery/other invasive procedure performed on the wrong site/patient; wrong surgical or other invasive procedure

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Description	2014	2015	2016	2017	Total	%
Ophthalmology	19	16	11	7	53	11.6
Orthopedics	12	8	8	15	43	9.4
Surgery/General	10	9	9	12	40	8.7
Medicine	11	6	11	6	34	7.4
Anesthesia	6	5	7	13	31	6.8
Neurosurgery	6	6	8	7	27	5.9
Interventional Radiology	4	8	4	8	24	5.2
Radiology/Imaging	7	4	6	6	23	5.0
Urology	2	5	4	7	18	3.9
Dentistry	4	5	5	3	17	3.7
Ambulatory Surgery	7	3	4	2	16	3.5
Pain/Palliative	4	4	2	3	13	2.8
ER	2	5	1	2	10	2.2
Gastroenterology	0	2	4	4	10	2.2
Vascular Surgery	0	5	3	1	9	2.0
Cardiac Catheterization	1	1	1	5	8	1.7
Thoracic Surgery	1	2	1	3	7	1.5
Gynecology	4	0	0	2	6	1.3
Other	1	1	1	3	6	1.3
Plastic Surgery	0	2	2	1	5	1.1
Cardiology	0	1	2	2	5	1.1
Pulmonary	2	0	2	1	5	1.1
All Others*	9	6	18	15	48	10.5
Total	112	104	114	128	458	100

* Service categories with <1% of the total were combined into "All Others" .

Occurrences by Service Location and Occurrence Year, 2014-2017 (sorted by total occurrences)

Code 913: Unintended retention of a foreign object after surgery or invasive procedure

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Description	2014	2015	2016	2017	Total	%
Surgery/General	20	21	10	11	62	16.4
Obstetrics	16	13	10	12	51	13.5
Gynecology	8	7	13	10	38	10.1
Orthopedics	9	7	6	10	32	8.5
Medicine	11	7	5	6	29	7.7
Neurosurgery	7	6	2	8	23	6.1
ER	6	7	4	2	19	5.0
Cardiothoracic Surgery	6	6	2	3	17	4.5
Urology	3	3	5	1	12	3.2
Transplant Surgery	1	0	4	5	10	2.6
Vascular Surgery	1	1	1	6	9	2.4
Anesthesia	3	2	0	4	9	2.4
Cardiology	4	2	2	0	8	2.1
Interventional Radiology	1	3	2	0	6	1.6
Thoracic Surgery	2	1	2	0	5	1.3
Cardiac Catheterization	1	1	1	2	5	1.3
Plastic Surgery	0	1	2	1	4	1.1
Gastroenterology	0	2	1	1	4	1.1
Other	1	2	1	0	4	1.1
All Others*	10	9	5	7	31	8.2
Total	110	101	78	89	378	100

* Service categories with <1% of the total were combined into "All Others" .

Occurrences by Service Location and Occurrence Year, 2014-2017 (sorted by total occurrences)

Code 915: Patient death or serious injury

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Description	2014	2015	2016	2017	Total	%
Obstetrics	297	327	385	433	1,442	30.6
Medicine	237	239	294	251	1,021	21.7
ER	75	79	87	84	325	6.9
Surgery/General	51	53	63	53	220	4.7
Orthopedics	50	45	40	32	167	3.5
Psychiatry	31	36	40	35	142	3.0
Gynecology	19	30	32	28	109	2.3
Gastroenterology	17	23	34	28	102	2.2
Rehabilitation/Rehab Medicine	21	29	20	19	89	1.9
Cardiology	18	15	29	26	88	1.9
Pediatrics	15	19	30	20	84	1.8
Neonatology	21	21	17	25	84	1.8
Other	15	20	25	13	73	1.5
Oncology	17	12	21	15	65	1.4
Hemodialysis	17	9	20	12	58	1.2
Nursery/NICU	9	12	24	10	55	1.2
Neurosurgery	11	8	15	18	52	1.1
Ambulatory Surgery	4	6	14	21	45	1.0
All Others*	101	133	128	129	491	10.4
Total	1,026	1,116	1,318	1,252	4,712	100

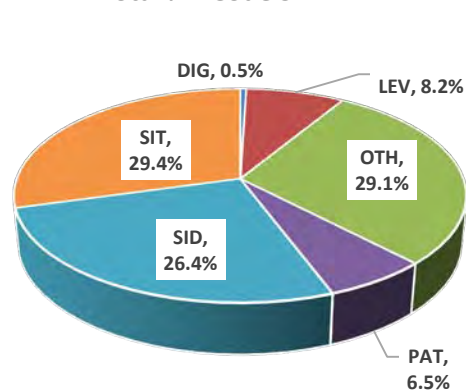
* Service categories with <1% of the total were combined into "All Others" .

Occurrences of Codes 911, 913 and 915 by Sub Codes and Occurrence Year, 2014-2017: Hospitals

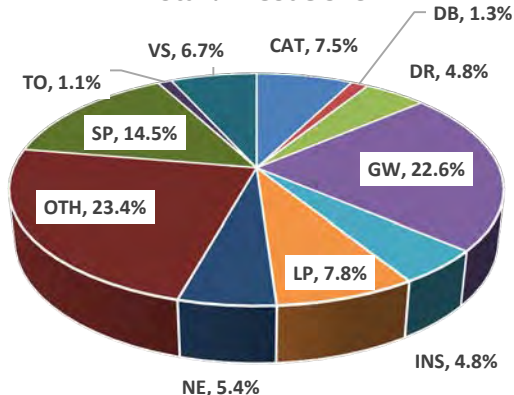
Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Year	911: Wrong site, patient, surgical, or procedure							913: Unintended retention of a foreign object after surgery or invasive procedure											915: Patient death or serious injury											All	
	DIG	LEV	OTH	PAT	SID	SIT	Total	CAT	DB	DR	GW	INS	LP	NE	OTH	SP	TO	VS	Total	BIO	FAL	LPR	MAT	NEO	OTH	PHL	RES	RX	SUR		Total
2014	1	7	23	6	28	28	93	10	4	3	30	3	6	5	23	16	2	7	109	2	332	20	131	196	1	248	3	53	2	988	1,190
2015	1	7	21	6	25	33	93	10	0	6	21	5	7	6	24	16	0	4	99	8	359	17	171	187	0	269	1	52	5	1,069	1,261
2016	0	11	35	8	25	24	103	7	0	3	12	6	6	4	17	11	1	9	76	2	399	21	216	218	0	332	3	61	1	1,253	1,432
2017	0	8	38	6	28	33	113	1	1	6	21	4	10	5	23	11	1	5	88	4	337	16	257	211	0	315	1	49	3	1,193	1,394
All	2	33	117	26	106	118	402	28	5	18	84	18	29	20	87	54	4	25	372	16	1,427	74	775	812	11	1,164	8	215	11	4,503	5,277

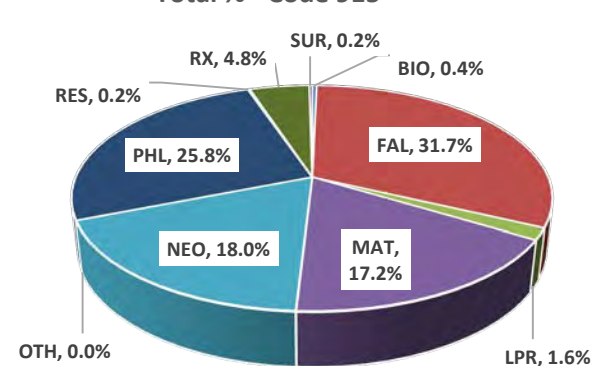
Total % - Code 911



Total % - Code 913



Total % - Code 915

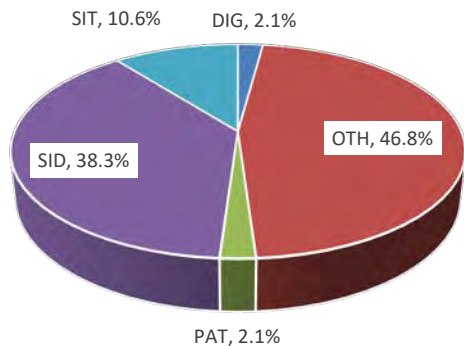


Occurrences of Codes 911, 913 and 915 by Sub Codes and Occurrence Year, 2014-2017: ASCs

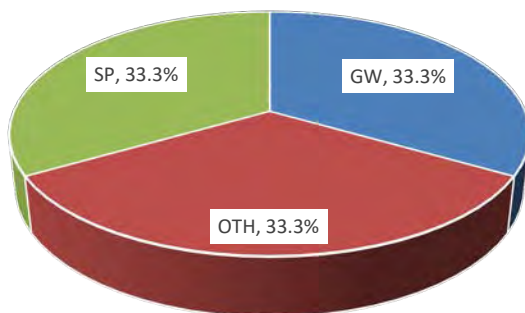
Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Year	911: Wrong site, patient, surgical, or procedure						913: Unintended retention of a foreign object after surgery or invasive procedure				915: Patient death or serious injury					All
	DIG	OTH	PAT	SID	SIT	Total	GW	OTH	SP	Total	FAL	PHL	RX	SUR	Total	
2014	0	11	0	7	1	19	0	1	0	1	0	14	0	1	15	35
2015	0	6	0	3	2	11	0	0	0	0	1	26	0	0	27	38
2016	0	2	1	1	1	5	1	0	1	2	1	38	1	0	40	47
2017	1	3	0	7	1	12	0	0	0	0	0	32	0	1	33	45
All	1	22	1	18	5	47	1	1	1	3	2	110	1	2	115	165

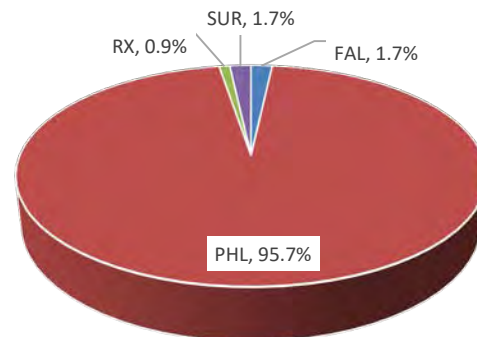
Total % - Code 911



Total % - Code 913



Total % - Code 915



Sub Code Descriptions for Codes 911, 913 and 915

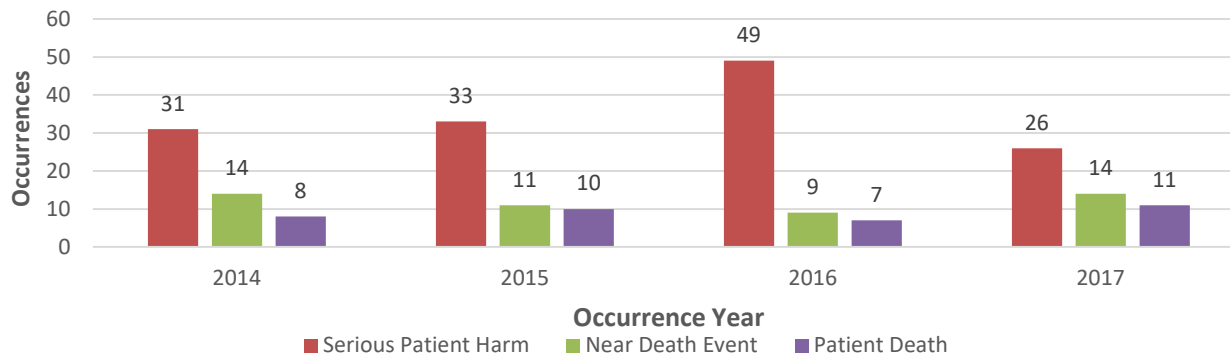
Code 911	Code 913	Code 915
DIG Wrong digit	CAT Catheter	BIO Death or serious injury resulting from the irretrievable loss of an irreplaceable biologic specimen
LEV Wrong level	DR Drain	FAL Fall associated with a death or serious injury
SID Wrong side	DB Drill Bit	LPR Death or serious injury associated with failure to follow up or communicate lab, pathology, radiology test results
SIT Wrong site	GW Guidewire	MAT Maternal death or serious injury
PAT Wrong patient	INS Instrument	MRI Death or serious injury associated with the introduction of a metallic object into the MRI area
OTH Wrong procedure	LP Lap Pad	NEO Neonatal death or serious injury
	NE Needle	Death or serious injury in circumstances other than those related to the natural course of illness, disease or proper treatment
	SP Sponge	PHL
	TO Towel	RES Death or serious injury associated with the use of physical restraints or bedrails
	VS Vaginal Sponge	RX Death or serious injury associated with a medication error
	OTH Other	SUR Intraoperative or immediately post-operative/post procedure death
		OTH Other, this sub-code retired in late 2014

Occurrences by Primary Codes (Medication Errors) and Occurrence Year, 2014-2017

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Medication Error Code*	Description	Occurrence Year				Total	%
		2014	2015	2016	2017		
108	Serious Patient Harm	31	33	49	26	139	62.3
109	Near Death Event	14	11	9	14	48	21.5
110	Patient Death	8	10	7	11	36	16.1
All		53	54	65	51	223	100

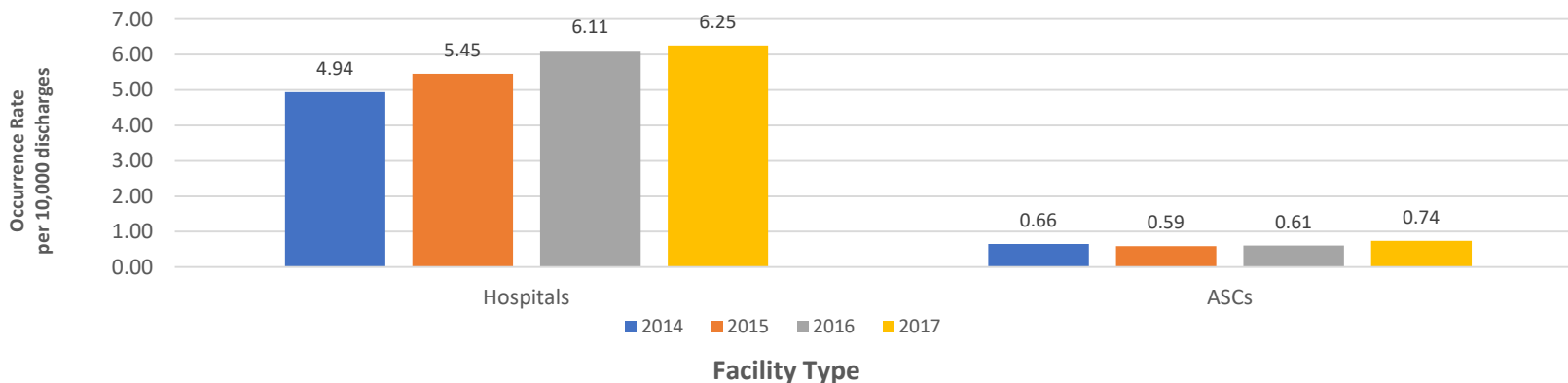
* Medication error code associated with a serious injury (detail code 915 with sub code RX).



Occurrences, Discharges and Occurrence Rate (per 10,000 discharges) by Facility Type and Occurrence Year, 2014-2017

Data Source: NYPORTS, 2014-2017 as of Nov. 30th, 2018; SPARCS 2014-2017 as of Nov. 15th, 2018

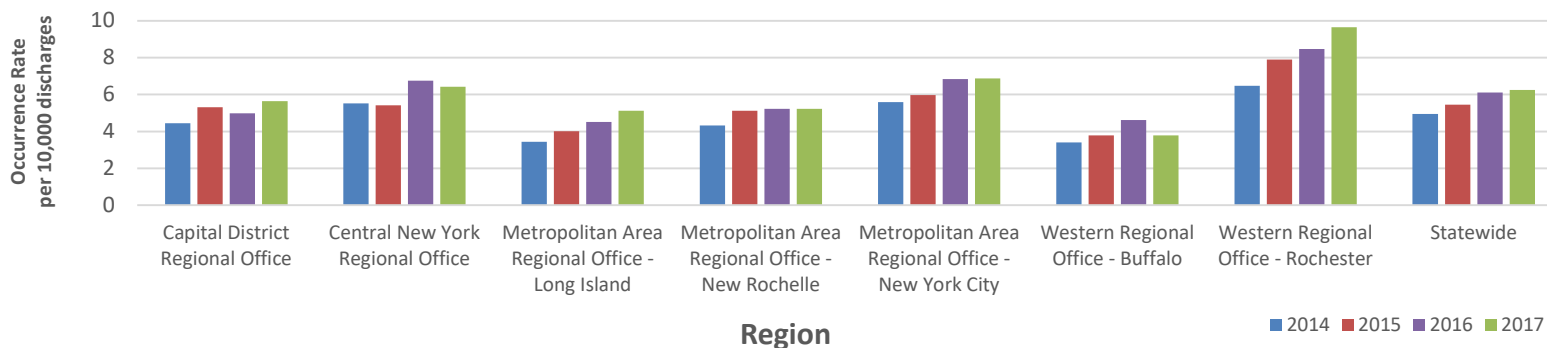
Facility Type	Occurrence Year											
	2014			2015			2016			2017		
	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges
Hospitals	1,884	3,815,276	4.94	2,070	3,795,165	5.45	2,318	3,794,813	6.11	2,312	3,696,962	6.25
ASCs	53	808,875	0.66	52	879,265	0.59	58	951,705	0.61	69	929,023	0.74



Occurrences, Discharges and Occurrence Rate (per 10,000 discharges) by Region and Occurrence Year, 2014-2017: Hospitals

Data Source: NYPORTS, 2014-2017 as of Nov. 30th, 2018; SPARCS 2014-2017 as of Nov. 15th, 2018

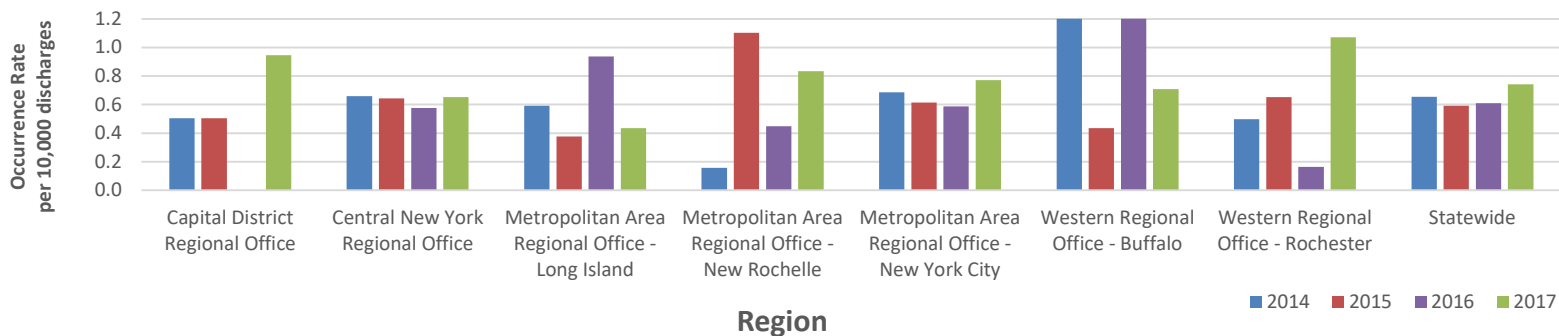
Regional Office	Occurrence Year											
	2014			2015			2016			2017		
	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate
Capital District Regional Office	138	310,007	4.45	166	312,261	5.32	161	323,294	4.98	177	313,953	5.64
Central New York Regional Office	185	334,932	5.52	182	336,145	5.41	231	341,875	6.76	206	321,254	6.41
Metropolitan Area Regional Office - Long Island	189	550,985	3.43	220	548,844	4.01	249	550,956	4.52	273	533,333	5.12
Metropolitan Area Regional Office - New Rochelle	160	370,286	4.32	190	370,908	5.12	196	375,067	5.23	194	370,851	5.23
Metropolitan Area Regional Office - New York City	926	1,655,720	5.59	974	1,632,869	5.96	1,099	1,608,778	6.83	1,087	1,583,923	6.86
Western Regional Office - Buffalo	109	319,974	3.41	121	319,522	3.79	146	316,353	4.62	115	303,982	3.78
Western Regional Office - Rochester	177	273,372	6.47	217	274,616	7.90	236	278,490	8.47	260	269,666	9.64
Statewide	1,884	3,815,276	4.94	2,070	3,795,165	5.45	2,318	3,794,813	6.11	2,312	3,696,962	6.25



Occurrences, Discharges and Occurrence Rate (per 10,000 discharges) by Region and Occurrence Year, 2014-2017: ASCs

Data Source: NYPORTS, 2014-2017 as of Nov. 30th, 2018; SPARCS 2014-2017 as of Nov. 15th, 2018

Regional Office	Occurrence Year											
	2014			2015			2016			2017		
	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate
Capital District Regional Office	4	79,178	0.51	4	79,404	0.50	0	91,238	0.00	9	95,052	0.95
Central New York Regional Office	7	106,318	0.66	7	108,682	0.64	7	121,660	0.58	8	122,704	0.65
Metropolitan Area Regional Office - Long Island	7	118,096	0.59	5	133,007	0.38	13	138,746	0.94	6	138,158	0.43
Metropolitan Area Regional Office - New Rochelle	1	63,521	0.16	7	63,463	1.10	3	66,916	0.45	6	71,896	0.83
Metropolitan Area Regional Office - New York City	20	291,818	0.69	21	341,704	0.61	22	374,893	0.59	26	336,990	0.77
Western Regional Office - Buffalo	11	89,588	1.23	4	91,797	0.44	12	97,083	1.24	7	98,903	0.71
Western Regional Office - Rochester	3	60,356	0.50	4	61,208	0.65	1	61,169	0.16	7	65,320	1.07
Statewide	53	808,875	0.66	52	879,265	0.59	58	951,705	0.61	69	929,023	0.74



JANUARY 22, 2025

PATRICIA E. MCSORLEY
EXECUTIVE DIRECTOR
ARIZONA MEDICAL BOARD
1740 W. ADAMS, SUITE 4000
PHOENIX, AZ 85007

RE: APPLICATION FOR LICENSURE IN ARIZONA

Dear Ms. McSorley,

Thank you for your January 22, 2025 (copy enclosed) identifying the basis for the denial of my licensure application.

However, before I respond, could you please, in your capacity as the legal representative of the Arizona Medical Board, articulate your position as to the relevance of the June 27, 2024 SCOTUS rulings in SEC v Jarkesy: 22-859 (June 27, 2024) and Loper Bright Enterprises v Raimondo: 22-451 (June 28, 2024) to the illegal article III judge-free juryless April 9, 2012/March 24, 2014 NJ license revocation.

Please find within the enclosed August 8, 2024 letter from myself to the New York State Medical Board my position as to these matters. Although I am sure a copy of this letter was brought into your possession by either the New York State Medical Board and or The Kaul Cases Defendant, Federation State Medical Boards, I have for the sake of completeness included this document.

Finally, I conclude from the lack of any reference to the 1999 UK case as a basis for denial, that you have determined it to be irrelevant to the issuance of a state medical license within the United States, and that being a subjugate member of The Kaul Cases Defendant, Federation State Medical Boards you adhere, as do all other state board members, to the same standard regarding the granting of license applications.

And in fact, to not adhere to the same license granting standard would undermine/contradict The Kaul Cases Defendant, Federation State Medical Boards policy of so called 'reciprocal discipline'. A policy, as I am sure you aware, that generates vast profits for The Kaul Cases Defendant, Federation State Medical Boards and its subjugate members through the

enforcement of legal fees/course remediation fees/'fines'/'penalties' that are imposed on 'disciplined' physicians by what is referred to in **The Kaul Cases** as the "**Federation Cartel**".

I look forward to your response and please see that counsel for **The Kaul Cases** Defendant, Federation State Medical Boards and its subjugate member/co-conspirator, New York State Medical Board are copied on this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul', with a horizontal line underneath.

RICHARD ARJUN KAUL, MD

cc: Bradley Kilmer, Esq – Counsel to Co-conspirator NYSMB
Jay Brown – Counsel to Defendant FSMB

ATTACHMENTS

AUGUST 8, 2024

CATHY BELKA, EPA 2
NEW YORK STATE EDUCATION DEPARTMENT
OFFICE OF RHE PROFESSIONS
80 WOLF ROAD, SUITE 204
ALBANY, NY 12205

RE: VIRTUAL SEPTEMBER 4, 2024, LICENSE APPLICATION HEARING

Dear Ms. Belka,

JARKESY + LOPER

I write this letter to both inform the NYS board of the June 27/28, 2024, opinion in SEC v Jarquesy-22-859 (June 27, 2024) and Loper Bright Enterprises v Raimondo (22-451) (June 28, 2024) and the effect of these opinions on rendering the NJ 2014 'revocation illegal. The revocation and the December 13, 2013 'opinion' of **The Kaul Cases** Defendant, James Howard Solomon, a copy of which is already in your possession, incorporated the so-called UK 'conviction' and was the progenitor of the fraudulent medical malpractice lawsuits that ensued from the revocation and surrounding publicity. These facts constitute an element of the subject matter of **The Kaul Cases**.

The illegal December 13, 2013 'revocation opinion' in incorporating and perpetuating these facts, did cause them to become elements of the state-orchestrated crime detailed in **The Kaul Cases**.

In light of the new law/facts that have emerged within the last few weeks, it is my position that there exists no basis on which to not issue a license, the continued non-issuance of which constitutes a violation of the SCOTUS holdings in Jarquesy and Toper.

However, in order to ensure the upcoming September 4, 2024, hearing addresses all the relevant legal/factual issues, please submit by **August 20, 2024**, your substantiated position as to your concurrence or otherwise of the invalidating effect of Jarquesy/Toper on the illegal 2014 NJ revocation, and its incorporation of prior events and causing of subsequent events.

Please be advised that a non-response will constitute a concurrence, and will be employed in future legal action, should it be required.

APPLICABLE STANDARDS

In seeking to eliminate the seeming arbitrariness in these proceedings, please confirm or deny if the clinical outcomes standards to which my application is being compared are those contained within the 'New York Patient Occurrence Reporting & Tracking System', a copy of the 2014-2017 report of which is attached. Could you please also identify how many of the New York licensed physicians involved in the cases were convicted of manslaughter, sued in civil court and or had their licenses revoked for 12 + years.

However, if this is not the applicable standard, then what is, as arbitrariness constitutes a violation of my Constitutional right to fairness and equal protection.

IMMEDIATE ISSUANCE OF LICENSE

The law/facts have changed substantially since May 21, 2024, which is why, I suspect you arbitrarily rescheduled the May 21, 2024, hearing, in the hope that the SCOTUS rulings would substantiate your position and actions that you now know are illegal and unconstitutional.

There now affirmatively exists no basis on which to deny me a license and as such my application should be granted forthwith.

Please be advised that any further violation of the illegal twelve-year-plus (12+) deprivation of my human/civil/constitutional rights will leave me no option but to either initiate suit in the United States District Court or enjoin you in of the pending cases. I do hope this is not necessary.

Please inform yourself of the public rights doctrine/sovereign immunity question that was raised and resolved in the Jarkesy matter and of the Toper related repeal of the Chevron deference defense, and of your personal/official liabilities should litigation be required.

Finally, it appears that your initial objection of a supposed 'question of moral suitability' became dissolved upon the production of contradictory witness reports, and so the NYS MB has proceeded to the illegal 2014 NJ revocation, its progeny and the 2001 UK 'conviction', which itself, consequent to the non-unanimous verdict, would be considered null/void pursuant to Jarkesy and the constitutional mandate to a unanimous verdict.

Your 'goalposts' have once again been shifted, but in a direction that renders illegal/unconstitutional your denial of my application and ongoing violation of my human/civil/constitutional rights.

Yours sincerely

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

RICHARD ARJUN KAUL, MD



**Department
of Health**

New York Patient Occurrence Reporting & Tracking System (NYPORTS)

Summary Statistics 2014-2017

**Health Care Transformation Group
Office of Primary Care and Health System Management**

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Occurrences of Adverse Events by Detail Codes and Occurrence Year, 2014-2017 (sorted by total occurrences)

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Code	Description	Occurrence Year				
		2014	2015	2016	2017	Total
915*	Death or serious injury	1,026	1,116	1,318	1,252	4,712
914	Misadministration of radiation or radioactive material	259	259	323	360	1,201
933	Termination of vital services	189	193	242	241	865
932	External disaster	187	221	93	198	699
922*	Patient suicide, attempted suicide	106	109	161	152	528
911*	Wrong side/wrong patient/wrong procedure	112	104	114	128	458
913*	Unintended retention of a foreign object	110	101	78	89	378
935	Hospital fire or other internal disaster	65	84	59	53	261
963*	Sexual abuse/sexual assault	31	34	42	43	150
921*	Death or serious injury resulting from physical assault	26	26	21	38	111
701*	Death/serious injury associated with a burn	27	27	17	18	89
938*	Patient death or serious injury associated with device	18	24	13	15	70
962*	Discharge to unauthorized person	6	6	8	5	25
923*	Death or serious injury associated with elopement	2	8	7	4	21
934	Poisoning occurring within the hospital	0	2	0	1	3
961*	Abduction of a patient of any age	1	1	0	1	3
931	Strike by hospital staff	0	0	1	1	2
All		2,165	2,315	2,497	2,599	9,576

* Occurrences requiring root cause analysis

Occurrences of Adverse Events by Facility Type and Occurrence Year, 2014-2017

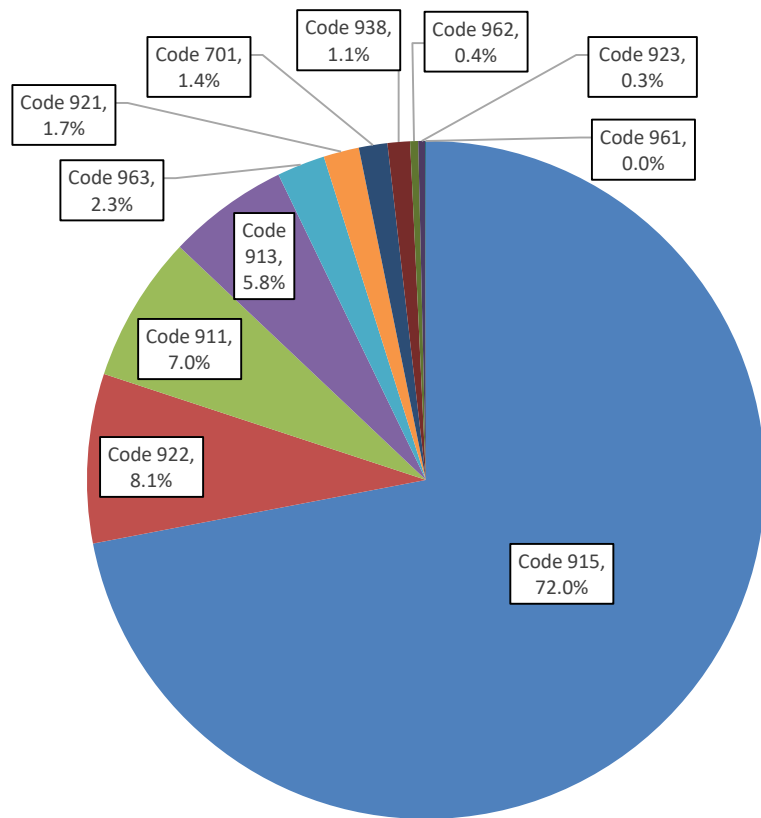
Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Facility Type ^a	Occurrence Year								Total	
	2014		2015		2016		2017			
	Occurrences	%	Occurrences	%	Occurrences	%	Occurrences	%	Occurrences	%
Hospital	1,884	87.0	2,070	89.4	2,318	92.8	2,312	89.0	8,584	89.6
Ambulatory Surgery Center	53	2.4	52	2.2	58	2.3	66	2.5	229	2.4
Diagnostic & Treatment Center	228	10.5	193	8.3	121	4.8	221	8.5	763	8.0
All	2,165	100	2,315	100	2,497	100	2,599	100	9,576	100

^a The facility type is determined by performing a lookup of NYPORTS' facility ID (PFI) against the Health Facility Information System (HFIS). If the facility type in HFIS is a hospital, the NYPORTS incidents are tabulated in the "Hospital" category; if the facility type is a Diagnostic & Treatment Center, a second check is performed against the PFIs in the SPARCS Ambulatory Surgery (AS) outpatient records. If SPARCS AS records exist, the facility's incidents are tabulated in the "ASC" category. If SPARCS AS records do not exist, the facility's incidents are tabulated in the Diagnostic & Treatment Center category.

Distribution of the Occurrences Requiring Root Cause Analysis, 2014-2017

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018



Code	Description	Occurrences	%
915	Death or serious injury	4,712	72.0
922	Patient suicide, attempted suicide	528	8.1
911	Wrong side/wrong patient/wrong procedure	458	7.0
913	Unintended retention of a foreign object	378	5.8
963	Sexual abuse/sexual assault	150	2.3
921	Death or serious injury resulting from physical assault	111	1.7
701	Death/serious injury associated with a burn	89	1.4
938	Patient death or serious injury associated with device	70	1.1
962	Discharge to unauthorized person	25	0.4
923	Death or serious injury associated with elopement	21	0.3
961	Abduction of a patient of any age	3	0.0
All		6,545	100

Occurrences by Service/Location and Occurrence Year, 2014-2017 (sorted by total occurrences)

Code 911: Surgery/other invasive procedure performed on the wrong site/patient; wrong surgical or other invasive procedure

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Description	2014	2015	2016	2017	Total	%
Ophthalmology	19	16	11	7	53	11.6
Orthopedics	12	8	8	15	43	9.4
Surgery/General	10	9	9	12	40	8.7
Medicine	11	6	11	6	34	7.4
Anesthesia	6	5	7	13	31	6.8
Neurosurgery	6	6	8	7	27	5.9
Interventional Radiology	4	8	4	8	24	5.2
Radiology/Imaging	7	4	6	6	23	5.0
Urology	2	5	4	7	18	3.9
Dentistry	4	5	5	3	17	3.7
Ambulatory Surgery	7	3	4	2	16	3.5
Pain/Palliative	4	4	2	3	13	2.8
ER	2	5	1	2	10	2.2
Gastroenterology	0	2	4	4	10	2.2
Vascular Surgery	0	5	3	1	9	2.0
Cardiac Catheterization	1	1	1	5	8	1.7
Thoracic Surgery	1	2	1	3	7	1.5
Gynecology	4	0	0	2	6	1.3
Other	1	1	1	3	6	1.3
Plastic Surgery	0	2	2	1	5	1.1
Cardiology	0	1	2	2	5	1.1
Pulmonary	2	0	2	1	5	1.1
All Others*	9	6	18	15	48	10.5
Total	112	104	114	128	458	100

* Service categories with <1% of the total were combined into "All Others" .

Occurrences by Service Location and Occurrence Year, 2014-2017 (sorted by total occurrences)

Code 913: Unintended retention of a foreign object after surgery or invasive procedure

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Description	2014	2015	2016	2017	Total	%
Surgery/General	20	21	10	11	62	16.4
Obstetrics	16	13	10	12	51	13.5
Gynecology	8	7	13	10	38	10.1
Orthopedics	9	7	6	10	32	8.5
Medicine	11	7	5	6	29	7.7
Neurosurgery	7	6	2	8	23	6.1
ER	6	7	4	2	19	5.0
Cardiothoracic Surgery	6	6	2	3	17	4.5
Urology	3	3	5	1	12	3.2
Transplant Surgery	1	0	4	5	10	2.6
Vascular Surgery	1	1	1	6	9	2.4
Anesthesia	3	2	0	4	9	2.4
Cardiology	4	2	2	0	8	2.1
Interventional Radiology	1	3	2	0	6	1.6
Thoracic Surgery	2	1	2	0	5	1.3
Cardiac Catheterization	1	1	1	2	5	1.3
Plastic Surgery	0	1	2	1	4	1.1
Gastroenterology	0	2	1	1	4	1.1
Other	1	2	1	0	4	1.1
All Others*	10	9	5	7	31	8.2
Total	110	101	78	89	378	100

* Service categories with <1% of the total were combined into "All Others" .

Occurrences by Service Location and Occurrence Year, 2014-2017 (sorted by total occurrences)

Code 915: Patient death or serious injury

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Description	2014	2015	2016	2017	Total	%
Obstetrics	297	327	385	433	1,442	30.6
Medicine	237	239	294	251	1,021	21.7
ER	75	79	87	84	325	6.9
Surgery/General	51	53	63	53	220	4.7
Orthopedics	50	45	40	32	167	3.5
Psychiatry	31	36	40	35	142	3.0
Gynecology	19	30	32	28	109	2.3
Gastroenterology	17	23	34	28	102	2.2
Rehabilitation/Rehab Medicine	21	29	20	19	89	1.9
Cardiology	18	15	29	26	88	1.9
Pediatrics	15	19	30	20	84	1.8
Neonatology	21	21	17	25	84	1.8
Other	15	20	25	13	73	1.5
Oncology	17	12	21	15	65	1.4
Hemodialysis	17	9	20	12	58	1.2
Nursery/NICU	9	12	24	10	55	1.2
Neurosurgery	11	8	15	18	52	1.1
Ambulatory Surgery	4	6	14	21	45	1.0
All Others*	101	133	128	129	491	10.4
Total	1,026	1,116	1,318	1,252	4,712	100

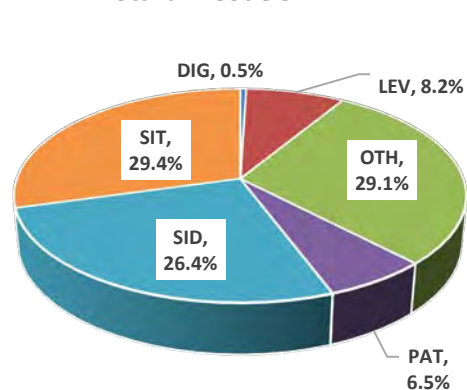
* Service categories with <1% of the total were combined into "All Others" .

Occurrences of Codes 911, 913 and 915 by Sub Codes and Occurrence Year, 2014-2017: Hospitals

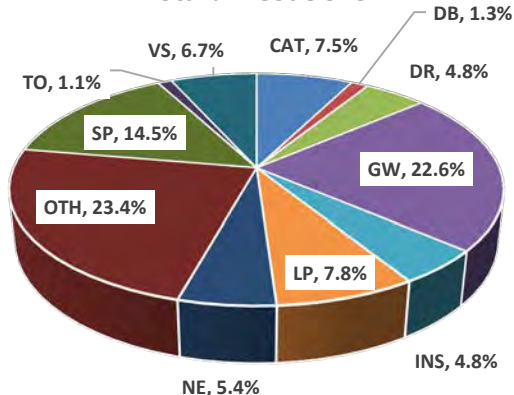
Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Year	911: Wrong site, patient, surgical, or procedure							913: Unintended retention of a foreign object after surgery or invasive procedure											915: Patient death or serious injury											All	
	DIG	LEV	OTH	PAT	SID	SIT	Total	CAT	DB	DR	GW	INS	LP	NE	OTH	SP	TO	VS	Total	BIO	FAL	LPR	MAT	NEO	OTH	PHL	RES	RX	SUR		Total
2014	1	7	23	6	28	28	93	10	4	3	30	3	6	5	23	16	2	7	109	2	332	20	131	196	1	248	3	53	2	988	1,190
2015	1	7	21	6	25	33	93	10	0	6	21	5	7	6	24	16	0	4	99	8	359	17	171	187	0	269	1	52	5	1,069	1,261
2016	0	11	35	8	25	24	103	7	0	3	12	6	6	4	17	11	1	9	76	2	399	21	216	218	0	332	3	61	1	1,253	1,432
2017	0	8	38	6	28	33	113	1	1	6	21	4	10	5	23	11	1	5	88	4	337	16	257	211	0	315	1	49	3	1,193	1,394
All	2	33	117	26	106	118	402	28	5	18	84	18	29	20	87	54	4	25	372	16	1,427	74	775	812	11	1,164	8	215	11	4,503	5,277

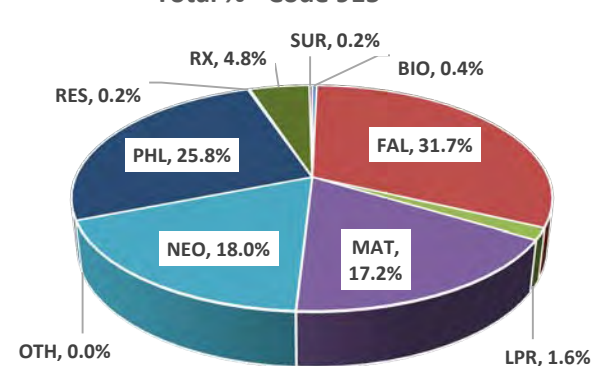
Total % - Code 911



Total % - Code 913



Total % - Code 915

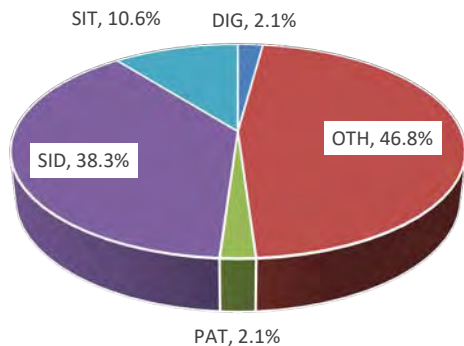


Occurrences of Codes 911, 913 and 915 by Sub Codes and Occurrence Year, 2014-2017: ASCs

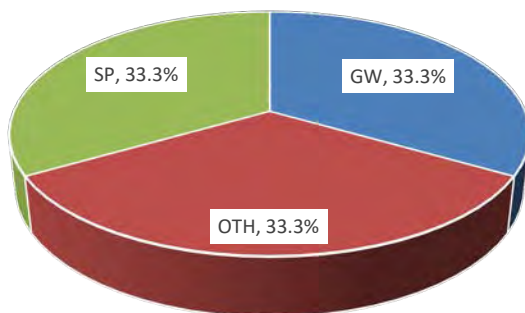
Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Year	911: Wrong site, patient, surgical, or procedure						913: Unintended retention of a foreign object after surgery or invasive procedure				915: Patient death or serious injury					All
	DIG	OTH	PAT	SID	SIT	Total	GW	OTH	SP	Total	FAL	PHL	RX	SUR	Total	
2014	0	11	0	7	1	19	0	1	0	1	0	14	0	1	15	35
2015	0	6	0	3	2	11	0	0	0	0	1	26	0	0	27	38
2016	0	2	1	1	1	5	1	0	1	2	1	38	1	0	40	47
2017	1	3	0	7	1	12	0	0	0	0	0	32	0	1	33	45
All	1	22	1	18	5	47	1	1	1	3	2	110	1	2	115	165

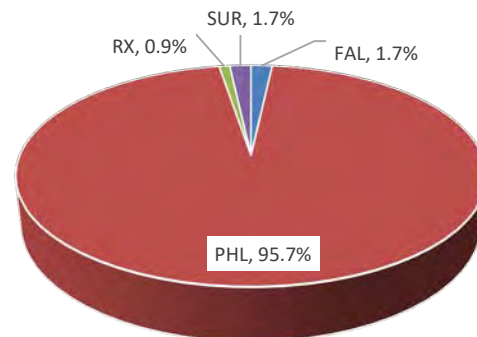
Total % - Code 911



Total % - Code 913



Total % - Code 915



Sub Code Descriptions for Codes 911, 913 and 915

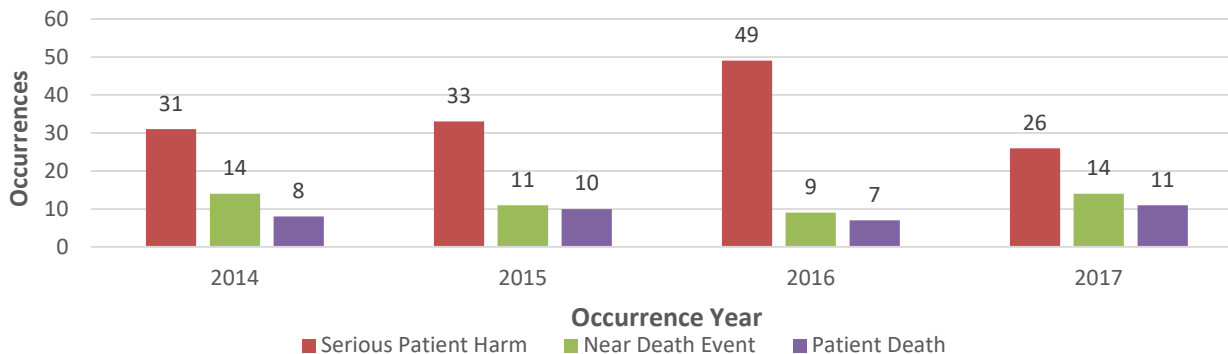
Code 911	Code 913	Code 915
DIG Wrong digit	CAT Catheter	BIO Death or serious injury resulting from the irretrievable loss of an irreplaceable biologic specimen
LEV Wrong level	DR Drain	FAL Fall associated with a death or serious injury
SID Wrong side	DB Drill Bit	LPR Death or serious injury associated with failure to follow up or communicate lab, pathology, radiology test results
SIT Wrong site	GW Guidewire	MAT Maternal death or serious injury
PAT Wrong patient	INS Instrument	MRI Death or serious injury associated with the introduction of a metallic object into the MRI area
OTH Wrong procedure	LP Lap Pad	NEO Neonatal death or serious injury
	NE Needle	Death or serious injury in circumstances other than those related to the natural course of illness, disease or proper treatment
	SP Sponge	PHL
	TO Towel	RES Death or serious injury associated with the use of physical restraints or bedrails
	VS Vaginal Sponge	RX Death or serious injury associated with a medication error
	OTH Other	SUR Intraoperative or immediately post-operative/post procedure death
		OTH Other, this sub-code retired in late 2014

Occurrences by Primary Codes (Medication Errors) and Occurrence Year, 2014-2017

Data Source: NYPORTS 2014-2017, as of Nov. 30th, 2018

Medication Error Code*	Description	Occurrence Year				Total	%
		2014	2015	2016	2017		
108	Serious Patient Harm	31	33	49	26	139	62.3
109	Near Death Event	14	11	9	14	48	21.5
110	Patient Death	8	10	7	11	36	16.1
All		53	54	65	51	223	100

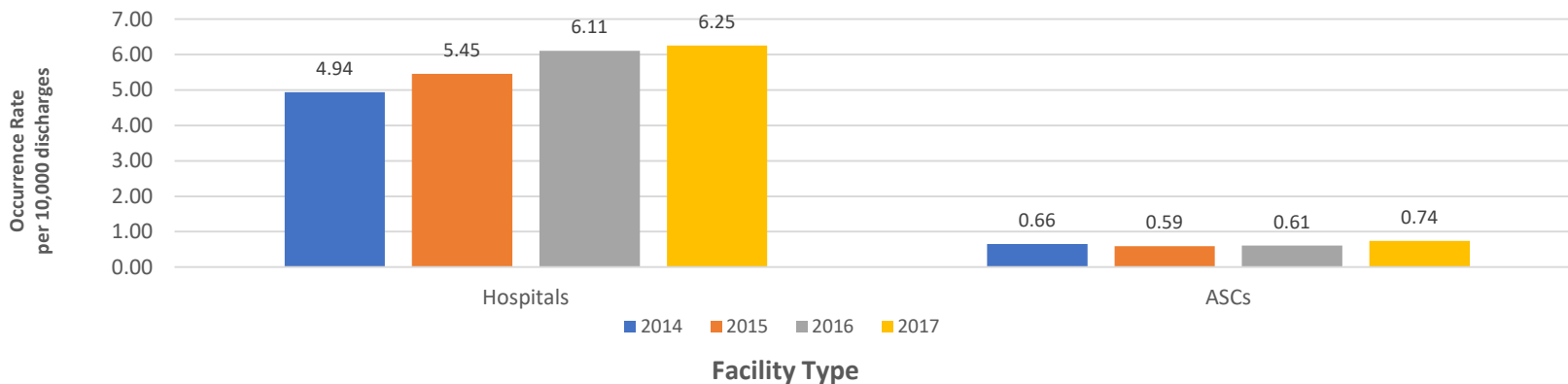
* Medication error code associated with a serious injury (detail code 915 with sub code RX).



Occurrences, Discharges and Occurrence Rate (per 10,000 discharges) by Facility Type and Occurrence Year, 2014-2017

Data Source: NYPORTS, 2014-2017 as of Nov. 30th, 2018; SPARCS 2014-2017 as of Nov. 15th, 2018

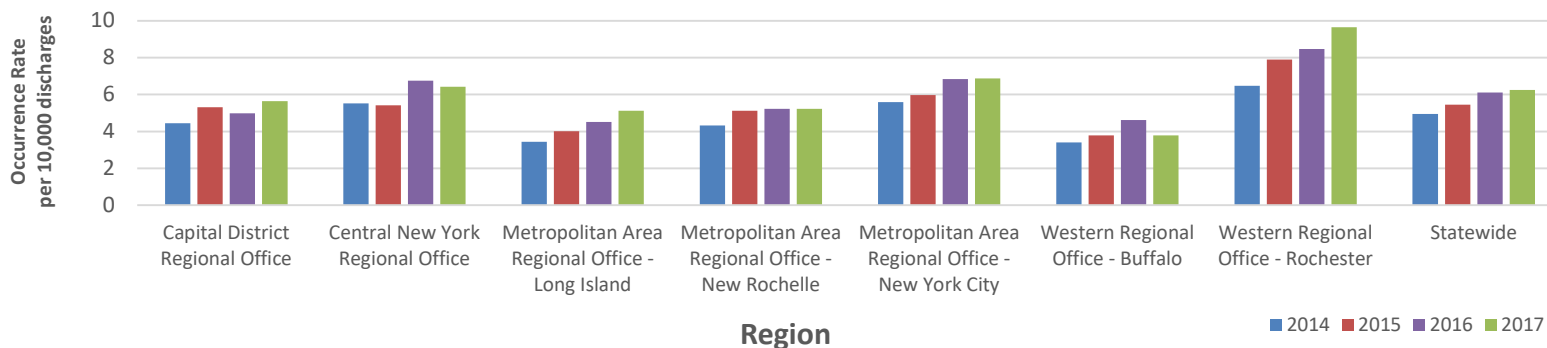
Facility Type	Occurrence Year											
	2014			2015			2016			2017		
	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges	Occurrences (NYPORTS)	Discharges (SPARCS)	Rate per 10,000 discharges
Hospitals	1,884	3,815,276	4.94	2,070	3,795,165	5.45	2,318	3,794,813	6.11	2,312	3,696,962	6.25
ASCs	53	808,875	0.66	52	879,265	0.59	58	951,705	0.61	69	929,023	0.74



Occurrences, Discharges and Occurrence Rate (per 10,000 discharges) by Region and Occurrence Year, 2014-2017: Hospitals

Data Source: NYPORTS, 2014-2017 as of Nov. 30th, 2018; SPARCS 2014-2017 as of Nov. 15th, 2018

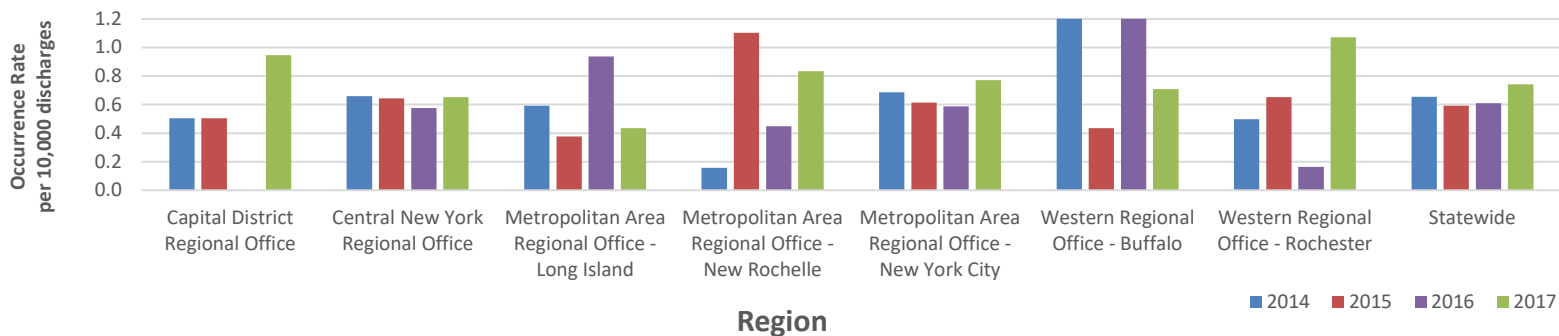
Regional Office	Occurrence Year											
	2014			2015			2016			2017		
	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate
Capital District Regional Office	138	310,007	4.45	166	312,261	5.32	161	323,294	4.98	177	313,953	5.64
Central New York Regional Office	185	334,932	5.52	182	336,145	5.41	231	341,875	6.76	206	321,254	6.41
Metropolitan Area Regional Office - Long Island	189	550,985	3.43	220	548,844	4.01	249	550,956	4.52	273	533,333	5.12
Metropolitan Area Regional Office - New Rochelle	160	370,286	4.32	190	370,908	5.12	196	375,067	5.23	194	370,851	5.23
Metropolitan Area Regional Office - New York City	926	1,655,720	5.59	974	1,632,869	5.96	1,099	1,608,778	6.83	1,087	1,583,923	6.86
Western Regional Office - Buffalo	109	319,974	3.41	121	319,522	3.79	146	316,353	4.62	115	303,982	3.78
Western Regional Office - Rochester	177	273,372	6.47	217	274,616	7.90	236	278,490	8.47	260	269,666	9.64
Statewide	1,884	3,815,276	4.94	2,070	3,795,165	5.45	2,318	3,794,813	6.11	2,312	3,696,962	6.25



Occurrences, Discharges and Occurrence Rate (per 10,000 discharges) by Region and Occurrence Year, 2014-2017: ASCs

Data Source: NYPORTS, 2014-2017 as of Nov. 30th, 2018; SPARCS 2014-2017 as of Nov. 15th, 2018

Regional Office	Occurrence Year											
	2014			2015			2016			2017		
	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate	Occur	Disch (SP)	Rate
Capital District Regional Office	4	79,178	0.51	4	79,404	0.50	0	91,238	0.00	9	95,052	0.95
Central New York Regional Office	7	106,318	0.66	7	108,682	0.64	7	121,660	0.58	8	122,704	0.65
Metropolitan Area Regional Office - Long Island	7	118,096	0.59	5	133,007	0.38	13	138,746	0.94	6	138,158	0.43
Metropolitan Area Regional Office - New Rochelle	1	63,521	0.16	7	63,463	1.10	3	66,916	0.45	6	71,896	0.83
Metropolitan Area Regional Office - New York City	20	291,818	0.69	21	341,704	0.61	22	374,893	0.59	26	336,990	0.77
Western Regional Office - Buffalo	11	89,588	1.23	4	91,797	0.44	12	97,083	1.24	7	98,903	0.71
Western Regional Office - Rochester	3	60,356	0.50	4	61,208	0.65	1	61,169	0.16	7	65,320	1.07
Statewide	53	808,875	0.66	52	879,265	0.59	58	951,705	0.61	69	929,023	0.74





Arizona Medical Board

1740 W. Adams, Suite 4000 • Phoenix, AZ 85007

Telephone: 480-551-2700 • Toll Free: 877-255-2212 • Fax: 480-551-2704

Website: www.azmd.gov • E-Mail: questions@azmd.gov

January 22, 2025

Richard Arjun Kaul, MD
6th North Midland Avenue, Apt# 308
Nyack, NY 10960

Email: drRichardKaul@gmail.com

Re: Application for Licensure

Dear Dr. Kaul ,

The Arizona Medical Board (AMB) has received your application for a license to practice medicine in Arizona.

After a review of your application and the verification of your licensing history, it has been determined that you do not qualify for licensure because you do not meet the basic requirements for licensure. Specifically, you do not meet the requirements of **A.R.S. § 32-1422(A)(5) due to the revocation of your New Jersey Medical License on February 12, 2014.**

32-1422. Basic requirements for granting a license to practice medicine; credentials verification

A. An applicant for a license to practice medicine in this state pursuant to this article shall meet each of the following basic requirements:

...

5. Not have had a license to practice medicine revoked by a medical regulatory board in another jurisdiction in the United States for an act that occurred in that jurisdiction that constitutes unprofessional conduct pursuant to this chapter.

7. Not have surrendered a license to practice medicine in lieu of disciplinary action by a medical regulatory board in another jurisdiction in the United States for an act that occurred in that jurisdiction and that constitutes unprofessional conduct pursuant to this chapter.

You may withdraw your application by submitting a written request to [designate Board staff member] within 10 days from the date of this letter. If the application is not withdrawn, it will be forwarded to the Board will a recommendation to deny the license. A withdrawal of this application is **not** a reportable action to the National Practitioner Data Base; however, a license denial will be reported to the National Practitioner Data Bank.

Very truly yours,

Patricia E. McSorley, Executive Director

JANUARY 26, 2025

PATRICIA E. MCSORLEY
EXECUTIVE DIRECTOR
ARIZONA MEDICAL BOARD
1740 W. ADAMS, SUITE 4000
PHOENIX, AZ 85007

RE: APPLICATION FOR LICENSURE IN ARIZONA

Dear Ms. McSorley,

Thank you for your January 24, 2025 email in response to my January 23, 2024 email to which was attached a letter dated January 22, 2025 (enclosed) that was filed in response to your January 22, 2025 email to which was attached your January 22, 2025 letter (enclosed).

In summary your January 22, 2025 letter stated that my application had been denied based on the 2014 revocation of my New Jersey license, albeit it admittedly illegal, and that I had the option of withdrawing the application or having it presented to the board for in essence a ratification of the board's purported initial denial. No document with board member signatures has been provided nor evidence to substantiate it was actually presented to the board.

The thrust of my January 22, 2025 letter requests that before I decide whether to withdraw the application or proceed you assert your position with regards to the **"relevance of the June 27, 2024 SCOTUS rulings in SEC v Jarkesy: 22-859 (June 27, 2024) and Loper Bright Enterprises v Raimondo: 22-451 (June 28, 2024) to the illegal article III judge-free juryless April 9, 2012/March 24, 2014 NJ license revocation."**

If you adopt the position that the cases have no relevance, as did co-conspirator/defendant New York State Medical Board, this being a violation of the Supremacy Clause, then you will become subject to suit as is co-conspirator/defendant New York State Medical Board **and The Kaul Cases** Defendant New Jersey Board of Medical Examiners.

If, however you agree that the application of the law to the facts of the 2014 NJ revocation, i.e., an illegal jury-less article III judge-free \$475,000 'fine' imposing revocation, establish the illegality of the revocation proceedings and the revocation, then your basis for initial denial is

nullified, there exists no requirement for further examination by the board and my application should be immediately granted.

Any further board meeting that renders or even considers any further aspect of the application prior to the submission of your position as to the illegality of the 2014 NJ revocation will not only be considered a knowing violation of the law and my rights, but will be without legal effect and will constitute a further basis for damages.

If I receive no response by January 29, 2025 as to the applicability to Jarkesy/Loper, I will request a district court within the United States District Court adjudicate the question.

You cannot, as a lawyer, not understand the relevance of this issue/question to a fair and lawful adjudication of the application, and the fact that you are attempting to pursue a patently illegal course, does nothing but substantiate the claims asserted in K11-24 against The Kaul Cases Defendant Federation State Medical Boards/others.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul', written over a horizontal line.

RICHARD ARJUN KAUL, MD

cc: Bradley Kilmer, Esq – Counsel to Co-conspirator NYSMB
Jay Brown – Counsel to The Kaul Cases Defendant FSMB

JANUARY 22, 2025

PATRICIA E. MCSORLEY
EXECUTIVE DIRECTOR
ARIZONA MEDICAL BOARD
1740 W. ADAMS, SUITE 4000
PHOENIX, AZ 85007

RE: APPLICATION FOR LICENSURE IN ARIZONA

Dear Ms. McSorley,

Thank you for your January 22, 2025 (copy enclosed) identifying the basis for the denial of my licensure application.

However, before I respond, could you please, in your capacity as the legal representative of the Arizona Medical Board, articulate your position as to the relevance of the June 27, 2024 SCOTUS rulings in SEC v Jarkesy: 22-859 (June 27, 2024) and Loper Bright Enterprises v Raimondo: 22-451 (June 28, 2024) to the illegal article III judge-free juryless April 9, 2012/March 24, 2014 NJ license revocation.

Please find within the enclosed August 8, 2024 letter from myself to the New York State Medical Board my position as to these matters. Although I am sure a copy of this letter was brought into your possession by either the New York State Medical Board and or The Kaul Cases Defendant, Federation State Medical Boards, I have for the sake of completeness included this document.

Finally, I conclude from the lack of any reference to the 1999 UK case as a basis for denial, that you have determined it to be irrelevant to the issuance of a state medical license within the United States, and that being a subjugate member of The Kaul Cases Defendant, Federation State Medical Boards you adhere, as do all other state board members, to the same standard regarding the granting of license applications.

And in fact, to not adhere to the same license granting standard would undermine/contradict The Kaul Cases Defendant, Federation State Medical Boards policy of so called 'reciprocal discipline'. A policy, as I am sure you aware, that generates vast profits for The Kaul Cases Defendant, Federation State Medical Boards and its subjugate members through the

enforcement of legal fees/course remediation fees/'fines'/'penalties' that are imposed on 'disciplined' physicians by what is referred to in **The Kaul Cases** as the "**Federation Cartel**".

I look forward to your response and please see that counsel for **The Kaul Cases** Defendant, Federation State Medical Boards and its subjugate member/co-conspirator, New York State Medical Board are copied on this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul', with a horizontal line underneath.

RICHARD ARJUN KAUL, MD

cc: Bradley Kilmer, Esq – Counsel to Co-conspirator NYSMB
Jay Brown – Counsel to Defendant FSMB



Arizona Medical Board

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January 22, 2025

Richard Arjun Kaul, MD
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Email: drRichardKaul@gmail.com

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Very truly yours,

Patricia E. McSorley, Executive Director