

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

AUG 26 2024

Nathan Ochsner, Clerk of Court

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

v.

FEDERATION STATE MEDICAL BOARDS;
CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS;
JAMES HOWARD SOLOMON;
ALLSTATE INSURANCE COMPANY;
CHRISTOPHER J. CHRISTIE; ROBERT FRANCIS HEARY
DANIEL STOLZ; JANE DOE; JOHN DOE.

CIVIL ACTION: NO.:

24-3180

COMPLAINT

KAUL v. FEDERATION ET AL
K11-20

CONTENTS

A. PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY – PAGE 10

1. PARTIES – PAGE 11

2. PRE JARKESY AND TOPER REFERENCED CASES OF ‘THE KAUL CASES’ -PAGE 12

3. JURISDICTION + VENUE – PAGE 13

4. EXHIBITS – PAGE 14

5. STATEMENT OF DEFENDANTS CULPABILITY – PAGE 16

6. CONSOLIDATION OF THE KAUL CASES + INTERESTED PARTIES – PAGE 17

7. BASIS FOR ALL DISTRICT STANDING – PAGE 18

B. FACTS – PAGE 19

1. STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW – PAGE 20

a. NULLIFICATION OF ALL PRIOR ADMINISTRATIVE/STATE MEDICAL BOARD/STATE/BANKRUPTCY/DISTRICT/APPELLATE PROCEEDINGS BY JARKESY + TOPER + ADMITTED FACTS – PAGE 20

b. ONGOING CAUSATION OF NEW CLAIMS, INJURIES, VIOLATIONS AND DAMAGES – PAGE 20

c. JUNE 28, 2022-451 LOPER BRIGHT ENTERPRISES ET AL v. RAIMONDO SECRETARY OF COMMERCE ET AL. ARGUED JANUARY 17, 2024-DECIDED JUNE 28, 2024 – PAGE 21

d. JUNE 27, 2024: 22-859 SECURITIES AND EXCHANGE COMMISSION v. JARKESY ET AL. ARGUED NOVEMBER 29, 2023-DECIDED JUNE 27, 2024 (Exhibit 1) – PAGE 21

e. NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN’S K11-7 SEPTEMBER 12, 2022 ‘INJUNCTION’ BY JUNE 27, 2024, SCOTUS OPINION IN JARKESY – PAGE 22

f. THE ILLEGALLY CONDUCTED ADMINISTRATIVE LAW PROCEEDINGS AND BOARD REVOCATION (APRIL 9, 2013, TO MARCH 24, 2014) – PAGE 25

g. INJURIES CAUSED TO PLAINTIFF KAUL CONSEQUENT TO DEFENDANT SOLOMON’S ILLEGAL ORDER OF REVOCATION – PAGE 27

h. JUNE 17, 2024: STATE OF NEW JERSEY v. GEORGE NORCROSS, III, PHILIP NORCROSS, ET AL: INDICTMENT NO. 24-06-00111-S – SUPERIOR COURT OF NEW JERSEY LAW DIVISION – CRIMINAL (Exhibit 3) – PAGE 28

i. JUNE 14, 2024:KAUL v CPEP ET AL: 23-CV-00672 – PAGE 29

j. APRIL 9, 2012, TO JULY 2, 2024 – PAGE 30

k. MARCH 25, 2024: KAUL v JAMES PAUL OETKEN: 24-CV-00185 (K11-18) – PAGE 30

2. STATEMENT OF FACT ADMITTED PURSUANT TO RULE 8(b)(6) AND RULE 36 – PAGE 32

3. STATEMENT OF FACT COMMON TO ALL DEFENDANTS, ALL ISSUES AND THE OVERALL PURPOSE OF K11-20 AND THE KAUL CASES – PAGE 33

a. THE “HOSPITAL-INSURANCE-PHARMACEUTICAL-INDUSTRIAL COMPLEX – FEDERATION CARTEL” (“HIPIC- FC”) – PAGE 33

b. DEFENDANTS CONVERSION OF THE AMERICAN CORPORATE/ POLITICAL/MEDICAL/ LEGAL BODIES INTO AN “ASSOCIATION-IN-FACT RACKETEERING ENTERPRISE” – PAGE 35

c. FACTS OF CONSPIRACY AS TO DEFENDANTS ALLSTATE/CHRISTIE AND CO-CONSPIRATORS HORIZON BLUE CROSS BLUE SHIELD/GEICO INSURANCE COMPANY (JULY 2012 TO MARCH 2014) – PAGE 37

d. US INSURANCE GIANT, BLUE CROSS BLUE SHIELD, HAS EXPOSED ITS TARGETING OF ETHNIC MINORITY PHYSICIANS FOR MASS INCARCERATION – PAGE 38

e. FACTS RELEVANT TO THE DEFENDANTS “ONGOING PATTERN OF RACKETEERING” – PAGE 39

(i) The UC San Diego Physician Assessment and Clinical Education (PACE) Program – PAGE 39

(ii) The New York State Medical Board – PAGE 39

f. OTHER FACTS – PAGE 40

4. STATEMENT OF FACT SPECIFIC TO EACH DEFENDANT – PAGE 41

a. FACTS AS TO DEFENDANTS SOLOMON – PAGE 41

b. FACTS AS TO DEFENDANT CPEP – PAGE 42

c. FACTS AS TO DEFENDANT FEDERATION STATE MEDICAL BOARDS – PAGE 45

(i) DEFENDANT FSMB’S MONOPOLIZATION OF THE MULTI-STATE AMERICAN PHYSICIAN REGULATORY MARKET SUBJECTS THEM TO REGULATORY MARKET RELATED MULTI-DISTRICT LITIGATION – PAGE 46

(ii) DEFENDANT FSMB’S SUPPRESSION OF FREE SPEECH, THE COVID VACCINE FRAUD AND PROFIT PURPOSED HUMAN RIGHTS ABUSES, TOXICITY AND DEATH – PAGE 47

(iii) DEFENDANT FSMB/CO-CONSPIRATOR TMB’S PROFITEERING FROM THE OPIATE EPIDEMIC – PAGE 50

d. FACTS AS TO DEFENDANT CHRISTIE – PAGE 51

e. FACTS AS TO DEFENDANT HEARY – PAGE 52

f. FACTS AS TO DEFENDANT STOLZ – PAGE 52

g. FACTS AS TO K11-18 RESPONDENT-DEFENDANT AND K11-20 THIRD-PARTY WITNESS JAMES PAUL OETKEN – PAGE 52

(i) JUDICIAL CORRUPTION + FRAUD ON THE COURT - ‘THE OETKEN ANALYSIS’ – DEFENDANTS PERPETRATION IN THE UNITED STATES DISTRICT COURT OF A ‘FRAUD ON THE COURT’ AND RESULTANT NULLITY OF THE K11-7 SEPTEMBER 12, 2022, PURPORTED ‘OPINION/ORDER’ OF JAMES PAUL OETKEN AND THE K11-10 MAY 10, 2023, ORDER OF U.S.D.J. ROCHON – PAGE 56

5. STATEMENT OF EVIDENTIAL EXHIBITS CONTAINED WITHIN THE KAUL CASES - PAGE 66

a. FACTS OF RACIAL DISCRIMINATION AS TO DEFENDANT ALLSTATE

C. LEGAL CLAIMS AND RELIEF – PAGE 73

1. COUNT ONE – PAGE 74

Association-In-Fact Enterprise: State of Texas-State of Colorado (“SNC-SC Association-In-Fact Enterprise”)

Defendant Persons: CPEP/FSMB

Co-conspirators: Defendant Solomon/Allstate/Christie

RICO Predicate Acts: Wire Fraud/Bribery/Witness Tampering/Evidential Tampering

2. COUNT TWO – PAGE 79

Association-In-Fact Enterprise: New Jersey Medical Board-Federation State Medical Boards-Texas Medical Board (“NJMB-FSMB-NCMB Association-In-Fact Enterprise”)

Defendant Persons: Solomon/Christie/Allstate

Co-conspirators: Geico/TD

RICO Predicate Acts: Mail Fraud/Wire Fraud/Public Corruption/Bribery

3. COUNT THREE – PAGE 87

Association-In-Fact Enterprise: Corporations-Governments-FSMB//Co-conspirator TMB IAMRA-Medical Boards/Councils-NYSE (“CFN Association-In-Fact RICO Enterprise”)

Defendant Person: FSMB

Co-conspirator TMB

Co-conspirators: Pfizer/Moderna/Astra Zenica/Johnson + Johnson + Corporate Media

RICO Predicate Acts: Wire Fraud/Murder/Manslaughter/Public

Corruption/Bribery/Money Laundering

4. COUNT FOUR – PAGE 96

Association-In-Fact Enterprise: United States District Court-NYSE (“SDNY-NYSE

Association-In-Fact- Enterprise)

Defendant Persons: Allstate

Co-conspirators: Geico/TD/ICE

RICO Predicate Acts: Bribery/Fraud on the Court/Public Corruption/Money Laundering

5. COUNT FIVE – PAGE 98

Association-In-Fact Enterprise: State of New York-New York State Medical Board-State of Texas-Texas Medical Board (“NYSMB-FSMB-NCMB Association-In-Fact-Enterprise)

Defendant Persons: FSMB/Allstate

Co-conspirator: Geico

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

6. COUNT SIX – PAGE 102

Association-In-Fact Enterprise: State of California-UC San Diego Physician Assessment and Clinical Education (PACE) Program

Defendant Persons: FSMB/Allstate

Co-conspirator: Geico

RICO Predicate Acts: Wire fraud/Conspiracy/Public Corruption

7. COUNT SEVEN – PAGE 105

Association-In-Fact Enterprise: State of Texas-NYSE-SEC (“SNS Association-In-Fact-Enterprise)

Defendant Persons: Allstate/Christie

Co-conspirators: TD/Geico/ICE

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

8. COUNT EIGHT – PAGE 114

Association-In-Fact Enterprise: State of Texas-United States Bankruptcy Court-NYSE
Defendant Persons: Allstate/Stolz
Co-conspirators: Geico/TD
RICO Predicate Acts: bankruptcy fraud/mail fraud/wire fraud/public corruption/bank fraud/securities fraud/money laundering

9. COUNT NINE – PAGE 119

Association-In-Fact Enterprise: State of Texas-United States District Court
Defendant Persons: Christie/Heary
Co-conspirator: AHS
RICO Predicate Acts: mail fraud/wire fraud/bribery/obstruction of justice/public corruption/money laundering

10. COUNT TEN – PAGE 125

Association-In-Fact Enterprise: State of New Jersey-United States District Court-United States Bankruptcy Court-NYSE
Defendant Persons: FSMB/Christie/Allstate
Co-conspirators: Geico/NCMB
RICO Predicate Acts: mail fraud/wire fraud/bribery/obstruction of justice/public corruption/money laundering

11. COUNT ELEVEN – PAGE 133

Association-In-Fact Enterprise: State of Texas-United States Bankruptcy Court-United States District Court
Defendant Persons: Christie/Allstate
Co-conspirators: Geico/Grewal/Murphy
RICO Predicate Acts: kidnapping/mail fraud/wire fraud/bribery/obstruction of justice/public corruption

12. COUNT TWELVE – PAGE 144

Association-In-Fact Enterprise: State of New York-State of Texas-NYSE (“SSN Association-In-Fact Enterprise)
Defendant Persons: Allstate/FSMB
Co-conspirators: Geico/Hengerer/NCMB
RICO Predicate Acts: Bribery/Mail Fraud/Wire Fraud/Obstruction of Justice/Conspiracy

13. COUNT THIRTEEN – PAGE 149

Violation of Civil Rights
Symbiosis of State/Private Actors

14. COUNT FOURTEEN – PAGE 150

Section 1983 claim

15. COUNT FIFTEEN – PAGE 153

UN Human Rights Violation
The United Nations Universal Declaration of Human Rights

16. RELIEF – PAGE 157

17. CERTIFICATION – PAGE 158

A. PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY

1. PARTIES

Plaintiff

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

Defendants

FEDERATION STATE MEDICAL BOARDS - 400 Fuller Wiser Rd, Suite 300, Euless, TX 76039
 (“FSMB”)

CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS – 222 NORTH PERSON STREET
 RALEIGH, NC 27601-1067 (“CPEP”)

ALLSTATE INSURANCE COMPANY – 2775 SANDERS ROAD, NORTH PLAZA, NORTHBROOK, IL
 60062-6127 (“ALLSTATE”).

CHRISTOPHER J. CHRISTIE – 46 Corey Lane, Mendham, NJ 07960 (“CHRISTIE”).

DANIEL STOLZ – 60 Christy Drive, Warren, NJ 07059-6833 (“STOLZ”).

ROBERT HEARY – 1 Bay Avenue, Suite 5, Montclair, NJ 07042 (“HEARY”).

JAMES HOWARD SOLOMON – 44 DOVER STREET, ASHEVILLE, NC 28804-2557 – SUBDIVISION
 NAME: COUNTRY CLUB VILLAS OF ASHEVILLE.

828 505 0885 – jamessolomon@gmail.com (“SOLOMON”) - The corrupted New Jersey
 lawyer/administrative law judge who presided over the administrative law proceedings (April 9
 to June 28, 2013) and whose December 13, 2013, signed opinion/order ‘rubber-stamped’ The
 Kaul Cases conspiracy (commenced in 2005) that caused the illegal license revocation and all
 the consequent injuries to Plaintiff Kaul’s life/liberty/property.

2. PRE-JARKESY AND TOPER REFERENCED CASES OF 'THE KAUL CASES'

K1: KAUL v CHRISTIE: 16-CV-02364-CLOSESD

K2: KAUL v CHRISTIE ET AL: 18-CV-08086-CLOSED

K3: KAUL v SCHUMER ET AL: 19-CV-13477-CLOSED

K4: KAUL v STOLZ: 18-01489-CLOSED

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

K11-2: KAUL v BOSTON PARTNERS ET AL: 21-CV-10326-CLOSED

K11-3: KAUL v ALLSTATE ET AL: 21-CV-00736-CLOSED

K11-7: KAUL v ICE ET AL: 21-CV-6992-CLOSED

K11-8: KAUL v PACE: 23-CV-00955-CLOSED

K11-10: KAUL v ICE ET AL: 23-CV-2016-CLOSED

K11-14: KAUL v FEDERATION ET AL: 23-CV-22325-CLOSED

K11-15: KAUL v CHRISTIE/MURPHY: 23-CV-22582-CLOSED

K11-17: KAUL v CPEP: 23-CV-00672-CLOSED

K11-18: KAUL v OETKEN: 23-CV-00185-CLOSED

K11-19: KAUL v TEXAS MEDICAL BOARD ET AL: 24-CV-00163-STAYED

K11-20: KAUL v FEDERATION: CASE NO. PENDING

K11-22: KAUL v BCBSA ET AL: 23-CV-01688-OPEN

3. JURISDICTION + VENUE

General:

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

U.S.C. § 1337 – Plaintiff’s allegations allege violations of an Act of Congress regulating commerce and monopolies.

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

Personal:

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

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 Texas 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 Western District of Texas, that confers on Plaintiff Kaul the right to sue in the United States District Court for the Western District of Texas.

4. EXHIBITS

JUNE 2014: ARTICLES REGARDING DEFENDANT CHRISTIE'S QUID PRO QUO SCHEMES WITH NJ 'POLITICAL BOSS' AND PERSON INDICTED ON JUNE 13, 2024, GEORGE NORCROSS – **EXHIBIT 8**

APRIL 21, 2017: ORDER BY THE AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS PUBLICLY CENSURING **THE KAUL CASES** DEFENDANT FOR LYING UNDER OATH AS AN EXPERT IN A MEDICAL MALPRACTICE CASE. PLAINTIFF KAUL'S LICENSE REVOCATION WAS BASED ON THE TESTIMONY OF THE KAUL CASES DEFENDANTS GREGORY PRZYBYLSKI AND ANDREW KAUFMAN – **EXHIBIT 13**

JUNE 30, 2017: OPINION IN K1 OF U.S.D.J. KEVIN MCNULTY, OPINING THAT 2014 REVOCATION WAS LEGAL AND PROCEEDING WAS CONDUCTED IN ACCORDANCE WITH DUE PROCESS CLAUSES OF CONSTITUTION AND PLAINTIFF KAUL WAS PROVIDED THE "FULL PANOPLY OF DUE PROCESS RIGHTS" – **EXHIBIT 7**

OCTOBER 1, 2019: COMPLAINT EXCERPT IN K5 REGARDING UNCONSTITUTIONALITY/ILLEGALITY OF ADMINISTRATIVE PROCESS OF PHYSICIAN LICENSE REVOCATION – **EXHIBIT 6**

MAY 11, 2020: ARTICLES PUBLISHED ON INTERNET BY PLAINTIFF KAUL REGARDING TOXICITY OF SO CALLED COVID 'VACCINE' – **EXHIBIT 16**

FEBRUARY 1, 2022, TO MARCH 9, 2023: ARTICLES AND LEGAL SUBMISSION REGARDING DEFENDANT FSMB'S-STATE MEDICAL BOARDS ("FEDERATION CARTEL") MAFIA-LIKE TACTICS OF LICENSE REVOCATION AND FREE SPEECH SUPPRESSION AGAINST PHYSICIANS WHO WROTE/SPOKE ABOUT THE LETHAL TOXICITY OF THE SO CALLED COVID 'VACCINE' – **EXHIBIT 17**

SEPTEMBER 12, 2022: ORDER IN K11-17 BY DEFENDANT-RESPONDENT JAMES PAUL OETKEN PURPORTEDLY INJUNCTING PLAINTIFF KAUL FROM FILING ANY FURTHER ACTIONS IN THE UNITED STATES DISTRICT COURT WITHOUT HIS PERMISSION – **EXHIBIT 12**

SEPTEMBER 13, 2022: ADMISSION BY DEFENDANT-RESPONDENT OETKEN AS TO HIS QUID PRO QUO WITH K11-7 DEFENDANTS TO ISSUE A PURPORTED ANTI-FILING INJUNCTION AGAINST PLAINTIFF KAUL – **EXHIBIT 19**

MAY 16 TO JUNE 6, 2023: COMMUNICATIONS BETWEEN PLAINTIFF KAUL AND DEFENDANT CPEP – **EXHIBIT 14**

MARCH 13, 2024: ORDER FOR DISCOVERY PLAN IN K11-17 – **EXHIBIT 5**

MARCH 15, 2024: ORDER IN K11-7 BY K11-18 DEFENDANT-RESPONDENT JAMES PAUL OETKEN THREATENING TO HOLD PLAINTIFF KAUL IN CONTEMPT UNLESS HE DISMISSES K11-17 BY MARCH 29, 2024 – **EXHIBIT 11**

APRIL 11, 2024: DENIAL OF PLAINTIFF KAUL'S APPLICATION FOR TEXAS LICENSURE BASED ON ILLEGAL 2014 NJ REVOCATION – **EXHIBIT 3**

MAY 15, 2024: U.S.C.A. FOR THE FOURTH CIRCUIT – **THE KAUL CASES** DEFENDANTS ADMISSION OF ALL FACT IN ALL **THE KAUL CASES** (2016-2024). A PARTIAL TWELVE (12) PAGE COPY IS SUBMITTED AS THE ENTIRE THREE HUNDRED AND THREE (303) PAGE DOCUMENT IS SUBMITTED IN K11-19 (D.E. 1-7) IN CONJUNCTION WITH TWO HUNDRED AND THIRTY-SIX (236) PAGES OF EXHIBITS OF FACT – **EXHIBIT 2**

MAY 29, 2024: INFORMAL OPENING BRIEF IN U.S.C.A. IN KAUL v OETKEN (**CASE NO. 24-1417**) – **EXHIBIT 9**

JUNE 9, 2024: RELEASE FROM PLAINTIFF KAUL REGARDING PRESIDENT TRUMP'S 'CONVICTION' IN A NEW YORK STATE COURT + PLAINTIFF KAUL'S LAWSUIT AGAINST NEW YORK BASED DEFENDANT-RESPONDENT, JAMES PAUL OETKEN **AND** JUNE 12, 2024, LETTER FROM PLAINTIFF KAUL TO NYS ATTORNEY DISCIPLINARY COMMITTEE REGARDING DEFENDANT-RESPONDENT JAMES PAUL OETKEN – **EXHIBIT 18**

CONSEQUENT TO THE RELEASE, PLAINTIFF KAUL'S RELEASE PLATFORM WAS DEACTIVATED BY WIX.COM, A PUBLICLY TRADED CORPORATION IN WHICH SOME OF **THE KAUL CASES** DEFENDANTS HOLD SHARES. PLAINTIFF KAUL BEGAN USING THE APPLICATION IN 2015 AND WAS NEVER DEACTIVATED DESPITE DISTRIBUTING RELEASES RELATING TO POLITICAL/LEGAL EVENTS.

JUNE 13, 2024: CRIMINAL INDICTMENT IN NJ IN WHICH DEFENDANT CHRISTIE IS IDENTIFIED AS A CO-CONSPIRATOR + EXCERPT FROM JUNE 30, 2017, OPINION OF U.S.D.J. KEVIN McNULTY IN K1 OPINING THAT THE REVOCATION OF PLAINTIFF KAUL'S LICENSE WAS LEGAL AND CONDUCTED IN ACCORDANCE WITH THE DUE PROCESS CLAUSES OF THE CONSTITUTION, AND THAT PLAINTIFF KAUL WAS AFFORDED **"THE FULL PANOPLY OF DUE PROCESS"** – **EXHIBIT 7**

JUNE 14, 2024: ORDER OF DISMISSAL WITH PREJUDICE OF K11-17: **EXHIBIT 10**

JUNE 15, 2024: JUDICIAL NOTICE TO U.S.C.A. 4TH CIRCUIT RE: INVALIDITY OF JUNE 14, 2024, ORDER OF DISMISSAL WITH PREJUDICE OF K11-17 – **EXHIBIT 4**

JUNE 17, 2024: COMPLAINT IN STATE OF KANSAS v PFIZER REGARDING CLAIMS FOR DAMAGES FROM SO CALLED COVID 'VACCINE' – **EXHIBIT 15**

JUNE 27, 2024: SCOTUS – **SECURITIES AND EXCHANGE COMMISSION v. JARKEYS ET AL NO.22-859** - **EXHIBIT 1**

AUGUST 22, 2024: ADMISSIONS OF FACT FROM **THE KAUL CASES** – **EXHIBIT 1**

5. STATEMENT OF DEFENDANTS CULPABILITY

1. The Defendants are guilty of the within levied charges, pursuant to: (i) their admission of all fact (**Exhibit 2**) except the new facts asserted in K11-20 and; (ii) to the application of the below cited new intervening law to the admitted facts. This application unequivocally establishes the illegality of the 2014 NJ license revocation, a revocation that was the defining/determinative element of all **The Kaul Cases** Defendants defenses (2016-2024) and all the judicial opinions that dismissed **The Kaul Cases**.

2. **The Kaul Cases** Defendants and certain judges did, for eight (8) years, mischaracterize and slander Plaintiff Kaul's claim that the revocation was a consequence of a constitutionally unauthorized and illegal NJ administrative law proceeding, that was perpetrated with knowing illegality in furtherance of a monopolistic conspiracy between Plaintiff Kaul's market competitors in the minimally invasive spine surgery sector, corrupt politicians and state actors involved in physician licensing.

3. The June 27 and 28, 2024 SCOTUS rulings in **Jarkesy** and **Loper** (see below) as applied to the facts of **The Kaul Cases** do irrefutably establish Defendants culpability.

6. CONSOLIDATION OF THE KAUL CASES + INTERESTED PARTIES

4. In or around late 2005, certain members of The Kaul Cases Defendants commenced conspiring to cause the knowingly illegal revocation of Plaintiff Kaul's NJ license, in order to eliminate him from the burgeoning minimally invasive spine surgery market, a market in which his practice was rapidly expanding consequent to his 2005 invention of the percutaneous spinal fusion. This procedure revolutionized the field of spine surgery, and was perceived by The Kaul Cases Defendants as a threat to their commercial and professional practices.

5. The 2014 revocation proceeding was illegal ab initio, was conducted illegally, pursuant to Jarkesy and the Constitution and remains illegal. Consequent to the revocation, there did occur and continues to occur immense injury to Plaintiff Kaul's life/liberty/property/reputation and to his human/civil/constitutional rights. These violations and injuries are ongoing and with the passing of each day, there are "new" injuries/violations/losses, none of which have been remediated-rectified-recompensed. Plaintiff Kaul's license was illegally suspended on April 2, 2012, and as of July 9, 2024, he has sustained four thousand four hundred and eighty-one (4.481) days of injury to his life/liberty/property/reputation.

6. One of the issues that appears in all of the cases, other than The Kaul Cases Defendants "pattern of racketeering" is the illegal 2014 NJ revocation. It appears in K11-19, K11-20 and K11-22, the three (3) pending cases, all of which Plaintiff Kaul seeks to consolidate in the Southern District of Texas, a court highly experienced in the central issue decided in Jarkesy on June 27, 2024, by SCOTUS, that being the illegality/unconstitutionality of the jury-less deprivation of a person's life/liberty/property by administrative agencies/persons within administrative tribunals/offices.

7. But for the illegal 2014 revocation, Plaintiff Kaul would not have been caused injury (2012-2024) to his life/liberty/property/reputation and violations of his human/civil/constitutional rights.

8. The Court is aware of the INTERESTED PARTIES (D.E. 6), persons and entities inextricably involved in the perpetration of the injuries and violations and or the witnessing of the perpetration of the violations and injuries and or the facilitation of the conspiracy-schemes against Plaintiff Kaul.

9. Plaintiff Kaul respectfully asserts that a consolidation of the pending cases, in the context of Jarkesy and the immense/highly particularized foundation of admitted rights violating fact of The Kaul Cases will replicate in medicine the constitutionally faithful systemic change caused by Jarkesy in finance.

7. BASIS FOR ALL DISTRICT STANDING

10. 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 and Defendant FSMB, Co-conspirator NCMB and all state medical boards, information regarding the knowingly fraudulent suspension/revocation proceedings of Plaintiff Kaul's New Jersey license. The illegality of the 2014 NJ revocation was established on June 27, 2024 by SCOTUS in Jarkesy. The NPDB became a co-conspirator in the perpetration of the racketeering schemes detailed within The Kaul Cases.

11. 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.

12. Since April 2012, Plaintiff Kaul has continued to be caused injury in all states/districts because The Kaul Cases Defendants with Defendant 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.

13. Similarly, Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life/social standing/professional standing/physical standing have been injured and have 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.

14. On November 5, 2020 and then again on April 25, 2024 (Exhibit 3) Plaintiff Kaul affirmatively established the 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 or Texas despite a persistent/material/concerted effort since 2012 (Plaintiff Kaul's attempts at a 'peaceful' negotiation were ignored/rejected), and despite the fact that new law and new facts (see below) irrefutably establish that the 2012/2014 NJ suspension/revocation were/are illegal, DOES unequivocally establish standing in all districts.

15. 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.

B. FACTS

1. STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW.

16. K11-20 is brought based upon new law and new facts that have emerged since the unauthorized June 14, 2024, dismissal of K11-17 of Chief Judge Richard E. Myers III, a jurist who was knowingly conflicted consequent to an appeal Plaintiff Kaul filed against him in K11-18 in the U.S.C.A. for the 4th Circuit on May 6, 2024 (Case No. 24-1417). Plaintiff Kaul noticed the E.D.N.C. and the U.S.C.A. for the 4th Circuit as to the invalidity of the June 14, 2024, order (Exhibit 4).

An element of the factual foundation of K11-20 consists of material facts admitted in prior cases of The Kaul Cases, facts that became admitted upon The Kaul Cases Defendants failure to deny the facts within thirty (30) days pursuant to Rule 36 (Exhibit 1). Another element of the factual foundation of K11-20 pertains to Rule 8(b)(6) and the admission of all fact within all of The Kaul Cases, consequent to the fact that none of The Kaul Cases Defendants denied any of the facts asserted in any of the Complaints (2016-2024), thus causing the facts to become admitted pursuant to Rule 8(b)(6) for all purposes. Rule 8(b)(6), unlike Rule 36, deems facts admitted for all purposes and not just the case from which the admission arises, and one of those purposes includes Summary Judgment.

a. NULLIFICATION OF ALL PRIOR ADMINISTRATIVE/STATE MEDICAL BOARD/STATE/BANKRUPTCY/DISTRICT/APPELLATE PROCEEDINGS BY JARKEYS + TOPER + ADMITTED FACTS

17. Jarkesy and Toper nullify of all legal opinions/orders/proceedings in all administrative/state/bankruptcy/family/district/appellate/state medical board in all states in the United States that occurred after April 2, 2012, and had any relation/association/causation/connection or another link to the illegal 2012/2014 suspension and revocation.

18. The within stated corpus of new law/fact further negates/nullifies all prior opinion within the New Jersey administrative law proceedings (2010 to 2014) that caused the knowingly illegal suspension/revocation of Plaintiff Kaul's NJ license (2012/2014).

19. It also negates/nullifies all prior opinion within the United States District Court (2016-2024) including the September 12, 2022, opinion-injunction of The Kaul Cases Defendant, James Paul Oetken, and all opinions/orders that were either based on or incorporated findings/opinion/orders regarding the illegal 2012 suspension and or 2014 revocation. The 2014 revocation was the 'poisoned seed of greed-envy that spawned the poisoned tree' from which The Kaul Cases Defendants did eat/live for twelve (12) years.

b. ONGOING CAUSATION OF NEW CLAIMS, INJURIES, VIOLATIONS AND DAMAGES.

20. The filing of new claims based on new facts/law and ongoing/"new" offenses and injuries is pursuant to Jarkesy/Loper/ 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)/Agency Holding v. Malley-Duff, 483 U.S. 143 (1987)/Continuing Violations Doctrine/Bodner v. Banque Paribas 114 F.Supp.2d 117 (2000).

RELEVANT CHRONOLOGY:

c. JUNE 28, 2024: 22-451 LOPER BRIGHT ENTERPRISES ET AL v. RAIMONDO SECRETARY OF COMMERCE ET AL. ARGUED JANUARY 17, 2024-DECIDED JUNE 28, 2024:

21. The overruling of the Chevron doctrine of deference in Loper is of immense relevance to the power of a district court to reverse an administrative-agency action, particularly in light of the ruling in Jarkesy, as to the unconstitutionality of administratively based license revocations/civil penalties. Throughout The Kaul Cases, an element of the relief sought by Plaintiff Kaul has been to have the district court order The Kaul Cases Defendant, New Jersey Board of Medical Examiners to reinstate his NJ license, a license the illegal revocation of which was a consequence of admitted facts of, amongst other things, bribery/perjury/public corruption/fraud/evidential tampering/witness tampering/judicial corruption. The Loper holding empowers this district court to grant Plaintiff Kaul this relief.

d. JUNE 27, 2024: 22-859 SECURITIES AND EXCHANGE COMMISSION v. JARKESY ET AL. ARGUED NOVEMBER 29, 2023-DECIDED JUNE 27, 2024 (Exhibit 1):

22. SCOTUS concurred with the U.S.C.A. for the Fifth Circuit in finding that the revocation of Respondent Jarkesy's trading licenses and imposition of civil monetary penalties by an in-house administrative 'judge' and agency, absent an Article III independent judge/jury, did violate the Constitution and Respondent's Constitutional Rights. SCOTUS affirmed the judgment of the U.S.C.A. for the Fifth Circuit and remanded the case to the U.S.D.C. for the Southern District of Texas for proceedings consistent with the opinion.¹

23. In the K11-17 Complaint, Plaintiff Kaul set forth a fact pattern that mirrors and indeed exceeds that within the Jarkesy case, in that Plaintiff Kaul was subjected in a period from at

¹ In K11-17 on April 30, 2024, Plaintiff Kaul judicially noticed the E.D.N.C. of the May 18, 2022, opinion of the U.S.C.A. for the 5th Circuit, of the pending SCOTUS decision and of its likely invalidation of the illegal 2014 NJ license revocation (K11-17: D.E. 103). However, in his June 14, 2024, dismissal with prejudice of K11-17, Chief Judge Myers failed to analyze the effect of the 5th Circuit ruling and the potential effect of the SCOTUS ruling. Chief Judge Myers ought to have simply waited for the June 27, 2024, SCOTUS decision, which, as Plaintiff Kaul stated, affirmed the decision of the 5th Circuit. Instead, Chief Judge Myers bewilderingly dismissed the case with prejudice, knowing that the new law would and does substantiate the filing of new claims.

least 2012 to 2024 of admitted ongoing and “new” violations of his human/civil/constitutional rights and injuries to his life/liberty/property/reputation, on a felonious scale (Exhibit 1).

24. The facts admitted within K11-17 caused the district court to enter an ORDER FOR DISCOVERY PLAN on March 13, 2024 (Exhibit 5) and these admitted facts in conjunction with the K11-20 “new” facts, as interpreted pursuant to Jarkesy, do substantiate in K11-20 the issuance of a Rule 26 Order, as was issued properly by Chief Judge Myers on March 13, 2024, in K11-17. The legal correctness of the issuance of the March 13, 2024, order is consistent with the SCOTUS ruling in Jarkesy, in that the district court’s dismissal of the case constituted an error that resulted in the case being remanded.

From 2012, Plaintiff Kaul has been asserting that the NJ administrative persons/agencies perpetrated suspension-revocation of his license stemmed from an unconstitutional/illegal configuration of the mechanism of physician regulation (Exhibit 6), was illegally conducted and was/is illegal. And now in 2024 in Jarkesy SCOTUS has validated Plaintiff Kaul’s assertions, all of which however were dismissed and denounced as “**implausible-conspiratorial-harassing-frivolous-unreasonably burdensome-vexatious-oppressive-impermissibly order violating-procedurally premature-legally unsubstantiated-unentitled-irrelevant-legally foundationless-unauthorized-bizarre-invalid-far-fetched-flawed-non-viable-unjustified-discovery scope violating-blatantly order violating-intentionally order violating-improper-unnecessarily delaying-needlessly cost incurring-unreasonably excessive-voluminous-repetitive-complicated-ambiguous-unclear-abusive-unreasonable-incoherent-speculative-sweepingly broad-imaginary-redundant-repetitive-repugnant-unsupported-illusory-scandalous-’bootstrapping-’-’bad-faith-’-acriminous-non-productive”** by The Kaul Cases Defendants and less than ten (10) of the six hundred and seventy-seven (677) district judges in the United States District Court. This group is now associated with the wrong minority view, and will forever be, unless the due process-impartial tribunal rights/clauses within the Constitution are repealed.

25. The following section, although not comprising new facts and being an excerpt from K11-17, is inserted here due to its probity to the relevance/application of Jarkesy to the events surrounding the 2014 illegal license revocation and to the outcome of K11-20, which Plaintiff Kaul respectfully asserts will be guided by the SCOTUS ruling in Jarkesy.

e. NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN’S K11-7 SEPTEMBER 12, 2022 ‘INJUNCTION’ BY JUNE 27, 2024, SCOTUS OPINION IN JARKESEY

26. The illegality of the April 9, 2012/March 24, 2014, suspension/revocation of Plaintiff Kaul’s NJ license was finally and indisputably established on June 27, 2024, by the SCOTUS ruling in Jarkesy, and is analogized by Plaintiff Kaul in K11-19 with the November 29, 2023, Jarkesy ruling of the U.S.C.A. for the Fifth Circuit (K11-19: D.E. 1). K11-18 Defendant-Respondent Oetken’s K11-7 September 12, 2022 ‘order-injunction’ was based, as were all of The Kaul Cases Defendants defenses/judicial opinions (2016-2024) on the illegal April 9, 2012/March 24, 2014, suspension/revocation. For example, Defendant-Respondent Oetken states in his knowingly

fraudulent K11-7 September 12, 2022, opinion/order of dismissal and purported injunction (Exhibit 19):

“This case is another chapter in a long saga of repetitive, frivolous lawsuits pro se Plaintiff Richard Arjun Kaul has brought against numerous defendants regarding revocation of his license to practice medicine.” Kaul v. Fed’n of State Med. Boards, 21-CV-57, 2021 WL 6550884, at *1 (N.D. Tex. Sept. 17, 2021), report and recommendation adopted, 21-CV-57, 2022 WL 171294 (N.D. Tex. Jan. 19, 2022) ... **From the date of this Opinion and Order, Plaintiff Kaul is barred from filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or arises from (i) the denial of his medical license; (ii) subsequent litigation proceedings initiated by the Defendants here before the date of this Order; (iii) subsequent litigation proceedings initiated by Plaintiff Kaul before the date of this Order; without first obtaining leave from this Court. Any motion for leave must include the caption “Request for Permission to File under Filing Injunction” and must be submitted to the Pro Se Intake Unit of this Court along with Plaintiff Kaul’s proposed filings.”**

27. The tyrannical illegality and life-ending potential of Defendant-Respondent-Oetken’s purported ‘injunction’ is exposed for just that in the light of SCOTUS in Jarkesy. He attempted to foreclose Plaintiff Kaul from ever holding accountable those who knowingly committed the crime of illegally revoking his license and maliciously causing twelve (12) years-plus of injury to his life/liberty/property/reputation and twelve (12) years-plus of violations of his human/civil/constitutional rights. The extremis of such malfeasance is explained by nothing except that of a judicially perverted state-of-mind and bribery/public corruption, the latter felonies to which he has twice already admitted.

28. The judicial profession is sworn to the Constitution with no allegiance to individual judges, and Plaintiff Kaul asserts with the greatest respect for Chief Judge Myers that he had an absolute obligation to his oath and the Constitution to have examined the serious allegations/facts in K11-18, facts that are now nonetheless admitted. Had Chief Judge Myers applied the same public corruption standard that he applied as a US Attorney, K11-17/K11-18 would have been advanced into discovery, but he did not, and in failing to do so, did effectively state that he holds the public to a higher standard than judges, governors and other public servants, particularly the corrupt ones.

29. Regardless, prior to June 27, 2024, Plaintiff Kaul had established that Defendant-Respondent Oetken’s September 12, 2022 ‘order-injunction’ was a ‘Fraud on the Court’, the evidence/facts of which Plaintiff Kaul submitted within Exhibits 7/14 of the K11-17 Complaint filed on November 20, 2023, in the E.D.N.C. (K11-17: D.E. 1-7 + 1-14). This corpus of evidence/fact were part of Chief Judge Myers’ consideration in the issuance of the March 13, 2024, ORDER FOR DISCOVERY PLAN. The correctness of Chief Judge Myers March 13, 2024, action has been vindicated by the June 27, 2024, SCOTUS ruling in Jarkesy. The April 9, 2012/March 24, 2014, suspension/revocation were/are illegal as were and are all consequent

injuries to Plaintiff Kaul's life/liberty/property and violations of his human/civil/constitutional rights (2012-2024).

30. It was The Kaul Cases Defendants corruption/harassment/intimidation (2016-2024) of certain district court judges within the United States District Court that caused the rendering of false opinion based principally on the illegal April 9, 2012/March 24, 2014, suspension/revocation. In fact, U.S.D.J. Kevin McNulty, the brother-in-law of The Kaul Cases Defendant, Senator Charles Schumer, a politician engaged for decades in quid pro quo schemes with the banking-insurance industry, did in his June 30, 2017, order dismissing K1 (K1: D.E. 200) state the following in regard to the 2012/2014 suspension/revocation (Exhibit 7):

"But the state afforded Dr. Kaul the full panoply of due process rights during the disciplinary proceedings ... The disciplinary proceedings possessed virtually all the usual and expected safeguards, and therefore the probative value of allegations that additional safeguards could have been provided is very low. E.g., Matthews v. Eldridge, 424 U.S. 319, 334-35 (1976)"

31. The knowing falsity of U.S.D.J. Kevin McNulty's June 30, 2017, opinion is highlighted by Jarkesy, as U.S.D.J. McNulty could not have but known that the administrative board proceedings provided none of the due process protections mandated by the Constitution, and as detailed in Jarkesy. McNulty, in seeking to validate Defendant Solomon's knowingly fraudulent December 13, 2013 'opinion', did quote substantial sections of it within his equally fraudulent June 30, 2017, opinion, and used one fraud to buttress another fraud. This theme of perpetuating a knowing fraud from one legal proceeding to another was further exemplified by Defendant-Respondent Oetken in his September 12, 2022 'opinion-order-injunction' (Exhibit 12):

"Plaintiff Kaul has never received any relief in these cases. District courts in the District of New Jersey have dismissed some. See, e.g., Kaul v. Christie, 16-CV-2364, 2019 WL 920815 (D.N.J. Feb. 22, 2019) (McNulty, J.) (granting motion to dismiss); Kaul v. Christie, 372 F. Supp. 3d 206 (D.N.J. Feb. 25, 2019) (McNulty, J.) (granting motion to dismiss); Kaul v. Christie, No. 16-CV-2364, 2019 WL 13176430, at *4 (D.N.J. July 29, 2019) (Martinotti, J.) (denying motion for reconsideration); Patel v. Crist, No. 19-CV-9232, 2020 WL 64618, at *1 (D.N.J. Jan. 7, 2020) (Vazquez, J.) (granting motion to dismiss); Patel v. Crist, No. 19-CV-8946, 2020 WL 64571, at *1 (D.N.J. Jan. 7, 2020) (Vazquez, J.) (granting motion to dismiss); Patel v. Crist, No. 19-CV-9232, 2020 WL 6156772, at *1 (D.N.J. Oct. 20, 2020) (granting motion to dismiss); Patel v. Crist, No. 19-CV-8946, 2020 WL 6156751, at *1 (D.N.J. Oct. 20, 2020) (granting motion to dismiss); Kaul v. Murphy, No. 21-CV-13063, 2021 WL 3663873, at *1 (D.N.J. July 9, 2021) (dismissing complaint sua sponte). Kaul has voluntarily dismissed others. See, e.g., Kaul v. Christie, No. 19-1651, 2019 WL 4733531, at *1 (3d Cir. June 20, 2019) (dismissing appeal without prejudice pursuant to Fed. R. App. P. 42(b)); Kaul v. Stein, No. 20-3522, 2021 WL 6197149, at *1 (3d Cir. Nov. 12, 2021) (dismissing appeal pursuant to Fed. R. App. P. 42(b)); (Dkt. No. 101 at 3-4.) But Kaul continues to file lawsuits in various jurisdictions."

32. In K1 (February 22, 2016, to November 16, 2021) U.S.D.J. McNulty knew that the revocation proceeding was conducted illegally, and the revocation was/is illegal, and knew that his revocation related orders of dismissal/denial of discovery were similarly illegal.

33. In K11-17 (August 19, 2021, to September 12, 2022), Defendant-Respondent Oetken knew that the revocation proceeding was conducted illegally, that the revocation was/is illegal and that U.S.D.J. McNulty's revocation related opinions/orders were similarly illegal, but nonetheless based his September 12, 2022, purported 'order-injunction' on these frauds/illegalities, thus rendering them illegal.

34. In K11-17, U.S.D.J. Myers did initially disregard Defendant-Respondent Oetken's September 12, 2022, purported 'order-injunction' by issuing an ORDER FOR DISCOVERY PLAN on March 13, 2024, but did then utilize them as the foundation for his June 14, 2024, dismissal with prejudice of K11-17.

35. The June 27, 2024, SCOTUS ruling in Jarkesy has invalidated all of these opinions/others, and has effectively 'turned the clock-back' to 11 am EST on April 9, 2012.

36. Every magistrate./district judge involved in dismissing/obstructing The Kaul Cases knew that they were involved in the perpetration of a "pattern of racketeering" within the United States District Court, and the perpetuation of a 'Fraud on the Court'.

37. Defendant-Respondent Oetken's fraud was perpetuated by Chief Judge Myers in his June 14, 2024, opinion-order, an order, the totality of which is undermined by Jarkesy, which finds illegal the 2014 revocation and, in the March 13, 2024, ORDER FOR DISCOVERY PLAN (Exhibit 5) and in the fact that Chief Judge Myers was conflicted and did not have the authority to act within K11-17 (Exhibit 2 + 4).

38. It is noteworthy that The Kaul Cases Defendant Charles Schumer (K3), the brother-in-law of U.S.D.J. Kevin McNulty, sponsored both McNulty and Oetken for seats on the federal bench. Schumer illegally obstructed Plaintiff Kaul's prosecution of The Kaul Cases, a prosecution that involves members of the banking-insurance industry, his biggest political 'donors'.

f. THE ILLEGALLY CONDUCTED ADMINISTRATIVE LAW PROCEEDINGS AND BOARD REVOCATION (APRIL 9, 2013, TO MARCH 24, 2014)

39. In mid to late 2012, having agreed upon the terms of the various quid pro quos, Defendant Solomon entered into the conspiracy, that unbeknownst to him at the time would expand over the next twelve (12) years to include, but to name a few, the New York Stock Exchange, every state medical board, a bank, disqualified corrupt judges, share price-dropping insurance companies and the felonies of kidnapping/illegal imprisonment/attempted drugging-killing.

40. Defendant Solomon, a corrupt person, acted as the judge/jury within the April 9 to June 28, 2013, license revocation proceeding within the New Jersey Office of Administrative Law.

41. The proceeding was a charade and a massive illegal fraud, the sole purpose of which was to have Plaintiff Kaul's license illegally revoked, in order to eliminate Plaintiff Kaul from the minimally invasive spine surgery market, an elimination from which his competitors illegally profited at his expense.

42. Defendants Christie/Solomon became enriched through bribes from their perpetration of Plaintiff Kaul's elimination.

43. Plaintiff Kaul's insurance competitors, including Defendant Allstate, schemed with the revocation to not pay Plaintiff Kaul monies they owed him, while Plaintiff Kaul's physician competitors would seize a larger part of the minimally invasive spine surgery market.

44. All of Plaintiff Kaul's competitors were motivated and invested in the knowingly illegal revocation of Plaintiff Kaul's license.

45. Defendant Solomon knew that his participation in the quid pro quo schemes was illegal, but perpetrated the scheme nonetheless with a sense of impunity derived from his belief that Plaintiff Kaul would never expose his crimes and those of The Kaul Cases Defendants.

46. The hearing commenced on April 9, 2013, and concluded on June 28, 2013, and as part of the charade it involved witnesses, lawyers, and large volumes of testimony.

47. Plaintiff Kaul presented fifteen (15) witnesses, that included highly respected lawyers/surgical center consultants/an ex-executive of the New Jersey Medical Board/expert physician witnesses/patients whose testimony undermined that presented by the state.

48. On December 13, 2013, Defendant Solomon found all fifteen (15) witnesses to be not credible.

49. Plaintiff Kaul's lawyer's cross examination of the state's 'star' witness on May 6, 2013, caused him to admit that there were no standards for the performance of minimally invasive spine surgery, thus disproving the state's case and exposing its fraudulence.

50. The no standards admission undermined the state's entire case, as it's argument was that because Plaintiff Kaul was not a neurosurgeon, he had violated the state 'expert' (Dr. Gregory Przybylski) neurosurgeon's false standard.

51. The Kaul Cases Defendants and the state brought the case despite knowing that Plaintiff Kaul had invented the percutaneous spinal fusion procedure in 2005 and had successfully performed eight hundred (800) of them from 2003 to 2012 in state licensed surgical centers in which he had been credentialed.

52. The state had knowledge of these facts, but did in 2012, in the 'reign' of Defendant Christie, suddenly and very publicly declare that Plaintiff Kaul was "an imminent threat to the public", and therefore his license had to be revoked to save the public.

53. In April 2018, the state's 'expert' neurosurgeon, Dr. Gregory Przybylski was publicly disciplined by the American Association of Neurological Surgeons for having committed perjury while testifying as an 'expert' in a case against another neurosurgeon.

54. Plaintiff Kaul brought this fact to the attention of the New Jersey Medical Board and the District of New Jersey. It was ignored (Exhibit 13).

55. In the period from September 2013 to December 2013, Plaintiff Kaul was informed that because he had proved the falsity of the state's case, Defendant Solomon would, as ordered by Defendant Christie, falsify his report.

56. Plaintiff Kaul sent several letters to Defendants Christie/Solomon requesting that the matter be investigated. His pleas were ignored.

57. However, despite Plaintiff Kaul's disapproval of the state's case, Defendant Solomon did, on December 13, 2013, issue a one hundred and five (105) page report that bore little or no resemblance to submitted evidence, a report in which he found all fifteen (15) witnesses presented by Plaintiff Kaul to be not credible and all witnesses presented by Defendant Christie to be credible.

58. Defendant Solomon recommended revocation and a three hundred thousand (\$300,000) dollar fine and used the US wires to transmit his knowingly fraudulent report to The Kaul Cases Defendant, New Jersey Board of Medical Examiners.

59. On February 12, 2014, a time by which Plaintiff Kaul knew of the corruption that preceded and pervaded the illegal revocation proceedings, The Kaul Cases Defendant, New Jersey Board of Medical Examiners, conducted a hearing on Defendant Solomon's knowingly fraudulent report, a hearing the legitimacy of which Plaintiff Kaul challenged/refused to attend (Exhibit 12), stating: "I consider all actions taken against my license since June 2012 to be illegal and will pursue all options to remedy the damage caused to my reputation and estate."

60. On March 24, 2014, The Kaul Cases Defendant, NJBME, adopted Defendant Solomon's knowingly fraudulent report and revoked Plaintiff Kaul's license and illegally levied a 'fine' of \$450,000, in the knowledge that their actions and those of persons/agencies of the State of New Jersey involved in the revocation were illegal.

g. INJURIES CAUSED TO PLAINTIFF KAUL CONSEQUENT TO DEFENDANT SOLOMON'S ILLEGAL ORDER OF REVOCATION

61. Defendant Solomon's knowingly criminal actions and involvement in The Kaul Cases Defendants scheme to have illegally revoked Plaintiff Kaul's license constitute a willful perpetration of a knowingly illegal "**pattern of racketeering**" that commenced in or around 2005/6.

62. Defendant Solomon, a lawyer, knew of this "**pattern of racketeering**".

63. Defendant Solomon also knew the criminal consequences of participating/furthering/profitting from such a scheme, and knew that the illegal revocation of Plaintiff Kaul's New Jersey license would cause Plaintiff Kaul to indefinitely sustain "**new racketeering injuries**" consequent to the fact that all his applications for state licenses would be denied/restricted based on the illegal New Jersey revocation.

64. Defendant Solomon also knew that Plaintiff Kaul would be foreclosed from obtaining a license in any state due to the illegal profiteering purposed anti-competitive interstate licensing system (the "**Federation Cartel**") operated by/through Defendant FSMB.

65. Defendant Solomon knew that the illegal revocation would cause to Plaintiff Kaul an illegal deprivation of his economic standing/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing.

66. Defendant Solomon knew that his actions were criminal, but his motive/method of greed and abuse of state power blinded him to the possibility that Plaintiff Kaul would expose his felonious conduct.

67. Plaintiff Kaul's injuries and their willful/knowing/ongoing commission extend over a period that commenced on at least February 3, 2010, and include injuries to the human/civil/constitutional/property/economic/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing RIGHTS of Plaintiff Kaul.

68. Defendant Solomon is liable for his criminal offenses (2013-2014) and their **ONGOING** consequences (2012-2023) to Plaintiff Kaul's life/liberty/property.

69. The exact date of Defendant Solomon's entering the conspiracy of The Kaul Cases Defendants' will be obtained through discovery, but regardless he is liable for the violations committed within/by the conspiracy's perpetrators prior to his enjoinder date. See United States v. Coonan, 938 F. 2d 1553 (2nd Circuit 1991).

h. JUNE 17, 2024: STATE OF NEW JERSEY v. GEORGE NORCROSS, III, PHILIP NORCROSS, ET AL: INDICTMENT NO. 24-06-00111-S – SUPERIOR COURT OF NEW JERSEY LAW DIVISION – CRIMINAL (Exhibit 3):

70. Defendant Christie is a co-conspirator in the racketeering schemes detailed in the criminal indictment (**Exhibit 7**). Defendant Norcross, a democrat, funded the political campaigns of

Defendant Christie, a republican, in return for receiving a \$260 million tax break from the New Jersey Economic Development Authority (NJEDA) (Exhibit 8).

71. These property development related schemes involved, amongst other things extortion/public corruption/threats of violence to person and property/bribery/wire fraud/kickbacks/money laundering and illegal deprivations of people's livelihoods and property, in the pursuit of political and economic gain in New Jersey during the gubernatorial tenure of Defendant Christie (2009-2017).

72. These crimes constitute further evidence of Defendant Christie's long-standing, but ultimately unsustainable "**pattern of racketeering**" and public corruption. An unsustainability dead-weighted in the imminent and changing political landscape in the United States.

i. JUNE 14, 2024: KAUL v CPEP ET AL: 23-CV-00672:

73. Chief Judge, Richard E. Myers III, did, on June 14, 2024, absent authority, inexplicably dismiss K11-17 with prejudice, after having entered an ORDER FOR DISCOVERY PLAN on March 13, 2024 (Exhibit 5).

74. Chief Judge Myers acted with the knowledge that he and Plaintiff Kaul became adversaries on May 6, 2024, upon Plaintiff Kaul filing a Notice of Appeal in K11-18, a case Chief Judge Myers dismissed with prejudice on April 8, 2024.

75. This adversarial relationship was furthered on May 29, 2024, when Plaintiff Kaul filed an INFORMAL OPENING BRIEF in K11-18 (Exhibit 9), an event that preceded Chief Judge Myer's unauthorized June 14, 2024, dismissal of K11-17.

76. Chief Judge Meyers knew that consequent to this adversarial relationship he was conflicted and did not have the authority to dismiss K11-17, as just two (2) months earlier in K11-18 and in his order dismissing K11-18, he stated:

"As the Supreme Court has explained, mandamus relief "has the unfortunate consequence of making a district court judge a litigant". (K11-18: D.E. 7).

77. In his June 14, 2024, opinion, Judge Myers failed to reconcile his conflict of interest with his dismissal of K11-17, or indeed provide any explanation of how the law provides him any authority to adjudicate a matter involving a "**litigant**" with whom he is in conflict in the U.S.C.A. for the 4th Circuit.

78. Judge Myers' knowing conflicted-ness precluded him from having any further involvement in K11-17, be it ministerial/adjudicative, and similarly precludes him from any further involvement in any case involving Plaintiff Kaul in any district court in the United States.

79. Plaintiff Kaul's fraud related June 15, 2024, NOTICE OF INVALIDITY (**Exhibit 4**) remains unchallenged by Judge Myers and or any of the Defendants, and under the doctrine of 'Fraud on the Court' substantiates the filing of the same claims in the same/different court.

80. However, K11-20, as this Complaint evidences, is based on not only new law and new facts, but on the admitted factual foundation of K11-17 (**Exhibit 2**).

j. APRIL 9, 2012, TO JULY 2, 2024:

81. **The Kaul Cases** Defendants illegal ongoing/"new" violations and injuries to Plaintiff Kaul's human/civil/constitutional rights and his life/liberty/property/reputation constitute **four thousand four hundred and sixty-six (4,466) days** of knowing/willful and malicious injury, for which the law (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)/Agency Holding v. Malley-Duff, 483 U.S. 143 (1987)/Continuing Violations Doctrine/Bodner v. Banque Paribas 114 F.Supp.2d 117 (2000)) substantiates a new claim for each unremediated-unrecitfied-unrecompensed ongoing/"new" injury.

82. K11-17 was filed on November 20, 2023, and dismissed on June 14, 2024, without any remediation-rectification-compensation of the ongoing/"new" injuries to Plaintiff Kaul's life/liberty/property.

83. K11-20 is filed on July 7, 2024, an increase in "new" injury to Plaintiff Kaul's life/liberty/property of two hundred and thirty (230) days, thus further substantiating the new claims of K11-20.

84. For Defendants to cause a cessation of their ongoing liability, requires Plaintiff Kaul be compensated for his past/ongoing injuries and for Defendants to cause no further or future injuries.

85. Similarly, a dismissal with prejudice of prior claims does not, pursuant to 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)/Agency Holding v. Malley-Duff, 483 U.S. 143 (1987)/Continuing Violations Doctrine/Bodner v. Banque Paribas 114 F.Supp.2d 117 (2000), preclude Plaintiff Kaul from bringing new claims based on unremediated-unrectified-uncompensated past/ongoing/"new" facts of violation and injury.

k. MARCH 25, 2024: KAUL v JAMES PAUL OETKEN: 24-CV-00185 (K11-18):

86. On March 13, 2024, Chief Judge Myers caused the issuance of an ORDER FOR DISCOVERY PLAN in K11-17 (**Exhibit 5**).

87. On March 15, 2024, the K11-17 Defendants conspired with K11-18 Defendant-Respondent Oetken to issue an 'order' in K11-7 (**Exhibit 11**) based on his illegal September 12, 2022, anti-

filing 'injunction' against Plaintiff Kaul (**Exhibit 12**). In the March 15, 2024, order, K11-18 Defendant-Respondent Oetken threatened to hold Plaintiff Kaul in contempt unless he dismissed K11-17 by March 29, 2024.

88. On March 18, 2024, the K11-17 Defendants filed the March 15, 2024 'order' onto the docket in the E.D.N.C. (K11-17: D.E. 72).

89. On March 25, 2024, Plaintiff Kaul filed suit against Defendant Oetken in the E.D.N.C. (**Exhibit 19**), the case was assigned to U.S.D.J. Flanagan, but then reassigned to Chief Judge Myers by himself, and then dismissed with prejudice on April 8, 2024.

90. On May 6, 2024, Plaintiff Kaul filed a Notice of Appeal in the U.S.C.A. for the 4th Circuit and

91. On May 29, 2024, Plaintiff Kaul filed an INFORMAL OPENING BRIEF (**Exhibit 9**).

92. Defendant-Respondent Oetken's failure to deny the facts of the Complaint did cause their admission, and Defendant-Respondent Oetken has failed to contest the appeal, as has Chief Judge Myers.

93. The circumstances/facts of K11-17 and K11-20 are such that the factual foundation of K11-20 consists of fact admitted In K11-17 consequent to Defendants' failure to deny the facts, and of new law and new fact consequent to intervening/relevant SCOTUS rulings and unremediated-unrectified-uncompensated ongoing/"new" facts of violation and injury to Plaintiff Kaul's life/liberty/property.

2. STATEMENT OF FACT ADMITTED PURSUANT TO RULE 8(b)(6) AND RULE 36

94. The broad factual underpinning of the case consists of the above stated **new fact** and **fact** admitted 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 2**). 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. In this period (2008 to 2024) not one fact within **The Kaul Cases** has been denied, and thus pursuant to Rule 8(b)(6), all facts have been admitted, including those in K11-17. The admittance of these now undisputed/material facts substantiates the entry of Summary Judgment against all Defendants.

3. STATEMENT OF FACT COMMON TO ALL DEFENDANTS, ALL ISSUES AND THE OVERALL PURPOSE OF K11-20 AND THE KAUL CASES

95. The facts stated in this section provide context as to the Defendants motives, methods and factual commission in the perpetration of their schemes, “**patterns of racketeering**” and violations of rights/law.

a. THE “HOSPITAL-INSURANCE-PHARMACEUTICAL-INDUSTRIAL COMPLEX – FEDERATION CARTEL” (“HIPIC- FC”)

96. Within approximately the last thirty-three (33) years, there has emerged in the regulatory side of American medicine a collection of for-profit businesses/corporations that commenced initially as a ‘cottage industry’ in the process of physician credentialing and certification, and at the operative center of which exists Defendant FSMB (“**FEDERATION CARTEL**”) (“**FC**”).

97. This industry proved highly profitable as its lucrative nature was a product of the high stakes associated with a physician’s career path, an incomparable one that involves the sacrifice to medicine of the entirety of one’s young adulthood.

98. K11-20 places before this Court a body of ever-expanding evidence of the Defendants “**ongoing pattern of racketeering**” within the for-profit system of corporate-government alliances involved in the multi-billion-dollar enterprise of so-called physician regulation/discipline, a system of oppression/human rights violation at the head of which sits Defendant FSMB, the ‘hub’ of the ‘hub-and-spoke’ conspiracy of the “**Federation-Cartel**” (“**FC**”).

99. **The Kaul Cases** Defendants, in a period from 2016 to 2024, have, through schemes of judicial/political corruption, prevented this body of claim conclusive evidence from being submitted to a jury in America.

100. The evidence/admitted facts substantiate a concerted and knowing “**pattern**” of human/constitutional rights violations, whose origins extend back to March 2005, when Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive spinal fusion:

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

<https://www.youtube.com/watch?v=50R5N9bJMAg&t=11s>

<https://www.youtube.com/watch?v=guwx5kuBiEg>

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

101. Recognizing the immense value to a physician of his/her license and the immense deprivation associated with the loss of a license, Defendant FSMB commenced a politico-legal scheme to position itself as the ‘gate-keeper’ of state medical boards, in order to seize

complete control of the entire national mechanism of physician regulation, knowing that such control would generate huge profits for its executives/board members.

102. By the mid to late 1990s, Defendant FSMB had, through an aggressive political and public relations campaign that involved the funneling of large bribes to political lobbyists/politicians/media, deceived the public into believing that there existed many 'bad' doctors in America who deserved to be 'punished' by having their licenses suspended and or revoked.

103. In furtherance of this highly profitable scheme, Defendant FSMB manufactured a list that encouraged/encourages state medical boards to compete to have the highest rate of so-called disciplinary actions.

104. Defendant FSMB recognized the immense profits generated from a so called 'disciplined' physician and did in the late 1990s/early 2000s enter into a series of quid pro quo schemes with for-profit healthcare insurance corporations in which these corporations schemed to have eliminated physicians to whom they owed money, by bribing Defendant FSMB to use its power to have state medical boards suspend/revoke the targeted physicians' licenses.

105. Defendant FSMB viewed a 'disciplined' physician as a greater profit unit generator than a non-disciplined physician, as the former, in order to regain his/her livelihood, was forced to fund very expensive courses/programs/assessments/monitoring all established under the aegis of Defendant FSMB, with a percentage of these programs' profits being 'kick-backed' to Defendant FSMB.

106. Two of Defendant FSMB's programs are K11-8 Defendant PACE Program and K11-20 Defendant CPEP, both of whom defrauded Plaintiff Kaul, while cognizant of their conflicted state in that they knew Plaintiff Kaul was suing Defendant FSMB in K11-7 and K11-10 while they were respectively 'assessing' him for the issuance of his Pennsylvania license.

107. From the early 2000s this system of profiteering has expanded without governmental oversight or a public watchdog, and today aggressively promotes, to the detriment of the American public's welfare, the agendas of for-profit healthcare corporations, as it did with Purdue's oxycontin and the so called 'vaccine' from Pfizer/Astra Zeneca/Moderna/Johnson + Johnson.

108. The union/association-in-fact between these for-profit healthcare corporations and the "FC" is the "Hospital-Insurance-Pharmaceutical Industrial Complex – Federation Cartel ("HIPIC-FC") an entity previously identified/defined/described within The Kaul Cases.

109. However, on June 27/28, 2024, the SCOTUS rulings in Jarkesy and Loper, (Chevron deference defense dismantling) did force the "Federation Cartel" back into the control and oversight of the Constitution, and the public.

110. This scheme of profiteering being perpetrated by The Kaul Cases Defendants has caused and continues to cause immense injury to Plaintiff Kaul's life/liberty/property.

111. K11-20 seeks to hold accountable all persons who caused or conspired to cause injury to Plaintiff Kaul and or violated Plaintiff Kaul's human/civil/constitutional rights, in order to deter the continued perpetration of such state-corporate orchestrated malfeasance against the public and medical profession. That accountability is provided indisputable legal authority by the application of Jarkesy and Loper, the United States Constitution and RICO to the admitted facts, as detailed within this Complaint and Exhibits.

b. DEFENDANTS CONVERSION OF THE AMERICAN CORPORATE/ POLITICAL/MEDICAL/ LEGAL BODIES INTO AN "ASSOCIATION-IN-FACT RACKETEERING ENTERPRISE"

112. Since approximately 1986, the ever-increasing economic confluence between the worlds of medicine, business, law, and politics has resulted in a healthcare system driven solely by profit/political ambition and one that acts increasingly to the lethal detriment of the American public.

113. The "HIPIC - FC" is controlled by for-profit corporations in a totalitarian manner that eliminates physicians it deems a threat to its corporate agenda.

114. The "HIPIC-FC" conducts physician elimination through the weaponizing of the medical regulatory/legal systems, whereby physicians who think/speak/act against the "HIPIC-FC" or encourage others to do so are eliminated by license suspension/revocation and or indictment/incarceration, the consequences of which are, amongst other things, reputational destruction/social isolation/loss of livelihood.

115. The most recent catastrophe of the "HIPIC-FC" is that related to the mass forced/coerced inoculations of the American public with an mRNA toxin, that the public was deceived into believing was a 'vaccine' against COVID-19. This gene manipulating toxin has resulted and will continue to result in, amongst other things, premature death, increased rates of cancer, cardiac disease, and early-onset dementia/neuro-cognitive deterioration.

116. K11-17 exposes the inner machinations of the "HIPIC-FC" and seeks to: (i) effectuate regulatory and political reform; (ii) cause the perpetrators of such tyranny to be monetarily penalized; (iii) re-distribute their wealth amongst the victims of their tyrannical corporate greed.

117. Commencing in 2005/6 and continuing in the present (2023) Plaintiff Kaul, consequent to having invented and successfully performed the first percutaneous spinal fusion, a procedure that revolutionized the field of spine surgery in a manner that immensely benefitted and continues to benefit the public, came under attack from The Kaul Cases Defendants, including the K11-20 Defendants.

118. The “ongoing pattern of racketeering” continues to cause “new racketeering injuries” to Plaintiff Kaul’s life/liberty/property, and it is and has been the willful/knowing/purposeful intention of the K11-20 Defendants to cause a perpetuation of these offenses/injuries.

119. The purpose of the perpetuation is to attempt to prevent the further emergence of highly incriminating evidence of crimes orchestrated/committed by for-profit corporations in conspiracy/collusion with certain governmental persons/agencies against not just Plaintiff Kaul, but against the public and medical profession.

120. George Norcross owns a hospital system and insurance company in New Jersey, and was part of Defendant Christie’s conspiracy to have Plaintiff Kaul’s competing outpatient surgical center businesses eliminated.

121. K11-20 exposes the grand corruption of American political power by multi-national publicly traded for-profit corporations and their lethal profit purposed exploitation of the American public.

122. K11-20 details the nexus between this ‘unholy’ corporate-government alliance and certain persons within the medical/legal/judicial professions, a nexus through which are conducted massive schemes of racketeering that have caused, and continue to cause the wrongful deaths/incarceration of millions of innocent Americans.

123. The within pled “pattern of racketeering” commenced in or around 2008 with Defendant Christie’s declaration of his gubernatorial/presidential ambitions; ambitions the pursuit of which required vast sums of money.

124. The Kaul Cases Defendants were motivated to conspire with Defendant Christie as they believed it would advance their political/economic agendas, through the exploitation and then elimination of Plaintiff Kaul/other physicians from whom they extracted free medical services (insurance carriers) and competed with in the healthcare market (physicians/hospitals).

125. From 2007/2008 to the present (2023), Plaintiff Kaul has been illegally injured and continues to be illegally injured in his economic standing/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing by the perpetration of an “ongoing pattern of racketeering” by The Kaul Cases Defendants, purposed to attempt to conceal their prior crimes.

126. The crimes and their continued willful/knowing/malicious commission through the courts, the “Federation Cartel”, and the “ongoing” and “new racketeering injuries” (up to and including those in 2024) were facilitated/permitted by Defendant Solomon’s knowingly illegal 2013/2014 aiding/abetting of The Kaul Cases Defendants acts of wire fraud/public corruption/subornation of perjury/kickbacks/evidential tampering/witness tampering.

127. The illegality of Defendant Solomon's crimes are established by the application of Jarkesy and Loper, the United States Constitution and RICO to the admitted facts.

128. Defendant Solomon's knowing commission of crime constituted and constitutes a critical role in the injuries caused to Plaintiff Kaul (2005-2024), injuries for which Defendant Solomon is liable both directly and vicariously pursuant to RICO's doctrine of vicarious liability.

129. The Kaul Cases Defendants "pattern of racketeering" has brought together the worlds of medicine, law, business, and politics, and has been conducted through judicial/administrative/financial/governmental agencies, and is, at its core, and as often described by U.S.D.J. Mark Wolf, a scheme of "grand corruption", the type for which Judge Wolf has proposed an international anti-corruption court.

c. FACTS OF CONSPIRACY AS TO DEFENDANTS ALLSTATE/CHRISTIE AND CO-CONSPIRATORS HORIZON BLUE CROSS BLUE SHIELD/GEICO INSURANCE COMPANY (JULY 2012 TO MARCH 2014)

130. In late 2012, Defendant Solomon came out of retirement specifically to adjudicate Plaintiff Kaul's licensing case in the New Jersey Office of Administrative Law (OAL DOCKET NO. BDS 08959-2012N).

131. Defendant Solomon received bribes from Defendants Allstate/Horizon Blue Cross Blue Shield/Geico as part of a quid pro quo to ensure he ordered the revocation of Plaintiff Kaul's license, in order that Defendants Allstate/Horizon Blue Cross Blue Shield/Geico could use/did use as an excuse to not only not pay Plaintiff Kaul monies owed to him for rendered clinical services, but to sue him to attempt to seize all his assets to increase executive/corporate/shareholder profit and to attempt to eliminate the risk of Plaintiff Kaul suing Defendants.

132. The New Jersey Office of Administrative Law is part of the executive branch of New Jersey Government, and Defendant Solomon was appointed to adjudicate Plaintiff Kaul's case by Defendant Christie.

133. Defendant Christie received bribes from Plaintiff Kaul's competitors (insurance companies/hospitals/neurosurgeons) in the minimally invasive spine surgery market as part of a quid pro quo scheme purposed to have the medical board suspend and then 'rubber-stamp' the revocation recommended by Defendant Solomon on December 13, 2013, after the sham administrative proceedings (April 9 to June 28, 2013).

134. Commencing in approximately 2008, Defendant Christie began requiring vast sums of money to fund his various political campaigns to procure the offices of governor and president.

135. Defendant Solomon was controlled within the executive branch by its CEO, Defendant Christie.

136. Defendant Christie, in his quest for the 2016 Presidency, did order Defendant Solomon to ensure the revocation of Plaintiff Kaul's license by causing, if necessary, the final December 13, 2013, report to be falsified and to lie about the evidence/truth of the hearing if it vindicated Plaintiff Kaul.

137. In a time period between late 2012 and early 2013, Defendants Solomon and Christie did communicate directly and through intermediaries that Defendant Solomon would receive a percentage of the bribes before the issuance of his December 13, 2013, report of revocation and the balance after the report had been issued/widely publicized and Plaintiff Kaul's license revoked.

138. Defendants Solomon, Christie and their intermediaries agreed that as soon as the medical board had revoked Plaintiff Kaul's license (March 24, 2014), Plaintiff Solomon would be relocated out of the State of New Jersey to thwart any potential litigation by Plaintiff Kaul.

139. Defendant Solomon, not a wealthy man, was relocated to an extremely wealthy area of North Carolina which is where he has resided since late 2014.

140. This particular scheme of illegal insurance profiteering, a scheme spearheaded by the Blue Cross Blue Shield Association/Corporations, and part of the so called 'Healthcare Fraud Partnership', is now well recognized within the American healthcare sector and more indicted/license threatened physicians are taking their cases to trial and winning. See Drs. Aly Rifai and Lesly Pompy:

<https://www.lehighvalleylive.com/news/2024/05/jury-clears-easton-psychiatrist-of-1m-health-care-fraud-allegation.html>

<https://www.monroenews.com/story/news/crime/2023/01/10/dr-lesly-pompy-acquitted-all-charges-federal-drug-case/69790454007/>

d. US INSURANCE GIANT, BLUE CROSS BLUE SHIELD, HAS EXPOSED ITS TARGETING OF ETHNIC MINORITY PHYSICIANS FOR MASS INCARCERATION

<https://www.drrichardkaul.com/so/20OWhtSL1?languageTag=en>

141. In fact, the Flexner Report (**Exhibit 20**) provides historical evidence that corroborates the facts within the above linked press release. The Report, published in 1910 at the behest of the Carnegie and Rockefeller Corporations, set forth a plan to design and control every element of medical education/licensing in order to subjugate the medical profession to corporate interests.

142. Within this scheme there was engineered a structural racism that continues today, and within which for-profit healthcare corporations, such as Defendants FSMB/Allstate/Co-Conspirator Geico conspire with governmental agencies/courts to illegally profit through exploitative schemes of false indictment/prosecution/incarceration and asset seizure of ethnic

minority physicians: **“Many aspects of the present-day American medical profession stem from the Flexner Report and its aftermath. The Flexner report has been criticized for introducing policies that encouraged systemic racism.”**

143. This fact, as with many others, was submitted in K11-10, was unrefuted/uncontested/unrebutted by the Defendants and or Court and is thus admitted as a fact in support of the K11-20 claims.

e. FACTS RELEVANT TO THE DEFENDANTS “ONGOING PATTERN OF RACKETEERING”

(i) The UC San Diego Physician Assessment and Clinical Education (PACE) Program

144. In approximately September 2017, Plaintiff Kaul submitted a licensure application to the Pennsylvania Medical Board, and on February 7, 2020, an administrative court conducted a hearing.

145. Plaintiff Kaul’s application was granted on May 27, 2020, on the condition he complete a so-called physician ‘assessment course’. In April 2022, Plaintiff Kaul applied to K11-8 Defendant UC San Diego Physician Assessment and Clinical Education PACE Program (“PACE”), and from May to July 6, 2022, he underwent the first part of the course, which consisted of two (2) recorded interviews, that were conducted virtually.

146. On July 21/22 Plaintiff Kaul underwent the second part of the assessment, which was conducted on-site in San Diego, was video recorded and for which Plaintiff Kaul generated contemporaneous notes.

147. On October 17, 2022, K11-8 Defendant PACE issued a report replete with knowing falsehoods, as evidenced by Kaul’s audio recordings/contemporaneous notes. Plaintiff Kaul repeatedly requested he be provided a copy of his case file/video record, but none was provided, and so Plaintiff Kaul filed suit against Defendant PACE on May 24, 2023, in the United States District Court for the Southern District of California (23-CV-0955) (K11-8), in which Plaintiff Kaul details the conflictual commercial nexus between Defendant PACE and Defendant FSMB.

(ii) The New York State Medical Board

148. Plaintiff Kaul’s February 2021 application to the New York State Medical Board caused this board, in collusion/conspiracy with The Kaul Cases Defendants (NYS Medical Board is a commercial partner of Defendant FSMB) to perpetrate a fraud that his application was denied based on a supposed board subcommittee’s purported opinion of a **“question of moral suitability”**. This was and is a lie. There is no record of any subcommittee ever being convened.

149. Plaintiff Kaul filed a petition in the New York State Supreme Court seeking a copy of this supposed opinion. The petition was denied on January 3, 2022, and Kaul moved in the First Department of the Appellate Court.

150. Notwithstanding the pendency of the matter in the Supreme Court, the New York State Medical Board scheduled a virtual hearing on October 3, 2022, a hearing attended by approximately twelve (12) persons, including a hearing officer and counsel for the board. The matter was abruptly truncated when Plaintiff Kaul alerted the panel that the issue of the board's fraud was pending in the appellate court.

f. OTHER FACTS

151. Other relevant facts are incorporated into the legal claims. However, the most salient and irrefutable facts of The Kaul Cases Defendants' guilt are found within their ill-conceived May 27, 2021, kidnapping of Plaintiff Kaul, their June 14/15 illegal arrest-imprisonment-attempted drugging-killing and their seven-plus-years (2016-2022) commission of securities fraud.

152. These facts, in conjunction with the perjury/obstruction of justice/mail fraud/wire fraud/kickbacks/honest services fraud/extortion/bank fraud/bankruptcy fraud/racketeering/conspiracy/public corruption/judicial corruption/false imprisonment/false arrest committed by The Kaul Cases Defendants from 2008/2009 to 2024, are admitted (Exhibit 2).

153. The facts in The Kaul Cases are irrefutable proof of the K11-20 Defendants grand corruption of American judicial/political/medical bodies, and the illegal, rights violating effect that corruption has had for the last twelve (12) years (2012-2024) and continues to have on Plaintiff's human/civil/constitutional rights.

4. STATEMENT OF FACT SPECIFIC TO EACH DEFENDANT

a. FACTS AS TO DEFENDANTS SOLOMON

154. The admitted facts substantiating Defendant Solomon's violations of Plaintiff Kaul's human/civil/constitutional rights and causing injury to his life/liberty/property are pled above, within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (**Exhibit 2**).

155. In 2013, Defendant Solomon, a lawyer and administrative law judge had the duty, right, responsibility and opportunity to halt **The Kaul Cases** Defendants crimes, but he did not because he had been bribed, and is as directly responsible, if not more than **The Kaul Cases** Defendants, for the crimes/violations/injuries committed and **continuing** to be committed against Plaintiff Kaul in 2024, eleven (11) years later.

156. Defendant Solomon knows the sum and substance of **The Kaul Cases** but has failed, as the law requires and per recent DOJ "**outsourcing**" policy regarding white-collar crime (See Cognizant Bribery Case: **2:19-cr-00120-MEF-1**) to report his crimes or those of his co-conspirators to state or federal authorities.

157. The RICO predicate acts committed by Defendant Solomon, in collusion and conspiracy with **The Kaul Cases** Defendants, including the K11-20 Defendants have caused and continue to cause (2007/8-2024) a perpetration of a "**pattern of racketeering**".

158. This "**pattern of racketeering**" has been and continues to be perpetrated through certain courts within the United States District Court, certain persons within the United States Government and within the totality of the "**Federation Cartel**" ("**FC**"), an illegally configured syndicate that monopolizes the entire process of physician regulation and the multi-billion-dollar business of so called 'physician discipline'.

159. The commencement of the "**pattern of racketeering**" as pled in **The Kaul Cases**, coincided with the 2008/9 gubernatorial/presidential political ambitions of Defendant Christie, a co-conspirator in the June 13, 2024, criminal indictment against George Norcross III (**Exhibit 7**).

160. The principal motivation for **The Kaul Cases** Defendants participation in the conspiracy was the advancement of their political/economic agendas, through the exploitation and at the expense of Plaintiff Kaul/other physicians, mostly of Black/Indian/Hispanic ethnicity.

161. The principal motivation for continuing the conspiracy into 2024, is an increasingly desperate attempt to prevent Plaintiff Kaul from further exposing their crimes of **The Kaul Cases** Defendants, and now the SCOTUS rulings in **Jarkesy** and **Loper** and the admitted facts (**Exhibit 2**).

162. The crimes, their continued willful/knowing/malicious commission and the “ongoing” and “new racketeering injuries” (up to and including those in 2024) were precipitated/aided and abetted/perpetuated by Defendant Solomon’s commission of, amongst other things, wire fraud/public corruption/subornation of perjury/kickbacks/evidential tampering/witness tampering, crimes for which

163. Defendants Solomon/Christie are liable for these crimes, both directly and vicariously pursuant to RICO’s doctrine of vicarious liability.

164. The admitted facts (Exhibit 2) substantiate Defendant Solomon’s criminal state-of-mind, his criminal course of conduct, his criminal effort to conceal his misconduct/whereabouts and the ongoing consequences of his criminal conduct to Plaintiff Kaul’s economic standing/reputation/livelihood/professional standing/social standing/psychological standing/physical standing/liberty/life.

165. Some of the admitted facts caused U.S.D.J. Noel Hillman on December 16, 2020, in K5 to issue a Rule 16 ORDER FOR SCHEDULING CONFERENCE (K5: D.E. 155) and U.S.D.J. Beth Bloom on July 6, 2023, to issue an ORDER REQUIRING SCHEDULING REPORT AND CERTIFICATES OF INTERESTED PARTIES. In both instances The Kaul Cases Defendants, including Defendant Solomon, corrupted the judicial process to prevent the cases moving into discovery.

166. On February 22, 2016, in K1 Plaintiff Kaul sued Defendant Solomon.

167. Defendant Solomon’s failure to refute/contest/address the facts, did cause their admission (Exhibit 2).

168. Similarly, Defendant Solomon’s liability as to the admitted facts inures from that pursuant to RICO’s doctrine of vicarious liability, and specifically to the fact that none of The Kaul Cases Defendants ever refuted/contested/addressed/denied any of the evidence/facts within the entire body of The Kaul Cases (February 22, 2016, to July 7, 2024), thus causing all of them, including those below, to become admitted for themselves and vicariously for Defendant Solomon (Exhibit 2).

b. FACTS AS TO DEFENDANT CPEP

169. The admitted facts substantiating Defendant CPEP’s violations of Plaintiff Kaul’s human/civil/constitutional rights and causing injury to his life/liberty/property are pled within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (Exhibit 2).

170. Defendant CPEP did not deny one fact asserted against it within K11-17, facts pertaining to the felonies of amongst other things, perjury/bankruptcy fraud/bank fraud/wire fraud/embezzlement/public corruption/judicial corruption.

171. On September 17, 2017, Plaintiff Kaul commenced the application process for a license in the State of Pennsylvania.

172. On February 7, 2020, a hearing was conducted as to Plaintiff Kaul's application.

173. On May 27, 2020, the hearing officer granted Plaintiff Kaul's application on condition he undergo an 'assessment course'. This order was ratified by the Pennsylvania Medical Board on February 8, 2021.

174. K11-8 Defendant PACE and Defendant CPEP were two of the recommended 'assessment course' businesses.

175. In July 2022, Plaintiff Kaul paid for and underwent the PACE course, but at that time had no knowledge of K11-8 Defendant PACE's commercial relationship with Defendant FSMB.

176. Due to COVID restrictions, the part of the course that involved case discussions with a physician was conducted virtually.

177. Defendant PACE recorded the case discussions as did Plaintiff Kaul.

178. On October 17, 2022, K11-8 Defendant PACE issued a fraudulent report that falsified the case discussions.

179. Plaintiff Kaul sent a letter to K11-8 Defendant PACE that contained a link to the audio file of Plaintiff Kaul's recording of the case discussions and an analysis of the fraud perpetrated by K11-8 Defendant PACE in their October report. There then ensued an email/letter exchange between Plaintiff Kaul and K11-8 Defendant PACE.

180. On May 24, 2023, Plaintiff Kaul filed suit against K11-8 Defendants PACE/Leung (KAUL v UC SAN DIEGO PACE PROGRAM: 23-CV-00955). K11-8 Defendant PACE and Defendant CPEP are both subjugate members of Defendant FSMB, and know of each other's activities.

181. However, on January 17, 2023, Plaintiff Kaul retained Defendant CPEP to conduct an assessment and submitted a deposit of nine thousand dollars (\$9,000), with the balance of five thousand dollars (\$5,000) submitted on February 6, 2023. The business is highly lucrative.

182. In a period from January 17, 2023, to February 22, 2023, Plaintiff Kaul underwent an intensive self-imposed study program, in which he devoted fourteen (14) hours every day to reading medical textbooks/articles, viewing hundreds of online medical educational videos, and having other physicians examine his case management knowledge and skills. In a period from January 17, 2023, to May 2, 2023, Plaintiff Kaul devoted time and effort to completing extensive questionnaires pertaining to his application and proposed practice.

183. In a period from February 22 to April 2023 Plaintiff Kaul underwent numerous verbal and written cognitive/psychological/physical/knowledge assessments, the latter of which were conducted virtually on February 22/23, 2023, with each one lasting approximately six (6) hours.

184. The February 22/23, 2023, knowledge and case management evaluations were conducted by Drs. Ajay Antony/Robert Brown/Michael Harned, all of whom, unbeknownst at that time to Plaintiff Kaul were/are senior board members of The Kaul Cases Defendant American Society of Interventional Pain Physicians (ASIPP),

185. Drs Antony/Brown/Harned all knew, as did Defendant CPEP, that they were conflicted, a conflicted state they willfully concealed from Plaintiff Kaul while conducting the case management evaluations/assessments, a concealment consistent with and in furtherance of The Kaul Cases Defendants scheme to attempt to prevent Plaintiff Kaul from having issued his Pennsylvania license. The Kaul Cases Defendants recognized/recognize that the economic enhancement caused to Plaintiff Kaul by the Pennsylvania license issuance would facilitate Plaintiff Kaul's prosecution of his claims against them.

186. At the conclusion of the February 22/23, 2023, assessments, Defendant CPEP informed Plaintiff Kaul that the report would be issued before the end of May 2023.

187. Plaintiff Kaul received no report by the end of May 2023 and was provided no explanation by Defendant CPEP as to the non-issuance.

188. Plaintiff Kaul, concerned consequent to his experience with K11-8 Defendant PACE, researched the three (3) physicians with whom he conducted case discussions and his research revealed that all three (3) physicians were senior board members of The Kaul Cases Defendant American Society of Interventional Pain Physicians (ASIPP).

189. Between May 16 and 23, 2023, Plaintiff Kaul informed Defendant CPEP via email of these conflicts (Exhibit 14) and enquired: **"Did any of these three physicians (Antony/Harned/Brown) disclose their conflicts of interest to CPEP?"**

190. Defendant CPEP's non-response constituted a tacit admission that they did know of their conflicts but did not expect Plaintiff Kaul would expose this fact.

191. On June 6, 2023, Plaintiff Kaul sent a letter (Exhibit 14) to Defendant CPEP's in-house counsel, Alexis Angell, in which Plaintiff Kaul provided Defendant CPEP an opportunity to rectify their wrongdoing: **"I believe there are two (2) options: 1. The physician assessments are re-conducted by physicians with no professional, commercial connections/relations/associations, and as stated in my May 30, 2023 email [Exhibit 20] to Ms. Besmanoff, these individuals will likely be found in academic/research settings. 2. CPEP issue a report containing the contents of all the tests and the reports of Antony/Harned/Brown with a statement/paragraph as to the conflicted nature of the reports**

and how/why the situation was permitted to come into existence, and cause further costly delay.”

192. On June 9, 2023, Defendant CPEP’s CEO, Elizabeth Korinek emailed a letter to Plaintiff Kaul rejecting both options: **“CPEP is unable to agree to either option ... CPEP will not re-conduct the Assessment nor issue an Assessment Report with the existing consultants and data”** and suddenly deciding that Plaintiff Kaul was not a **“suitable candidate”** (Exhibit 14).

193. On June 21, 2023, Plaintiff Kaul sent a letter to Defendant CPEP’s CEO, Elizabeth Korinek, in response to her June 9, 2023, letter in which Plaintiff Kaul raises, amongst other things, Defendant CPEP’s fraudulent, knowingly conflicted, and anti-competitive conduct: **“Conflict of Interest re: ASIPP: ... Conflict of Interest re: Federation State Medical Boards ... Your failure, in your June 9, 2023, letter to address/deny/contest/rebut these facts, constitute their tacit admission for the purpose of pending/future litigation ... Mail Fraud ... obstruct the delivery of documents from me. (Exhibit 14).**

194. The arbitrary rejection of Plaintiff Kaul’s logical suggestions and Defendant CPEP’s sudden not **“suitable candidate”** agreement cancellation constitute further evidence in support of the of the K11-17 claims, the conspiracy element being pre-eminent.

195. On July 9, 2023, Plaintiff Kaul, in recognition of the overwhelming evidence of The Kaul Cases Defendants’ conspiracy to prevent Plaintiff Kaul from satisfying the terms of the February 8, 2021, opinion/order of the Pennsylvania Medical Board regarding a physician assessment, sent a letter to the Pennsylvania Medical Board informing them of the obstruction and a request, in light of these facts, to modify the conditions of licensure.

196. As of the filing date of K11-20, Plaintiff Kaul has received no communication from counsel for the Pennsylvania Medical Board, despite several emails enquiring as to whether the board had granted the amendment. The Pennsylvania Medical Board is a subjugate member of Defendant Federation and conducts business with Defendant CPEP and The Kaul Cases Defendant PACE (K11-8).

c. FACTS AS TO DEFENDANT FEDERATION STATE MEDICAL BOARDS

197. The admitted facts substantiating Defendant FSMB’s violations of Plaintiff Kaul’s human/civil/constitutional rights and causing injury to his life/liberty/property are pled within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (Exhibit 2). Defendant FSMB has not denied one fact asserted against him within The Kaul Cases, in a period from October 2019 to June 2024, including those asserted in K11-17. Facts pertaining to the felonies of amongst other things, perjury/bankruptcy fraud/bank fraud/wire fraud/embezzlement/public corruption/judicial corruption.

(i) DEFENDANT FSMB'S MONOPOLIZATION OF THE MULTI-STATE AMERICAN PHYSICIAN REGULATORY MARKET SUBJECTS THEM TO REGULATORY MARKET RELATED MULTI-DISTRICT LITIGATION

198. The dismantling effect of SCOTUS in Jarkesy and Loper on the monopolistic violations of Defendant FSMB and the “Federation Cartel” with its subjugate state medical board members cannot be overstated.

199. For decades, the “Federation Cartel” operated a knowingly illegal/unconstitutional enterprise of illegal profiteering within American medicine, at the heart of which existed the knowingly illegal use of administrative state ‘courts’/tribunals-lawyer-‘judges’ to cause the illegal revocation of physicians licenses. The scheme was perpetrated in furtherance of the corporate profit agenda of the “FC” and its corporate co-conspirators, the “Hospital-Insurance-Pharmaceutical Industrial Complex – Federation Cartel” (“HIPIC – FC”). That weapon has been ‘jammed’.

200. Defendant FSMB’s illegal procurement of monopoly power of the entire mechanism and all elements of the process of physician education, training, board certification, licensing, credentialing, certification and so called ‘disciplining’ does deprive state actors of state sovereignty/immunity defenses in litigation related to licensing disputes, but in light of Jarkesy, this deprivation ‘pails in light’ to the fact that the administrative perpetration of revocations was illegal ab initio.

201. Defendant FSMB’s monopolization of this system was totalitarian in nature and effect, was designed to subjugate/enslave the medical profession to obey the edicts/orders/agendas of for-profit healthcare corporations and to increase corporate profits through a ruthless slave-like exploitation of the public and medical profession.

202. A critical element of this system, one required for absolute control, was the element that prevents a physician whose license is suspended/revoked in any state, from obtaining a license anywhere in the world, unless and until he forfeits all his property to the system (insurance corporations/medical boards/lawyers), admits to his guilt, even though innocent and submits himself to punitive/harsh/unconstitutional/illegal terms as condition of his re-commencement of clinical practice and regaining a livelihood.

203. The denial of Plaintiff Kaul’s petition for a Texas license constitutes both an example of this element and a “new racketeering injury”, for which the law provides Plaintiff Kaul the right/standing to file suit in the Southern District of Texas (Exhibit 3).

204. In fact, the denial by every state of Plaintiff Kaul’s applications does substantiate a Jarkesy related claim against The Kaul Cases Defendants and every state medical board in the district courts within every state.

(ii) DEFENDANT FSMB'S SUPPRESSION OF FREE SPEECH, THE COVID VACCINE FRAUD AND PROFIT PURPOSED HUMAN RIGHTS ABUSES, TOXICITY AND DEATH

205. One of the principal themes of The Kaul Cases, has been that pertaining to the corrupt engineering of quid pro quo schemes by for-profit healthcare corporations with the regulatory/political apparatus of American healthcare in which at its most fundamental, human life is sacrificed for corporate profit.

206. Defendant FSMB is a critical cog in this 'Soylent-Green' like machine, the ruthlessness of which was exposed during the so called COVID-19 pandemic.

207. Commencing in early 2020, just after the announcement of the purported pandemic, Plaintiff Kaul began writing WIX articles and filing legal documents that highlighted the multiple profit purposed COVID related frauds that mandated knowingly toxic and ineffective mRNA 'vaccines', the wearing of masks and ubiquitous, but non-specific PCR testing.

208. This information reached a massive global audience, as did that published by other dissenting voices that exposed these crimes against humanity, and threatened corporate profits.

209. Consequently, these corporations conspired with Defendant FSMB to have suspended/revoked the licenses of physicians who either used the internet to communicate the grave risks of the vaccine or advised their patients against being inoculated, and or, as in Plaintiff Kaul's case, attempt to obstruct applications for/issuance of licenses, as in Texas.

210. Defendant FSMB/Co-Conspirator NCMB's 'muzzling' of the truth and dissemination of knowing falsehoods is ongoing, represents an "**open-ended pattern of racketeering**", is a serious threat to the public's health/welfare and pertains not just to the COVID vaccine, but to a myriad of drugs/medical devices, whose manufacturers participate in quid pro quo schemes with Defendant FSMB.

211. On or about June 10, 2024, WIX deactivated Plaintiff Kaul's article publishing account on false pretenses, and refused to provide Plaintiff Kaul the names of those who had pressured them to deactivate the account. WIX recently became a publicly traded corporation, a corporation whose investors include corporations invested in The Kaul Cases Defendants Allstate/TD/Geico.

212. The WIX articles are:

a. May 11, 2020 – WIX Article: COVID 19 CRIMES AGAINST HUMANITY: "The thrust of the case is that Defendant Allstate has, since at least 1999, engaged in massive schemes of bribery that have corrupted state medical boards. The Complaint alleges that this corruption is directly responsible, as of May 11, 2020, for over eighty thousand (80,000) deaths and one

point three million (1,300,000) cases caused by COVID-19 infections.” (Exhibit 16). These facts are relevant to the racketeering, section 1983, and human rights charges

b. November 4, 2020 – WIX Article: COVID-19 DEATHS + MEDICAL BOARD RACKETEERING + THE SUPREME COURT OF THE UNITED STATES: “Kaul respectfully asserts that a grant of the writ will mitigate future threats of COVID-19 like microbial pandemics ... “Kaul respectfully asserts that the grant of a writ will mitigate any further decrease in market capitalization of Defendants Allstate ...” (Exhibit 16). These facts are relevant to the Defendants ongoing racketeering injuries, in that unless the commencement of change is effectuated, the same corporate related death and destruction will continue within the west.

c. December 15, 2020 – WIX Article: COVID-19 MUTATION DEFEATS A VACCINE: “The vaccine has caused the mutation and will provide no protection to the mutant virus now coursing through the planet’s circulatory system. Of course, those corporations/executives raking in billions of dollars from having corrupt governments/politicians mandating vaccination programs, have insulated themselves and their families from harm. Two of these corporations are Berkshire Hathaway/Geico and Allstate Insurance Company.” (Exhibit 16). The uncontested/admitted facts within the release, in conjunction with the admitted facts (Exhibit 1) further substantiate Summary Judgment.

213. The following documents, all part of (Exhibit 16 + 17) and extracted from K11-10, contain facts highly probative to Defendant FSMB/Co-conspirator NCMB’s perpetration of schemes, willfully violative of the Nuremberg Code, of forced/coerced programs of mass public inoculation with a knowingly lethal mRNA toxin. The K11-10 district judge’s May 10, 2023, dismissal was an attempt to suppress a public examination of these facts and deprive the public of their right to know information critical to their health, welfare, and life, sacrificing the lives of people and their children at the ‘gallows-guillotine’ of corporate profit.

a. March 9, 2023 – K11-10: D.E. 1 Page 9 to 10 of 169: “The COVID vaccine, as Kaul predicted, has now been found to be highly toxic/ineffective: <https://www.dr-richard-kaul.com/so/24NPf5O65> This fact was known by the government/corporate entities that forced it on the world’s population: <https://theswisstimes.ch/swiss-banker-files-criminal-charges-over-false-covid-vaccine-statements/> In K11-7, the Defendants attempted to frame the Plaintiffs’ assertion of these facts as evidence of the implausibility of their complaint, with terms such as “vast conspiracy” and “nutcase”. These facts are now proven, and this country, like Switzerland, should have the courage to bring criminal charges against those who perpetrated these crimes against humanity.”

b. May 2, 2023 – K11-10: D.E. 19 Page 74 to 81 of 116: “According to the CDC, more than 10,000 reports of myocarditis were reported to the VAERS after COVID-19 vaccination (Pfizer-BioNTech and Moderna) in the US ... Adverse effects such as myocarditis, glomerular diseases and cutaneous eruptions are seen with the MRNA vaccines.”

c. May 2, 2023 – K11-10: D.E. 19 Page 101 to 104 of 116: “The mafia tactics of the Federation of State Medical Boards, filtered down to individual health professionals, has been highly effective in suffocating dissent, stigmatizing critical thinking and helping to establish a Stasi-style culture.”

d. May 2, 2023 – K11-10: D.E. 19 Page 68 to 72 of 116: “The federation expects its members will conduct more investigations that would lead to disciplinary actions. But in some cases, the responses from some medical boards and state officials have been stymied by political backlash. States like Tennessee and North Dakota, for example, have restricted state medical boards’ powers. And now legislators in 10 other states — including Florida and South Carolina — have introduced similar measures.”

e. May 2, 2023 – K11-10: D.E. 19 Page 83 to 88 of 116: “Physicians who generate and spread COVID-19 vaccine misinformation or disinformation are risking disciplinary action by state medical boards, including the suspension or revocation of their medical license ... Spreading inaccurate COVID-19 vaccine information ... threatens to further erode public trust in the medical profession and puts all patients at risk.”

Defendant FSMB/Co-conspirator TMB and its COVID manufacturing corporate masters and their investors are today responsible for the deaths and injuries of millions of global citizens who were forced/coerced into inoculation. This constitutes further evidence as to the urgent need for a “Reformation Of American Medical Boards”, the foundation of which Jarkesy and Loper provide.

f. May 2, 2023 – K11-10: D.E. 19 Page 91 of 116: “The COVID-19 pandemic may someday be the subject of countless volumes of literature describing it as a sinister man-made global plague. In today’s America, it has introduced a dark age of medical science. Nowhere has this fact been demonstrated more clearly than by the actions of state medical licensing boards, most of whom take their cues from the Federation of State Medical Boards (FSMB). Their drive to control medical practice has been gaining momentum for decades, but their current stance and methodology is an all-out assault on the once noble and legitimate medical profession. Having received the infamous honor of being the first medical doctor in the U.S. to have my medical license first suspended, then fully revoked, because of COVID malevolence, I’ve learned many lessons about exactly how state medical boards have honed the process of destroying good physicians. Now, to be sure, there are no perfect physicians, just as there are no perfect people. But a serious problem must exist when the Oregon Medical Board (OMB) is able to take down a physician who has done no harm and who actually had no patient complaints concerning the board’s allegations against him. In this story of my experience, I am just an example. It exposes the corruption and dirty secrets of an agency that is out of control, without accountability, and devoid of any regard for the best science and sound medical practice. State medical licensing boards have evolved into monsters that devour any medical practitioners in their path who do not comply with the government narrative. When government goes rogue, the medical system becomes an unholy alliance that ultimately wreaks havoc on patients. When the physician-patient kinship is

compromised, the healing arts suffer greatly. Any collaboration between government and medicine spells disaster.”

g. May 2, 2023 – K11-10: D.E. 19 Page 47 to 64 of 116: “The Committee’s Long-Standing Interest in the Opioid Epidemic ... the Department of Health and Human Services (HHS) and others, it stressed the critical need to remain diligent, especially during the COVID-19 pandemic ... we sent letters to 10 tax-exempt organizations and requested information about their financial relationships with opioid manufacturers

Purdue funneled bribes to Defendant FSMB/Co-conspirator in exchange for the issuance of an order in or around 2000, that resulted in the disciplining of physicians who under-prescribed opiates in the treatment of chronic pain patients.

h. May 2, 2023 – K11-10: D.E. 19 Page 96 of 116: “Recently, there have been increasing calls in the medical community, including from the Federation of State Medical Boards (FSMB) and professional certification boards such as the American Boards of Family Medicine (ABFM), Internal Medicine (ABIM), and Pediatrics (ABP) to revoke the licenses and board certifications of physicians who promulgate medical misinformation.”

Defendant FSMB/Co-conspirator NCMB knew the so called ‘vaccine’ was toxic and ineffective, and knew that its use of the US wires to transmit such knowingly fraudulent information constituted wire fraud, but more importantly, that the forced inoculation of the public would cause death and life-threatening long-term morbidity. Genocidal crimes against humanity rendered through the quid pro quo ‘hijacking’ of the apparatus of world governments.

i. May 30, 2023 – Article “COVID outbreak at CDC gathering infects 181 disease detectives”: “Nearly all of the survey takers, 1,435 (99.4%), reported having received at least one COVID-19 vaccine.”

214. On June 17, 2024, a lawsuit was filed against Pfizer by the State of Kansas (Exhibit 15), a case that will expose more new evidence to further substantiate the K11-20 facts of Defendant FSMB’s knowing commission of crimes against humanity. The outcome of K11-20 has immense consequences for the public, not only in exposing the truth and in ensuring such crimes are never again committed, but in bringing about a long-overdue and much needed “**Reformation Of American Medical Boards**”.

(iii) DEFENDANT FSMB/CO-CONSPIRATOR TMB’S PROFITEERING FROM THE OPIATE EPIDEMIC

215. In approximately 2000, numerous opiate manufacturers, including Purdue, commenced bribing Defendant FSMB/Co-conspirator NCMB and its directors, in a series of quid pro quo schemes, in which monies were exchanged in return for forcing/coercing physicians to dispense opiates under threat of license suspension/revocation.

210. Indeed, many physicians who chose to treat pain without opiates had their licenses suspended/revoked, their livelihoods destroyed and many of these physicians/family members committed suicide.

216. In 2012, the United States Senate opened an investigation into these illegal schemes, and on May 8, 2012, requested from Defendant FSMB/Co-conspirator NCMB, a list of all exchanged monies/information pertaining to facts of the genesis and perpetuation of the opiate epidemic and related deaths: **“It is clear that the United States is suffering from an epidemic of accidental deaths and addiction resulting from the increased sale and use of powerful narcotic painkillers such as Oxycontin (oxycodone), Vicodin (hydrocodone), and Opana (oxymorphone) ... Deaths from these drugs rose more rapidly “from about 4,000 to 14,800” between 1999 and 2008, than any other class of drugs and now kill more people than heroin and cocaine combined ... Recent investigative reporting from the Milwaukee Journal Sentinel/MedPage Today and ProPublica revealed extensive ties between companies that manufacture and market opioids and ... the Federation of State Medical Boards ...”**

217. On December 16, 2020, the results of the investigation and the Senate’s demand for greater transparency in commercial relationships between for-profit healthcare corporations and Defendant FSMB/Co-conspirator TMB /other tax-exempt groups, were published: **“Senate Finance Committee Ranking Member Ron Wyden, D-Ore., and Chairman Chuck Grassley, R-Iowa, today issued a report to committee colleagues illuminating the extensive connections between opioid manufacturers and opioid-related products, and tax-exempt entities that have helped drive up sales while downplaying the risks of opioid addiction.”**

218. Almost as soon as the Senate admonished Defendant FSMB/Co-conspirator NCMB, it commenced its public campaign of promoting the so called ‘vaccine’ and began suspending/revoking the licenses of those physicians who highlighted its toxicity and ineffectiveness. George Orwell’s ‘1984’ dystopian **“think-speak”** at work.

d. FACTS AS TO DEFENDANT CHRISTIE

219. The admitted facts substantiating Defendant Christie’s violations of Plaintiff Kaul’s human/civil/constitutional rights and causing injury to his life/liberty/property are pled within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (Exhibit 2).

220. Defendant Christie has not denied any fact asserted against him within The Kaul Cases, in a period from February 2016 to June 2024, including those asserted in K11-17, facts pertaining to the felonies of amongst other things, perjury/bankruptcy fraud/bank fraud/wire fraud/embezzlement/public corruption/judicial corruption.

221. The facts to which Defendant Christie has admitted in K11-17 are contained within the FIRST SET OF REQUESTS FOR ADMISSIONS AS TO DEFENDANT CHRISTOPHER J. CHRISTIE (Exhibit 2).

222. Contained within the K11-20 body of fact is fact already proven in K11-15 (**Exhibit 20**), a case that details Defendant Christie's attempts to cause either an actual or effective cessation of Plaintiff Kaul's physical existence.

e. FACTS AS TO DEFENDANT HEARY

223. The admitted facts substantiating Defendant Heary's violations of Plaintiff Kaul's human/civil/constitutional rights and causing injury to his life/liberty/property are pled within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (**Exhibit 2**).

224. Defendant Heary has not denied one fact asserted against him within **The Kaul Cases**, in a period from February 2016 to June 2024, including those asserted in K11-17. Facts pertaining to the felonies of amongst other things, perjury/bankruptcy fraud/bank fraud/wire fraud/embezzlement/public corruption/judicial corruption.

f. FACTS AS TO DEFENDANT STOLZ

225. The admitted facts substantiating Defendant Stolz's violations of Plaintiff Kaul's human/civil/constitutional rights and causing injury to his life/liberty/property are pled within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (**Exhibit 2**).

226. Defendant Stolz has not denied one fact asserted against him within **The Kaul Cases**, in a period from April 2018 to June 2024, including those asserted in K11-17, facts pertaining to the felonies of amongst other things, perjury/bankruptcy fraud/bank fraud/wire fraud/embezzlement/public corruption/judicial corruption.

g. FACTS AS TO K11-8 RESPONDENT-DEFENDANT AND K11-20 THIRD-PARTY WITNESS JAMES PAUL OETKEN

227. The factual foundation of K11-18 Respondent-Defendant James Paul Oetken's involvement/interference in Plaintiff Kaul's fundamental litigation rights in **The Kaul Cases** is detailed in the K11-18 Complaint (**Exhibit 19**) and in Plaintiff-Petitioner Kaul's K11-18 INFORMAL OPENING BRIEF in the U.S.C.A. for the 4th Circuit (Case No. 24-1417) (**Exhibit 9**).

228. Central to Oetken's knowingly fraudulent K11-7 September 12, 2022 'opinion-order-injunction' in K11-7 and his March 15, 2024 'order' threatening to hold Plaintiff Kaul in contempt if he did not dismiss K11-17 by March 29, 2024, was his bribery induced participation in the ongoing conspiracy of **The Kaul Cases** Defendants, an inducement that commenced sometime after August 19, 2021, the K11-7 filing date.

229. The Kaul Cases Defendants corruption of certain judges was critical to their scheme to prevent Plaintiff Kaul from further exposing their decades of crime. Oetken's entanglement in **The Kaul Cases** Defendants conspiracy and the November 20, 2023, negation by Chief Judge Myers of Oetken's September 12, 2022, purported injunction, caused Oetken, under threat from the K11-7 Defendants of exposing his bribery/public corruption felonies, to issue his March 15, 2024, order of contempt against Plaintiff Kaul.

230. Oetken's failure to deny the facts in K11-18, did, pursuant to F.R.C.P 8(b)(6) cause them to become admitted.

231. Within K11-18, and on March 25, 2024, Plaintiff Kaul states at para. 13 (**Exhibit 19**):

"Defendant Oetken's ... failure of the K11-17 Defendants to cause the submission of affidavits from the New York State Ethics Committee, the Judicial Disciplinary Council, and or any other judge within the SDNY, as to Defendant Oetken's refuting that Defendant Oetken engaged in criminal schemes with the K11-17 Defendants."

232. On June 12, 2024, Plaintiff Kaul responded to a letter from the NYS Ethics Committee (**Exhibit 18**), in which Plaintiff Kaul stated, amongst other things, that his WIX application had been deactivated after he distributed a June 9, 2024, release regarding K11-18 and President Trump's comments as to judicial corruption in the New York courts (**Exhibit 18**)

233. The timing of the letter from the NYS Ethics Committee is noteworthy in that the complaint was filed on November 30, 2022, and the committee's fraudulent 'whitewash' response was issued on June 12, 2024, after the filing of K11-18, a copy of which was served upon the Chief Judge of the SDNY and the Judicial Disciplinary Council of the 2nd Circuit. Plaintiff's Kaul seeks production of the entire committee's file as to Oetken.

234. Respondent-Defendant Oetken became conflicted in November 2022 when Plaintiff Kaul filed complaints against him with the NYS Ethics Committee and the Judicial Disciplinary Council. Oetken's purported 'injunction' was rendered null/void and a 'Fraud on the Court' when he failed to respond to Plaintiff Kaul's September 14, 2022, request that by October 6, 2022 he disclose his financial holdings and all exparte communications (**Exhibit 19**). As of the July 11, 2024, filing of the K11-20 Compliant, the information has still not been disclosed.

235. Respondent-Defendant Oetken's purported 'injunction' became a 'Fraud on the Court' on October 6, 2022. From October 6, 2022, to March 25, 2024, the filing date of K11-18, the purported 'injunction' has remained a 'Fraud on the Court', and on April 8, 2024, K11-18 was dismissed with prejudice without Defendant-Respondent Oetken denying the facts, the non-denial of which caused their admittance. For example:

"Through their nexus with K3 Defendant Charles Schumer and K11-3 Defendant Kevin McNulty, counsel for the K11-7 Defendants knew that Defendant Oetken was a well-known

“racketeer” within the SDNY, with a reputation for ‘selling’ his opinion to the ‘highest bidder’.”

236. Chief Judge Myers, in the knowledge that Respondent-Defendant Oetken was conflicted and that his September 12, 2022, purported ‘injunction’ was an admitted ‘Fraud on the Court’, did enter on March 13, 2024, an ORDER FOR DISCOVERY PLAN (**Exhibit 5**), an order illegitimately ignored by the K11-17 Defendants.

237. However, on June 14, 2024, Chief Judge Myers, in the knowledge that he himself was conflicted consequent to Plaintiff Kaul’s appeal of his April 8, 2024, dismissal of K11-18 with prejudice, did dismiss K11-17 with prejudice based on the knowingly conflicted and fraudulent ‘injunction’ of K11-18 Respondent-Defendant Oetken.

238. The dismissal of K11-17 is an admitted ‘Fraud on the Court’ invalid for all purposes (**Exhibit 4**) and for which the law permits the refiling of claims (**Exhibit 5**):

“The truth is more important than the trouble it takes to get it” See Publicker v. Shallcross 106 F.2d 949 (3rd Circuit 1939) (Exhibit 5**).**

239. However, for some inexplicable reason, Chief Judge Meyers went from seeking the truth on March 13, 2024, to not on June 14, 2024, when he issued an opinion within which he states, amongst other things: **“no court has invalidated the filing injunction. Thus, the filing injunction remains in full effect.”**

240. The nullity/falsity of this statement is evidenced by numerous facts:

241. The purported injunction was rendered a ‘Fraud on the Court’ on October 6, 2022, consequent to Respondent-Defendant Oetken’s failure to submit his financial holdings/exparte communications as required by law;

242. it has continued to constitute a ‘Fraud on the Court’ consequent to Respondent-Defendant Oetken’s continued failure to submit his financial holdings/exparte communications;

243. Chief Judge Myers, in full knowledge of the purported injunction, did enter an ORDER FOR DISCOVERY PLAN on March 13, 2024;

244. Respondent-Defendant Oetken’s failure to deny the facts of, amongst other things, bribery/public corruption asserted in K11-8 did cause their admission;

245. the doctrine of ‘Fraud on the Court’ as applied to Respondent-Defendant Oetken’s admission of the K11-18 facts places the burden of proof on Respondent-Defendant Oetken to prove his innocence, a proof for which no judicial intervention is required and a proof he continues to fail to submit;

246. the SCOTUS rulings in Jarkesy and Toper invalidate every administrative proceeding/defense/court ruling associated the illegal 2014 revocation, and that includes Respondent-Defendant Oetken's September 12, 2022, purported 'injunction' and Chief Judge Myers June 14, 2024, order in K11-17.

247. Consequent to these facts, the purported 'injunction' continues to constitute an illegal violation of Plaintiff Kaul's human/civil/constitutional rights, that Chief Judge Meyers, in his state of knowing conflicted-ness, had no authority on which to submit an opinion onto the federal docket.

248. Chief Judge Myers ought to have recused himself from K11-17 and had the matter adjudicated by another judge, but did not, an act consistent with the twelve (12) years-worth of violations of Plaintiff Kaul's human/civil/constitutional rights.

249. The 'clock has been turned back' to 11 am EST on April 9, 2012, and every injury/violation caused to Plaintiff Kaul consequent to the illegal suspension/revocation, including those committed by certain judges within the United States District Court, will be remediated.

250. AND every argument/defenses/opinion/order/'injunction' is invalidated, for the simple fact that the 2014 revocation was procured illegally, remained knowingly illegal for ten (10) years and is illegal in 2024, an inescapable illegality for which the Court, post Jarkesy/Loper, must order, amongst other things, the immediate reinstatement of Plaintiff Kaul's illegally revoked NJ license.

251. Every consequence/injury/violation and every element of Plaintiff Kaul's 'universe of existence' that was affected/is affected/will be affected by the illegal revocation and its consequences to Plaintiff Kaul's life/liberty/property/reputation (2012-2024) does substantiate compensation and will substantiate further charges against The Kaul Cases Defendants.

252. The below stated facts of Respondent-Defendant Oetken's judicial misconduct in the period preceding the filing of K11-17 were pled in the K11-17 Complaint, and were facts on which Chief Judge Myers transferred the case to his remit, and facts on which he entered an ORDER FOR DISCOVERY PLAN on March 13, 2024.

253. Chief Judge Myers, being aware of these facts, did then inexplicably permit the Defendants and Respondent-Defendant Oetken to continue their misconduct/violations in the E.D.N.C. by ignoring his March 13, 2024, ORDER and threatening Plaintiff Kaul on March 15, 2024, with contempt of court if he did not dismiss K11-17.

254. Chief Judge Myers, in not providing Plaintiff Kaul a protective order against Respondent-Defendant Oetken's threat, did violate the authority of the E.D.N.C., and did, in furtherance of this error, then ascribe validity to Respondent-Defendant Oetken's fraudulent 'injunction' in his June 14, 2024, order of dismissal, when he had done the exact opposite on November 20, 2023 (K11-17 filing) and March 13, 2024.

250. Chief Judge Myers provided no factual/legal basis nor rationale for his starkly contradictory positions (March 13, 2024, vs. June 14, 2024).

(i) JUDICIAL CORRUPTION + FRAUD ON THE COURT - 'THE OETKEN ANALYSIS' – DEFENDANTS PERPETRATION IN THE UNITED STATES DISTRICT COURT OF A 'FRAUD ON THE COURT' AND RESULTANT NULLITY OF THE K11-7 SEPTEMBER 12, 2022, PURPORTED 'OPINION/ORDER' OF JAMES PAUL OETKEN AND THE K11-10 MAY 10, 2023, ORDER OF U.S.D.J. ROCHON

255. The fraudulence/illegality of U.S.D.J. James Paul Oetken's K11-7 September 12, 2022, order/opinion became established on September 14, 2022, AND has since been further confirmed by 'THE OETKEN ANALYSIS' which proves the ADMITTANCE of every argument submitted in K11-7 by Plaintiffs Kaul/Basch from August 19, 2021, to September 12, 2022, AND by Oetken's continued failure (September 12, 2022, to November 5, 2023) to deny the fact that he was bribed/corrupted by the K11-7 Defendants.

256. IN FACT, and in a further tacit admission that he [Oetken] received bribes from the K11-7 Defendants/engaged in exparte communications, Oetken DID on August 14, 2023, ten (10) months after Plaintiffs Kaul/Basch filed a motion (October 6, 2022) to disqualify him and two (2) months after Plaintiffs filed K11-14 (June 22, 2023) in the U.S.D.C. – Southern District Florida, Defendant-Respondent Oetken INADVERTENTLY CAUSED a further tacit admission of the fact that he was bribed/engaged in exparte communications in the manufacturing of his September 12, 2022, purported 'injunction', by filing a response to the motion to disqualify (K11-7: D.E. 172), without denying any of the facts, thus causing them to become admitted.

257. Respondent-Defendant Oetken's admissions of bribery/exparte communications occurred on October 6, 2022/August 14, 2023/April 8, 2024, and the invalidation of all his opinions-orders-injunctions did occur on June 27/28, 2024, with Jarkesy and Loper. This also further invalidates Chief Judge Myer's April 8, 2024, statement in his dismissal of K11-18:

"... no court has invalidated the filing injunction. Thus, the filing injunction remains in full effect." (K11-17: D.E. 113 Page 4 of 6).

258. Oetken's motivation for filing a document (K11-7: D.E. 172) on August 14, 2023, in K11-7 (a case he ordered closed in October 2022) was an attempt, albeit unsuccessful, to belatedly un-deny facts that had already been admitted in October 2022, and to attempt to disguise his motivation by framing it as a 'denial' of Plaintiffs Kaul/Basch October 6, 2022, motion for disqualification.

259. Oetken's motivation for seeking to un-deny these admitted facts was an attempt to buttress/reassure the August 23, 2023 'injunction' based dismissal of K11-14 by the district judge in the U.S.D.C for the Southern District of Florida, a judge whose opinion evidences her immense hesitation in referencing Oetken's corrupted 'injunction' in the opinion.

260. However, and as even further evidence of his guilt, and in 'digging himself even deeper into his crime' is his explicit non-denial of the already admitted disqualification facts.

261. For example, in his K11-7 August 23, 2023, submission, he does not certify that he did not receive bribes nor engage in ex parte communications nor render a knowingly fraudulent/corrupted 'injunction', but instead alludes to Plaintiff Kaul's Rule 36 procurement of fact as being an "impermissible" and "speculative" process.

262. Oetken's August 23, 2023, submission/defense effectively says: **"yes I committed the crimes, but you [Kaul/Basch] do not have the evidence to prove it"**.

263. Oetken's September 12, 2022, purported 'injunction' is not only now invalid, but is a 'Fraud on the Court', a fact exposed and re-exposed on October 6, 2022 (K11-7)/August 23, 2023 (K11-14)/April 8, 2024 (K11-18)/June 14, 2024 (K11-17)/June 27, 2024-Jarkesy/June 28, 2024-Loper.

264. Respondent-Defendant Oetken has still not denied the facts of his felonies (August 19, 2021, to July 7, 2024), a non-denial not dissimilar to that of Martin Thomas Manton.

265. The below section (**para. 271 to para. 312**) up until STATEMENT OF EVIDENTIAL EXHIBITS appears in K11-14 and K11-17, and evidences the perpetuation of Defendant-Respondent-Oetken's September 12, 2022, fraudulent September 12, 2022, purported injunction by the K11-10 judge through the S.D.N.Y. AND although K11-20 is replete with admitted/undisputed fact sufficient for Summary Judgment, Plaintiff Kaul's purpose in retaining this section within K11-20 is to illustrate in the context of SCOTUS in Jarkesy (June 27, 2024) and Toper (June 28, 2024) the extent to which The Kaul Cases Defendants, Respondent-Defendant Oetken and certain other district judges acted illegally in attempting to conceal The Kaul Cases Defendants criminal conspiracy (2005 to 2024), and crimes, in using the United States District Court as a conduit and 'cover' for their "pattern of racketeering".

266. A fundamental error of every district court that has dismissed one of The Kaul Cases is that every court incorporated into its decision, the illegal/fraudulent opinions/orders of all prior district courts/NJ administrative law court/NJ state medical board (2012 to 2024), thus rendering its opinion/order as equally illegal/fraudulent.

267. It is scenarios such as this that strongly counsel for the prompt investigation/recognition/remediation of suspected and proven acts of 'Fraud on the Court' and or other violations/crime, in order that innocent and unsuspecting judges/courts are not dragged into The Kaul Cases Defendants' criminal conspiracy.

268. Defendants admittance of fact and defenseless-ness is absolute, in that at the heart of all judicial opinions/orders within The Kaul Cases is the illegal 2014 revocation.

269. Moreover the ongoing/"new" injuries to Plaintiff Kaul's life/liberty/property/reputation and ongoing/"new" violations of his human/civil/constitutional rights (2012-2024) will continue to substantiate new claims until the injuries/violations/offenses are remediated/recompensed/causes to cease.

270. On May 10, 2023, in K11-10, a purported order/opinion was entered by the district judge, Jennifer L. Rochon. The document perpetuates the admitted K11-7 'Fraud on the Court', in that its purpose, nature, substance and character are identical to the fraudulent K11-7 September 12, 2022, order/opinion of district judge, James Paul Oetken.

271. On May 2, 2023, in K11-10, a case in which Oetken was deprived of adjudicative power, consequent to pending complaints before state/federal disciplinary committees/councils, counsel for Defendant ICE filed a letter with the Court in which he copied Oetken, thus converting him from a jurist to a witness/defendant, a fact stated in Plaintiffs K11-10 May 12, 2023, response to the K11-10 district judge's May 10, 2023, purported order/opinion.

272. On May 9, 2023, in K11-10 and in response to Defendant ICE's May 2, 2023, letter, Plaintiffs submitted opposition papers, in which they identified, amongst other things, Defendant ICE's "**conspicuous failure to have the New York State ATTORNEY GRIEVANCE COMMITTEE issue an opinion of no cause regarding the K11-7 district judge, does further consolidate the corpus of fact substantiating 'Fraud on the Court' as a basis for K11-10.**"

273. The K11-10 district judge's knowingly improper May 10, 2023, incorporation, and use of the US wires/United States District Court, to propagate Oetken's fraudulent September 12, 2022, K11-7 order/opinion, did cause to be rendered fraudulent and thus null/void the K11-10 district judge's May 10, 2023, purported order/opinion (K11-10: D.E. 27).

274. However, in addition to the procedural 'Fraud on the Court' based nullity, the purported K11-10 order/opinion of May 10, 2023, is without legal effect consequent to multiple misrepresentations/mischaracterizations of fact, as identified in the below analysis of the May 10, 2023, K11-10 opinion/order:

BACKGROUND (K11-10):

275. Filing History: The Court states: "**In March 2014, the New Jersey State Board of Medical Examiners ... any request will be denied for failure to comply with this Opinion and Order, and Plaintiff Kaul may be subject to sanctions, including monetary penalties or contempt.**" *Id.* at *9."

276. The opinion was drafted by the Defendants lawyers, and contains verbiage that is almost an exact copy of that submitted in prior judicial opinions, the purpose of which is an attempt to undermine Plaintiff Kaul's credibility, character, and competence, by misrepresenting the facts pertaining to the politico-legal events preceding/surrounding the illegal February 12, 2014, revocation/revocation proceedings (April 9 to June 28, 2013).

277. The revocation/revocation proceedings were and are illegal, a fact known to the K11-10 district judge, a fact admitted to by The Kaul Cases Defendants, and a fact substantiated by the undisputed and claim conclusive evidence within The Kaul Cases.

278. From the commencement of The Kaul Cases on February 22, 2016 (K1), the Defendants defense strategy has involved bribing politicians/judges (See April 27, 2022, Wall Street Journal article – ‘Dozens of Federal Judges Had Financial Conflicts: What You Need to Know’) to prevent any of the cases advancing into discovery and to have cases dismissed for legally invalid reasons, and to then use these fraudulently procured dismissals to argue, and have judges argue the mantra that because **“Plaintiff Kaul has never received any relief in these cases.”** that therefore the case before them, regardless of new evidence/facts/injuries should be dismissed.

279. At no point have The Kaul Cases Defendants contested/refuted/rebutted/addressed any of the evidence/facts, facts they have admitted sufficient for Summary Judgment, and facts that support claims that they continue to falsely describe as “frivolous”.

280. In furtherance of the K11-10 Defendants/District Judge’s scheme to undermine Plaintiff Kaul/Basch’s credibility, is the district court judge’s blatant misrepresentation of the FACT that the insurance industry was indeed born out of the trans-Atlantic slaving industry, did profit from the Nazi engineered Holocaust and continues to profit from the mass mandated dissemination of so called COVID vaccines.

281. Defendants have not denied these facts, nor indeed could they as they are part of historic and legal records, as a simple Google search does prove.

282. Plaintiffs submitted these facts in The Kaul Cases and specifically in K11-2 as evidence of a four hundred year-plus “**pattern of racketeering**” and a general profit-purposed criminal state-of-mind consistent with the wrongdoing committed against the Plaintiffs, as identified in The Kaul Cases, and NOT, as the district judge disingenuously claims, a direct conspiracy against Plaintiffs Kaul/Basch; although the insurance industry does indeed view/treat ethnic minority physicians as modern-day slaves.

283. The K11-10 district judge states: **“Plaintiff Kaul has never received any relief in these cases as the District of New Jersey dismissed many of Kaul’s claims and Kaul voluntarily dismissed others. Id. at *2.”**

284. All cases were in fact voluntarily dismissed, and the district judge’s statement is false and purposed to mislead the record and any future readers of the record into believing the Defendants false narrative that The Kaul Cases claims are without merit. The claims, as evidenced by the admitted fact, do indeed have merit, a fact known to the district judge.

285. Similarly, the K11-10 district judge, in keeping with and furthering the K11-7 district judge’s September 12, 2022 ‘Fraud on the Court’ (Exhibit 12) mischaracterizes a kidnapping of

Plaintiff Kaul on May 27, 2021 as a “purported kidnapping”, and re-enters onto the record a quote from the knowingly fraudulent September 12, 2022 document: “The Court warned that “[i]f Plaintiff Kaul violates this Opinion and Order and files any materials without first obtaining leave to file, any request will be denied for failure to comply with this Opinion and Order, and Plaintiff Kaul may be subject to sanctions, including monetary penalties or contempt.” Id. at *9.

286. K11-10 was filed on March 9, 2023, and the Court after having reviewed the Complaint, issued summonses for all Defendants, four (4) of whom were served. The K11-10 district judge only dismissed the case after direct interference from Oetken, the jurist who was converted into a witness/defendant consequent to being copied on Defendant ICE’s May 2, 2023, letter (K11-10: D.E. 17).

287. **Factual Background:** The Court states: “Plaintiffs have now filed, without leave, another complaint alleging that Defendants supported ... Plaintiffs allege that PACE submitted a false report to the Pennsylvania Medical Board stating that Kaul “would be a danger to the public” and “likely never meet the standards to ever return to the practice of medicine.” Id. ¶ 64” –

288. The strategy of the Defendants/District Judge involves citing statements from Plaintiffs’ pleadings that are either unrefuted/uncontested/unrebutted/undenied, mischaracterized/misrepresented and or contextually excerpted, in an attempt to mischaracterize Plaintiffs’ claims as implausible and or evidentially unsupported.

289. The Defendants/District Judge’s mischaracterization is an attempt to mitigate Oetken’s K11-7 ‘Fraud on the Court’ and justify the K11-10 district judge’s knowingly improper attempt to further perpetrate this fraud within the United States District Court. The Court states: “Plaintiffs claim that the Defendant insurance companies are committing racketeering through a “Slaving-Nazi-COVID-Insurance Axis” to “force[] mass global vaccination programs.” Compl. ¶¶ 17-18.”

290. This is a gross mischaracterization of the pled fact that the insurance industry (the principal perpetrator in The Kaul Cases) began with the trans-Atlantic slaving industry, profited from the Nazi Holocaust, and continues to profit from mandated COVID vaccine programs. These constitute forms of legalized human trafficking/exploitation, a theme within The Kaul Cases of legally facilitated exploitation of principally ethnic minority physicians (Hispanic/Asian/African American), through the coopting of the government/courts and the enactment/perversion of law to provide ‘legal’ cover for such crimes against humanity.

291. These historical facts substantiate a four-hundred-year-plus “pattern of racketeering”, facts regarding the continuance of which are pled in The Kaul Cases. The Court states: “Plaintiffs admit to filing several similar lawsuits between 2015 and 2022. Id. ¶ 4 ... These claims are summarized in Judge Oetken’s opinion, and the Court assumes familiarity with those allegations. Kaul 2021 at *2-3.”

292. The K11-10 district court judge has misrepresented the pleading, in that in paragraph 4. the Plaintiffs did NOT admit to filing several similar lawsuits between 2015 to 2022, as is evident from a plain reading of para. 4. The Court states: **“Portions of the Complaint are seemingly a “copy and paste” from the amended complaint filed in Kaul 2021. Compare id. ¶¶ 16-21, 27, 29-35, 71-222 with Kaul v. Intercontinental Exch., No. 21-cv-6992 (JPO), ECF No. 14 (“Kaul 2021 Compl.”) ¶¶ 6-10, 12-152.”**

293. This is a contextually excerpted and grossly misleading statement of the legal warranty of K11-10 pursuant to the doctrine of ‘Fraud on the Court’ which permits a case to be refiled in the same or a different court, as substantiated in K11-10 with reference to controlling SCOTUS law (K11-10: D.E. 1 Page 82 of 169) (**Exhibit 5**).

294. This accounts for the fact that the majority of K11-10 is indeed identical to K11-7. A lack of identity between K11-10 and K11-7 would be inconsistent with the foundational doctrine of ‘Fraud on the Court’, but even absent this basis, K11-10 was brought jointly on new evidence/facts/injuries.

295. On May 10, 2023, in K11-10 the Court/Defendants state: **“Notwithstanding, Plaintiffs claim this lawsuit is an “independent action” alleging new facts and “new racketeering injuries.” Compl. ¶ 7. The first “new” allegation is that Judge Oetken fraudulently dismissed Plaintiffs’ previous case, Kaul 2021; and Judge Oetken “tacitly admitted to having received bribes and conspiring with the Defendants and or their agents.” Compl. ¶¶ 5, 12. Plaintiffs allege that various Defendants bribed Judge Oetken to dismiss Kaul 2021 and enter the injunction that prevents Plaintiff from prosecuting the “Kaul Cases.” Id. ¶¶ 22-24 ... Second, Plaintiffs allege that the New York State Medical Board colluded with “[t]he Kaul Cases Defendants” to deny Kaul’s medical license application ... Third, Plaintiffs claim that three defendant insurers – FSMB, Allstate, and GEICO – used the State of California - UC San Diego Physician Assistant and Clinical Education (“PACE”) Program to further their racketeering scheme.”**

296. Neither the Court nor the Defendants have refuted/rebutted/contested/addressed these facts, but in simply re-stating them on the federal record, they have inadvertently admitted the facts. Attached to K11-10 was a copy of a lawsuit Plaintiff Kaul had drafted against Defendant PACE (K11-10: D.E. 1 Page 151 of 169), another so called ‘physician assessment’ program whose commercial survival is dependent on Defendant FSMB. K11-8 Defendant PACE rendered a report in October 2022, the fraudulence of which was proved by Plaintiff Kaul’s recording of the May/June 2022 virtual interviews.

Procedural Background (K11-10):

297. The Court states: **“Plaintiffs filed the Complaint on March 9, 2023. See id. Defendant Allstate requested dismissal of this action on April 19, 2023, on the grounds that the Complaint violates an anti-filing injunction. ECF No. 3. Plaintiffs filed a motion for summary**

judgment on April 21, 2023, ... Plaintiffs responded to Defendant Intercontinental Exchange's letter on May 9, 2023. ECF No. 24."

298. This is a purposefully incomplete recitation, in that the Court fails to specifically identify Defendant Heary's April 24, 2023, **ADMISSION OF MATERIAL AND UNDISPUTED FACT OF DEFENDANT ROBERT HEARY (K11-10: D.E. 9)**. These admissions, pursuant to RICO's vicarious liability doctrine, did on May 24, 2023, become admitted with regards to all other K11-10 Defendants, sufficient to substantiate Summary Judgment.

DISCUSSION (K11-10):

Anti-Filing Injunction Against Kaul:

299. The Court states: **"This lawsuit runs afoul of Judge Oetken's order barring Kaul from filing any lawsuits related to the facts of his earlier cases ... The Court finds that Kaul is barred from bringing the Complaint in this lawsuit as it clearly falls with Judge Oetken's anti-filing injunction."**

300. The K11-10 district judge's analysis incorporates and perpetuates Oetken's K11-7 September 12, 2022, knowing 'Fraud on the Court' and is knowingly/willfully false in that the K11-10 district judge knew and knows that the doctrine of 'Fraud on the Court' as applied to Oetken's September 12, 2022 admitted fraud and further (K11-18-March 25, 2024) proven fraud (Exhibit 19), rendered/renders null and void Oetken's September 12, 2022 K11-7 opinion and all purported orders within the opinion, including that of the purported 'anti-filing injunction'.

301. The K11-10 district judge, by willfully incorporating into a judicial opinion/order, the contents of the knowingly fraudulent K11-7 document, the K11-10 district judge has, for political/professional reasons, assumed Oetken's liability of fraud, an act that was a consequence of her/his calculation that the liability of fraud assumption was outweighed by the risk that without such an order, the Plaintiffs would not be coerced/intimidated into not continuing to litigate The Kaul Cases to the emergence of 'the truth.

302. The K11-10 district judge evinces her fraudulent state-of-mind in devoting twenty (20) lines to a purported analysis of why Oetken's fraudulent September 12, 2022, opinion/order applies to K11-10, while willfully omitting the fact that K11-10 pleads new and **"ongoing racketeering"** offenses/injuries, for which the law regarding new evidence/facts authorizes new claims as does the doctrine of 'Fraud on the Court'. The K11-10 opinion/order are legally unsubstantiated.

303. The K11-10 district judge's failure to contest/rebut/refute/analyze the applicability of 'Fraud on the Court'/"ongoing racketeering" constitutes a tacit admission of these doctrines, which further substantiates the filing of K11-17.

304. These admissions further invalidate the purported ‘anti-filing injunction’ and further validate the filing of K11-17, while the K11-10 judge’s tangential referencing of the doctrines, although intended to convey the impression of analysis, does nothing but evidence a fraudulent state-of-mind and its attempted perpetuation, as does the footnote on page 6: “ ... **procedurally proper way to challenge the decision in Kaul 2021 [K11-7]”**, which is a blatant attempt to mischaracterize Oetken’s September 12, 2022 K11-7 opinion/order as a legitimate honest act, which it is not, and which has been admitted/proven as such..

Collateral Estoppel (K11-10):

305. The Court states: **“The doctrine of claim preclusion, also called collateral estoppel, also bars most of Plaintiffs’ claims ... bars all of the claims in this action except the three new RICO claims, which were not already adjudicated, but which are barred by the injunction.”**

306. The doctrine is inapplicable/invalid for the same reasons that invalidate the purported ‘anti-filing injunction’, those being the **“ongoing racketeering”** offenses/injuries and ‘Fraud on the Court’; reasons not contested/rebutted/refuted/analyzed by the K11-10 district judge, and for the simple fact that the K11-7 issues were never litigated nor legitimately decided, and the facts were admitted.

307. The K11-10 judge’s reliance on Somerset v Partners, LLC, No. 20-cv001241 is misplaced, in that in the Somerset cases there was no ‘Fraud on the Court’, and there was one discrete alleged offense/injury that was highly circumscribed in time and there was neither any **“ongoing pattern of racketeering”** nor **“new racketeering injuries”** as was the case in K11-7/K11-10 and is the case in K11-17.

308. The K11-10 district judge chose to raise a preclusion defense, knowing that within The Kaul Cases, including K11-7, the Defendants use of these defenses had uniformly failed, in that neither the Defendants nor the courts disproved Plaintiff Kaul’s negation of the defenses. The K11-10 district judge knew this to be the law of The Kaul Cases, including K11-10, but in attempting to violate the law, did further perpetuate the ‘Fraud on the Court’.

Rule 8(a)(2) (K11-10):

309. The Court states: **“The Complaint should also be dismissed pursuant to Rule 8(a)(2). Rule 8(a)(2) requires “a short and plain statement of the claim showing that the pleader is entitled to relief.” ... Therefore, the Court also dismisses this complaint pursuant to Rule 8(a)(2).”**

310. The K11-10 district judge’s strategy of ‘throwing everything at the wall, to see what sticks’ is most distinctly evidenced in raising a Rule 8 defense, a defense that failed in K11-7 in that neither the Defendants nor the court disproved Plaintiff Kaul’s negation of the defense.

311. In fact, the mere raising of this defense by the K11-10 district judge constitutes evidence of the knowing invalidity of the purported ‘anti-filing injunction’ and collateral estoppel defenses,

in that if these defenses were indeed valid, which they are not, their validity would render moot/unnecessary a Rule 8 defense, but from which in fact, the lack of mootness and specific Rule 8 citation do infer the **invalidity** of the purported 'anti-filing injunction' and collateral estoppel defense. Put otherwise, the K11-10 judge's mere raising of Rule 8 evidences her knowing invalidity of the anti-filing injunction/collateral estoppel defenses.

312. The K11-10 district judge's May 10, 2023, opinion/order constitute a 'Fraud on the Court', but even if it did not, which it does, K11-17 is legally warranted as it is based on new/ongoing offenses/injuries, previously not in existence, and contains undisputed facts material to the proof of Summary Judgment.

Rule 54 Infraction, Admission Of Undisputed Material Fact And Oetken's Conversion Into A Witness/Defendant (K11-10):

313. On May 12, 2023, Plaintiffs submitted a letter to the K11-10 district judge in which they raised the following facts: **(i)** the K11-10 May 10, 2023 opinion/order (D.E. 27) was invalid/null and void consequent to unadjudicated motions, as pursuant to Rule 54(b) **"Otherwise, any order or other decision, however designated, that adjudicates fewer than all the claims or the rights and liabilities of fewer than all the parties does not end the action as to any of the claims or parties and may be revised at any time before the entry of a judgment adjudicating all the claims and all the parties' rights and liabilities."**; **(ii)** On May 24, 2023, the facts contained within the K11-10 April 24, 2023 **ADMISSION OF MATERIAL UNDISPUTED FACT OF DEFENDANT ROBERT HEARY** (K11-10: D.E. 9) became permanently admitted not just as to Defendant Heary, but as to all Defendants pursuant to RICO's vicarious liability doctrine; **(iii)** the Defendants and the K11-10 district judge failed to provide authority to negate the controlling law of the doctrine of 'Fraud on the Court', a failure that corroborated Oetken's September 14, 2022 admission in K11-7 that his purported opinion/order were/are a 'Fraud on the Court'; **(iv)** Defendant ICE, in improperly copying Oetken on their May 2, 2023 letter to the court (K11-10: D.E. 17) (an individual with no legitimate adjudicative power in K11-10) did cause him to become a witness/defendant, who obstructed justice in K11-10 by conspiring with the K11-10 district judge to dismiss K11-10 with prejudice, knowing that a public prosecution of K11-10 would expose evidence of all his prior wrongful acts, be they civil and or criminal.

The Inapplicability Of Mootness (K11-10):

314. On May 16, 2023, and in response to Plaintiffs' May 12, 2023, letter, the K11-10 district judge, absent any citation to legal authority and further evidencing her 'Fraud on the Court' did alter the Plaintiffs' May 12, 2023, letter (K11-10: D.E. 29) to claim that her willful non-adjudication of motions filed by Plaintiffs for Summary Judgment/Default Judgment was **"moot"** because the dismissal had the **"effect of denying as moot all open motions"**.

315. The K11-10 district judges mootness argument is fallacious because: **(i)** The major premise of the K11-10 district judge's purported opinion/order is Oetken's September 12, 2022, K11-7 purported order/opinion, an admitted/proven 'Fraud on the Court' and thus a premise fatally

undermined by the authoritative principles of Rule 60/Doctrine of 'Fraud on the Court'; **(ii)** Finality, pursuant to Rule 54, cannot exist without adjudication of all pending motions, which thus renders null/void the May 10, 2023 K11-10 district judge's purported opinion/order (K11-10: D.E. 27); **(iv)** the legal definition of 'moot' is that of an open question, or a thing that is debatable, unsettled or subject to argument, and thus the K11-10 district judge undermined her purported opinion/order in using this term (there remain debatable/unsettled questions/issues with The Kaul Cases) but even if this were not the unintended result, the new and ongoing evidence/facts/offenses/injuries continuing to be caused to Plaintiff Kaul (2012 to 2023 and ongoing) will continue to preclude from The Kaul Cases any consideration of the concept of mootness, until the offenses cease and the injuries are rectified/remedied/remediated.

316. The facts that preclude mootness exist within the scheme that has been perpetrated and continues to be perpetrated by The Kaul Cases Defendants, certain judges within administrative/state/federal courts and others, whereby these individuals have violated and continue to violate Plaintiff Kaul's right to regain his livelihood/life/liberty/economic standing/reputational standing/professional standing/social standing/physical standing/psychological standing by obstructing his efforts to litigate his legal claims, have his New Jersey license reinstated, actualize the May 27, 2020 grant of his Pennsylvania license and or obtain a license in any other state, including Texas.

5. STATEMENT OF EVIDENTIAL EXHIBITS CONTAINED WITHIN THE KAUL CASES

317. This body of admitted claim conclusive evidence, some of which was submitted in K11-19 and the remainder of which is contained within The Kaul Cases, does exceed the Summary Judgment standard, evidences criminal violations of American law, gross violations of Plaintiff Kaul's human/civil/constitutional rights and is as follows w/excerpts:

a. July 28, 2023 – COMPLAINT IN KAUL v. CHRISTIE/MURPHY: 23-CV-22582 (K11-15):

“The conspiracy to violate Plaintiff Kaul’s civil rights continued from the Morristown Police Department to the United States Marshals Service and into the Mercer County Correctional Center, where the scheme, for which Defendants Christie/Murphy, and in fact all of The Kaul Cases Defendants, pursuant to RICO’s vicarious liability doctrine, are liable, involved an attempt to use anti-psychotics to render Plaintiff Kaul mentally infirm, psychiatrically labelled, susceptible to serious injury/death, in order to effectively eliminate his right to life and to actually eliminate Plaintiff Kaul.”

b. April 4, 2023 – ADMISSION OF MATERIAL AND UNDISPUTED FACT OF DEFENDANT ROBERT HEARY: 23-CV-2016 (K11-10)

“I admit that the knowing, willful, malicious, and purposeful violation of Plaintiff Kaul’s human rights is commensurate with the standard of that of a crime against humanity.”

c. February 11, 2022 – INTERVIEW OF DEFENDANT CHRISTIE’S POLITICAL COLLEAGUE, ANTHONY CAPPELLO: 21-CV-06992 (K11-7):

“Mr. Cappello, a decades-long New Jersey political insider, was presented with various pieces of evidence, and with his intimate knowledge of Defendant Christie, did unequivocally state that the case was “totally believable”. His statement undermines the Defendants mischaracterizations of the case as “vexatious ... frivolous ... meritless ... abusive ... harassing”, and we respectfully request this document’s contents be incorporated into your consideration of Defendants’ motions ... From 2012 to 2017, my requests to Kathleen for this person’s identity were unsuccessful, as were my requests for her brother’s contact information. She remained fearful of the consequences to her life, but did upon my continued plea, provide an affidavit in September 2017, factually establishing certain content of her brother’s communications with the then anonymous state government person.”

d. May 28, 2021 – LETTER FROM PLAINTIFF KAUL TO U.S.D.J. ALLISON BURROUGHS RE: KAUL KIDNAPPING SCHEME: 21-CV-10326 (K11-2)

“These events lend further evidential weight to the claims, that is irrefutable. As is clear from the record, the commission and attempted cover-up by the Defendants now involves the

executive/legislative/judicial branches of the State of New Jersey. The Defendants scheme now involves the use of police to threaten, harass and intimidate process servers, witnesses, and the Plaintiff himself, while violating the jurisdiction/authority of the United States ... My concern is that with this escalation of armed force, people will be killed. In that regard, I do request that there be emergently schedule a case management conference, in order to mitigate this threat, and stop the Defendants criminal abuse of state power and continued falsification of evidence.”

e. August 23, 2021 – DEFENDANT ALLSTATE ADMISSIONS OF FACT RE: COMMISSION SECURITIES FRAUD: 21-CV-06992 (K11-7):

“Defendant Allstate does admit to the following facts: That in its 2018 10Q filing, it did, on “Page 92 of 93, under “PART II. OTHER INFORMATION-Item 1. Legal Proceedings” with fraudulent intent and effect, omit a material legal proceeding and divert attention to a general “discussion under the heading “Regulations and Compliance”.

Defendant Allstate, as the SEC record shows, filed false returns for five (5) years, from 2016 to 2021, this being the year it was exposed by Plaintiff Kaul in K11-7. As a consequence of this fraud and Defendant Allstate being sued in India by Plaintiff Kaul in K11-5 for its practice/policy of racial discrimination, its share price decreased.

f. February 11, 2019 – ‘THE SOLOMON CRITIQUE 2’:

This document evidences the massive fraud perpetrated by Defendant Solomon in collusion/conspiracy with other members of The Kaul Cases Defendants in the April 9 to June 30, 2013, NJ OAL revocation proceeding, and then in the December 13, 2013, issuing of Defendant Solomon’s report, a report that was adopted by The Kaul Cases Defendant NJBME on February 12, 2014, and that caused the illegal revocation of Plaintiff Kaul’s license on March 24, 2014.

“From April 9, 2013, to June 28, 2013, there was conducted a hearing in the New Jersey Office of Administrative Law, the purpose of which was to illegally revoke Kaul’s medical license. The proceeding was a massive fraud, orchestrated with criminal intent by K2 defendant Christopher J. Christie. The proceeding was polluted with perjury + evidential omissions + misrepresentations + falsifications + gross mischaracterizations ...

This analysis, ‘The Solomon Critique 2’, focuses entirely on Defendant Przybylski and it proves that he, in conjunction with K2 defendants Hafner + Solomon collectively committed two hundred and twenty-two (222) separate instances of perjury + evidential omissions + falsifications + misrepresentations. K2 defendant Solomon based his opinion on a record that Kaul has since proven to be one replete with perjury + evidential omissions + fabrications + falsifications + misrepresentations. A massive fraud.”

g. September 21, 2018 – CERTIFICATION OF MINIMALLY INVASIVE SPINE SURGEON DR. ARNOLD ERWIN FELDMAN:

“It was at this meeting that I first met Dr. Kaul, and to the best of my recollection it was his presence that prompted Dr. Yeung to make the following statement to a group of approximately five (5) physicians:

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

Dr. Kaul, like myself, was a victim of professional jealousy, that manifested itself through a corrupt medical board, that like many in the United States, flagrantly violate the due process rights of physicians.”

h. January 16, 2018 – ‘THE SOLOMON CRITIQUE’:

“This document is a detailed analysis of the trial transcript of the hearing in the MATTER OF THE SUSPENSION OR REVOCATION OF THE LICENSE OF RICHARD A. KAUL, M.D. TO PRACTICE MEDICINE AND SURGERY IN NEW JERSEY – OAL DOCKET NO. BDS 08959-12. The document demonstrates the enormous volume of willful misrepresentation, perjury, critical evidential omission, and gross mischaracterization that were committed by Jay Howard Solomon, Esq, Gregory Przybylski, MD and Andrew Kaufman, MD, during the proceeding ...

These numbers suggest that the evidence provided was flawed and dishonest and that the interpretation of evidence was selective and prejudiced. The analysis proves that two of the defendants in Kaul v Christie provided misinformation and that they committed perjury. The extent of the corruption of information that was committed suggests the need for a criminal investigation into the reasons why Jay Howard Solomon would violate the law in such a concerted manner.”

i. August 6, 2017 – CERTIFICATION OF PLAINTIFF KAUL PATIENT, JOHN ZERBIN!:

“Dr. Kaufman seemed to have some kind of vendetta against Dr. Kaul, and made comments to the effect that he was going to destroy Dr. Kaul’s medical career, his reputation, and make sure he never worked again as a doctor. He stated that he was going to make sure Dr. Kaul was ostracized, and that he and a group of five other doctors had been working together since at least 2011, to make sure Dr. Kaul’s medical license was revoked. He mentioned that they were going to have articles and stories published, that caused permanent damage to Dr. Kaul’s reputation, so that he would never be able to find work.”.

j. September 21, 2017 – CERTIFICATION PLAINTIFF KAUL PATIENT, KATHLEEN CALABRESE:

"In approximately May/June 2012 my brother related to me a conversation he had with his acquaintance, during which the acquaintance made the following comment in regard to the suspension of Dr. Kaul's license: "I think it is terrible what they are doing to Dr. Kaul"".

k. July 12, 2017 – AFFIDAVIT OF PLAINTIFF KAUL PATIENT, KENNETH SABO:

"After the interview Ms. Hafner [NJ DAG involved in revocation scheme telephoned me approximately six times, and on each occasion attempted to have me testify against Dr. Kaul, and on each occasion I refused."

l. October 6, 2016 – LETTER FROM PLAINTIFF KAUL TO K1 U.S.M.J. STEVEN MANNION:

"On September 21, 2016, at approximately 1:30am eight armed police officers from the Somerset County Sheriff's Office arrested me at my residence on a warrant for non-payment of child support. The revocation of my medical license caused immense economic harm to my family and resulted in the loss of my surgical center, Manhattan townhouse, professional practices ... I believe that, as a consequence of the federal lawsuit, state agencies, under the control of the defendant politician, are being used in a retaliatory manner, with the clear intention of harassment and intimidation."

m. October 24, 2015 – EMAIL FROM THIRD PARTY WITNESS/PHYSICIAN STEVEN WALDMAN, MD TO PLAINTIFF KAUL:

"Revolutionaries are often met with great resistance even when they are trying to do great and beneficial things. I'm sorry that the fascists in the Medical Board and state government have pulled your license. They are bullies and clearly politically motivated."

n. September 13, 2013 – LETTER FROM PLAINTIFF KAUL PATIENT, COREY JOHNSON, TO CEO OF UMDNJ UNIVERISTY HOSPITAL, JAMES GONZALEZ REGARDING THE KAUL CASES DEFENDANT, ANDREW KAUFMAN, MD:

"That motherfucker Richard Kaul is trying to take over the spine business and we are going to put a stop to it – I later worked out that he made this comment when he realized I had been under the care of Dr. Kaul since 2006 and who in my opinion had provided excellent care."

6. STATEMENT OF FACT SPECIFIC TO DEFENDANT ALLSTATE

318. The admitted facts substantiating Defendant Allstate's violations of Plaintiff Kaul's human/civil/constitutional rights and causing injury to his life/liberty/property are pled within the below claims and are referenced within the PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201 ... TO THE ISSUES ON APPEAL (Exhibit 2).

319. Defendant Allstate has not denied any fact asserted against it within The Kaul Cases, in a period from February 2016 to July 2024, including those asserted in K11-17. Facts pertaining to the felonies of amongst other things, perjury/bankruptcy fraud/bank fraud/wire fraud/embezzlement/public corruption/judicial corruption.

The historical facts of racial discrimination integral to the origins and industrial perpetuation of modern-day economic slavery of Defendants FSMB/Allstate and Co-conspirators Geico/TD, the latter three derived from the British banking-insurance cartels, are those of a “pattern” of profit purposed racketeering/human rights violations/crimes against humanity.

320. The facts within the articles contained within submissions filed in The Kaul Cases since K11-2 (February 24, 2021) are facts never denied and thus admitted (Exhibit 1) for the purpose of proving Defendants four hundred(400) year-long “open-ended pattern of racketeering” and human rights violations, that continues today against American physicians.

321. In his K11-17 June 14, 2024, opinion, Chief Judge Myers’ cursory reference to these facts contained no analysis to disprove that these facts are highly probative to the claims, but instead attempted to characterize and imply their inclusion as being consistent with The Kaul Cases Defendants’ eight-year-long derogation of the claims, the facts of which are now all admitted (Exhibit 2). The absurdity of The Kaul Cases Defendants’ defenses of derogation is that if all claims are indeed “frivolous ... bizarre ... far-fetched ... etc ... etc ... etc” then why not just deny everything.

322. The district judges who have aligned themselves with this absurdity are in the great minority and are simply wrong.

323. K11-2: D.E. 4-1 Page 33 of 254 – Article NYT May 18, 1998 – “Insurers Swindled Jews, Nazi Files Show”: “The documents, which abound with anti-Jewish slurs, include a confidential industry estimate that at least 19 of the 43 German fire insurance companies stood to suffer losses for the year if they fulfilled their obligations to Jewish policyholders for Kristallnacht. That contradicts an assertion of some German insurers that they did not profit from the Holocaust.”.

324. K11-2: D.E. 4-1 Page 28 of 254 – Article The Guardian November 26, 2016 – “Family’s quest for truth reveals top insurer’s link to SS death camps”: “After Gold’s book was published, an executive of Ergo, the company that now owns the insurer, allowed her to see the archive recording the activities of the firm during the Nazi era. They revealed that the SS, which ran factories in the camps at Auschwitz, Buchenwald and Stutthof, close to what is now Gdansk, paid a consortium of firms, including the Victoria, premiums of 3.7m reichsmarks a year (£320,000 at 1939 exchange rates) to insure the factories ... “They didn’t insure the workers,” says Gold. “They were too easily replaced.”.

325. K11-2: D.E. 4-1 Page 95 of 254 – Statement of historical fact of insurance/banking industry’s critical role in the trans-Atlantic slaving industry and Nazi Holocaust – “The Slaving-

Nazi-Insurance Axis: “The common thread connecting the slaving industry, the Nazi atrocities and the “War on Doctors” (1990 to the present) is the ruthless/genocidal for-profit insurance/banking industry/machine of which Defendants Allstate/Geico/TD/Northern Trust/Boston Partners are members ... The atrocities/crimes (murder/manslaughter/enslavement/economic servitude/human trafficking/imprisonment) against humanity of the slaving industry/the holocaust/the targeted extermination of the infirm/specific racial groups continues to be perpetrated today in the United States by the insurance industry against ethnic minorities, occupied principally by immigrants/Indians/Hispanics/Blacks ... Similarly, the insurance industry propaganda machine has concealed from the American public its “War on Doctors” and patients with chronic illnesses. It has concealed its pervasive corruption of the judiciary and crooked physicians willing to provide false testimony against physicians to whom the insurance industry owes money, in order to have these physicians (mostly Indians) eliminated through incarceration/loss of livelihood/license suspension/revocation/suicide/social ostracization/professional ostracization.”

The insurance industry’s four hundred (400) year-plus “pattern” of profit purposed racketeering/human rights violations/crimes against humanity continues in its ongoing abuse of American investigative/prosecutorial/adjudicative agencies in the filing/procuring of false criminal indictments/prosecutions/incarcerations of innocent ethnic minority physicians.

326. In the five (5) week trial of Dr. Lesly Pompy (USA v Dr. Lesly Pompy (18-cr-20454)), a physician from Haiti acquitted on all thirty-eight (38) counts, there emerged evidence on December 2, 2022, in the form of testimony from a James Stewart Howell, an ex-police officer/Blue Cross Blue Shield ‘undercover investigator’/Government witness, that detailed the massive schemes of fraud perpetrated against principally ethnic minority physicians by Blue Cross Blue Shield and governmental persons/agencies.

327. Plaintiff Kaul incorporated the transcript of this testimony into the matter of Kaul v BCBS/Marino: 23-CV-00518 (K11-11) (D.E. 1-4) and submits into K11-20 excerpts of the K11-11 Complaint, which contain facts pertaining to racial targeting and insurance industry “**patterns of racketeering**” that are highly probative of the claims in K11-20:

“In 2018, Dr. Lesly Pompy, a Michigan based interventional pain physician of Haitian origin, was indicted by the US Government on charges of healthcare fraud, in a case almost identical to that filed against Dr. Anand”.

“However, during the trial evidence emerged of the fraudulent schemes perpetrated by the Blue Cross Blue Shield corporations in their efforts to entrap knowingly innocent physicians, mostly of whom belonged to ethnic minorities”.

“During the testimony of a James Howell, an ex-police officer employed by Blue Cross Blue Shield to manufacture entrapment schemes, Howell testified that in furtherance of these schemes he was provided fraudulent medical documents, driving licenses and other official

documents by agencies/persons of the State of Michigan and physicians employed by Blue Cross Blue Shield”.

“Howell’s prior testimony in various other prior court proceedings had resulted in the wrongful conviction and incarceration of other ethnic minority physicians, all of whom continue to languish in jail”.

“The trial of Dr. Pompy unequivocally establishes the “pattern of racketeering” being perpetrated by the American insurance industry and specifically the Blue Cross Blue Shield corporations, and corroborates the claims that Kaul has asserted within The Kaul Cases, since 2016.”.

The American insurance industry’s schemes of racial discrimination/asset seizure and commercial conspiracies with governmental agencies against ethnic minority physicians (Hispanic/Black/Indian) are almost exact replicas of those perpetrated against Jews by German industrialists and the Nazi Government as detailed in the final reports of the Nuremberg Trial.

328. The parallels between the Nazis persecution of the Jews/others (1933-1945) as detailed in the Nuremberg trial/final report and the persecution of ethnic minority physicians by an insurance industry-government totalitarianism (1990s and ongoing) is more than coincidental, and is fact, simply a continuation of the four hundred (400) year-plus “**pattern**” of profit purposed racketeering/human rights violations/crimes against humanity.

329. Irrefutable evidence of these crimes against humanity was released by the American Government under a FOIA request and was published as part of a May 17, 2023, press release issued by Plaintiff Kaul.

C. LEGAL CLAIMS, RELIEF AND CERTIFICATION

1. COUNT ONE

Association-In-Fact Enterprise: State of Texas-State of Colorado (“SNC-SC Association-In-Fact Enterprise”)

Defendant Persons: CPEP/FSMB

Co-conspirators: Defendant Solomon/Allstate/Christie

RICO Predicate Acts: Wire Fraud/Bribery/Witness Tampering/Evidential Tampering

Overview:

330. In a period commencing in early 2023, Defendant CPEP after having been contacted on January 11, 2023, by Plaintiff Kaul regarding the conduction of a physician assessment course as per the February 8, 2021, final order of the Pennsylvania Medical Board, did enter into a knowingly illegal conspiracy with Defendant FSMB and indirectly with co-conspirators Defendants Solomon/Allstate/Christie.

331. The purpose of the conspiratorial scheme was to prevent Plaintiff Kaul from obtaining his Pennsylvania license by manufacturing a false reason/s to fail Plaintiff Kaul on the physician assessment.

332. Defendants CPEP/FSMB recognized that the issuance to Plaintiff Kaul of his Pennsylvania license would cause his economic resurgence, which would facilitate his ability to prosecute **The Kaul Cases** Defendants.

333. Defendants CPEP/FSMB recognized that an enhanced prosecutorial ability would facilitate the emergence of evidence as to the crimes of **The Kaul Cases** Defendants and their co-conspirators.

334. Defendant CPEP, a subjugate element of Defendant FSMB, an entity from whom it derives the majority of its business, did use the US wires to exchange information with Defendant FSMB in the conception/development of the scheme to fail Plaintiff Kaul.

In these communications the following points were agreed upon:

335. Defendant CPEP would deceive Plaintiff Kaul into believing it would conduct an honest and impartial evaluation.

336. Defendant CPEP would financially defraud Plaintiff Kaul for a service it knew it would conduct fraudulently.

337. Defendants CPEP/FSMB recognized that their misconduct and use of the US wires to perpetrate such misconduct was illegal but persisted in the belief, quite incredulously, that Plaintiff Kaul would not expose their crimes.

338. Defendants CPEP/FSMB were convinced that Plaintiff Kaul would not expose their crimes because they expected that a purported nationwide ‘injunction’ entered (albeit a ‘Fraud on the Court’) on September 12, 2022, in K11-7 by U.S.D.J. James Paul Oetken in the SDNY (Exhibit 13) would cause Plaintiff Kaul to believe he was foreclosed from filing claims against them/others for both “ongoing” and “new” racketeering injuries. Defendants expectation is knowingly contrary to the law: 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)

Wire Fraud:

339. Defendant CPEP’s knowledge of the nature/character of acts that substantiate the elements of the RICO predicate act of wire fraud pre-dated their January 2023 entry into The Kaul Cases Defendants “ongoing pattern of racketeering”.

340. Defendant CPEP entered the conspiracy, so to speak, with their ‘eyes wide open’ and with a willful/knowing/malicious intention to cause/perpetuate harm to Plaintiff Kaul’s life/liberty/property, the principal purpose of which was an attempt to conceal the crimes of The Kaul Cases Defendants.

341. Defendant CPEP was motivated to enter the conspiracy as its commercial survival is inextricably intertwined with that of Defendant FSMB and its for-profit healthcare corporation quid pro quo collaborators.

342. Defendant CPEP did, with a knowing illegality, use the US wires to transmit information in furtherance of The Kaul Cases Defendants scheme to attempt to obstruct Plaintiff Kaul’s efforts to have reinstated his 2014 illegally revoked New Jersey license/obtain a license in any state.

343. Defendant CPEP did, with a knowing illegality, use the US wires to transmit information in furtherance of The Kaul Cases Defendants scheme to attempt to obstruct Plaintiff Kaul’s efforts to procure justice/compensation in the United States District Court by hindering his license related economic ability to prosecute the claims.

344. Subsequent to Defendant CPEP’s entry into the conspiracy, it transmitted fraudulently purposed communications across the US wires with Defendant FSMB on hundreds of occasions, the content and subject matter of which pertained to the above agreed upon points.

345. Defendant CPEP did know that the transmission of each communication constitutes sufficient fact for the charge of a separate count of wire fraud.

346. Defendant CPEP, despite knowledge of the civil/criminal liability associated with its wire fraud offenses, did nonetheless perpetrate these crimes in the conviction that Plaintiff Kaul would not expose the crimes and even if he did, he would be precluded from holding liable Defendant CPEP and The Kaul Cases Defendants.

Bribery:

347. Defendants FSMB/CPEP engage in multiple quid pro quo schemes of bribery with for-profit healthcare corporations, in which they receive monies in exchange for causing, aiding/abetting and or otherwise facilitating the elimination from and obstruction of re-entry into the healthcare market of physicians who either threaten or fail to support corporate agenda/profits.

348. Defendants CPEP/FSMB manufacture and publicly propagate lies to justify and provide 'cover' for their schemes of profit purposed grand corruption and racketeering, the so called COVID 'vaccine' being the most recent.

349. One of Defendants CPEP/FSMB most frequently propagated lie is that the targeted physician, mostly an ethnic minority individual, is allegedly incompetent and a threat to public safety.

350. In furtherance of this lie Defendants CPEP/FSMB conspire with state medical boards to conduct fraudulent legal proceedings in which evidence is tampered with/falsified and witnesses are suborned to perjury in order to substantiate corruptly engineered foregone conclusions of license revocation.

351. In conjunction with Defendants CPEP/FSMB bribery related license revocation schemes are the license reinstatement/issuance obstruction schemes, in which Defendant CPEP and other so called 'physician assessment programs', which coincidentally are owned/overseen by nurses/lawyers/businessmen, do 'fail' targeted physicians, and particularly those that fight for their rights, such as Plaintiff Kaul.

352. Within this “HIPIC-FC” system of tyrannical medical boards/regulatory agencies that conduct the ‘dirty work’ or ‘dirty war’ of the for-profit healthcare corporations, those physicians who seek justice/truth and who fight for their human/civil/constitutional rights are further targeted through criminally conducted elimination schemes and reputational injury, as was/is Plaintiff Kaul (**Exhibit 20 Para. 114**): **“It also became apparent to Plaintiff Kaul that Defendant Christie’s scheme involved attempting to have Plaintiff Kaul held for as long as possible, with the intention of having him, while in a mentally incapacitated state, physically injured/killed, in order to prevent him from continuing his prosecution of The Kaul Cases by his elimination through either death or severe physical/psychological injury.”**

353. Defendants CPEP/FSMB corporate-charity structures provide some of the conduits through which bribes are funneled, while other bribe-monies are funneled towards the paying of personal expenses for senior members of Defendants CPEP/FSMB.

Witness/Evidential Tampering:

354. Defendants CPEP/FSMB schemes of physician elimination (license revocation/reinstatement + issuance prevention) necessarily involve causing witnesses (patients/physician ‘experts’) to lie in legal/associated proceedings in order to pervert the ‘means’ to justify the ‘ends’.

355. Defendants CPEP/FSMB identify and repeatedly use the same corrupted/conflicted witnesses in furtherance of their schemes, witnesses whose annual incomes rely substantially on monies received from Defendants CPEP/FSMB and other so called ‘physician assessment programs’.

356. Defendants CPEP/FSMB knew that Drs. Antony/Brown/Harned were conflicted and knew that in using these individuals in the February 22/23, 2023, assessments did constitute a knowing violation of Plaintiff Kaul’s due process rights.

357. Defendants CPEP/FSMB knew that Drs. Antony/Brown/Harned (the assessment physicians) were conflicted and knew that in using these individuals in the February 22/23, 2023, assessments did constitute a knowing/willful ‘Fraud on the Court’, a fraud to which Plaintiff Kaul has been subjected since at least 2010.

358. Defendants CPEP/FSMB were motivated to continue the perpetration of such a fraud because their economic survival is inextricably intertwined with that of **The Kaul Cases** Defendants, and economic/professional/reputational advances by Plaintiff Kaul equate to their equivalent retreats by **The Kaul Cases** Defendants.

359. Defendants CPEP/FSMB conspired with Antony/Brown/Harned to ensure their reports would be false representations of the case discussions with Plaintiff Kaul in order to cause a ‘fail’ of the assessment program, and thus a non-issuance of his Pennsylvania license.

360. Defendants CPEP/FSMB believed that their scheme to have falsified documents submitted onto the assessment record would go undetected/unprovable, as Defendant CPEP had inserted

into their contract with Plaintiff Kaul a clause that prohibited Plaintiff Kaul from recording the virtual assessments.

361. Defendant CPEP/FSMB believed that this non-recording clause would prevent Plaintiff Kaul from obtaining evidence to prove the fraud they planned to commit.

362. Defendants CPEP/FSMB knew that in July 2022, Plaintiff Kaul had recorded his assessments with The Kaul Cases Defendant PACE, and that the recording proved Defendant PACE had falsified its report, as pled in K11-8. Therefore, Defendants CPEP/FSMB sought to prevent Plaintiff Kaul from exposing their planned falsification in a similar manner.

363. Defendant CPEP informed Plaintiff Kaul to expect the report within four (4) to six (6) weeks after the assessment, but by the end of April, Plaintiff Kaul had received no report.

364. In or around the first week of May 2023 Plaintiff Kaul commenced researching Harned, as he had seemed the most suspicious individual, in that throughout the ninety (90) minute conversation he had not once looked directly at Plaintiff Kaul. Instead, he looked down or to the side, with a demeanor of anxiety and tone that vacillated between overt aggressiveness and a bizarre superciliousness.

365. Plaintiff Kaul's research revealed that Harned was a director of the Kentucky chapter of The Kaul Cases Defendant, American Society of Interventional Pain Society ("**ASIPP**"), an organization that in 2012 publicly criticized Plaintiff Kaul for performing percutaneous spinal fusions and a member of whom (Andrew Kaufman, MD) testified against Plaintiff Kaul in the 2012-2013 license revocation proceedings. However, since at least 2016, The Kaul Cases Defendant ASIPP has taught its members how to perform the percutaneous spinal fusion procedure invented by Plaintiff Kaul in 2005.

366. The Kaul Cases Defendant ASIPP/Members motivation for criticism was professional jealousy, in that most of these individuals did not possess the skill to conduct such procedures, including Harned/Antony/Brown. It was more expeditious for them to 'gang-up'/bribe a corrupt governor/defame Plaintiff Kaul than strive to emulate, a conspiracy subsequently aided/abetted, for the purposes of crime concealment, by Defendants CPEP/FSMB's ill-conceived February 2023 assessment fraud.

367. Plaintiff Kaul, having established Harned's conflicted state, provided Defendant CPEP an opportunity to claim no knowledge of this offense (Exhibit 14).

368. Defendant CPEP's non-response caused a tacit admission of its knowledge that Harned was conflicted.

369. Plaintiff Kaul subsequently established that Antony/Brown were similarly conflicted, and it was at this point that Plaintiff Kaul provided Defendant CPEP an opportunity to rectify their wrongdoing and repeat the assessment with non-conflicted physicians.

370. Defendant CPEP's response constitutes an admission of guilt and evidences a guilty state-of-mind in Defendant CPEP's comment regarding Plaintiff Kaul's sudden inappropriateness for the assessment, an inappropriateness that conveniently appeared after Plaintiff Kaul exposed their scheme (Exhibit 14).

371. Plaintiff Kaul's request for a complete copy of his file, a file for which he paid \$14,500, was denied and no report was ever issued.

2. COUNT TWO

Association-In-Fact Enterprise: New Jersey Medical Board-Federation State Medical Boards-Texas Medical Board ("NJMB-FSMB-NCMB Association-In-Fact Enterprise")

Defendant Persons: Solomon/Christie/Allstate

Co-conspirators: Geico/TD

RICO Predicate Acts: Mail Fraud/Wire Fraud/Public Corruption/Bribery

Overview:

372. In a time period commencing in or around 2010, the Defendants did conspire to commit, and did commit a knowingly illegal "pattern of racketeering" and did convert the New Jersey Medical Board/Federation State Medical Boards/Texas Medical Board into an association-in-fact enterprise ("NJMB-FSMB-NCMB Association-In-Fact-Enterprise") through and under cover of which they perpetrated the RICO predicate acts of 'Fraud on the Court'/public corruption, 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.

373. As a New Jersey administrative law judge, Defendant Solomon was subjugated to the executive branch of the New Jersey government, of which Defendant Christie, as the then governor, was the 'executive'.

374. In a period between 2010 and 2012, Defendant Solomon entered into a quid pro quo with Defendant Allstate, 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 Defendant Christie and involved the funneling of bribes from Defendant Allstate to Defendant 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.

375. The benefit that inured to Defendant 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 Defendant Allstate and others.

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

377. The benefit that inured to Defendant Allstate 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.

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

379. Defendants Christie/Solomon/Allstate knew that their scheme constituted an illegal theft of services and deprivation of Plaintiff Kaul's livelihood right.

380. Defendants Christie/Solomon/Allstate 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/livelihood.

2009 - 2012

381. Defendants knowingly illegal scheme to revoke Plaintiff Kaul's license commenced in or around 2009, shortly after Defendant Christie assumed the New Jersey governorship.

382. Defendant Christie, in using the 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.

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

384. In the conceiving/planning/execution of this scheme, Defendants 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).

385. The planning/development of the scheme involved Defendants Christie/Allstate's 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.

386. 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.

387. Defendant Solomon was recommended to Defendants Christie/Allstate as such an individual.

388. In the period from 2010 to 2011, there were multiple communications (digital/non-digital) meetings and negotiations between Defendant Solomon and Defendants Christie/Allstate, in which they agreed upon the terms of their quid pro quo scheme.

389. Defendant Allstate provided Defendant Solomon a similar but lesser deal as the one they agreed upon with Defendant Christie, but stipulated in their corrupt pact with Defendant Solomon that their lawyers would co-draft his final opinion/order (December 13, 2013).

390. 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 Allstate/Solomon agreed that all of Plaintiff Kaul's witnesses (15) would be found not credible and all of Defendant Christie's witnesses would be found credible.

391. 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.

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

393. It was also agreed that Defendant Christie's witnesses would be treated with immense respect, while Plaintiff Kaul and his witnesses would be demeaned and harassed.

394. It was also understood that Defendant Christie's then deputy attorney general, Doreen Hafner would coerce and cajole some of Plaintiff Kaul's patients into perjuring themselves by providing knowingly false testimony against Plaintiff Kaul.

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

396. Defendants 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.

397. Defendants 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.

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

399. Defendants 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.

400. 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.

401. In the 2010-2012 planning of the scheme, Defendants Allstate/Solomon/Christie never imagined that in 2023 their crimes would be before the United States District Court for the Southern District of Texas, the state from which Defendant FSMB coordinated its worldwide COVID 'vaccine' scheme.

402. Defendants Allstate/Solomon-lawyer/Christie-lawyer inability to imagine such a scenario accounts for their shameless and knowingly willful commission of crime.

403. The malice with which the crimes were committed reflects Defendants Allstate/Solomon/Christie's criminal state-of-mind.

404. Defendants Christie/Allstate/Solomon agreed that as soon as Plaintiff Kaul's license was revoked (March 24, 2014), Defendant Solomon would leave the State of New Jersey and move out-of-state to avoid and or render less likely any civil or criminal repercussions.

405. It was agreed that Defendant Solomon, upon taking residence out-of-state would not discuss the case with anybody and would attempt to conceal his prior professional history in New Jersey.

406. It was also agreed that Defendant Solomon would inform any interested parties that his name was Howard Solomon and not his full name, which is James Howard Solomon, in order that his whereabouts would remain concealed.

2012-2014

407. Defendants Christie/Allstate/Solomon, 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.

408. Defendants Christie/Allstate/Solomon and others 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.

409. 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.

410. Defendants Christie/Allstate/Solomon and others, 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 hearing, most of which they believed would be occupied by the testimony of their witnesses.

411. Defendants Christie/Allstate/Solomon 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"

412. It was this mistaken belief regarding Plaintiff Kaul's departure that caused Defendants Christie/Allstate/Solomon and others to experience no sense of risk/danger in perpetrating their crimes by, through and with state persons/authority/apparatus.

413. This mistaken belief was further bolstered by Defendants conviction that Defendant Christie would become the 2016 US President, and would, if Plaintiff Kaul did not depart, use its 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) or those who refused to support him (Fort Lee Mayor Mark Sokolich). Political Gangsterism.

414. With the commencement of the scheme on April 2, 2012, Defendants 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'.

415. In the time period from April 2, 2012, to August 2012 Defendants Christie/Allstate/Solomon 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.

416. 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.

417. Despite the highly concerted and conspiratorial organization of the scheme, Defendants were not successful in preventing Plaintiff Kaul from finding counsel to prepare an opposition to the revocation case.

418. However, Defendants 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 Defendant Solomon, Plaintiff Kaul's then lawyers were told by Defendant Christie/agents that Defendant Solomon had been ordered to revoke Plaintiff Kaul's license regardless of what evidence he presented.

419. 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,

420. 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.

421. 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.

422. 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 Solomon/Allstate/Christie and The Kaul Cases Defendants to destroy Plaintiff Kaul's life/liberty/property.

423. Defendant 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 Defendants illegal scheme and knew it was caused into existence through nothing but Defendants criminal conspiracy.

424. Defendants Solomon/Christie, both lawyers, knew that that December 13, 2013, opinion/order was a 'Fraud on the Court', a fraud that was illegally incorporated into subsequent multiple legal proceedings and caused the issuance of fraudulent judgements/multi-million-dollar payouts on fraudulent medical malpractice claims.

425. In the time period from April 2, 2012, to December 13, 2013, Defendants scheme caused Plaintiff Kaul's corporations to file for Chapter 11 bankruptcy and 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 owed money by Plaintiff Kaul's corporations.

426. Defendant 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:

427. From the inception of Defendants 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. **The Kaul Cases** Defendants conspiracy commenced in 2005/6 and its ongoing-ness in 2023 is consequent to **The Kaul Cases** Defendants scheme to attempt to prevent Plaintiff Kaul from causing further evidential exposure of their crimes. 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**.

428. In this time period the Defendants, as did others, came 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 (11 +) injuries (2012-2023) Defendants have caused and continue to cause Plaintiff Kaul.

429. In this knowledge and seeking to "shut Kaul down" the Defendants and **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.

430. However, immediately after the March 24, 2014, revocation, Defendants, 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".

431. Defendant Allstate in finalizing the final bribes to Defendants 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 exist or effectively exist.

432. From 2014 to 2016, Defendants 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.

433. 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.

434. Defendants 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.

435. Defendants 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.

436. In January 2019, Defendant 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.

437. Defendant 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’.

438. 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.

439. Defendants 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 are prepared to take to attempt to prevent Plaintiff Kaul from further exposing their past/ongoing crimes.

440. In this period, occurring concurrently with Defendants corruption of the courts, has been their conspiracy with Defendant FSMB 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.

441. In the most recent of The Kaul Cases (K11-14/K11-15), the Defendants waived an opportunity to mitigate their damages in refusing to discuss settlement at a Rule 26 Conference on October 20, 2023, a repeat of their refusal to participate in a Rule 26 Conference in K5 on January 26, 2021.

442. . Defendants willfulness/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 K11-17, and will continue to be filed until the current

eleven-plus-years (11+) of injury caused to Plaintiff Kaul by The Kaul Cases Defendants are compensated for and remediated ().

3. COUNT THREE

**Association-In-Fact Enterprise: Corporations-Governments-FSMB//Co-conspirator TMB
IAMRA-Medical Boards/Councils-NYSE (“CFN Association-In-Fact RICO Enterprise”)**

Defendant Person: FSMB

Co-conspirator TMB

**Co-conspirators: Pfizer/Moderna/Astra Zenica/Johnson + Johnson + Corporate Media
RICO Predicate Acts: Wire Fraud/Murder/Manslaughter/Public Corruption/Bribery/Money
Laundering**

Overview:

443. In a time period commencing in or around May 2020, Defendant FSMB/Co-conspirator NCMB /agents in collusion and conspiracy with co-conspirators Pfizer/Moderna/agents and others did order American state medical boards and coerce foreign medical councils to compel, under penalty of license suspension/revocation and or medical registration suspension/erasure, its physicians to deceive patients into being inoculated with an mRNA compound that patients were falsely led to believe was a vaccine against COVID, but that Defendant FSMB/Co-conspirator NCMB and its corporate/state medical board co-conspirators knew was not only not a vaccine, but a substance with lethal toxicity.

444. Defendant FSMB/Co-conspirator NCMB/co-conspirators were motivated by profit and used the apparatus of law, medicine, business, and government to perpetrate through and attempt to conceal a knowingly illegal scheme/crime against humanity, that involved the commission of a global “**pattern of racketeering**” that converted the NYSE/State Medical Boards/Foreign Medical Councils/American State Governments/Foreign Governments into an association-in-fact enterprise (“**CFN Association-In-Fact RICO Enterprise**”).

445. The RICO predicate acts included and include fraud/murder/manslaughter/public corruption/bribery/money laundering.

The “CFN Scheme”:

446. The scheme involved the sudden and unscientifically explained appearance of the COVID-19 virus (SARSCoV2) in or around late 2019 and was rapidly followed by corporate-government emergency orders that forced/coerced the public into becoming inoculated with the mRNA compound/complying with so called draconian ‘lockdowns’/bankrupting businesses/closing schools/forcing the useless wearing of masks/restricting travel and

arresting/jailing/fining/otherwise penalizing citizens who chose not to comply with these dictates.

447. Defendants FSMB/Allstate/Co-conspirators TMB/Geico/TD and their corporate co-conspirators/shareholders generated profits in the billions from the sale of the so-called vaccine to governments, who used tax payer funds to purchase the so called 'vaccine'.

448. Structure: In order to attempt to conceal and mitigate the civil/criminal liability of all persons associated in any manner with any element of the conception/research/development/production/marketing/public relations/distribution/storage/professional coercion/defamation of so called 'anti-vaxers/dispensation/inoculation or any aspect with any relevance/connection/association to any facet of the process, Defendant FSMB/Co-conspirator TMB and its corporate co-conspirators established a structural hierarchy, through which communications were conducted in a strict manner that limited them, in a militaristic manner, to persons/agencies immediately above or below in the hierarchy in an attempt to create a plausible deniability defense

449. The five (5) tiers in descending order are: **(i) Corporations/Corporate Media:** the CEOs/Agents of the toxin manufacturers, that include CEO Joaquin Duato/Agents (Johnson + Johnson) CEO Albert Bourla/Agents (Pfizer), Pascal Soriot/Agents (Astra Zeneca) and CEO Stephane Bancel/Agents (Moderna); **(ii) Government:** persons within the US Food and Drug Administration that authorized the dispensation of the toxin and persons within the US Treasury that authorized tax payers money be diverted to the toxin manufacturers and persons within the US DOJ that provided immunity to the toxin manufacturers AND persons within international governments/agencies who authorized the use of the toxin and the transfer of wealth from the 'public purse' to the corporate toxin manufacturers; **(iii) FSMB/Co-conspirators TMB/IAMRA:** Defendant FSMB/Co-conspirator NCMB, its CEO/Directors including Humayun Chaudry/Lisa Robbins/Agents and the International Association Medical Regulatory Agencies (IAMRA)/Agents; **(iv) Medical boards/councils:** the **executive directors** of all medical boards/councils/Agents; **(v) Medical boards/councils:** the **physician/lay person** members of all American state medical boards/international medical councils/Agents.

450. Functions: The principal and only function of the "CFN Scheme" is corporate/shareholder profit, which was/is achieved through governments knowingly illegal diversion of tax payers money to 'vaccine' manufacturers in exchange for the 'vaccine'.

451. However, for the scheme to work it required the participation of Defendant FSMB-/IAMRA and its coercive, punitive, and potentially life-ending 'policing powers' within the global medical profession, to force physicians to both receive and dispense the 'vaccine'.

452. Within the scheme there exist communication channels within and between persons in each tier and a covert system through which bribes/other monies were/are secretly funneled in either tax avoidance/evasion schemes. Taxpayers money became distributed, albeit unevenly, throughout the scheme's participants.

453. The overall coordination of the scheme is conducted by the Corporations/Agents, who use their Corporate Media as a 'whip' to control/intimidate/direct the public and publicly humiliate those that attempt to expose/expose their crimes against humanity.

454. Suppression of free speech regarding the toxicity of the 'vaccine' is a critical element for the perpetration of the scheme, and is achieved by the Corporate Media not reporting the toxicity/complications/deaths associated and or caused by the 'vaccine', and by the manipulation of internet search algorithms in an attempt to 'bury' such information.

455. To ensure the schemes profits were protected from lawsuits expected by the Corporations, and as further evidence they knew of the 'vaccine's' toxicity, governmental agencies provided them immunity against lawsuits and established so called 'Vaccine Injury Funds to attempt placate the public. Defendant FSMB/Co-conspirator TMB/IAMRA have no such immunity.

456. For the scheme to have been successful, it required the knowingly illegal use of the US wires/other modes of digital/non-digital communication to propagate/perpetuate lies/pretexts regarding the safety/effectiveness of the 'vaccine', the symptom mitigating effect of the 'vaccine' and the increased risk of morbidity/mortality of not being 'vaccinated'.

457. The scheme was also furthered by the effect of having publicly ostracized/punished members of the public who refused to be inoculated, this function including the deployment of economic/reputational/social/professional pressure to force the 'vaccine' objectors into becoming inoculated or becoming homeless/poverty stricken/socially ostracized.

The "CFN Association-In-Fact RICO Enterprise" ("CFN")

458. The "CFN" is pled consequent to the pleading of the RICO predicate acts and a "pattern of racketeering", which in this case has involved billions of RICO predicate acts, from the conception to the inoculation to the fraud/lies preceding/surrounding/concealing the crimes against humanity, as are codified within the Nuremberg Code.

459. Structure: The elements comprising the "CFN Association-In-Fact Enterprise" are (i) Corporations/Corporate Media; (ii) Government; (iii) FSMB/Co-conspirator TMB /IAMRA Medical Boards/Councils are separate legal entities that coalesced through conspiracy for the purpose/act of perpetrating a knowingly illegal profit purposed scheme (coerced/forced/mandated 'vaccination') and for the purpose of attempting to use the 'cover' of government/regulatory agencies to conceal and or otherwise legitimize their crimes against humanity.

460. The knowing/willful/conspiratorial nature of the crimes and the construction of a legal artifact to attempt to conceal/legitimize/immunize against the crimes, do deprive of any immunity (limited/qualified/absolute) the separate legal entities and the "CFN Association-In-

Fact Enterprise” and thus specifically, the purported immunity granted to the ‘vaccine manufacturers’ is deprived, and they are therefore subject to suit.

461. Function: The principal purpose of the **“CFN Association-In-Fact RICO Enterprise”** was/is a conduit and ‘cover’ for the concealed perpetration of a knowing crime against humanity.

462. The mechanism of these two functions – conduit/cover - consists respectively of: **(i)** the scheme and its **“pattern of racketeering”** required and indeed could not have been perpetrated absent the **“CFN”**, which is a critical conduit for the scheme’s commission. The power of the **“CFN”** to act as a conduit is illegally derived from the power of government, which itself is derived from the power of the people, and for the **“CFN”** to act as a conduit without the risk of global revolution (revolution already underway in France), required the public be deceived by the **“CFN”** elements into believing the ‘vaccine’ was indeed a vaccine and was safe/effective, which it is not; **(ii)** the scheme’s ‘cover’ was effectuated by the perpetration of lies by and through persons/agencies within governmental, non-governmental and media structures with an apparent legitimacy and ‘expertise’ in healthcare/regulatory related matters.

The RICO Predicate Acts

463. Wire Fraud: In a period commencing in approximately late 2019/early 2020, if not before, Defendant FSMB/Co-conspirator NCMB commenced conspiring to commit and did commit millions of ongoing acts of wire fraud in the furtherance/perpetration of the knowingly fraudulent **“CFN”** scheme, a scheme from which Defendant FSMB/Co-conspirator TMB profited from the receipt of bribes from manufacturers of the ‘vaccine’ and associated testing/prevention paraphernalia.

464. The fraudulent communications, transmitted across the US wires, were conducted with their co-conspirators in government and the CEOs/agents at Pfizer/Moderna/Johnson + Johnson, and were purposed to and did in fact increase corporate/shareholder profit and ensure ongoing governmental kickbacks.

465. Defendant FSMB/Co-conspirator NCMB /co-conspirators committed these acts at the knowing expense/exploitation of human life.

Defendant FSMB /Co-conspirator TMB + Co-conspirators Pfizer/Moderna/Astra Zeneca/Johnson + Johnson CEOs Albert Bourla/Joaquin Duato/Pascal Soriot/Stephane Bancel/Agents + Corporate Media

466. Date range: 2019 to 2023

467. Conduits of Communication + Bribery by Pfizer/Bourla/Agents to Defendant FSMB/Co-conspirator TMB /Agents (Executive Directors US and Foreign Medical Boards/Councils): Communication: Directly and through law/public relation firms. Bribery: Directly (disguised as ‘philanthropic’ donations) and through offshore bank networks.

467. Mode of Communication: Email + Voice + SMS (text) + Face to Face

468. Substance of Communication: Scheme to cause knowingly illegal mass inoculation of toxin into human race, while profiteering through the embezzlement of monies from the 'public purse' and eliminating/weakening that percentage of the world's population considered to be infirm/detrimental/unhelpful to the corporate agenda/profits.

Tactics Employed:

469. Use of the US wires to initiate a discussion regarding the scheme.

470. Use of the US wires to communicate that the use of governmental/regulatory/public health /drug regulatory agencies/persons (Anthony Fauci et al) for the scheme's perpetration would provide seemingly legitimate 'cover' which would negate or substantially mitigate the risk of public exposure.

471. Use of the US wires to communicate that the perpetration of the scheme/crimes against humanity in collusion/conspiracy with western governmental agencies/persons, would render criminal charges more likely in courts of the BRICS nations.

472. Use of the US wires to communicate that although Defendant FSMB had no immunity, it was highly unlikely their involvement would be exposed.

473. Use of the US wires to communicate that it was highly unlikely that any lawyer/person would identify the "willful misconduct" immunity exception of Defendant FSMB/Co-conspirator NCMB's conspiracy/bribery with the 'vaccine' manufacturers.

474. Use of the US wires to communicate the potential profit of billions dollars from the scheme.

475. Use of the US wires to communicate an outline of the scheme.

476. Use of the US wires to communicate the elements of the scheme.

477. Use of the US wires to identify/describe each element of the scheme.

478. Use of the US wires to describe how public fear would be engineered by incorporating into the scheme the elements of (para. 446 to 452):

479. ordering the corporate media's use of the US wires in the willful dissemination/propagation of the knowingly false narrative that contraction of the COVID-19 virus would cause permanent damage and or death;

480. having its corporate hospital partners manipulate hospital death statistics to willfully/knowingly/fraudulently ascribe the deaths to the COVID virus.

481. ordering the corporate media's use of the US wires in the willful dissemination/propagation of the knowingly fraudulent death statistics.

482. ordering the corporate media to produce willfully/knowingly fraudulent video news interviews that involved paid actors posing as persons whose relatives died consequent to the COVID-19 virus.

483. ordering the corporate media's use of the US wires in the willful dissemination/propagation of the knowingly false narrative that so called 'social distancing' and the wearing of face masks reduced transmission.

484. ordering the corporate media to continuously report on persons who were denied employment/housing/healthcare because they refused to be inoculated, wear masks and or engage in so called 'social distancing'.

485. ordering the corporate media's use of the US wires in the willful dissemination/propagation of the knowingly fraudulent narrative that governmental members received the 'vaccine' when in fact it was a saline injection.

486. Use of the US wires to describe how, by incorporating into the scheme the following element, fear would be engineered within the global medical community in order to coerce physicians to inoculate the public and to silence any dissent as to the toxicity/ineffectiveness of the 'vaccine'.

487. bribing/coercing the executives of medical boards/councils to enact disciplinary policies that forced physicians to become inoculated and to inoculate patients, and to suspend/revoke/erase their licenses/registrations if they either refused self/patient inoculation and or provided digital/non-digital information regarding the toxicity/dangers of the 'vaccine'.

488. Use of the US wires to describe how the power of fear/coercion would be engineered within the global population by incorporating into the scheme the following elements (para. 456 to 461).

489. coopting conspiring with the World Health Organization in the issuance of reports/releases that disseminated as fact, the knowing falsehood that contraction of the COVID-19 virus would cause serious permanent injury and or death.

490. coopting conspiring with the World Health Organization in the issuance of reports/releases that disseminated as fact, the knowing falsehood that the 'vaccine' was safe/effective.

491. coopting conspiring with the US Federal Drug Administration in the issuance of reports/releases that disseminated as fact, the knowing falsehood that the 'vaccine' was safe/effective.

492. coopting conspiring with the US Centers for Disease Control in the issuance of reports/releases that disseminated as fact, the knowing falsehood that contraction of the COVID-19 virus would cause serious permanent injury and or death.

493. coopting and conspiring with governmental public health and drug regulatory agencies/persons across the planet in the dissemination as fact, the knowing falsehoods that contraction of the COVID-19 virus would cause serious permanent injury and or death and that the 'vaccine' was safe/effective.

494. coopting and conspiring with police forces across the planet in the enforcement through physical force/restraint/incarceration and so called 'lockdowns' of the human race, including those that had been inoculated and wore masks.

495. Use of the US wires to describe how Defendant FSMB/Co-conspirator NCMB's co-conspirator corporate media partners, would conspire/scheme with the tech industry to corrupt digital news feeds by suppressing any information that exposed the 'vaccine' toxicity and promoted any that extolled its safety.

496. Use of the US wires to describe the critical nexus of the scheme's elements, those of dissemination of lies, the generation of fear, coerced/forced inoculation, behavioral conditioning/modification, the suppression of truth, the absolute enslavement of humanity and the generation of corporate profit.

Defendant FSMB /Co-conspirator TMB + Co-conspirators IAMRA/Medical Board/Council Executives:

497. Date range: 2019 to 2023.

498. Conduits of Communication + Bribery by Defendant FSMB/Co-conspirator NCMB to Executive Directors Medical Boards/Councils: Communication: Directly through the IAMRA and indirectly through law/public relation/political lobbying firms. Bribery: Through the IAMRA and through offshore bank networks.

499. Mode of Communication: Email + Voice + SMS (text) + Face to Face.

500. Substance of Communication: A Scheme in which Defendant FSMB an American corporation, in violation of the Foreign Corrupt Practices Act, uses its corruptly procured power to corrupt the 'regulatory/disciplinary' apparatus of foreign medical boards/councils into ordering their executives to perpetrate the Scheme, disguised as policy, that suspended/revoked/erased medical licenses/registrations of physicians who refused to be

inoculated/refused to inoculate his patients/advised patients against inoculation/used the internet to communicate any information adverse to the 'vaccine', including but not limited to stating it was lethal, caused permanent injury and was ineffective.

Tactics Employed:

501. Use of the US wires to disseminate the order, falsely disguised as 'COVID Policy', to implement the Scheme of eliminating physicians who either undermined the corporate profit agenda or failed to support it.

502. Use of the US wires to exchange information on a daily basis as to any media or other reports of physicians not complying with the corporate agenda.

503. Use of the US wires to exchange information on a daily basis as to the quota of 'vaccines' being dispensed in various global regions.

504. Use of the US wires to exchange information on a daily basis as to regulatory policing enforcements actions against 'underperforming' physicians

505. Use of the US wires to issue orders to subjugate medical boards/councils to have eliminated underperforming' physicians through license/registration suspension/revocation/erasure.

506. Crimes Against Humanity: Defendant FSMB/Co-conspirator TMB and its 'vaccine' manufacturer co-conspirators CEO Joaquin Duato/Agents (Johnson + Johnson) CEO Albert Bourla/Agents (Pfizer), Pascal Soriot/Agents (Astra Zeneca) and CEO Stephane Bancel/Agents (Moderna), knew that the 'vaccine' was toxic and ineffective, and that it would cause death, permanent injury, and generational injury in that 'vaccine' caused genetic mutations/injuries would be transmitted in reproduction.

507. The motivation for these crimes, other than immediate profit from the tax payer funds, lies in the fact that advancing technology, such as Artificial Intelligence, renders obsolete the requirement for humans, and that by eliminating 'useless food eating' humans and their ability to procreate, the so called '1%" will retain an increasingly greater percentage of the planet's resources for themselves and their progeny.

508. Defendant FSMB/Co-conspirator TMB/Other Co-Conspirators have been perpetrating these ongoing crimes since at least 2019, in collusion/conspiracy with governmental agencies/persons, in multiple jurisdictions across the globe, including this jurisdiction, in furtherance of corporate/personal profit, in knowing violation of human rights and with knowledge that the crimes caused, are causing and will continue to cause death and permanent injury.

509. Evidence of these crimes is contained within (**Exhibit 15**) and within **The Kaul Cases**.

510. Public Corruption: In a period commencing in approximately, if not before 2019, Defendant FSMB/Co-conspirator NCMB and other co-conspirators entered into a conspiracy with governmental agencies/persons, in which tax payer monies were funneled from government treasuries to the 'vaccine' manufacturers who then funneled some of these monies as bribes to Defendant FSMB/Co-conspirator NCMB, its executives and executives associated with medical boards/councils across the globe.

511. The co-conspirator 'vaccine' manufacturers, while bribing Defendant FSMB/Co-conspirator NCMB/Medical Board and Council Executives, did kickback a percentage of the embezzled tax payer money to corrupt politicians/governmental officials.

512. The injuries caused by this scheme were to the public treasury, to the public health/welfare, to the public's right to honest services, to the public's human rights and to the SOCIAL CONTRACT between the people and government. Defendant FSMB/Co-conspirator NCMB/Governmental and Corporate Co-Conspirators acts of public corruption have violated and continue to violate the SOCIAL CONTRACT, such that its terms are no longer valid.

513. Bribery: In a period commencing in approximately, if not before 2019, Defendant FSMB/Co-conspirator NCMB and its medical board/council co-conspirators did receive bribes from the 'vaccine' manufacturer co-conspirators (Johnson + Johnson/Pfizer/Astra Zeneca/Moderna) in a series of quid pro quo schemes, in which the bribes were paid in exchange for Defendant FSMB/Co-conspirator NCMB's abuse of regulatory power in the coercion of physicians, under threat of license/registration suspension/revocation/erasure into inoculating patients with the 'vaccine', while knowing it would cause death/permanent injury.

514. Defendant FSMB/Co-conspirator NCMB knew that the more doses dispensed, the more taxpayer monies were funneled from the government to the 'vaccine' manufacturers, the greater their corporate profits and the greater the bribes.

515. The bribes were disguised as 'philanthropic' payments to the corporate vehicle of Defendant FSMB/Co-conspirator NCMB and were also funneled to offshore bank networks of executives associated with Defendant FSMB/Co-conspirator NCMB Medical Boards/Medical Councils, in order to ensure they enforced the coercion of physicians into inoculating patients with the 'vaccine'.

516. Money Laundering: The bribes received by Defendant FSMB/Co-conspirator NCMB /Medical Board Executives/Medical Council Executives from the 'vaccine' manufacturers as part of a series of quid pro quo schemes in which physicians under threat of license/registration suspension/revocation/erasure were forced/coerced into knowingly inoculating patients with a substance they knew would cause death and permanent injury, were funneled into, and laundered through offshore bank networks and through Defendant FSMB/Co-conspirator NCMB US based tax-deducting corporation and stock market investment vehicles.

517. The financial benefit of bribes was also realized through the laundering-effect of remittance by the 'vaccine' manufacturers to law firms/lawyers to whom Defendant FSMB/Co-conspirator NCMB owed monies, and whom the 'vaccine' manufacturers retained specifically to launder the bribes, the payment of which directly benefited Defendant FSMB/Co-conspirator NCMB.

4. COUNT FOUR

Association-In-Fact Enterprise: United States District Court-NYSE ("SDNY-NYSE Association-In-Fact-Enterprise)

Defendant Persons: Allstate

Co-conspirators: Geico/TD/ICE

RICO Predicate Acts: Bribery/Fraud on the Court/Public Corruption/Money Laundering

Overview:

518. In a time period commencing in approximately September 2021, the Defendants did conspire to commit, and did commit a knowingly illegal "**pattern of racketeering**" and did convert the Chambers of U.S.D.J., James Paul Oetken and the New York Stock Exchange into an association-in-fact enterprise ("**SDNY-NYSE Association-In-Fact-Enterprise**") through and under cover of which they perpetrated the RICO predicate acts bribery/fraud on the court/public corruption/money laundering, purposed to eliminate the Plaintiffs by having U.S.D.J. Oetken dismiss K11-7 with prejudice and permanently injunct Kaul/Basch from prosecuting their claims against the Defendants.

519. In the latter half of September 2021, the corporate Defendants did begin conspiring to perpetrate a knowingly illegal scheme ("**SDNY-NYSE Scheme**") against the United States District Court for the Southern District of New York, in which they planned, and did eventually effectuate, a quid pro quo scheme with U.S.D.J. James Paul Oetken, that involved the funneling of non-tangible/tangible favors (stocks/shares/bonds in return for having K11-7 dismissed with prejudice and Kaul/Basch injuncted from further prosecuting **The Kaul Cases** Defendants.

520. In September 2021, the Defendants, having realized that U.S.D.J. Oetken did not intend on dismissing or transferring the case to the District of New Jersey, a court whose judges are on their 'payroll', initiated a series of digital/non-digital communications/meetings in which they agreed that their only option was to bribe U.S.D.J. Oetken.

521. The Defendants and their lawyers discussed the details of how to minimize any exposure of the scheme, and conceal the communications and funneling of bribes, and decided to utilize an 'arms-length' tactic, by co-opting third-party agents as the 'middlemen', a ruse employed by the Defendants for decades in the New Jersey courts.

522. It was not until approximately February 2022, that the specifics of the scheme had been agreed upon and willing third-party agents identified.

523. The next phase involved persuading U.S.D.J. Oetken to participate in the scheme, and consisted of intensive time-consuming third-party mediated communications, which occurred slowly due to the Defendants priority for the maintenance of secrecy and their recognition that if any information were leaked to court staff, it would sabotage the scheme, and cause U.S.D.J. Oetken to withdraw.

524. A substantial part of the time from inception to execution was assigned to the contents of U.S.D.J.'s September 12, 2022, and to the Defendants attempt to effectively and permanently suppress Plaintiff Kaul's ability to vindicate his rights.

525. In these communications, the Defendants' lawyers transmitted across the US wires to non-official emails belonging to U.S.D.J. Oetken and or agents acting on his behalf, the substance of the September 12, 2022, report, which the Defendants intended to disseminate to their shareholders, who had been withdrawing their positions.

526. The Defendants recognized that unless the opinion/order permanently suppressed Plaintiff Kaul's legal rights, their shareholders would continue their withdrawal and their share price would continue to decrease.

527. Subsequent to the September 12, 2022, opinion/order Defendant Allstate's share price has risen, a rise that has enriched U.S.D.J. Oetken, and a rise that is a direct consequence of his illegally procured order. Defendant Allstate continues to launder the proceeds of this crime through the NYSE, and to cause the dissemination of these fraudulent assets into the global equities market, including that in India.

528. In the planning and perpetration of the scheme, neither the Defendants nor U.S.D.J. Oetken discussed nor expected the Plaintiffs to request U.S.D.J. Oetken's financial holdings/exparte communications, nor file a motion for his disqualification, but they did conspire to include verbiage encouraging the Plaintiffs to file an appeal, knowing that an appeal would prohibit a judicial disciplinary investigation, and more likely conceal their corruption of the Court.

529. However, when the Plaintiffs did request U.S.D.J. Oetken's financial holdings/exparte communications, the Defendants in collusion/conspiracy with U.S.D.J. Oetken through their third-party agents, concluded that their optimal option was to ignore the Plaintiffs' request and motion, believing that the Plaintiffs would not ascertain a legal basis on which to render null/void the order, and that even if they did, they would not ascertain the requisite law to exclude U.S.D.J. Oetken and his purported 'injunction' from any involvement in a future filing.

530. In the perpetration of this overall scheme, the Defendants have, through their use of the US wires, knowingly committed wire fraud and through their use of the apparatus of the United States District Court, committed honest services fraud against the American public.

5. COUNT FIVE

Association-In-Fact Enterprise: State of New York-New York State Medical Board-State of Texas-Texas Medical Board ("NYSMB-FSMB-NCMB Association-In-Fact-Enterprise)

Defendant Persons: FSMB/Allstate

Co-conspirator: Geico

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

Overview:

531. In a time period commencing in approximately April 2021, the Defendants did conspire to commit, and did commit a knowingly illegal "pattern of racketeering" and did convert the State of New York/New York State Medical Board/State of Texas/Texas Medical Board into an association-in-fact enterprise ("NYSMB-FSMB-TMB Association-In-Fact-Enterprise") through and under cover of which they perpetrated the RICO predicate acts fraud on the court/public corruption, purposed to, in conjunction with the other RICO Schemes, purposed to eliminate Plaintiff Kaul, by attempting to prohibit his access to the courts for compensatory redress and his access to a livelihood.

532. In February 2021, Plaintiff Kaul submitted a licensure application to the New York State Medical Board, and on July 14, 2021, an investigator for the state emailed him a letter, stating that his application had been denied by a supposed sub-committee of the board who allegedly found that there existed a "question of moral suitability". This was and is a lie, as no subcommittee ever considered Plaintiff Kaul's application. This illegal/fraudulent denial was circulated via the US wires to the National Practitioner Data Bank/Defendant FSMB and to every state medical board, including Texas.

533. Plaintiff Kaul, after having been informed by this person of his right to appeal, requested a copy of the alleged opinion, in order to ascertain the basis of the opinion, but was informed it would not be provided until the conclusion of the appeal.

534. Plaintiff Kaul indicated he would seek judicial relief if the document was not provided by August 25, 2021, and on September 17, 2021, Plaintiff Kaul filed a petition for an OTSC in the New York State Supreme Court.

535. The petition was directed at Defendant Hengerer and Dr. Howard Zucker, the New York State Health Commissioner, and sought an order compelling production of the alleged opinion.

536. The NY AG responded for the Respondents, arguing that Kaul had no “clear legal right” to the document, despite knowing that no such document existed, and the NY AG thus implicitly adopted the Respondents knowingly false position that such a document existed.

537. The Respondents/NY AG propagated their fraud into the New York State Supreme Court, and on January 3, 2022, the judge adopted their fraud and denied Kaul’s petition based on the “clear legal right” defense.

538. Plaintiff Kaul appealed to the First Department of the New York State Supreme Court, Appellate Division, at which point a senior appellate litigation counsel within the NY AG entered the case.

539. However, in April 2022, while this matter was proceeding through the New York State Supreme Court, Plaintiff Kaul was contacted by counsel for the New York State Medical Board, and advised that his application was to be scheduled for a hearing on October 3, 2022.

540. Plaintiff Kaul re-requested a copy of the alleged opinion of the supposed sub-committee, but none was provided, and in June 2022, Kaul had a senior board member admit that no subcommittee had ever convened regarding his application and that no opinion had ever been issued (Exhibit 32).

541. Plaintiff Kaul served a subpoena on this individual to appear at the October 3, 2022, hearing. He did not move to quash the subpoena nor appear.

542. The virtual hearing was initiated on October 3, 2022, and was adjudicated by a hearing officer with a panel of approximately twelve (12) members of the New York State Medical Board.

543. As the matter commenced it became immediately apparent to Plaintiff Kaul that the proceeding’s sole purpose was to provide cover for the fraud of the alleged opinion and to deny Plaintiff Kaul’s appeal.

544. Plaintiff Kaul halted the proceeding by asserting that unless the alleged opinion was produced, the matter could not proceed, and that regardless, the issue of the alleged opinion was pending in the Appellate Court.

545. The hearing officer/panel went off-line for approximately ten (10) minutes, to discuss whether to proceed. Counsel for the board argued that the matter should proceed, but the officer/panel discontinued the hearing, pending the outcome of the Appellate Division.

546. Plaintiff Kaul subsequently procured a transcript of the approximately twenty (20) minute hearing.

547. The New York State Medical Board is a member of the **“Federation Cartel”** and profits from the fees, fines and other expensive and uselessly proven educational activities that American physicians are forced to undergo to obtain, retain and have licenses reinstated. The commercial existence of these units of the **“FC”** depends on this revenue stream, and the monies generated from disciplinary actions.

548. The greater the number of state board disciplinary actions, the more affected physicians are shunted into ‘Solent-Green’ like **“FC”** system, with the majority of physicians being either ethnic minorities and or foreign medical graduates, most of whom have ‘slaved’ in the American system for decades, and most of whom have their life assets illegally seized by government agencies under direction from the insurance industry.

549. The **“NYSMB-FSMB-TMB Scheme”** was conceived of shortly after Plaintiff Kaul commenced his application for licensure in the State of New York, and involved the K11-7 Defendants/agents conspiring/colluding with the New York State Medical Board/agents in the perpetration of a scheme to attempt to prevent Plaintiff Kaul from obtaining a license in order to facilitate, in conjunction with the other RICO Schemes, the elimination of Plaintiff Kaul, in order to attempt to eradicate the legal/economic/political/public relations threats posed by Plaintiff Kaul’s economic resurgence and or their continued prosecution by Plaintiff Kaul in the United States District Court.

550. One of the litigation benchmarks in The Kaul Cases appears to be Defendant Allstate’s share price, which fell during the pendency of K11-7, and only began to rise after the illegal September 12, 2022, opinion/order.

551. The litigation related fall substantiated the merit of K11-7. Investors, such as K11-2 Defendant Boston Partners, withdraw their positions after consultation with litigation counsel.

552. The **“NYSMB-FSMB-TMB Scheme”/ SDNY-NYSE Scheme”/ “UC-PACE Scheme”** emerged in late 2022, and were coordinated principally by the **“FC”** and the corporate K11-7 Defendants, with the purpose of attempting to prohibit Plaintiff Kaul’s access to the courts for compensatory redress/evidential disclosure and his access to a livelihood.

553. Within the conspiratorial digital/non-digital communications relevant to the conception, planning and perpetration of the **“NYSMB-FSMB-TMB Scheme”**, the Defendants did not anticipate that Plaintiff Kaul would pursue the issue of the alleged opinion to the Appellate Division, nor have a senior board member admit that no subcommittee was ever convened nor any opinion ever issued, and so they perpetrated their fraud through the state’s administrative/judicial/prosecutorial apparatus with a sense of experienced impunity, and with an overall purpose of attempting to contribute to halting Kaul’s prosecution of the K11-7 Defendants.

554. The Defendants used the US wires in the perpetration of the **“NYSMB-FSMB-TMB Scheme”** and within the corpus of communication, there exists evidence of a knowingly illegal

agreement with the New York State Medical Board that any response to Plaintiff Kaul's application should be delayed, and that if Plaintiff Kaul persisted in requiring a response, a false response should be fabricated without involving any member of the board, but falsely claiming otherwise.

555. It is noteworthy that during the October 3, 2022, hearing, Plaintiff Kaul observed an appearance of 'shock' on the faces of several panel members when he raised the issue that senior members (Dr. Jane Massie/Dr. Raju Ramanathan) had admitted that no subcommittee/opinion had ever been convened/issued.

556. It is the **"pattern"** of the Defendants to conduct their **"pattern of racketeering"** through courts/governmental agencies in a manner that is restricted, for the purpose of secrecy, to a person/limited persons, with whom the Defendants engineer or have already engineered a bribery-based quid pro quo scheme.

557. The immensity of the potential losses of liberty/property/life associated with the crimes of **The Kaul Cases** Defendants, has caused them to coerce others into committing knowing/willful violations of the law and Plaintiff Kaul's human/constitutional rights, with the most recent coercion consisting of an assurance that U.S.D.J. Oetken's purported 'injunction' would definitely eliminate any threat posed by Plaintiff Kaul.

558. The Defendants have conducted this **"pattern of racketeering"** for decades in collusion/conspiracy with the state medical board members of the **"FC"**, by using the medical boards purported mission to **"protect the public"** as cover for their profit purposed racketeering crimes of illegally suspending/revoking the licenses of innocent physicians. In fact, Defendant FSMB/Co-conspirator NCMB's long-standing mandate to its subjugate medical boards is to increase their quotas of profit-generating 'physician discipline', a scheme to which it attaches monetary incentives for those that meet the corporate quota, or put otherwise corporate 'bonuses'.

559. Defendant FSMB publishes lists of subjugate medical board ranking in terms of 'disciplinary' actions, in order to 'shame' those in the lower sections into manufacturing higher numbers. The greater the number of actions, the more profit to the **"FC"**, from so called 'fines' and legal/other fees required by the targeted/victimized physician to regain his/her illegally seized license.

560. There exists admitted fact within **The Kaul Cases** that medical boards do not **"protect the public"**, as the **"FC"** system of physician discipline related fees/fines and slave physician labor for the insurance industry, is purposed simply for corporate/executive profit. A continuation of a four hundred (400) year **"pattern"**.

6. COUNT SIX

**Association-In-Fact Enterprise: State of California-UC San Diego Physician Assessment and
Clinical Education (PACE) Program
Defendant Persons: FSMB/Allstate
Co-conspirator: Geico
RICO Predicate Acts: Wire fraud/Conspiracy/Public Corruption**

Overview:

561. In a time period commencing in approximately April 2022, Defendants FSMB/Allstate, and Co-conspirators NCMB/Geico did conspire to commit, and did commit a knowingly illegal **“pattern of racketeering”** and did convert the State of California and the UC San Diego Physician Assessment and Clinical Education (PACE) Program into an association-in-fact enterprise (**“UC-PACE Association-In-Fact-Enterprise”**)

562. It was through and under cover of the **“UC-PACE Association-In-Fact-Enterprise”** that Defendants FSMB/Allstate and Co-Conspirators NCMB/Geico perpetrated the RICO predicate acts of fraud on the court/public corruption, purposed to, in conjunction with the other RICO Schemes to attempt to eliminate Plaintiff Kaul by attempting to prohibit his access to the courts for compensatory redress and his access to a livelihood/license.

563. On May 27, 2020, the State of Pennsylvania granted Kaul’s application for licensure after a one-day administrative hearing on February 7, 2020.

564. In order for Plaintiff Kaul to be provided an actual license, he was required to take an assessment course, which he commenced with K11-8 (Kaul v PACE/Leung-USDC-SDC-23-CV-00955) Defendant PACE in May 2022, with the conduction of three virtual interviews on May 4, June 15, and July 6, 2022.

565. K11-8 Defendant PACE, a for-profit corporation, derives the majority, if not all of its business from the **“FC”**, and prior to Plaintiff Kaul’s first interview it knew the FSMB was a Defendant in K11-7. During the first interview, Plaintiff Kaul detected a suspicious tone, which caused the subsequent two (2) interviews to be recorded.

566. On July 21/22, Plaintiff Kaul completed the second and on-site component of the course at the K11-8 Defendant PACE’s facility in San Diego, the entirety of which was video recorded by K11-8 Defendant PACE and from which Plaintiff Kaul retained contemporaneous notes.

567. At the conclusion of the course on July 22, 2022, after Plaintiff Kaul had drafted the final note to be submitted to the evaluation committee, he created a copy of this note for his records.

568. Prior to Plaintiff Kaul's departure he enquired as when he would receive the final report, and was informed it would be emailed directly to him, and only him within eight (8) weeks.

569. On September 22, 2022, having not received the report, Plaintiff Kaul telephoned K11-8 Defendant PACE and was informed by the person responsible for drafting the report that she has allegedly been out on "sick leave" and no other staff member had wanted to "work" on the report.

570. On October 12, 2022, Plaintiff Kaul received an email from this person, in which she requested Kaul provide her an email/telephone number of a "contact person" at the Pennsylvania Medical Board.

571. Plaintiff Kaul instructed this person that the report was NOT to be sent to any person associated with the medical board until he had reviewed it.

572. K11-8 Defendant PACE perpetrated the "FC-PACE Scheme" with Defendant FSMB to render a false and negative report regarding Plaintiff Kaul, and to transmit it directly to the Pennsylvania Medical Board to attempt to cause it to not issue Plaintiff Kaul a license, and to prevent Plaintiff Kaul from exposing its fraudulence and to then claim qualified immunity if and when Plaintiff Kaul sued.

573. The perpetration of this scheme was conducted across the US wires by emails and telephone conversations, and it was agreed that a knowingly false and highly defamatory report would be issued, in which K11-8 Defendant PACE would describe Plaintiff Kaul as not only being a danger to the public, but that he would likely never meet the standards to ever return to the practice of medicine.²

574. The K11-7 Defendants conducted the same negative report/opinion/order generating scheme with K11-8 Defendant PACE, as it did with U.S.D.J. Oetken. K11-8 Defendant PACE, in drafting and transmitting the knowingly fraudulent report, did not anticipate that the virtual interviews had been recorded and that Plaintiff Kaul had retained a copies of his contemporaneous notes.

575. On October 17, 2022, K11-8 Defendant PACE used the US wires to transmit to Plaintiff Kaul a copy of their knowingly fraudulent report. It is an eleven (11) page document that Plaintiff Kaul's audio/final note evidence proves is fraudulent.

² (The Kaul Cases Defendants were seeking to permanently "shut Kaul down" in his efforts to procure a license, fearful that Plaintiff Kaul's license related economic resurgence would facilitate his prosecution of The Kaul Cases Defendants/further exposition of their crimes, which accounts for the rampant falsification of K11-8 Defendant PACE's 'assessment')

576. Plaintiff Kaul, having reviewed the report, did then request he be sent a copy of his entire case file, which includes the video recordings of the July 21/22 on-site assessments.

577. K11-8 Defendant PACE continues to withhold the property of Plaintiff Kaul's file.

578. On October 19, 2022, Plaintiff Kaul sent a letter to K11-8 Defendant PACE, in which he included a link to the July 6, 2022, audio recording and re-requested a copy of his file.

579. No file was produced.

580. On October 31, 2022, Plaintiff Kaul sent a second letter, in which he provided further evidence of the fraudulence of the October 17, 2022, report, and re-requested a copy of his case file.

581. No file was produced.

582. K11-8 Defendant PACE remained in communication with Defendant FSMB and used the US wires to discuss what steps it should implement to address Plaintiff Kaul's exposition of their fraud, and Plaintiff Kaul's October 19/31 letters.

583. Within these communications it was agreed that K11-8 Defendant PACE should not amend its fraudulent report, as U.S.D.J. Oetken's September 12, 2022, order/opinion purported to foreclose Plaintiff Kaul from filing suit in the United States District Court, and thus, in their estimation, Plaintiff Kaul could not seek redress for Defendant PACE's violation of his rights.

584. K11-8 Defendant PACE's lawyers obtained a copy of U.S.D.J. Oetken's September 12, 2022, report, and advised K11-8 Defendant PACE that Plaintiff Kaul had no legal recourse for their false report, and that they should send Plaintiff Kaul a letter informing him that they would not amend their report.

585. In the commission of this scheme, K11-8 Defendant PACE knew its misconduct constituted a violation of the wire fraud act, the honest services act and of Plaintiff Kaul's human/constitutional rights, and that their misconduct had converted the University of California – San Diego into a "racketeering enterprise" that furthered the interests of the "FC" at the expense of the people of the State of California.

586. The Kaul Cases Defendants decade-plus-long criminal conspiracy has exposed the State of California to immense domestic/international legal liability.

587. On November 10, 2022, Plaintiff Kaul submitted a FOIA request to the UC-San Diego seeking copies of all physician assessment reports since 2012. K11-8 Defendant PACE was notified of this request. Plaintiff Kaul's request was denied.

588. On May 25, 2023, Plaintiff Kaul filed suit against K11-8 Defendants PACE/Leung in the United States District Court for the Southern District of California.

7. COUNT SEVEN

Association-In-Fact Enterprise: State of Texas-NYSE-SEC ("SNS Association-In-Fact-Enterprise)

Defendant Persons: Allstate/Christie

Co-conspirators: TD/Geico/ICE

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

Overview:

589. In a time period commencing in approximately 2009, the Defendants Allstate/Christie and Co-Conspirators TD/Geico/ICE did conspire to commit, and did commit a knowingly illegal "pattern of racketeering" and did convert the NYSE/SEC/State of Texas into an association-in-fact enterprise, through and under cover of which they perpetrated thousands of the RICO predicate acts of mail fraud/wire fraud/securities fraud/money laundering, purposed to advance their political/economic agenda.

590. Specifically, Defendant Christie sought to raise monies for gubernatorial and presidential campaigns, while Defendant Allstate and Co-conspirators Geico/TD/ICE sought to increase executive compensation and share price.

591. The Defendants "State of Texas-NYSE-SEC" ("SNS Scheme") scheme involved an intersection of the worlds of medicine/business/law/politics, and commenced in 2009, with the purpose of causing injury to Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life through the perpetration of the following acts (474-480) of state/court-facilitated misconduct.

592. having Plaintiff Kaul's medical license revoked.

593. eradicating all debt owed to Plaintiff Kaul by insurance carriers (approx. \$45 million).

594. destroying Plaintiff Kaul's reputation;

595. eliminating any future financial liability to Plaintiff Kaul.

596. causing Plaintiff Kaul to enter a state of poverty/homelessness;

597. attempting to cause/actually causing Plaintiff Kaul to be jailed/deported/attempted drugging-killing.

598. intimidating other minimally invasive spine surgeons into not performing minimally invasive spine surgery, in order to divert a greater percentage of the public's insurance premiums into corporate/executive compensation.

599. Defendants Allstate/Christie and Co-Conspirators TD/Geico/ICE have colluded and conspired to orchestrate both their underlying **"SNS Scheme"** and the subsequent, and multiple schemes to conceal and provide cover for the **"SNS Scheme"**.

600. The concealment has been perpetrated through massive schemes of corruption of state/federal politicians/judges, in an attempt to prevent Plaintiff Kaul from exposing **The Kaul Cases** Defendants and Co-Conspirators decades-long schemes of judicial/public corruption.

601. In 2005, Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive spine surgery, at a NJ surgical center that had credentialed him to perform the procedure, and under the authority of his state medical license; a license issued in 1996 by the State of New Jersey for both medicine and **surgery**.

602. The state argued in administrative proceedings (NJ Office Administrative Law) from April 2 to June 28, 2013, that Plaintiff Kaul was not licensed to perform surgery. In this proceeding the Defendants and the state committed massive fraud, as evidenced in **'The Solomon Critique'/The Solomon Critique 2'**.

603. From 2006 to approximately 2009, Plaintiff Kaul was subjected to rule-of reason antitrust violations by **The Kaul Cases** Defendants, who wanted to eliminate the threat of Plaintiff Kaul's rapidly expanding minimally invasive spine surgery practice.

604. In furtherance of this scheme, **The Kaul Cases** Defendants did engage in multiple quid pro quo schemes with Defendant Christie, in which they funneled bribes into his political campaign, purposed to have him use state power to have the medical board revoke Plaintiff Kaul's license, an act that commenced illegally, was conducted illegally, and remains illegal (2008/9-2023)

605. Plaintiff Kaul's license was illegally suspended/revoked on April 2, 2012/March 24, 2014, and **The Kaul Cases** Defendants did with knowing illegality, use the US mail/wires to transmit this fraudulent notice globally to all governmental agencies, all state medical boards, including Texas/National Practitioners Data Bank/DEA/FBI.

606. From 2012 to 2020, pursuant to RICO's vicarious liability doctrine, Defendants Allstate/Christie, and Co-Conspirators TD/Geico/ICE, did conspire to commit, and did commit bankruptcy fraud and insurance fraud, by causing Plaintiff Kaul's medical malpractice carriers to be defrauded of millions of dollars by aiding/abetting the submission and fraudulent judicial adjudication of false 'medical malpractice' claims, as pled in K11-4.

607. Commencing in 2016, Defendants Allstate/Christie and Co-Conspirators TD/Geico/ICE, did extend their **"pattern of racketeering"** into the NYSE, through an ongoing commission of the

predicate acts of securities fraud, in that they submitted false SEC filings/accounts, that defrauded, and continue to defraud the global equities market.

608. Based on this knowingly false information, Defendants Allstate/Christie and Co-Conspirators TD/Geico/ICE did perpetrate millions of trades with unsuspecting investors, concealing from them the massive risk associated with the purchase of these fraudulent equities.

609. In conjunction with these crimes, Defendants Allstate/Christie and Co-Conspirators TD/Geico/ICE did not disclose to the market that its profits, including those from Texas, are the product of crimes, as detailed in The Kaul Cases, but yet willfully and with knowledge of its illegality, did launder the proceeds of these crimes through the NYSE.

610. The Kaul Cases Defendants have converted the NYSE into a massive money-laundering operation, into which it has funneled the proceeds of its global “**patterns of racketeering**”, including those generated from the mass inoculation (5.5 billion humans) of the experimental toxic gene-splicing mRNA compound.

611. From 2006 to the present, the overarching theme of Defendants Allstate/Christie and Co-Conspirators TD/Geico/ICE crimes, has been the commission of increasingly more serious crimes, in an attempt to conceal their prior crimes, malfeasance and misconduct.

612. What commenced in 2006 with the professional jealousy of Plaintiff Kaul’s competitors, of which Defendant Heary was a ‘ring-leader’, is in 2023, a multitude of felonies that include, amongst others: **(i)** bankruptcy fraud; **(ii)** securities fraud; **(iii)** mail fraud; **(iv)** wire fraud; **(v)** perjury; **(vi)** bribery; **(vii)** obstruction of justice; **(viii)** public/judicial corruption; **(ix)** civil rights violations; **(x)** evidence tampering; **(xi)** witness tampering; **(xii)** false imprisonment; **(xiii)** false prosecution; **(xiv)** insurance fraud; **(xv)** kickbacks; **(xvi)** human rights violations; **(xvii)** retaliation; **(xviii)** false seizure of property; **(xix)** honest services fraud; **(xx)** racketeering; **(xxi)** conspiracy; **(xxii)** market manipulation/money laundering; **(xxiii)** crimes against humanity; **(xiv)** violations of the Nuremberg Code.

Co-conspirator ICE:

613. From 2016 to the present, Co-conspirator ICE knew or should have known that Co-conspirators TD/Geico and Defendant Allstate committed securities fraud, in willfully, and with knowledge of its illegality, failing to report to the market and the SEC their liability in The Kaul Cases.

614. Co-conspirator ICE was motivated to willful ignorance and did fail to cross reference court records with the filings of Co-conspirators Geico/TD and Defendant Allstate.

615. Co-conspirator ICE, in recognizing that its profits were tied to those of Defendant Allstate and Co-conspirators TD/Geico did tacitly conspire with these Defendant/Co-conspirators to perpetrate a knowingly illegal scheme of securities fraud concealment, that artificially manipulated the market, and was purposed to prevent a decrease in its share price.

616. Co-conspirator ICE used the US mail and wires to exchange information with Defendant Allstate and Co-conspirators Geico/TD, in furtherance of the “**SNS Scheme**”, in recognition of the illegality of the scheme and the manipulation of the market that would be caused by such a fraud.

617. Co-conspirator ICE did conspire with and did commit a “**pattern of racketeering**” by aiding and abetting the laundering of the criminal proceeds of Defendant Allstate and Co-conspirators TD/Geico through the apparatus of the “**SNS Association-In-Fact Enterprise**”, the principal purpose of which was to increase insurance industry executive profit and share price, at the expense, and through the exploitation of Plaintiff Kaul and thousands of other physicians, many of whom remain falsely imprisoned.

618. Co-conspirator ICE, although having reported regulatory/litigation risks in its SEC filings, did willfully and knowingly fail to specifically identify the securities fraud crimes of Defendant Allstate and Co-conspirators Geico/TD and is thus liable for these crimes.

619. Similarly, Co-conspirator ICE is also liable for the crimes from which Defendant Allstate/Co-conspirators TD/Geico’s invested criminal proceeds originated, crimes that constitute a “**patterns of racketeering**” within the geographic boundaries of the State of Texas, commencing in a period at least, if not before, Defendant Christie’s first term as governor.

620. Co-conspirator ICE recognizes that because it both trades on the NYSE and engages in commerce with global exchanges, which affects the value of those exchanges, that its participation in the “**SNS Scheme**” caused it to become a conduit to these global exchanges of NYSE market valuation that it knew, or ought to have known were false and were the product of crime, but did also become a crime itself [market valuation] consequent to Co-conspirator ICE’s global dissemination of a knowingly false market valuation that concealed the fact that the monies underpinning it were derived from the crimes of Defendant Allstate and Co-conspirators Geico/TD

621. Co-conspirator ICE used the US mail/wires to globally transmit knowingly fraudulent information about the market valuation of Defendant Allstate and Co-conspirators Geico/TD in that it omitted any specific reference within its SEC filings of the legal liability (\$28,000 trillion +) to the global equities market of **The Kaul Cases**.

622. Co-conspirator ICE, in propagating this knowingly fraudulent information to the global equities market, did recognize its role in false equity evaluations and the creation of a ‘bubble market’ in India.

623. Co-conspirator ICE's Indian headquarters is Hyderabad (Plaintiff Kaul's birthplace), and it is cognizant of the fact that the Indian stock market was reported as being in a 'bubble' by the Reserve Bank of India. On December 16, 2022, Plaintiff Kaul filed a notice of litigation against Defendant ICE (India).

624. Defendant ICE recognizes that the false evaluations of the NYSE are responsible for the Indian 'bubble', and that the false evaluations of the NYSE are a consequence of The Kaul Cases Defendants financial crimes.

625. Co-conspirator ICE committed and continues to commit a massive fraud on the global financial market.

Christie:

626. From 2001, the year that Defendant Christie was appointed the US Attorney for the District of New Jersey, he abused state power and converted state/federal agencies into "racketeering enterprises", through which he has conducted a "pattern of racketeering" purposed to further the economic/political agendas of himself and those individuals with whom he engaged in quid pro quo schemes of bribery and public corruption.

627. Commencing in or around 2008/2009, Defendant Christie entered into knowingly illegal conspiracies with Defendant Allstate and Co-conspirators Geico/TD, in which they methodically planned schemes to have eliminated Plaintiff Kaul (economic standing/reputation/livelihood/liberty/life) through the abuse of governmental power and physical violence).

628. Defendants Christie/Allstate and Co-conspirators Geico/TD/ICE conspired with state/federal investigative/prosecutorial authorities to file knowingly false criminal indictments against Plaintiff Kaul. These investigations ceased when Plaintiff Kaul filed K1 (February 22, 2016) except for, in a retaliatory manner, the filing of a knowingly false state tax indictment (May 2016) and suspension of Plaintiff Kaul's driving license (February 27, 2016).

629. From 2009 to 2017, Defendant Christie converted the executive/legislative/judicial branches of the State of New Jersey into a "racketeering enterprise", that he used against Plaintiff Kaul, in a scheme to have him jailed/deported/seriously injured/killed.

630. The scheme sought to eliminate the debt owed to Plaintiff Kaul by the insurance industry.

631. The scheme sought to eliminate future liability to Plaintiff Kaul by the insurance industry.

632. The scheme sought to eliminate the threat that Plaintiff Kaul's minimally invasive spine surgery practice posed to The Kaul Cases physician/hospital Defendants, from whom, along with Defendant Allstate and Co-Conspirators Geico/TD, Defendant Christie had received bribes.

633. Defendant Christie believed that he would become the 2016 President of the United States, that Plaintiff Kaul would be eliminated, and the crimes of The Kaul Cases Defendants would go undetected, and that Plaintiff Kaul would not commence litigation in 2016.

634. However, when Plaintiff Kaul did commence litigation, Defendant Christie, in collusion/conspiracy with The Kaul Cases Defendants and certain judges within the United States District Court, did perpetrate a massive scheme of obstruction of justice, that violated Plaintiff Kaul's human rights, and was intended to prevent Plaintiff Kaul from exposing the crimes, and to obviate the obligation of Defendant Allstate and Co-conspirators TD/Geico (Berkshire Hathaway) to report the \$28,000 trillion + in their SEC filings.

635. In the perpetration of the "SNS Scheme", Defendant Christie did use the US mail/wires to exchange information with The Kaul Cases Defendants regarding the bankruptcy and securities fraud, as it pertained detrimentally to the share price of Defendant Allstate and Co-conspirator TD/Geico.

636. In aiding and abetting the "SNS Scheme", Defendant Christie did fully recognize its illegality and the international criminal consequences of his participation in the defrauding of the global equities market.

637. Defendant Christie, nonetheless, did persist in the perpetration of the scheme out of fear that if the \$28,000 trillion + liability were disclosed to the global equities market, it would cause shareholder litigation, that would expose the massive crimes committed by The Kaul Cases Defendants within the executive/legislative/judicial branches of the State of New Jersey, the United States District Court, and the United States Bankruptcy Court (2006 to Present).

638. Defendant Christie was also motivated to aid and abet the securities/bankruptcy fraud, as he had been bribed with shares from Defendant Allstate and Co-conspirator Geico, as part of the quid pro quo scheme in which he ordered the medical board to revoke Plaintiff Kaul's license.

639. Defendant Christie maintains a controlling position within the "SN5 Association-In-Fact Enterprise" from which he continues to illegally profit, the profits of which he launders through the enterprise of his political lobbying/law business, that currently provide cover for his "ongoing" schemes of bribery and public corruption.

Defendant Allstate/Co-conspirator Geico:

640. Plaintiff Kaul commenced suit against Defendant Allstate and Co-conspirator Geico on February 22, 2016, in K1, in which Plaintiff Kaul sought \$28,000 trillion + in monetary damages. Allstate's market capitalization was approximately \$33 billion, and thus it was obligated to report the claims in its SEC filings. It did not, and still has not.

641. Pursuant to RICO's vicarious liability doctrine, Defendant Allstate remains liable for the securities violation of its Co-conspirator, Geico.

642. Co-conspirator Geico, in recognizing the immense civil/criminal consequences of disclosure, and the damage to its reputation within the global equities market, did conspire with Co-conspirator ICE in its withholding of this information.

643. Co-conspirator ICE was motivated to participate in the **"SNS Scheme"** as its share price and corporate profits were linked to those of Co-conspirator Geico, and it recognized that exposure to the global equities market of the \$28,000 trillion + liability had the potential to bankrupt Co-conspirator Geico.

644. Co-conspirators ICE/Geico did use the US mail/wires and face-to-face meetings to exchange information about the **"SNS Scheme"**.

645. Within the corpus of communication, Co-conspirators ICE/Geico concluded that the risk of Plaintiff Kaul exposing a securities fraud violation was minimal compared to the risk of bankruptcy if **The Kaul Cases** were exposed to the global equities market.

646. Co-conspirator Geico, in recognizing that Co-conspirator ICE would not report its false filings to the SEC/DOJ, did continue to fraudulently trade millions of shares from 2016 onwards, in the knowledge of its illegality, and that it would cause false market valuations, market manipulations and investors to be defrauded.

647. Co-conspirator Geico reaped illegal profits from the **"SNS Scheme"**,

648. Co-conspirator Geico funneled the illegal profits as bribes to certain judges within the United States District Court (K11-3) and certain state/federal politicians (K11-1), in order to control the **"racketeering enterprise"** into which **The Kaul Cases** Defendants had converted certain courts (district/appellate) within the United States District Court.

649. In a period commencing in approximately 2008/2009, Co-conspirator Geico, a corporation that conducts business in every state, did, through a **"pattern of racketeering"**, and in conspiracy/collusion with **The Kaul Cases** Defendants, convert into **"racketeering enterprises"** the State of Texas/All Other American States, the United States District Court, the United States Bankruptcy Court, the New York Stock Exchange and state/federal investigative/prosecutorial authorities, all purposed to eliminate Plaintiff Kaul from the American healthcare market and life itself.

650. Co-conspirator Geico then used the **"racketeering enterprises"** (State of Texas/All Other American States, the United States District Court, the United States Bankruptcy Court, the New York Stock Exchange, and state/federal investigative/prosecutorial authorities) to attempt to obstruct Plaintiff Kaul's litigation/license procurement, in order to provide cover for their crimes, when their Kaul elimination scheme failed (2008/9 to 2021).

Co-conspirator TD:

651. On February 22, 2016, with the filing of K1, Plaintiff Kaul did expose the crimes of Co-conspirator TD, and their role in the willful deprivation of Plaintiff Kaul's economic resources, necessary to fight the revocation proceedings filed by Defendant Christie's then state AG, Jeffrey Chiesa.

652. In K1, Plaintiff Kaul also exposed Co-conspirator TD's knowingly illegal/conspiratorial use of state/bankruptcy courts within the geographic boundaries of the State of New Jersey to bankrupt Plaintiff Kaul's corporations and illegally deprive him of his personal/business assets (\$45 million accounts receivable/others).

653. Co-conspirator TD, a corporation that conducts business in Texas/All Other American States, commenced conspiring with Defendants Christie/Allstate and Co-conspirator Geico in or around 2010, in a series of quid pro quo schemes, in which Co-conspirator TD received regulatory favors from Defendant Christie in return for arbitrarily foreclosing on Plaintiff Kaul's personal/commercial loans.

654. Defendant Allstate/Co-conspirator Geico had bribed Defendant Christie to eliminate Plaintiff Kaul.

655. Defendant Christie's quid pro quo with Co-conspirator TD, was partially purposed to deprive Plaintiff Kaul of monies to litigate the licensing case against the State of New Jersey.

656. Defendant Christie's quid pro quo with Co-conspirator TD, was partially purposed to bankrupt his corporations in order to facilitate the elimination of debt (\$45 million) owed to Plaintiff Kaul by the insurance industry.

657. Co-conspirator TD, in recognizing the immense civil/criminal liability of The Kaul Cases, did conspire with Co-conspirator ICE to conceal the litigation from the global equities market, and did submit false SEC filings and accounts from 2016 to 2021,

658. Co-conspirator TD submitted false SEC filings in the belief that Kaul would not expose its prior crimes, as The Kaul Cases Defendants had bribed certain judges within the United States District Court and the United States Bankruptcy Court.

659. Co-conspirator TD submitted false SEC filings with a sense of impunity derived from its knowledge of the fact that Defendant FSMB/Co-conspirator NCMB acting through the "Federation Cartel" would attempt to obstruct Plaintiff Kaul's efforts at license procurement.

660. Co-conspirator TD submitted false SEC filings with a sense of impunity derived from its belief that The Kaul Cases Defendants obstruction of Plaintiff Kaul's litigation and the "FC"s obstruction of license procurement would collectively obstruct Plaintiff Kaul from procuring funding to litigate and even if he did, to actually litigate.

661. From 2016 onwards Co-conspirator TD did use the US mail/wires and engage in face-to-face meetings with Defendants Allstate/Christie and Co-conspirators ICE/Geico in furtherance of the **“SNS Scheme”**.

662. At these meetings, and within these communications, Defendants Christie/Allstate and Co-conspirators Geico/ICE did discuss and conclude that the risk of Plaintiff Kaul exposing their securities fraud violation was substantially outweighed by the risk of disclosing the \$28,000 trillion + liability to the global equities market.

663. In conspiring with The Kaul Cases Defendants, Co-conspirator TD did recognize the illegality of their failure to disclose and did follow the advice of counsel in failing to disclose.

664. Co-conspirator TD’s counsel did conspire/collude with counsel for The Kaul Cases Defendants in furtherance of the **“SNS Scheme”** for the purpose of concealing their prior crimes,

665. Co-conspirator TD’s prior crimes involved massive schemes of judicial/public corruption, at the center of which was Defendant Christie, his presidential ambitions, and the commercial agendas of corporations/persons from whom Defendant Christie had received bribes.

666. Co-conspirator TD, in willfully committing securities fraud and defrauding the global equities market of their right to honest services, did perpetrate such a scheme with the premeditated purpose of violating Plaintiff Kaul’s litigation rights, in that it stymied his ‘whistleblowing’ on the crimes of The Kaul Cases Defendants.

667. Defendant Allstate and Co-conspirators Geico/TD did recognize that disclosure to the global equities market would cause investors to withdraw their stock position, as occurred with K11-2 Defendant Boston Partners, after Plaintiff Kaul informed them in November 2018 of the pending litigation in K1/K2.

668. Defendant Allstate and Co-conspirators Geico/TD did recognize that a disclosure of the \$28,000 trillion + liability would cause massive shareholder litigation and damaging publicity regarding their schemes of judicial/public corruption, and that this litigation/publicity would augment Plaintiff Kaul’s prosecutorial rights.

669. Defendant Allstate and Co-conspirators Geico/TD knowing, and willful violation of the Sarbanes-Oxley Act was purposed to provide cover for their previous crimes against Plaintiff Kaul (bribery/mail fraud/wire fraud/judicial corruption/public corruption/civil rights violations/perjury/kickbacks/false arrest/false imprisonment/obstruction of justice/illegal seizure of assets/money laundering/bankruptcy fraud/bank fraud), and were purposed to, and did in fact, violate Plaintiff Kaul’s prosecutorial rights.

8. COUNT EIGHT

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

Defendant Persons: Allstate/Stolz

Co-conspirators: Geico/TD

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

Overview:

670. In a period from approximately 2008/2009 to 2013, Defendant Allstate and Co-conspirators Geico/TD, entities that conduct business in all states, did commence conspiring to commit, and did commit a **“pattern of racketeering”** through the enterprise of the State of Texas/All Other American States.

671. From 2013 to 2016, Defendant Allstate and Co-conspirators Geico/TD did extend and amplify this **“pattern of racketeering”** into the United States Bankruptcy Court.

672. From 2016 onwards, Defendant Allstate and Co-conspirators Geico/TD and did extend and amplify this **“pattern of racketeering”** into the NYSE, to form an association-in-fact enterprise, the **“State of Texas-United States Bankruptcy Court-New York Stock Exchange Association-In-Fact Enterprise”** (**“SUN-Association-In-Fact Enterprise”**).

673. The Defendant Persons that orchestrated, controlled, aided, and abetted, and that did either occupy or effect controlling positions within the enterprises were Defendants Stolz/Allstate.

674. The Co-conspirators, Geico/TD and specifically, K11-3 Defendant/U.S.B.J. John Sherwood, did aid and abet Defendants Stolz/Allstate’s perpetration of their **“SUN Scheme”** through a **“pattern of racketeering”**.

675. The **“pattern of racketeering”** involved the commission of the RICO predicate acts of mail fraud/wire fraud/perjury/obstruction of justice/kickbacks/judicial corruption/public corruption/money laundering/bankruptcy fraud/bank fraud/securities fraud,

676. The **“pattern of racketeering”** and the RICO predicate acts were knowingly/willfully committed, and with knowledge of their illegality, through a purposeful conversion of the State of Texas/U.S.B.C./NYSE into **“an association-in-fact racketeering enterprises”**, the principal purpose of which was to increase executive/corporate profit and compensation for Defendant Allstate, who funneled bribes to Defendants Stolz/Christie.

677. The bribes funneled by Defendant Allstate to Defendants Stolz/Christie were either disguised as ‘legal fees’/political campaign ‘donations’, or deposited in offshore bank accounts/trusts.

678. Defendants Stolz/Christie and Co-conspirators Geico/TD did use the US mail/wires and conduct face-to-face meetings in Texas, for the purpose of devising, planning, and executing the knowingly illegal “**SUN Scheme**”.

679. Defendants Stolz/Allstate/Christie and Co-conspirators Geico/TD, in the initial planning of their criminal enterprise did not anticipate that in 2016, Plaintiff Kaul would commence litigation, or that the damages sought would be in excess of ten percent (10%) of their market capitalization.

680. In fact, Defendants Stolz/Allstate/Christie and Co-conspirators Geico/TD believed that Plaintiff Kaul would be deported/jailed/killed, and on May 27, 2021, they did, in a state of desperation, perpetrate a scheme in which Plaintiff Kaul was illegally arrested/kidnapped/imprisoned, with the intention of having him permanently injured or killed in the Mercer County jail in Trenton, New Jersey.

681. The scheme failed, and Plaintiff Kaul filed suit on June 15, 2021, against K11-9 Defendants Christopher J. Christie/Philip Murphy/Doreen Hafner/Robert McGuire/Gurbir Grewal, the latter who is named in pending criminal indictment against Senator Robert Menendez.

682. Defendants Stolz/Allstate/Christie and Co-conspirators Geico/TD, in recognizing their \$28,000 trillion + liability, did conspire with Co-conspirator ICE, in the concealment of this information from the global equities market, in which Defendant Allstate and Co-conspirators Geico/TD trade.

683. In 2012, Defendant Allstate extended its operations into India, while simultaneously conducting, in collusion/conspiracy with American state/federal investigative/prosecutorial authorities, policies of racially targeting Indian physicians for license revocation and imprisonment.

Defendant Allstate/Co-conspirator Geico:

684. In June 2013, Co-conspirator TD, in furtherance of the Defendants “**racketeering schemes**” (2008/2008-2023) caused Plaintiff Kaul’s corporations to file for Chapter 11 bankruptcy, by arbitrarily/illegally cancelling all his personal/business loans and closing all his personal/business accounts.

685. On July 21, 2014, the Chapter 11 was converted to a Chapter 7, because of the illegal revocation of Plaintiff Kaul’s license on March 24, 2014. Defendant Stolz and his now deceased law partner, Robert Wasserman, were assigned as the trustee.

686. In a period that commenced in approximately July 2014, Defendant Allstate/Co-conspirator Geico did enter into a conspiracy with Defendant Stolz, in which Defendant Stolz accepted bribes from Defendant Allstate/Co-conspirator Geico in return for not pursuing the

\$45 million accounts receivable owed to Plaintiff Kaul by Defendants Allstate/Co-conspirator Geico and others within the insurance industry, as is irrefutably pled in K4.

687. Defendant Allstate/Co-conspirator Geico did use the US mail/wires and face-to-face meetings with Defendant Stolz to exchange information regarding the perpetration of the “**SUN Scheme**”, the purpose of which was to increase share price/executive compensation and bribes to Defendant Stolz.

688. During these communications, Defendants Allstate/Stolz and Co-conspirator Geico did consider the money laundering risk posed by the investment of the proceeds of their crimes into the NYSE.

689. Defendants Allstate/Stolz and Co-conspirator Geico calculated that the risk was minimal, as Plaintiff Kaul would be eliminated and any person who had knowledge of the crimes would remain silent, fearful of retaliation of a criminal indictment from Defendant Christie, who was still the NJ Governor.

690. Defendants Allstate/Stolz and Co-conspirator Geico calculated that their illegal scheme would cause an elevation of share price, the false basis of which would be concealed from the global investment community.

691. Subsequent to the filing of K1, the Defendants Allstate and Co-conspirators Geico/TD did conspire to not report the case in their SEC filings, in order to provide cover for, amongst other things, their crime of bankruptcy/creditors fraud.

692. However, in filing knowingly false SEC returns, they committed securities fraud, a crime that they have committed before, but in this case, a crime that commenced in 2016, and is ongoing in 2023.

693. On May 27, 2021, **The Kaul Cases** Defendants attempted to have Plaintiff Kaul seriously injured or killed (K11-9) and on June 14-15, 2023, did have Plaintiff Kaul illegally arrested/jailed/attempted murder.

Defendant Stolz:

694. Defendant Stolz, a lawyer, knew that in conspiring to commit and committing the RICO predicate acts of bankruptcy fraud/securities fraud/mail fraud/wire fraud, through a “**pattern of racketeering**” in which he converted the United States Bankruptcy Court into a “**racketeering enterprise**”, for a period commencing on July 21, 2014, he has defrauded the global equities market of its right to honest services, caused injury to foreign markets and has thus incurred international criminal liability.

695. Plaintiff Kaul has exposed the crimes of Defendant Stolz, who from 2018 conspired with corrupted judges in the District of New Jersey to prevent Plaintiff Kaul from prosecuting his claims against Defendant Stolz.

696. The tactics used by Defendant Stolz included having Co-conspirator/K11-3 Defendant U.S.B.J. John Sherwood enter an order in February 2020, that sought to bar Plaintiff Kaul from prosecuting Defendant Stolz for his crimes.

697. Co-conspirator/K11-3 Defendant Sherwood, as plausibly and irrefutably pled in K11-3, did accept bribes from Defendant Allstate/Co-conspirator Geico and K11-11 Defendant Blue Cross Blue Shield in return for entering judgements adverse to Plaintiff Kaul/creditors in the bankruptcy proceedings (July 21, 2014, to July 31, 2020).

698. The Kaul Cases Defendants 'hijacked' the authority of the United States Bankruptcy Court through massive schemes of judicial corruption/bribery.

699. When Plaintiff Kaul commenced litigation against Defendant Stolz in 2018 (K4) Defendant Stolz and his lawyer, Scott Rever, desperate to prevent their prosecution by Plaintiff Kaul, did threaten to expose the names of state/federal politicians and judges, who had either participated/facilitated his bankruptcy fraud in Plaintiff Kaul's case, or had received bribes from the insurance industry in cases involving other physicians/healthcare providers.

700. From 2016 to the present, Defendant Stolz, with knowledge of Defendant Allstate/Co-conspirators Geico/TD's securities fraud crimes, has failed to report the crimes to regulators or the global equities market, as he recognizes that to report would expose his crime of bankruptcy fraud, and the crimes/malfeasance of all of The Kaul Cases Defendants, extending back to 2006.

701. Defendant Stolz has knowledge that Defendant Allstate/Co-conspirators Geico/TD did conspire with Co-conspirator ICE to conceal from the global equities market, their \$28,000 trillion + liability.

702. Defendant Stolz has knowledge that Defendant Allstate/Co-conspirators Geico/TD did conspire with the SEC to have K11-9 Defendant/Co-conspirator and ex-NJ AG Gurbir Grewal, transferred on June 29, 2021, from the Office of the NJ AG to the securities fraud enforcement division, after Plaintiff Kaul sued him in K11-9 for his role in the May 27, 2021, kidnapping of Plaintiff Kaul.

703. Defendant Stolz has knowledge that K11-2 Defendant, Boston Partners, admitted to withdrawing its position in Co-conspirator Allstate, after they received a letter from Plaintiff Kaul in November 2018, that informed them of securities fraud violations committed by Defendant Allstate/Co-conspirators Geico/TD, in submitting knowingly false SEC filings in a period from 2016 onwards.

Co-conspirator TD:

704. In approximately 2010, Co-conspirator TD commenced conspiring against Plaintiff Kaul with Defendants Allstate/Christie and Co-conspirator Geico in a scheme to eliminate Plaintiff Kaul through the destruction of his career/livelihood/reputation/economic standing.

705. In furtherance of this scheme, Co-conspirator TD used the US mail/wires to transmit information regarding the scheme's devising/implementation/execution, in the knowledge that such transmission constituted the crimes of mail/wire fraud.

706. However, Co-conspirator TD did not believe that Plaintiff Kaul would expose its crimes, as it received information from Defendants Christie/Allstate and Co-conspirator Geico that Plaintiff Kaul would be eliminated.

707. Co-conspirator TD entered into a series of quid pro quo schemes with Defendants Allstate/Christie and Co-conspirator Geico in which they conducted a **"pattern of racketeering"** through the American banking system and United States Bankruptcy Court, through the commission of the RICO predicate acts of mail fraud/wire fraud/bankruptcy fraud/bank fraud.

708. Co-conspirator TD, in its conspiratorial role in the nationwide licensing suspension/licensing prohibition scheme directed at Plaintiff Kaul that commenced in 2012 in NJ, did subsequently convert into an **"association-in-fact racketeering enterprise"**, the State of Texas/United States Bankruptcy Court/NYSE in the knowledge of the immense civil/criminal liability that such crime, if exposed, would cause to them and their shareholders.

709. In approximately late 2013/2014, Co-conspirator TD, in collusion/conspiracy with Defendants Allstate/Christie and Co-conspirator Geico did file a knowingly false banking fraud claim against Kaul, with www.checksystems.com.

710. The purpose and effect of this fraudulent www.checksystems.com claim was to prevent Plaintiff Kaul's access to banking services, cause a deterioration in his credit score in order to prevent him funding the licensing litigation.

711. Co-conspirator TD did not anticipate that Plaintiff Kaul would sue them in 2016, nor that he would expose their securities fraud violation (2016 to present).

712. During the Chapter 11 and then Chapter 7 bankruptcy proceedings (June 17, 2013, to July 31, 2020), Co-conspirator TD, with knowledge of the illegality of the revocation of Plaintiff Kaul's license, and the **"racketeering schemes"** perpetrated by, amongst others, Defendants Allstate/Christie, and Co-conspirator Geico that caused the revocation/subsequent legal cases against Plaintiff Kaul, did conspire with its counsel to not report the bankruptcy fraud to authorities.

713. Co-conspirator TD's reason for failing to report the bankruptcy fraud was that it did not want exposed its prior crimes and involvement in The Kaul Cases Defendants scheme to eliminate Plaintiff Kaul (livelihood/reputation/assets/freedom/human rights).

714. Co-conspirator TD conspired with Defendants Stolz/Allstate and Co-conspirator Geico and K11-2 Defendant, John Diiorio, Esq, Plaintiff Kaul's Chapter 7 lawyer, to threaten Plaintiff Kaul that unless he signed over title to the real estate in which his surgical center was located, despite it belonging to a corporation not part of the Chapter 11 proceeding, that Plaintiff Kaul's ex-wife would be sued by Defendant Stolz and she/Plaintiff Kaul's young children would be evicted from their childhood home.

715. In a period from 2016 onwards, Co-conspirator TD conspired with its lawyers/accountants to defraud the global equities market of its right to honest services, through the submission of false SEC filings and accounting reports.

716. Co-conspirator TD perpetrated these criminal deceptions on the global equities market, in the belief, and with the intention of violating Plaintiff Kaul's prosecutorial rights in K1, knowing that disclosure of the K1 facts and the immense financial liability would have caused investors to withdraw their positions and commence shareholder litigation.

717. Co-conspirator TD knew that shareholder litigation would have exposed their crimes, that include those associated with the purchase of Commerce Bank in 2007, in which they bribed multiple NJ state politicians in a 'pay-to-play' scheme, in order to complete the purchase.

718. Co-conspirator TD knew that such an exposition of crime would have conclusively proved Plaintiff Kaul's claims in K1 and specifically the fact of the 2009/2010 quid pro quo scheme with Defendant Christie, in which Co-conspirator TD, in exchange for regulatory banking favors in New Jersey, did consent to cancelling Plaintiff Kaul's personal/commercial loans, closing his accounts, and filing a knowingly fraudulent claim with www.checksystems.com

9. COUNT NINE

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

Defendant Persons: Christie/Heary

Co-conspirator: AHS

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

Overview:

719. In a period commencing in approximately 2006, Defendants Christie//Heary and Co-conspirator AHS commenced conspiring to commit, and did commit, a "pattern of

“racketeering” through the association-in-fact enterprise of the State of Texas and the United States District Court, the **“SU Association-In-Fact Enterprise”**, in furtherance of the **“SU Scheme”**,

720. Defendants Christie//Heary and Co-conspirator AHS perpetrated the **“SU Scheme”** through the commission of the RICO predicate acts of mail fraud/wire fraud/bribery/public corruption/obstruction of justice/perjury/kickbacks/bank fraud/investor fraud.

721. A motivating factor for the **“SU Scheme”** was to increase Defendants Christie//Heary and Co-conspirator AHS’s economic/political power within the American legal/medical/business/political sectors of industry, at the expense of Plaintiff Kaul, free standing surgical centers, and non-neurosurgical minimally invasive spine surgeons,

722. A reassuring factor in the **“SU Scheme”**, one that provided a sense of impunity, was Defendant Christie/Heary and Co-Conspirator AHS’s belief that through corruption, they could indefinitely pervert the United States District Court into providing cover for their crimes within the State of Texas/All Other American States.

Defendant Christie:

723. In 2000, when Defendant Christie was appointed the US Attorney for the District of New Jersey, he commenced abusing state prosecutorial power for advancement of his personal/political/economic agendas by manufacturing false indictments to threaten persons with criminal prosecution in order to coerce them into funneling money (directly/indirectly) into his political campaigns and offshore bank accounts/trusts.

724. Defendant Christie used this money to occupy the governor’s office in 2009/2013, from which he continued the **“pattern of racketeering”** of extortion and quid pro quo scheme bribery, in which bribes were funneled into his political campaigns/offshore bank accounts by, amongst others, Defendant Heary and Co-conspirator AHS.

725. The quid pro quo schemes were purposed to have eliminated Plaintiff Kaul from the healthcare market and from life itself.

726. The quid pro quo schemes were purposed to have eliminated free standing surgical centers.

727. The quid pro quo schemes were purposed to have eliminated billing codes for outpatient spine surgery.

728. The quid pro quo schemes were purposed to have introduced legislation that prevented the issuance of state licenses for physician owned surgical centers

729. The quid pro quo schemes were purposed to have downgraded the RVU of billing codes for spine surgery in free standing physician owned surgical centers.

730. These illegally conducted tactics were part of an overall strategy perpetrated by for-profit healthcare corporations, such as Defendant Allstate and Co-conspirators Geico/AHS, to illegally monopolize, through both per se/rule of reason violations, the American healthcare market.

731. At the heart of this conspiracy lies the **“HIPIC-FC” (“Hospital-Insurance-Pharmaceutical-Industrial Complex – Federation Cartel”)** and related to this is the **“Hospital-Insurance-Pharmaceutical-Industrial-Complex-US Government Cartel”** the **“HIPIC-USC”**.

732. These two cartels, **“HIPIC-FC”** and **“HIPIC-USC”**, operate to eliminate physicians through license revocation/incarceration/suicide/death, in order to increase the corporations’ profits/share price, by reducing the amount of patient care provided, by reducing the number of physicians.

733. Defendant Christie, in his capacity as the US Attorney did come to understand the mechanics of the securities market, and was involved with securities fraud cases. Co-conspirator ICE came into existence as recently as 2000, the year Defendant Christie became US Attorney, but yet by 2021 it has a market capitalization of \$68 billion.

Bribery:

734. Defendant Christie’s relationship with bribers, bribery and quid pro quo schemes extends back to his early political/legal career in Morris County, New Jersey.

735. In a time period from 2008 to 2016, Defendants Heary and Co-conspirator AHS funneled bribes to Defendant Christie, using as cover, his political campaign account and law/public relation/political lobbying firms with whom Defendant Christie conducted illegal transactions, in which he used the public treasury to funnel state contracts to these firms in return for bribes.

736. The bribes flowed from Defendants Heary and Co-conspirator AHS to Defendant Christie, and the public’s money (kickbacks) flowed from Defendant Christie to Defendants Heary (\$3.1 million state ‘salary’) and Co-conspirator AHS, in the form, amongst others, of government grants and tax deductions/exemptions.

Mail Fraud/Wire Fraud:

737. In a period from 2008 to 2021 Defendant Christie did, with knowledge of its illegality, use the US mail/wires to exchange information with Defendants Heary and Co-conspirator AHS in furtherance of the **“SU Scheme”**, for the purpose of illegal spine market monopolization (2008-2014)

738. In a period from 2008 to 2021 the Defendants Christie/Heary and Co-conspirator AHS did, with knowledge of its illegality, use the US mail/wires to exchange information regarding the provision of cover in the United States District Court against Plaintiff Kaul's prosecution of their antitrust/racketeering/civil rights crimes (2016-2021).

739. The attempted procurement of cover constituted an effort to ensure Plaintiff Kaul did not expose The Kaul Cases Defendants illegal spine market monopolization.

Obstruction of Justice:

740. In a period from 2012 to 2021, Defendant Christie did conspire to commit, and did commit an obstruction/violation of Plaintiff Kaul's right to justice by, through and as a consequence of his control of the executive/judicial/legislative branches of the State of New Jersey.

741. The obstruction/violation caused "ongoing" and "new racketeering" injuries to Plaintiff Kaul's economic standing/reputation/livelihood/life/liberty.

742. Defendant Christie conspired with Defendants Stolz/Allstate and Co-Conspirator TD/Geico to obstruct Plaintiff Kaul's right to justice in the United States Bankruptcy Court (2013 to 2020), an obstruction that caused further new injuries and exacerbated ongoing injuries.

743. Defendant Christie conspired with The Kaul Cases Defendants/counsel (2016-2021) to obstruct/violate Plaintiff Kaul's prosecutorial rights in the United States District Court,

744. The purpose of the violation/obstruction was to attempt to prevent Plaintiff Kaul from further exposing their crimes in the State of New Jersey and the United States Bankruptcy Court.

Public Corruption:

745. In a period from 2008 to 2021, Defendant Christie abused his political power and public office to engage in acts of public corruption with private actors (persons/corporations), state/federal judges, medical boards, and NJ state police.

746. Defendant Christie's corrupt acts were purposed to eliminate Plaintiff Kaul (deportation/jailed/suicide-killed).

747. Defendant Christie's corrupt acts were purposed to order/coerce state judges/courts to obstruct Plaintiff Kaul's right to justice and to have entered multi-million-dollar judgments in knowingly fraudulent cases brought against him by The Kaul Cases Defendants/Co-Conspirators (lawyers/patients), in the widely publicized (2012 to 2015) aftermath of the illegal 2012/2014 suspension/revocation.

748. Defendant Christie's corrupt acts were purposed to obstruct Plaintiff Kaul's right to justice in the United States Bankruptcy Court (2013-2020).

749. Defendant Christie's corrupt acts were purposed to violate Plaintiff Kaul's prosecutorial rights in the United States District Court (2013-2023).

750. Defendants Christie/Allstate and Co-Conspirators Geico/TD conspired with the SEC to have Co-Conspirator Grewal transferred to the enforcement division of the SEC on June 29, 2021, to attempt to quash a securities fraud prosecution of Defendant Allstate and Co-Conspirators Geico/TD.

AHS:

Mail/Wire Fraud:

751. In a period from approximately 2008/2009 to 2014, Co-Conspirator AHS did with knowledge of its illegality, use the US mail/wires to conspire with, amongst others, Defendant Christie, regarding the perpetration of the first half of the **"SU Scheme"**.

752. The first half of the **"SU Scheme"** involved the illegal revocation of Plaintiff Kaul's license, the destruction of his economic standing/reputation and elimination, be it by jail/deportation/suicide-death.

753. From 2016 to 2021, Defendant AHS/counsel did, with knowledge of its illegality, use the US mail/wires to conspire with **The Kaul Cases** Defendants/counsel, regarding the perpetration of the second half of the **"SU Scheme"**,

754. The second half of the **"SU Scheme"** involved the corruption of judges within the United States District Court to obstruct justice by violating Plaintiff Kaul's prosecutorial rights.

755. The purpose of the second half of the **"SU Scheme"** was to attempt to prevent Plaintiff Kaul from further exposing the crimes committed in the first half of the **"SU Scheme"**, and the securities fraud violations of Defendants Allstate and Co-conspirators TD/Geico.

756. Co-Conspirator AHS's shareholding in these corporations has increased since the filing of K1, on February 22, 2016, as is a fact with many other of **The Kaul Cases** Defendants.

Bribery:

757. In a period from 2008/2009, Co-Conspirator AHS did engage in a series of quid pro quo schemes with Defendant Christie, in which they converted the executive/legislative/judicial branches of the State of New Jersey into a **"racketeering enterprise"**,

758. Through the **"racketeering enterprise"** Co-Conspirator AHS conducted a **"pattern of racketeering"**.

759. Co-Conspirator AHS's "**pattern of racketeering**" involved a conspiracy to commit, and the actual commission with knowing illegality of the RICO predicate acts of bribery/public corruption.

Heary:

Mail/Wire Fraud:

760. In a period from approximately 2008/2009 to 2014, Defendant Heary did with knowledge of its illegality, use the US mail/wires to conspire with, amongst others, Defendant Christie, regarding the perpetration of the first half of the "**SU Scheme**",

761. The first half of the "**SU Scheme**" involved the revocation of Plaintiff Kaul's license, the destruction of his economic standing/reputation and elimination, be it by jail/deportation/death.

762. From 2016 to 2021, Defendant AHS/counsel did, with knowledge of its illegality, use the US mail/wires to conspire with The Kaul Cases Defendants/counsel, regarding the perpetration of the second half of the "**SU Scheme**",

763. The second half of the "**SU Scheme**" involved the corruption of judges within the United States District Court to obstruct justice by violating Plaintiff Kaul's prosecutorial rights,

764. The purpose of the second half of the "**SU Scheme**" was to attempt to prevent Plaintiff Kaul from further exposing the crimes committed in the first half of the "**SU Scheme**", and the securities fraud violations of Defendant Allstate and Co-Conspirators.

765. Defendant Heary's shareholding in these corporations has increased since the filing of K1, on February 22, 2016, as is the case with many other of The Kaul Cases Defendants.

Bribery/Public Corruption:

766. In a period from 2008/2009, Defendant Heary did engage in a series of quid pro quo schemes with Defendant Christie,

767. In the perpetration of these quid pro quo schemes, Defendants Christie/Heary did directly/indirectly convert the State of Texas into a "**racketeering enterprise**".

768. Defendants Christie/Heary and the Co-Conspirators in collusion with The Kaul Cases Defendants, perpetrate through the "**racketeering enterprise**" a "**pattern of racketeering**".

769. The "**pattern of racketeering**" involved conspiring to commit and actually committing with a knowing illegality, the RICO predicate acts of bribery/public corruption.

10. COUNT TEN

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

Defendant Persons: FSMB/Christie/Allstate

Co-conspirators: Geico/NCMB

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

Overview:

770. In a period that commenced in approximately 2008/2009, the Defendants did conspire to commit, and did commit, with knowledge of its illegality, a “**pattern of racketeering**”.

771. The “**pattern of racketeering**” involved conspiring to commit and actually committing with a knowing illegality RICO predicate acts of mail fraud/wire fraud/bribery/obstruction of justice/public corruption.

772. Defendants Allstate/FSMB/Christie and their Co-Conspirators Geico/NCMB in perpetrating a “**pattern of racketeering**” did convert the State of Texas, the United States Bankruptcy Court, the United States District Court, and the NYSE into an association-in-fact racketeering enterprise, the “**SUUN Association-In-Fact Enterprise**”.

773. Through the “**SUUN Association-In-Fact Enterprise**” Defendants Allstate/FSMB/Christie and their Co-Conspirators Geico/NCMB perpetrated the “**SUUN Scheme**”.

774. A purpose of the “**SUUN Scheme**” was to eliminate Plaintiff Kaul (jailed/deported/suicide-killed)

775. A purpose of the “**SUUN Scheme**” was to have Defendant Christie become the 2016 US President.

776. A purpose of the “**SUUN Scheme**” was to prevent Plaintiff Kaul from further exposing their crimes, and the securities fraud/bank fraud/bankruptcy fraud of Defendant Allstate and Co-conspirators Geico/TD Bank.

777. Central to the perpetration of the “**SUUN Scheme**” was the “**Hospital-Insurance-Pharmaceutical-Industry-Complex**” (“**HIPIC-FC**”) and their monopolization/control of all elements of American medicine by for-profit public-private corporations.

778. The shared economic mission of the “**HIPIC-FC**” is the maximization of corporate profit and share price.

779. The “HIPIC-FC” maximization of corporate profit/share prices is procured through the exploitation of the American public (denial of care) and medical profession (license suspension/revocation/incarceration) achieved through their corrupt control of the executive/legislative/judicial branches of state/federal government.

Christie:

Mail/wire fraud:

780. In a period commencing from approximately 2008/2009 to 2016 Defendant Christie did use the US mail wires in a knowing illegal manner, to exchange information with Defendant Allstate and Co-conspirator Geico regarding the perpetration of the first half of the “SUUN Scheme”.

781. The first half of the “SUUN Scheme” involved the revocation of Plaintiff Kaul’s license, the destruction of his economic standing/reputation and elimination, be it by jail/deportation/death.

782. From 2016 to 2021, Defendant Christie did use the US mail/wires in a knowingly illegal manner, to exchange information with Defendants Allstate/FSMB and Co-conspirators Geico/TD regarding the second half of the “SUUN Scheme”.

783. The second half of the “SUUN Scheme” involved obstructing Plaintiff Kaul’s efforts to procure a license anywhere in the world.

784. The second half of the “SUUN Scheme” involved violating Plaintiff Kaul’s prosecutorial rights and obstructing his access to justice by corrupting judges within the United States District Court.

785. The purpose of the second half of the “SUUN Scheme” was an attempt to prevent Plaintiff Kaul from further exposing the crimes of Defendants Allstate/FSMB/Christie and Co-conspirators Geico/TD.

786. These crimes include securities fraud/bankruptcy fraud/bank fraud.

787. Defendant Christie received substantial shares from Defendant Allstate and Co-Conspirators Geico/TD as part of the quid pro quo schemes of bribery, to eliminate Plaintiff Kaul.

Bribery:

788. In a period from 2008/2009 to 2016, Defendant Christie did enter into a series of quid pro quo schemes with Defendant Allstate and Co-Conspirator Geico.

789. In these quid pro quo schemes, Defendant Christie received bribes disguised as political campaign donations and corporate shares,

790. In these quid pro quo schemes, Defendant Christie received bribes (monies) transferred into multiple tax-free offshore havens, including Israel.

791. In a period from 2016 to 2021, Defendant Christie did corrupt judges within the United States District Court in quid pro quo schemes purposed to violate Plaintiff Kaul's prosecutorial rights.

792. The purpose of violating Plaintiff Kaul's prosecutorial rights was to prevent him from further exposing the crimes of The Kaul Cases Defendants.

793. These crimes include securities fraud/bankruptcy fraud/bank fraud.

Obstruction of justice/public corruption:

794. In a period from 2008/2009 to 2016, Defendant Christie conspired to commit, and did commit, in collusion/conspiracy with The Kaul Cases Defendants, and as part of the first half of the "SUUN Scheme", an ongoing scheme to violate Plaintiff Kaul's right to justice within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey,

795. The violations were the intended product of multiple quid pro quo schemes in which The Kaul Cases Defendants funneled bribes to Defendant Christie to have Plaintiff Kaul eliminated.

796. In a period from 2016 to 2021, Defendant Christie did corrupt judges within the United States District Court to violate Plaintiff Kaul's prosecutorial rights and obstruct justice.

797. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from further exposing Defendants Allstate/FSMB/Christie and Co-conspirators Geico/TD decades-long schemes of corruption of American state/federal politicians/judges/legislators.

798. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from further exposing Defendants Allstate/FSMB/Christie and Co-conspirator Geico/TD crimes of securities fraud/bankruptcy fraud/bank fraud.

Money laundering:

799. In a period from 2008/2009 to 2017, Defendant Christie did launder the proceeds of his "SUUN Scheme" related criminal activity, in the same places that he laundered the proceeds of his many other criminal enterprises.

800. Defendant Christie laundered the proceeds through his family.

801. Defendant Christie laundered the proceeds through the NYSE.

802. Defendant Christie laundered the proceeds through offshore trusts/banks.

803. Defendant Christie laundered the proceeds through his law/political lobbying firm.

804. Defendant Christie laundered the proceeds through his lawyers.

805. Defendant Christie laundered the proceeds through his accountants.

806. Defendant Christie laundered the proceeds through his public relation personnel (Mercury Public Relations).

807. Defendant Christie laundered the proceeds through investments in Defendants Allstate and Co-Conspirators Geico/TD/AHS.

808. Defendant Christie laundered the proceeds through his real estate holdings.

Allstate/Geico:

Mail fraud/wire fraud:

809. In a period commencing in 2008/2009, Defendant Allstate and Co-Conspirator Geico did, with a knowing illegality, use the US mail/wires to exchange information with Defendant FSMB/Co-conspirator NCMB, in furtherance of both the first half of the **“SUUN Scheme”** and in continued furtherance of the decades-long **“HIPIC-FC”** scheme (1986-Present).

810. In these communications, Defendant Allstate, and Co-Conspirator Geico conspired with Defendant FSMB to globally disseminate knowingly fraudulent/highly defamatory information in furtherance of Plaintiff Kaul’s elimination.

811. The hoped-for-elimination (economic/reputation/livelihood/liberty/life) of Plaintiff Kaul was to prevent him exposing the crimes of **The Kaul Cases** Defendants.

812. From 2016 to 2021, Defendant Allstate did, with a knowing illegality, use the US mail/wires to exchange information with Defendant FSMB/Co-conspirators NCMB and all **The Kaul Cases** Defendants, in furtherance of the second half of the **“SUUN Scheme”**.

813. The second half of the **“SUUN Scheme”** involved violating Plaintiff Kaul’s prosecutorial rights in the United States District Court through judicial corruption.

814. A purpose of the violation was to prevent Plaintiff Kaul from further exposing **The Kaul Cases** Defendants prior crimes (2008/2009-2016) in the State of Texas and the United States Bankruptcy Court.

815. A purpose of the violation was to attempt to conceal their securities fraud crimes on the NYSE (2016-2023).

Bribery:

816. Defendant Allstate/Co-conspirator Geico have, since 1986, participated in an illegal bribery-based scheme of racketeering with Defendant FSMB/Co-conspirator NCMB/other state medical boards, the “HIPIC-FC” scheme, in a profit-purposed monopolization of the entire American healthcare system.

817. The monopolization is made possible by the corruption/control of the political/judicial bodies of the American Republic, and remains facilitated by Citizens United (2010).

818. From 2008/2009 to 2016 Defendants Allstate/FSMB and Co-Conspirators Geico/NCMB/other state medical boards perpetrated a massive series of crimes against Plaintiff Kaul, though the conduction of a “**pattern of racketeering**”.

819. The “**pattern of racketeering**” was perpetrated through the “**SUUN Association-In-Fact Enterprise**”

820. The “**pattern of racketeering**” furthered the first half of “**SUUN Scheme**”.

821. The “**pattern of racketeering**” provides further evidence of the longstanding “HIPIC-FC” scheme, in which, in its simplest form, for-profit corporations operating in the healthcare market, engage in knowingly illegal quid pro quo bribery schemes with Defendant FSMB/Co-conspirator NCMB/other state medical boards, in which these entities operating through the “FC” (“**Federation Cartel**”) have eliminated (license suspension/revocation/indictment/incarceration/suicide) physicians whose thoughts/words/actions either fail to support or undermine the corporate profit agenda. A scheme of CORPORATE TOTALATARIANSIM.

Obstruction of justice/public corruption:

822. From 2008/2009 to 2016, Defendant Allstate and Co-Conspirator Geico did, with knowing illegality, use the US mail/wires to exchange information with Defendant FSMB regarding the “**SUUN Scheme**” to eliminate Plaintiff Kaul.

823. From 2016 to 2021, Defendant Allstate and Co-Conspirator Geico did with knowing illegality use the US mail/wires to conspire to commit, and commit corruption of judges within the New Jersey Superior Court, the United States Bankruptcy Court (DNJ) and the United States District Court.

824. The purpose of the judicial corruption was to obstruct justice by violating Plaintiff Kaul’s prosecutorial rights.

825. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from further exposing The Kaul Cases Defendants crimes against Plaintiff Kaul in the State of Texas, crimes which commenced in 2012 and are ongoing.

826. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from exposing The Kaul Cases Defendants commission/aiding/abetting bankruptcy fraud in the United States Bankruptcy Court (2013-2020).

827. A purpose of the obstruction of justice was to attempt to conceal The Kaul Cases Defendants securities fraud offenses committed in the NYSE (2016-2023), crimes that have thus not been investigated by the SEC, because Co-Conspirator Grewal was fraudulently appointed its enforcement director in June 2021, for exactly this illegal purpose.

Money laundering:

828. Defendant Allstate and Co-Conspirator Geico did launder and continue to launder the proceeds of their crimes (2008/2009-2023) through the NYSE and global investment community, including the sovereign funds of many other nations, and exchanges, including the London, Shanghai, and Bombay Stock Exchanges.

829. Defendant Allstate and Co-Conspirator Geico continue to fail to disclose to international markets their ongoing commission of securities fraud (2016-2023), with knowledge of the immense liability this continues to cause to private/sovereign funds currently invested on the NYSE.

830. Defendant Allstate and Co-Conspirators Geico/TD have not disclosed the \$28,000 trillion + liability in any filings, anywhere in the world, at any point in time after 2016.

FSMB/Co-conspirator NCMB:

Mail fraud/wire fraud:

831. In a period from 2008/2009 to 2016, Defendant FSMB did with knowing illegality use the US mail/wires to exchange information with Defendant Allstate and Co-Conspirators Geico/NCMB regarding the first half of the "SUUN Scheme", that involved the revocation of Plaintiff Kaul's license, the destruction of his economic standing/reputation and his elimination, be it by jail/deportation/killed.

832. From 2016 to May 2023, Defendant FSMB did similarly use the US mail/wires to conspire with The Kaul Cases Defendants to commit acts of corruption of judges/senators within the United States District Court/US Government, purposed to violate Plaintiff Kaul's prosecutorial rights and obstruct justice.

833. Defendant FSMB's obstruction of justice was purposed to prevent Plaintiff Kaul from further exposing The Kaul Cases Defendants crimes (2008/2009 to 2023), including those of securities fraud.

834. From 2014 to 2021, Defendant FSMB in collusion/conspiracy with and through the "FC", did conspire with The Kaul Cases Defendants to attempt to obstruct Plaintiff Kaul from procuring a medical license anywhere in the world including the State of Texas.

835. The purpose of a global obstruction of license procurement was an attempt to restrict Plaintiff Kaul's access to capital, in the belief/hope it would obstruct his ability to prosecute his claims to judgment.

836. Defendant FSMB's purpose in attempting to violate Plaintiff Kaul's ability to prosecute his claims to judgment is to attempt to prevent Plaintiff Kaul from exposing the crimes (2008/2009 to 2021) of The Kaul Cases Defendants

837. The crimes of The Kaul Cases Defendants, including Defendant FSMB are mail fraud/wire fraud/perjury/extortion/kickbacks/obstruction of justice/public corruption/evidence tampering/witness tampering/securities fraud/bankruptcy fraud/bank fraud/money laundering/judicial corruption/kidnapping/manslaughter/chemical weapon trafficking/COVID vaccine related crimes against humanity.

Bribery:

838. Since 1986, Defendant FSMB has conducted ongoing schemes of bribery with for-profit corporations ("HIPIC-FC") in furtherance of their scheme to monopolize all elements of American medicine, from the business of regulation to healthcare commerce.

839. Defendant Allstate and Co-Conspirator Geico bribed, and continue to bribe Defendant FSMB to have Plaintiff Kaul eliminated from the market (2012/2014)

840. Defendants Allstate, Co-Conspirator Geico and The Kaul Cases Defendants continue to bribe Defendant FSMB-NCMB to attempt to prevent Plaintiff Kaul's re-entry into clinical practice.

840. The purpose of attempting to prevent Plaintiff Kaul's re-entry is an attempt to deny him access to capital.

841. Defendant FSMB-NCMB and all The Kaul Cases Defendants believe that if Plaintiff Kaul is denied capital, it will prevent Plaintiff Kaul from prosecuting them in the United States District Court.

842. From 2016 to 2021, Defendant FSMB-NCMB has bribed judges/senators within the United States District Court/US Government, in order to violate Kaul's prosecutorial rights and obstruct justice.

843. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from further exposing The Kaul Cases Defendants crimes against Plaintiff Kaul in the State of Texas, crimes which commenced in 2012 and are ongoing.

844. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from exposing The Kaul Cases Defendants commission/aiding/abetting bankruptcy fraud in the United States Bankruptcy Court (2013-2020).

845. A purpose of the obstruction of justice was to attempt to conceal The Kaul Cases Defendants securities fraud offenses committed in the NYSE (2016-2023), crimes that have thus not been investigated by the SEC, because Co-Conspirator Grewal was fraudulently appointed its enforcement director in June 2021, for exactly this illegal purpose.

Obstruction of justice/public corruption:

846. From 2016 to 2021, Defendant FSMB by, through and with the "FC", and in collusion/conspiracy with The Kaul Cases Defendants, did bribe judges/senators within the United States District Court/US Government.

847. The purpose of bribing judges/senators was to pervert the course of justice by violating Plaintiff Kaul's prosecutorial rights.

848. The purpose of violating Plaintiff Kaul's prosecutorial rights was to pervert the course of justice in order to attempt to prevent Plaintiff Kaul from further exposing the crimes of The Kaul Cases Defendants.

Money laundering:

849. Since 1986, Defendant FSMB has generated millions of dollars from its "pattern of racketeering" within American medicine, through the willful exploitation/expense of the American public/medical profession.

850. Defendant FSMB's criminal proceeds have been laundered through investments in corporations publicly traded on the NYSE, including Defendant Allstate and Co-Conspirator Geico and other health insurance companies including third-party carriers commercially allied with state/federal governments.

851. Defendant FSMB's proceeds are also laundered through law/political lobbying/public relation firms that funnel bribes to state/federal judges/executives/legislators, in exchange for judgments/legislation that further the political/economic agendas of Defendant FSMB/Co-

conspirator NCMB/other state medical boards and all corporations involved in commerce with the "HIPIC-FC-Association-In-Fact Enterprise".

11. COUNT ELEVEN

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

Defendant Persons: Christie/Allstate

Co-conspirators: Geico/Grewal/Murphy

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

Overview:

852. In a period from April 2, 2012, to the present, Defendants Christie/Allstate and Co-Conspirators Geico/Grewal/Murphy did conduct a "pattern of racketeering" within the association-in-fact enterprise of the State of Texas-United States Bankruptcy Court-United States District Court ("TBD Association-In-Fact Enterprise").

853. In conducting the "pattern of racketeering" within/through the "TBD Association-In-Fact Enterprise", Defendants Christie/Allstate and Co-Conspirators Geico/Grewal/Murphy did convert the State of Texas/United States Bankruptcy Court/United States District Court into a "racketeering enterprise".

854. It was through the "TBD Association-In-Fact Enterprise" that Defendants Christie/Allstate and Co-Conspirators Geico/Grewal/Murphy perpetrated the RICO predicate acts of kidnapping/mail fraud/wire fraud/bribery/obstruction of justice/public corruption/judicial corruption.

855. The purpose of Defendants Christie/Allstate and Co-Conspirators Geico/Grewal/Murphy's commission of the RICO predicate acts through a "pattern of racketeering" was to prevent Plaintiff Kaul from further exposing their crimes prior to the crimes of having Plaintiff Kaul kidnapped on May 27, 2021/illegally arrested-jailed on June 14, 2023.

856. The purpose of the prevention of exposition of crimes, other than the civil/criminal liability, was Defendant Christie's 2024 political aspirations.

857. Defendants Christie/Allstate and Co-Conspirators Geico/Grewal/Murphy's scheme to suppress Plaintiff Kaul's prosecution of **The Kaul Cases**, functioned partly in that all cases filed by Plaintiff Kaul, except K11-1/K11-3, were transferred to the District of New Jersey-Newark, where Plaintiff Kaul had no choice but to voluntarily dismiss them.

858. From the commencement of K1 on February 22, 2016, in only one case – K5 – was a Rule 16 Order entered (**Exhibit 26**). The K5 Defendants, consistent with their corruption of the court, had the case transferred from the Camden to the Newark vicinage, where the Rule 16 Order was stayed.

Christie:

Kidnapping:

859. On May 26, 2021, Defendant Christie was served at his law office in Morristown, with a summons and complaint in K11-2.

860. Shortly thereafter, Defendant Christie did, with knowing illegality, conspire with Defendant Allstate and Co-conspirators Murphy/Grewal/Geico to have Kaul kidnapped on May 27, 2021, by nine (9) armed individuals who purported to be NJ state police, as pled in K11-9.

861. No warrants were produced, and Plaintiff Kaul was forcibly detained against his will, and rapidly removed to a local police station, where he was chained to a bench (**Exhibit 14**).

861. Plaintiff Kaul was then forcibly transferred to another police station and told that he was to be transferred to the Mercer County Jail in Trenton, NJ.

862. Plaintiff Kaul's repeated requests for a warrant were ignored.

863. Defendants Christie/Allstate and Co-Conspirators Geico/Grewal/Murphy/**The Kaul Cases** Defendants commission of this RICO predicate act was committed in order to have Plaintiff Kaul jailed/injured/killed.

864. The purpose of having Plaintiff Kaul jailed/injured/killed was to cause him to become physically/psychologically unable to continue the prosecution of K11-2/other future litigation by having him eliminated.

865. The purpose of preventing Plaintiff Kaul's prosecution of K11-2 was to prevent him further exposing the crimes of **The Kaul Cases** Defendants, including those of securities fraud.

866. On May 29, 2021, it was made evident to Plaintiff Kaul that many people had knowledge of the '**Kaul Kidnapping Scheme**', as Plaintiff Kaul received a phone call from his ex-wife, with whom he had not spoken since November 2020, in which she recounted specifics details of the event that she obtained from her cousin, a physician who works at K11-2 Defendant Hackensack University Medical Center ("**HUMC**").

Mail/wire fraud:

867. In a period from May 26, 2021, to the present, Defendant Christie, with knowing illegality did use the US mail/wires to exchange information with Defendant Allstate and Co-Conspirators Geico/Grewal/Murphy/The Kaul Cases Defendants regarding the planning/execution and unexpected consequences of the 'Kaul Kidnapping Scheme.

868. When the scheme failed, the Defendants, realizing that Plaintiff Kaul would file suit, did use the US mail/wires to conspire with judges/senators in the United States District Court/US Government to violate Plaintiff Kaul's prosecutorial rights by obstructing justice through venue transfer from the Southern District of New York to the District of New Jersey,

869. Plaintiff Kaul's suit (K11-9), after having been transferred to the District New Jersey – Newark Vicinage, was dismissed, in an attempt to prevent Plaintiff Kaul from further exposing the crimes of The Kaul Cases Defendants (2008/2009 to 2021).

Bribery:

870. In a period from 2008/2009 to 2016, Defendant Christie did engage in multiple quid pro quo schemes of bribery with Defendant Allstate and Co-Conspirator Allstate, in which he abused state power to further the economic/political agendas of, amongst others, himself and these corporate Defendant/Co-Conspirators.

871. A purpose of the schemes was to have him elected the 2016 US President.

872. A purpose of the scheme was to increase share value/executive compensation of Defendant Allstate/Co-Conspirator Geico, through the knowing/willful exploitation of the American public and medical profession.

873. During his tenure as NJ Governor (2009-2017) Defendant Christie abused state power to have incarcerated many innocent physicians (principally Hispanic/Indian/African American) to whom the insurance industry owed money for their provision of life-saving clinical services.

874. These false prosecutions/convictions were perpetrated by his Attorney General, and in NJ state courts corrupted by Defendants Allstate/Co-Conspirator Geico.

Obstruction of justice/public corruption:

875. Defendant Christie, in conspiring to have Plaintiff Kaul kidnapped, did attempt to violate Plaintiff Kaul's prosecutorial rights, and obstruct justice in the United States District Court.

876. Defendant Christie's obstruction of justice was purposed to prevent Plaintiff Kaul from exposing the massive crimes of The Kaul Cases Defendants, of amongst other things, judicial/political corruption.

Murphy:

Kidnapping:

877. Co-Conspirator Murphy, prior to becoming the NJ Governor was the US Ambassador to Germany, and prior to that was a partner at Goldman-Sachs, a corporation that holds shares in Defendant Allstate/Co-Conspirator Geico, the dividends from which Co-Conspirator Murphy continues to profit.

878. Co-Conspirator Murphy, recognizing that there were no legitimate means of contesting Plaintiff Kaul's right to continue prosecuting The Kaul Cases Defendants, did conspire with Defendants Christie/Allstate and Co-Conspirators Grewal/Geico to have Plaintiff Kaul eliminated on May 27, 2021, be it by either severe injury and or death.

879. A purpose of eliminating Plaintiff Kaul was to prevent him from further exposing the crimes of The Kaul Cases Defendants, including the securities fraud violations.

880. Co-Conspirator Murphy, in perpetrating the 'Kaul Kidnapping Scheme' did recognize its illegality and violation of Plaintiff Kaul's fundamental human rights, but persisted nonetheless, because of the immense civil/criminal liability posed to The Kaul Cases Defendants.

Mail/wire fraud:

881. Co-Conspirator Murphy, in conspiring to perpetrate the 'Kaul Kidnapping Scheme' did, with knowledge of its illegality, use the US mail/wires to exchange information with Defendants Christie/Allstate and Co-Conspirators Grewal/Geico regarding the execution and then the unintended consequences of the scheme's failure including Plaintiff Kaul's filing/publicization of K11-9.

Bribery:

882. Co-Conspirator Murphy continues to receive bribes from Defendant Allstate/ Co-Conspirator Geico, under cover of dividends/shares from Goldman-Sachs, and has not, since becoming the NJ Governor, relinquished his/his family's holdings in the corporation, in accordance with NJ law pertaining to state official conflicts of interest.

Obstruction of justice/public corruption:

883. Defendant Murphy, in conspiring to have Plaintiff Kaul kidnapped, did attempt to violate Plaintiff Kaul's prosecutorial rights, and obstruct justice in the United States District Court.

884. A purpose of the obstruction of justice was to prevent Plaintiff Kaul from exposing the felonies of The Kaul Cases Defendants, of amongst other things, judicial/political corruption.

885. Co-Conspirator Murphy, in furtherance of this scheme to obstruct justice, did in a period commencing June 15, 2021, conspire with judges/senators in the United States District

Court/US Government to have K11-9 transferred from the Southern District of New York to the District of New Jersey.

886. Co-Conspirator Murphy, in furtherance of this scheme to obstruct justice, did in a period commencing June 15, 2021, conspire with judges/senators in the United States District Court/US Government to have K11-9 dismissed almost immediately after it had been transferred from the Southern District of New York to the District of New Jersey.

Grewal:

Kidnapping:

887. On May 27, 2021, Co-Conspirator Grewal did conspire with Defendants Christie/Allstate and Co-Conspirators Murphy/Geico to have Plaintiff Kaul kidnapped on May 27, 2021, with the purpose of having him incarcerated in the Mercer County jail in Trenton, over the Memorial Day Weekend, in order to have him either seriously injured and or murdered.

888. When the 'Kaul Kidnapping Scheme' commenced on May 27, 2021, at approximately 2:30 pm EST, Co-Conspirator Grewal remained in constant contact with the kidnappers, and did, at approximately 7 pm EST, learn that the scheme had publicly failed.

889. Co-Conspirator Grewal, in the planning and execution of the scheme, did know that its principal purpose was to have Plaintiff Kaul eliminated,

890. Co-Conspirator Grewal, in the planning and execution of the scheme, did know that its principal purpose of having Plaintiff Kaul eliminated was to prevent him further exposing the serious and massive crimes (2008/2009-2021) of The Kaul Cases Defendants.

Mail/wire fraud:

891. Co-Conspirator Grewal, did know that in the planning, perpetration and 'damage control' phases of the 'Kaul Kidnapping Scheme' he did, with knowing illegality use the US wires to exchange information with Defendants Christie/Allstate and Co-Conspirators Murphy/Geico.

892. Co-Conspirator Grewal knew that his illegal use of the US wires constituted the felony of wire fraud.

893. In these exchanges over the US wires, Defendant Christie/Allstate and Co-Conspirators Geico/Murphy/Grewal expressed their opinion that the scheme would be successful.

894. In these exchanges, conducted over the US wires, Defendant Christie/Allstate and Co-Conspirators Geico/Murphy/Grewal stated that the scheme's success would render Plaintiff Kaul mentally/physically unable to continue his prosecution of The Kaul Cases Defendants.

895. Also contained within these exchanges were frantic emails that evidenced their fear of public exposure when they learned that the scheme had failed, particularly as it related to the political careers of Defendant Christie and Co-Conspirators Murphy/Grewal.

Bribery:

896. Co-Conspirator Grewal made the decision to participate in the 'Kaul Kidnapping Scheme' believing it would be successful in causing Plaintiff Kaul's elimination through severe physical/psychological injury and or death.

897. However, when it failed and Plaintiff Kaul sued him on June 15, 2021 (K11-9), he panicked and was transferred to the enforcement division of the SEC, in the belief it would shield him from prosecution by Plaintiff Kaul.

898. Co-Conspirator Grewal 's transfer was part of a quid pro quo with the Defendants Christie/Allstate and Co-Conspirators Murphy/Geico.

899. In the quid pro quo scheme, a purpose of the transfer from being the NJ AG to the SEC enforcement director was to 'purchase'/ensure the silence of Defendant Grewal regarding the 'Kaul Kidnapping Scheme'.

900. In the quid pro quo scheme, a purpose of Co-Conspirator Grewal's transfer from being the NJ AG to the SEC enforcement director was to prevent exposure of the securities fraud crimes of Defendant Allstate and Co-conspirators /TD/Geico (Berkshire Hathaway).

Obstruction of justice/public corruption:

901. Co-Conspirator Grewal was appointed the NJ AG in 2017 by Co-Conspirator Murphy upon the recommendation of Defendant Christie, who had, while governor, appointed Co-conspirator Grewal a state county prosecutor. Co-conspirator Grewal worked under Defendant Christie while the latter was the US Attorney (2001-2009).

902. Co-Conspirator Grewal obediently followed orders from Defendant Christie and the insurance industry, in the filing of indictments/license revocation actions against physicians to whom the insurance industry owed monies.

903. Many of these false cases were brought on fabricated and meaningless claims regarding the prescription of pain-relieving medications.

904. Co-Conspirator Grewal conspired with Defendants Christie/Allstate and Co-Conspirators Geico/Murphy in schemes of public corruption.

905. Within these schemes of public corruption, Co-Conspirators Grewal/Murphy/Geico, and Defendants Christie/Allstate abused state/judicial power to knowingly/illegally violate the constitutional rights of principally ethnic minority (Indians/African Americans/Hispanics) physicians to whom the insurance industry owed monies.

906. A principal purpose of violating their constitutional rights was to cause them a deprivation of their fundamental right to due process/obstruction of justice in their defense against the indictments/license revocation proceedings.

907. A purpose of this judicially aided/abetted due process deprivation/obstruction justice scheme was to further the economic agenda of The Kaul Cases Defendants, through the exploitation of the American public.

908. A purpose of this judicially aided/abetted due process deprivation/obstruction justice scheme was to further the political agenda of The Kaul Cases Defendants, through the exploitation of the American medical profession.

909. Co-Conspirator Grewal, in the commission of these RICO predicate acts (kidnapping/mail fraud/wire fraud/bribery/obstruction of justice/public corruption) did violate the authority of all districts of the United States District Court.

910. Co-Conspirator Grewal, in the commission of these human rights violations did violate the rights of the United States as delegated and enshrined within the Universal Declaration Of Human Rights.

911. Co-Conspirator Grewal, in the knowingly illegal commission of these human rights violations did further injure the reputation of the United States as a signatory/beneficiary of the duties/privileges owed/derived from the Universal Declaration Of Human Rights.

912. Co-Conspirator Grewal, in the knowingly illegal commission of these RICO predicate acts/human rights violations did recognize that he, a lawyer/NJ AG, converted the State of New Jersey into a “**racketeering enterprise**” to serve the interests of corrupt corporations/politicians/judges.

913. Co-Conspirator Grewal, in the knowingly illegal commission of these RICO predicate acts/human rights violations did recognize that he, a lawyer/NJ AG, did act in a tyrannical manner.

914. Co-Conspirator Grewal, in recognizing he did act in a tyrannical manner, did also recognize his acts re-affirmed/re-in forced Defendant Christie’s conversion of the District of New Jersey (USA: 2000-2008) State of New Jersey (Governor NJ: 2009-2017) into a tyranny.

915. Co-Conspirator Grewal was a subjugate of Defendant Christie as an AUSA DNJ, before being assigned as lead prosecutor in Bergen County, New Jersey by Co-conspirator Murphy.

Allstate/Geico:

Public Corruption/Fraud on the Court/Witness Tampering/Evidence Tampering/False Indictments/False Arrests/Kidnapping/False Incarcerations.

916. From 2006 to 2016, Defendant Allstate/Co-Conspirator Geico employed a multi-pronged strategy to attempt to eliminate Plaintiff Kaul.

917. The strategy included knowingly false denials of certification for patient clinical care.

918. The strategy included knowingly false denial of payment after Plaintiff Kaul provided clinical care.

919. The strategy included knowingly false contestations of Plaintiff Kaul at every fee arbitration.

920. The strategy included the dissemination of knowing falsehoods to lawyers/doctors/surgical centers/hospitals to attempt to destroy Plaintiff Kaul's reputation,

921. The strategy included the dissemination of knowing falsehoods to lawyers/doctors/surgical centers/hospitals to attempt to make it impossible for Plaintiff Kaul to work.

922. The strategy included the filing and their publicization of knowingly fraudulent lawsuits against Plaintiff Kaul in corrupted NJ state/federal courts.

923. A purpose of the filing and publicization of knowingly fraudulent lawsuits was to re-litigate the arbitration hearings in which Plaintiff Kaul prevailed.

924. Plaintiff Kaul prevailed in almost ninety-nine percent (99%) of all arbitration hearings.

925. Defendant Allstate/Co-Conspirator Geico's strategy to attempt to eliminate Plaintiff Kaul included ordering the state medical board to revoke (illegally) Plaintiff Kaul's license.

926. Defendant Allstate/Co-Conspirator Geico's strategy to attempt to eliminate Plaintiff Kaul included having the NJ State AG initiate highly publicized criminal investigations/grand jury proceedings purposed to societally alienate/ostracize Plaintiff Kaul.

927. A purpose of the alienation/ostracization was to render Plaintiff Kaul unable to retain witnesses to defend against planned criminal indictments by the NJ State AG.

928. A purpose of the witness deprivation was to deprive Plaintiff Kaul of the ability to defend against planned criminal indictments by the NJ State AG.

929. A purpose of the alienation/ostracization was to render Plaintiff Kaul unable to procure monies to defend against planned criminal indictments by the NJ State AG.

930. A purpose of the monies deprivation was to deprive Plaintiff Kaul of the ability to defend against planned criminal indictments by the NJ State AG.

931. A purpose of the defense deprivation (monies/witnesses) was an attempt to ensure Plaintiff Kaul was convicted consequent to planned criminal indictments by the NJ State AG.

932. A purpose of any conviction consequent to planned criminal indictments by the NJ State AG was to illegally seize Plaintiff Kaul/his family's assets.

933. A purpose of any conviction consequent to planned criminal indictments by the NJ State AG was to have Plaintiff Kaul incarcerated.

934. A purpose of any incarceration consequent to planned criminal indictments by the NJ State AG was to attempt to have Plaintiff Kaul eliminated from the American healthcare market.

935. A purpose of Plaintiff Kaul's NJ State AG caused elimination from the American healthcare market was to illegally increase, through antitrust violations, the profits of competing healthcare corporations by eliminating the competitive threat posed by Plaintiff Kaul.

936. A purpose of any incarceration consequent to planned criminal indictments by the NJ State AG was to attempt to prevent Plaintiff Kaul from exposing the crimes of The Kaul Cases Defendants (2006-Present).

937. Defendant Allstate/Co-Conspirator Geico's strategy to attempt to eliminate Plaintiff Kaul included have the US Attorney/FBI initiate criminal investigations purposed to societally alienate/ostracize Plaintiff Kaul.

938. A purpose of the alienation/ostracization was to render Plaintiff Kaul unable to retain witnesses to defend against planned criminal indictments by the US Attorney/FBI .

939. A purpose of the witness deprivation was to deprive Plaintiff Kaul of the ability to defend against planned criminal indictments by the US Attorney/FBI.

940. A purpose of the alienation/ostracization was to render Plaintiff Kaul unable to procure monies to defend against planned criminal indictments by the US Attorney/FBI.

941. A purpose of the monies deprivation was to deprive Plaintiff Kaul of the ability to defend against planned criminal indictments by the NJ State AG.

942. A purpose of the defense deprivation (monies/witnesses) was an attempt to ensure Plaintiff Kaul was convicted consequent to planned criminal indictments by the US Attorney/FBI.

943. A purpose of any conviction consequent to planned criminal indictments by the US Attorney/FBI was to illegally seize Plaintiff Kaul/his family's assets.

944. A purpose of any conviction consequent to planned criminal indictments by the US Attorney/FBI was to have Plaintiff Kaul incarcerated.

945. A purpose of any incarceration consequent to planned criminal indictments by the US Attorney/FBI was to attempt to have Plaintiff Kaul eliminated from the American healthcare market.

946. A purpose of Plaintiff Kaul's US Attorney/FBI's caused elimination from the American healthcare market was to illegally increase, through antitrust violations, the profits of competing healthcare corporations by eliminating the competitive threat posed by Plaintiff Kaul.

947. A purpose of any incarceration consequent to planned criminal indictments by the US Attorney/FBI was to attempt to prevent Plaintiff Kaul from exposing the crimes of The Kaul Cases Defendants (2006-Present).

948. The strategy included having Plaintiff Kaul indicted on false tax charges.

949. The strategy included conspiring with Plaintiff Kaul's ex-wife to have him jailed on unpaid child support charges.

950. The strategy included preventing Plaintiff Kaul access to banking services.

951. The strategy included bribing judges/senators in federal court/government to obstruct/dismiss all cases filed by Plaintiff Kaul in the United States District Court.

952. The strategy included scheming to have and actually having Plaintiff Kaul kidnapped on May 27, 2021, after Defendant Christie had been served with the summons/complaint in K11-2 on May 26, 2021.

Mail/wire fraud:

953. Defendant Allstate/Co-Conspirator Geico, in the planning/execution/'damage control' phases of the 'Kaul Kidnapping Scheme', did, with knowledge of its illegality, use the US mail/wires to exchange information with Defendant Christie and Co-Conspirators Murphy/Grewal.

Bribery:

954. Defendant Allstate/Co-Conspirator Geico did funnel bribes to Defendants Christie/Murphy/Grewal as part of a quid pro quo scheme.

955. The quid pro quo scheme involved Defendant Christie and Co-Conspirators Murphy/Grewal corruptly 'selling' public (state) power, without the public's permission, to Defendant Allstate/Co-Conspirator Geico.

956. The scheme's purpose was to attempt to ensure the elimination of Plaintiff Kaul (jailed/deported/killed) to prevent him from further exposing their crimes.

Obstruction of justice/public corruption:

957. In having Plaintiff Kaul kidnapped on May 27, 2021/illegally arrested-jailed on June 14, 2023, The Kaul Cases Defendants did violate with physical violence his prosecutorial rights in the United States District Court, in the belief that he would either be unwilling or unable (psychologically/physically) to continue the prosecution of his claims.

958. In violating Plaintiff Kaul's prosecutorial rights, Defendants Christie/Allstate, and Co-Conspirators Murphy/Grewal/Geico did in the process, attempt to cause a knowingly illegal obstruction of justice within the United States District Court.

959. Defendants Christie/Allstate and Co-Conspirators Murphy/Grewal/Geico, in coopting a state police agency into the commission of the crimes of kidnapping/mail fraud/wire fraud did obstruct justice in the United States District Court.

960. In the commission of the obstruction of justice Defendants Christie/Allstate and Co-Conspirators Murphy/Grewal/Geico converted the apparatus of American State/United States District Court into a "racketeering enterprise".

961. Through the "NCBD Association-In-Fact Racketeering Enterprise" Defendants Christie/Allstate and Co-Conspirators Murphy/Grewal/Geico, being aided/abetted by state police, did conduct a "pattern of racketeering" through the commission of RICO predicate acts of obstruction of justice/public corruption/bribery/wire fraud/public corruption/fraud on the court/witness tampering/evidence tampering/false indictments/false arrests/kidnapping/false incarcerations.

962. The principal purpose of the "pattern of racketeering" was to attempt to eliminate Plaintiff Kaul to prevent him from further exposing the crimes of The Kaul Cases Defendants (2006-2023).

12. COUNT TWELVE

Association-In-Fact Enterprise: State of New York-State of Texas-NYSE (“SSN Association-In-Fact Enterprise)

Defendant Persons: Allstate/FSMB

Co-conspirators: Geico/Hengerer/NCMB

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

Overview:

963. In a period that commenced in late 2020, the Defendant FSMB/Allstate and Co-Conspirators Geico/Hengerer/NCMB did conspire to conduct, and did conduct a knowingly illegal **“pattern of racketeering”**

964. Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer/NCMB conducted the **“pattern of racketeering”** through the **“SSN Association-In-Fact Enterprise”**.

965. The **“pattern of racketeering”** involved the commission of the RICO predicate acts of bribery/ mail fraud/wire fraud/obstruction of justice/conspiracy.

966. A purpose of the **“pattern of racketeering”** was to illegally prevent Plaintiff Kaul from obtaining a physician license in the State of New York.

967. The license prevention scheme was an attempt to suppress Plaintiff Kaul’s economic resurgence, in the belief that such a scheme would hinder Plaintiff Kaul’s exposure of **The Kaul Cases** Defendants’ crimes (2006-2023).

968. **The Kaul Cases** Defendants crimes include, amongst others, bribery/public corruption/evidence tampering/witness tampering/bankruptcy fraud/bank fraud/mail fraud/wire fraud/judicial corruption/perjury/kickbacks/securities fraud (2006-2023 committed within judicial/political/legislative bodies of the American state/federal systems).

969. In the commission of obstructing Plaintiff Kaul’s efforts to obtain a license in the State of New York (October 2020 to July 2021), Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer did conspire to and did commit a multitude of frauds across the US wires to attempt to deceive, delay and deny Plaintiff Kaul’s application, an **“ongoing”** injury consequent to an **“ongoing pattern of racketeering”**, one purpose of which is to attempt to prevent Plaintiff Kaul exposing **The Kaul Cases** Defendants crimes.

970. Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer with others did use the US wires to propagate knowingly false information that the denial of Plaintiff Kaul’s application by a supposed medical board subcommittee was based on a question of so called **“moral suitability”**.

971. Plaintiff Kaul's multiple requests for the production of any state policy regarding the process of character assessment were ignored.

972. In furtherance of Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer effort to conceal the fraudulence of their "**moral suitability**" scheme, they conspired with an individual by the name of "**Vincent Vollaro**".

973. The conspiracy was purposed to attempt, on June 17, 2021, to engage Plaintiff Kaul in a non-recorded phone call, in which "**Vincent Vollaro**" a non-lawyer/non-physician/non-ethicist would "**explain the process**" [**"moral suitability"**] to Plaintiff Kaul.

974. The call did not occur, but its purpose was to fabricate evidence to bolster Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer falsehood regarding a supposed subcommittee's purported "**moral suitability**" as the basis for the denial of Plaintiff Kaul's NY February 2021 license application.

975. Plaintiff Kaul has established as a matter of fact that no board subcommittee ever convened to consider Plaintiff Kaul's application.

976. Plaintiff Kaul has established as a matter of fact that there exists no opinion, reasoned or not, that finds a "**question of moral suitability**" as the basis for denial of licensure.

977. On July 14, 2021, consequent to Plaintiff Kaul having sent letters to every member of the NY State Government regarding the state's liability for the crimes of The Kaul Cases Defendants, Defendants FSMB/Allstate, and Co-Conspirators Geico/Hengerer did conspire with "**Vollaro**" to use the US wires to transmit a knowingly fraudulent document.

978. In the knowingly fraudulent document "**Vollaro**" asserts that a "**subcommittee**" of the state medical board denied Plaintiff Kaul's application based on a purported "**question of moral suitability**".

979. Plaintiff Kaul's subsequent requests for a copy of the transcript and signed purported opinion of the supposed subcommittee were ignored and then denied.

980. On August 27, 2021, Plaintiff Kaul filed a petition (Kaul v Zucker/Hengerer: 101019-2021) in the New York Supreme Court (Borough of New York), that sought to compel Defendant Hengerer to produce the purported "**subcommittee**" opinion.

981. To date no physician/member of the New York State Medical Board has confirmed participating in any evaluation of Plaintiff Kaul's application.

Co-conspirator Hengerer:

982. Co-Conspirator Hengerer is a board director of Defendant FSMB with whom he engages in commerce related to the business of so called “**physician discipline**”.

983. Co-Conspirator Hengerer is the Chairman of the New York State Board Committee for Professional Medical Conduct.

984. Co-Conspirator Hengerer has a controlling position in deciding which physicians licenses are suspended and or revoked.

985. Co-Conspirator Hengerer abuses the power of his position to have prohibited the issuance of licenses to physicians whom for-profit healthcare corporations (insurance/hospital/pharmaceutical) have targeted for elimination.

986. Co-Conspirator Hengerer abuses the power of his position to have suspended/revoked the licenses of physicians whom for-profit healthcare corporations (insurance/hospital/pharmaceutical) have targeted for elimination.

987. Co-Conspirator Hengerer is cognizant of the illegality of his participation in the “**HIPIC-FC**” (“**Hospital-Insurance-Pharmaceutical Industrial Complex – Federation Cartel**”) scheme.

988. Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer compete with Plaintiff Kaul in the American healthcare market.

989. Despite Co-Conspirator Hengerer’s cognizance of the illegality he persisted in his unlawful use of the US mail/wires to propagate the license prohibition scheme to prevent Plaintiff Kaul from participating in the relevant market.

990. Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer’s license prohibition scheme constitutes a willful/ongoing antitrust injury to Plaintiff Kaul and the healthcare market.

991. Defendants FSMB/Allstate and Co-Conspirators Geico/Hengerer’s license prohibition scheme constitutes an offense that Defendant Hengerer recognizes is violative of Plaintiff Kaul’s constitutional/human rights to life/liberty/property.

992. Co-Conspirator Hengerer, despite knowing the penalties associated with his violations of antitrust law and of Plaintiff Kaul’s constitutional/human rights, was motivated to commit the crimes.

993. Co-Conspirator Hengerer’s motivation pertained to the economic benefit that inured to him.

994. The economic benefit derived partly from his commercial association with the American Hospital Association, to which Plaintiff Kaul's revolutionary outpatient spine surgical work presented a substantial business threat.

995. Co-Conspirator Hengerer was paid to be a surgical chairman at Strong Memorial Hospital in Rochester, NY for many decades.

996. The economic benefit derived partly from his commercial association with Defendant FSMB which received bribes from for-profit healthcare corporations, whose commercial agendas were threatened by Plaintiff Kaul's revolutionary outpatient spine surgical work.

997. In a period commencing on May 13, 2021, Co-Conspirator Hengerer, despite being noticed on multiple occasions by Plaintiff Kaul that he was participating in a **"pattern of racketeering"** did continue with his knowingly unlawful conduct.

Defendants FSMB/Allstate and Co-conspirators Geico/NCMB:

998. The introduction of the HCQIA in 1986 foreshadowed and created the conditions that spawned the **"HIPIC-FC"**.

999. Through the **"HIPIC-FC"** scheme Defendants Allstate/FSMB and Co-Conspirators Geico/NCMB have converted the American healthcare market into a massive **"racketeering enterprise"** purposed purely for profit at the expense and through the exploitation of the American public/medical profession.

1000. The singular goal of for-profit healthcare corporations is the maximization of executive compensation/share price at the cost of human life.

1001. A February 22, 2018, article in ProPublica exposed Strong Memorial Hospital in Rochester, NY, as a corporation that reaps vast/excessive/disproportionate profits from conducting business in the healthcare market.

1002. For many decades, Co-Conspirator Hengerer was Chairman of the Surgical Department at Strong Memorial Hospital, a member of the American Hospital Association.

1003. Defendants FSMB/Allstate and Co-Conspirator Geico have conspired with/continue to conspire with Co-Conspirator TMB in using the Texas physician licensing apparatus to conduct a **"pattern of racketeering"**.

1004. Defendants FSMB/Allstate and Co-Conspirators Geico/TMB's **"pattern of racketeering"** involved the commission against Plaintiff Kaul of the RICO predicate acts of wire fraud/conspiracy/bribery/obstruction of justice.

1005. Defendants FSMB/Allstate and Co-Conspirators Allstate/NCMB recognize that in committing these RICO predicate acts through the physician regulatory apparatus; they did knowingly convert the State of Texas into a **“racketeering enterprise”**.

1006. A purpose of the commission of the RICO predicate acts was to prevent Plaintiff Kaul from procuring a Texas license.

1007. A purpose of the license prevention scheme was to suppress Plaintiff Kaul’s economic resurgence.

1008. A purpose of the suppression of Plaintiff Kaul’s economic resurgence was to suppress his ability to prosecute **The Kaul Cases**.

1009. A purpose of the suppression of Plaintiff Kaul’s prosecution of **The Kaul Cases** was to suppress any further exposure to the global equities market/international regulators of the securities fraud crimes of Co-Conspirators Geico/TD and Defendant Allstate.

1010. Co-conspirator Geico/TD and Defendants Allstate/FSMB and their counsel do know that on September 7, 2021, a release was published to the world-wide-web entitled: **“United States Securities And Exchange Commission Alerted To Securities Fraud Crimes Of Three Titans Of North American Finance”**.

1011. The release was disseminated to the CEOs/CFOs of the S/P 500.

1012. On September 7, 2021, Defendant Allstate’s share price was 138, and on September 1, 2023, it was 111.

1013. Subsequent to the release, Co-conspirators Geico/TD and Defendant Allstate did use the US wires to transmit knowingly false information to their shareholders/global investment community.

1014. The knowingly false information consisted of willful misrepresentations/omissions in SEC filings regarding litigation in India and the US.

1015. In using the US wires to transmit knowingly false information to their shareholders/global investment community, Co-conspirators Geico/TD and Defendant Allstate did knowingly violate section 10(b) of the Securities/Exchange Act.

1016. Defendants FSMB/Allstate and Co-conspirators Geico/NCMB ongoing crimes constitute an **“ongoing open-ended pattern of racketeering”** being willfully conducted through **“SSN Association-In-Fact Enterprise”**.

1017. Defendants FSMB/Allstate and Co-Conspirator Geico/NCMB's knowingly "ongoing open-ended pattern of racketeering" continues to violate Plaintiff Kaul's constitutional/human rights.

1018. The knowing/willful violation continues to cause Plaintiff Kaul to be illegally deprived (2012-Present) of his right to a livelihood.

1019. The knowing/willful violation continues to cause Plaintiff Kaul to be illegally deprived (2012-Present) of his right/duty to support his children.

1020. The knowing/willful violation continues to cause Plaintiff Kaul to be illegally deprived (2012-Present) of his right to freedom.

1021. On May 27, 2021/June 14, 2023, **The Kaul Cases** Defendants, with knowledge of their immense civil/criminal liabilities in multiple international jurisdictions, did attempt to have Plaintiff Kaul seriously injured/killed and did have Plaintiff Kaul falsely arrested/jailed.

1022. Pursuant to RICO's doctrine of vicarious liability, all of **The Kaul Cases** Defendants have incurred, and will continue to incur liability of the aforementioned crimes, and any further ones that any of the Defendants might commit.

13. COUNT THIRTEEN

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

1023. The 'state actor' Symbiotic test confirms that all Defendants and Co-Conspirators have 'state actor' status for the purpose of a section 1983 claim.

1024. The 'state actor' Joint Participation Doctrine test confirms that all Defendants and Co-Conspirators have 'state actor' status for the purpose of a section 1983 claim.

1025. The 'state actor' State Command and Encouragement test confirms that all Defendants and Co-Conspirators have 'state actor' status for the purpose of a section 1983 claim.

1026. The 'state actor' Pervasive Entwinement test confirms that all Defendants and Co-Conspirators have 'state actor' status for the purpose of a section 1983 claim.

1027. The 'state actor' Public Function test confirms that all Defendants and Co-Conspirators have 'state actor' status for the purpose of a section 1983 claim.

1028. All of the above pled facts do confirm the intertwinement, for the purposes of section 1983 claims, of the 'state actor' status of the private actors/defendants/co-conspirators.

1029. All of the above 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 the private actors/defendants/co-conspirators against Plaintiff Kaul.

1030. The above facts include the exchange between private and state actors of monies pertaining to “**patterns of racketeering**” conducted through American states.

1031. The above facts include the exchange between private and state actors of monies pertaining to “**patterns of racketeering**” conducted through the United States District Court.

1032. The above facts include the exchange between private and state actors of monies pertaining to “**patterns of racketeering**” conducted through the United States Bankruptcy Court.

1033. The above facts include the exchange between private and state actors of information pertaining to “**patterns of racketeering**” conducted through American states.

1034. The above facts include the exchange between private and state actors of information pertaining to “**patterns of racketeering**” conducted through the United States District Court.

1035. The above facts include the exchange between private and state actors of information pertaining to “**patterns of racketeering**” conducted through the United States Bankruptcy Court.

1036. 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.

1037. 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.

14. COUNT FOURTEEN

Section 1983 claim

1038. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1039. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1040. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1041. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1042. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1043. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1044. In a period from 2008/2009 to the present, The Kaul Cases Defendants, 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.

1045. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of his livelihood.

1046. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his business real estate.

1047. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his personal real estate.

1048. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his life earnings.

1049. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his pensions.

1050. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his financial investments.

1051. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his professional licenses.

1052. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his accounts receivable.

1053. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to due process.

1054. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to free speech.

1055. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to impartial tribunals/judges/courts.

1056. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to prosecute his claims.

1057. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to equal protection under the law.

1058. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to liberty.

1059. These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of the property of eleven (11) years of his life.

1060. 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.

1061. These deprivations/violations/injuries were willfully/maliciously perpetrated by private actors within/through/with the assistance of the United States Bankruptcy Court.

1062. These deprivations/violations/injuries were willfully/maliciously perpetrated by private actors within/through/with the assistance of the United States District Court.

1063. These deprivations/violations/injuries were willfully/maliciously perpetrated by private actors within/through/with the assistance of the New York Stock Exchange.

1064. 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.

1065. These deprivations/violations/injuries were willfully/maliciously perpetrated by state actors within/through/with the assistance of the United States Bankruptcy Court.

1066. These deprivations/violations/injuries were willfully/maliciously perpetrated by state actors within/through/with the assistance of the United States District Court.

1067. These deprivations/violations/injuries were willfully/maliciously perpetrated by state actors within/through/with the assistance of the New York Stock Exchange.

1068. The commercial/communications nexus between state and private actors within The Kaul Cases, critical to the perpetration of the within pled schemes confers 'state actor' liability on all private actors as to the deprivations/violations/injuries caused to Plaintiff Kaul's human/constitutional rights.

1069. The commercial/communications nexus between state and private actors within The Kaul Cases, critical to the perpetration of the within pled schemes confers 'state actor' liability on all private actors as to the deprivations/violations/injuries caused to all Plaintiff Kaul's property rights, as stated above.

1070. The Kaul Cases Defendants were and are motivated to commit and continue to commit these deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1071. The motivation is based on The Kaul Cases Defendants scheme to prevent Plaintiff Kaul from exposing their crimes, including those of defrauding the global equities market.

15. COUNT FIFTEEN

UN Human Rights Violation

The United Nations Universal Declaration of Human Rights

1072. The Kaul Cases Defendants and Co-Conspirators 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.”

1073. The Article 1 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul’s human/constitutional/property rights.

1074. The Kaul Cases Defendants and Co-Conspirators 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.”

1075. The Article 2 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul’s human/constitutional/property rights.

1076. The Kaul Cases Defendants and Co-Conspirators 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.”

1077. The Article 3 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul’s human/constitutional/property rights.

1078. The Kaul Cases Defendants and Co-Conspirators 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.”

1079. The Article 4 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul’s human/constitutional/property rights.

1080. The Kaul Cases Defendants and Co-Conspirators 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.”

1081. The Article 5 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul’s human/constitutional/property rights.

1082. The Kaul Cases Defendants and Co-Conspirators 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.”

1083. The Article 6 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1084. The Kaul Cases Defendants and Co-Conspirators 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."**

1085. The Article 7 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1086. The Kaul Cases Defendants and Co-Conspirators 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."**

1087. The Article 8 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1088. The Kaul Cases Defendants and Co-Conspirators 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."**

1089. The Article 9 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1090. The Kaul Cases Defendants and Co-Conspirators 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."**

1091. The Article 10 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1092. The Kaul Cases Defendants and Co-Conspirators 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."**

1093. The Article 12 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1094. The Kaul Cases Defendants and Co-Conspirators 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."**

1095. The Article 17 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1096. The Kaul Cases Defendants and Co-Conspirators 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."**

1097. The Article 19 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1098. The Kaul Cases Defendants and Co-Conspirators 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."**

1099. The Article 23 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1100. The Kaul Cases Defendants and Co-Conspirators 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."**

1101. The Article 23 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1102. The Kaul Cases Defendants and Co-Conspirators 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."**

1103. The Article 28 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

1104. The Kaul Cases Defendants and Co-Conspirators 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."

1105. The Article 30 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights.

16. 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 33).

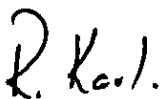
2. A PUBLIC APOLOGY FROM DEFENDANTS CHRISTIE/HEARY/STOLZ to be published on the platforms identified in the K1 February 22, 2016 'Settlement Terms' (K1: D.E. 1)..

3. IMMEDIATE REINSTATEMENT OF PLAINTIFF KAUL'S UNRESTRICTED NEW JERSEY LICENSE

4. ANY OTHER RELIEF THE COURT DEEMS APPROPRIATE AND NECESSARY FOP THE PURPOSE OF DETERRENCE.

17. 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.



RICHARD ARJUN KAUL, MD

DATED: AUGUST 22, 2024

www.drrichardkaul.com

AUGUST 22, 2024

CLERK OF THE COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION
515 RUSK AVENUE
HOUSTON, TX 77002

**RE: KAUL v. FEDERATION STATE MEDICAL BOARDS ET AL
K11-20
COMPLAINT**

Dear Sir/Madam,

Please find submitted the following documents:

1. COMPLAINT WITH EXHIBITS.
2. CIVIL COVER SHEET.
3. SUMMONS (2 COPIES) FOR ALL DEFENDANTS.
4. MONEY ORDER FOR FOUR-HUNDRED AND five DOLLARS (\$405.00) PAYABLE TO THE 'UNITED STATES DISTRICT COURT'.

Thank you in advance for your assistance.

Yours sincerely



RICHARD ARJUN KAUL, MD

Exhibit 1

FACTS

The undisputed/admitted facts material to the Summary Judgment proof of all elements of all claims are:

1. In a time period commencing in or around 2005/6, Defendants did perpetrate massive nationwide schemes of racketeering against Plaintiff Kaul that are ongoing.
2. In a time period commencing in or around 2005/6, Defendants did perpetrate anti-trust infractions against Plaintiff Kaul that are ongoing.
3. In a time period commencing in or around 2005/6, Defendants did perpetrate civil rights violations against Plaintiff Kaul that are ongoing.
4. In a time period commencing in at least 2000, the Defendants did submit knowingly false data to the New Jersey Department of Banking and Insurance in support of their annual applications to increase the public's cost of health insurance premiums.
5. The New Jersey Department of Banking and Insurance was either willfully blind/failed to conduct proper due diligence in its verification of the accuracy and truthfulness of the Defendants fraudulent data.
6. Defendant BCBS did, in a time period that commenced in at least 2000, enter into conspiracies with certain governmental agencies/persons under the subsequent cover of the so called 'Healthcare Fraud Prevention Partnership' (HFPP) (2012) that targeted principally ethnic minority physicians for elimination (license revocation/indictment/conviction/incarceration) and asset seizure.

7. Defendant BCBS fraudulently refused to pay Plaintiff Kaul for clinical services he rendered to their fee-paying clients.

8. Defendant BCBS's illegal non-payment was purposed to increase compensation to their corporate executives and bribes to corrupted politicians/judges on their 'payroll', through the exploitation/theft of services from Plaintiff Kaul and other physicians.

9. Consequent to Defendant BCBS's non-payment Plaintiff Kaul filed suit against them on two (2) occasions between 2004 to 2012.

10. In retaliation for the lawsuits, Defendant BCBS in collusion/conspiracy with The Kaul Cases Defendants coopted, within the State of New Jersey, both state/federal investigative/prosecutorial/judicial agencies to have Plaintiff Kaul's physician license revoked

11. In retaliation for the lawsuits, Defendant BCBS in collusion/conspiracy with The Kaul Cases Defendants coopted, within the State of New Jersey, both state/federal investigative/prosecutorial/judicial agencies to have to attempt to have Plaintiff Kaul indicted.

12. In retaliation for the lawsuits, Defendant BCBS in collusion/conspiracy with The Kaul Cases Defendants coopted, within the State of New Jersey, both state/federal investigative/prosecutorial/judicial agencies to have to attempt to have Plaintiff Kaul convicted.

13. In retaliation for the lawsuits, Defendant BCBS in collusion/conspiracy with The Kaul Cases Defendants coopted, within the State of New Jersey, both state/federal investigative/prosecutorial/judicial agencies to have to attempt to have Plaintiff Kaul incarcerated.

14. In May 2016 Defendant BCBS aided/abetted a similar retaliation scheme in retaliation for Plaintiff Kaul having filed K1.

16. In a period from approximately 2012 to 2016, Defendants BCBS/Marino, after having aided/abetted the 2014 illegal revocation of Plaintiff Kaul's New Jersey license, did, in collusion/conspiracy with both state/federal investigative/prosecutorial/judicial agencies and The Kaul Cases Defendants cause him to be continually subjected to state/federal criminal investigations,

17. None of these investigations produced any evidence of wrongdoing,

18. The lack of evidence constitutes further proof of the fraudulence of the entire case that caused the illegal revocation of Plaintiff Kaul's license.

19. In a period from February 22, 2016, to January 27, 2023, Plaintiff Kaul filed suit in the United States District Court, against the individuals/corporations that had conspired to commit and did commit a "pattern of racketeering" against Plaintiff Kaul.

20. On June 17, 2013, consequent to the suspension of Plaintiff Kaul's license, Plaintiff Kaul's corporations became obligated to file for Chapter 11 bankruptcy.

21. Defendant BCBS was identified as a debtor in the Chapter 11 bankruptcy.

22. In a period from 2012 to approximately 2016, Defendant BCBS conspired with The Kaul Cases Defendants to cause the publication of highly defamatory press coverage.

23. The purpose of the knowingly false and highly defamatory press coverage was to economically/professionally/socially/reputationally alienate Plaintiff Kaul.

24. Defendant BCBS's purpose of alienation was to attempt to eliminate the risk of Plaintiff Kaul's continued existence.

25. Defendant BCBS's purpose in attempting to eliminate Plaintiff Kaul was to attempt to ensure he would be unable to fight the revocation.

26. Defendant BCBS's purpose in attempting to eliminate Plaintiff Kaul was to attempt to ensure he would be unable to file charges against The Kaul Cases Defendants, including Defendants BCBS/Marino.

27. During the bankruptcy proceedings, the trustee and his lawyer, the latter, Daniel Stolz, Esq, a Defendant in The Kaul Cases, conspired with Defendant BCBS/other insurance carriers to not file claims to collect the monies owed to Plaintiff Kaul's estate by Defendant BCBS/other insurance carriers.

28. The Kaul Cases Defendant, Daniel Stolz, did enter into a quid pro quo with Defendant BCBS, in which in return for the bankruptcy related fraud of non-collection of Plaintiff Kaul's fees, he received bribes, disguised as 'legal fees'.

29. In 2018, Dr. Lesly Pompy, a Michigan based interventional pain physician of Haitian origin, was indicted by the US Government on charges of healthcare fraud.

30. Defendant BCBS's BCBS Association's partner, BCBS of Michigan, caused the filing of the indictment, in order to eliminate its debt to Dr. Pompy/eliminate him from the healthcare market.

31. During the trial evidence emerged of the fraudulent schemes perpetrated by the Blue Cross Blue Shield Association corporate members in their efforts to entrap knowingly innocent physicians, mostly of whom belonged to ethnic minorities.

32. During the testimony of a James Howell, an ex-police officer employed by Blue Cross Blue Shield to manufacture entrapment schemes, Howell testified that in furtherance of these

schemes he was provided fraudulent medical documents by agencies/persons of the State of Michigan and physicians employed by Blue Cross Blue Shield.

33. During the testimony of a James Howell, an ex-police officer employed by Blue Cross Blue Shield to manufacture entrapment schemes, Howell testified that in furtherance of these schemes he was provided fraudulent driving licenses by agencies/persons of the State of Michigan and physicians employed by Blue Cross Blue Shield.

34. During the testimony of a James Howell, an ex-police officer employed by Blue Cross Blue Shield to manufacture entrapment schemes, Howell testified that in furtherance of these schemes he was provided other official documents by agencies/persons of the State of Michigan and physicians employed by Blue Cross Blue Shield.

35. Howell's prior testimony in various other prior court proceedings had resulted in the wrongful conviction and incarceration of other ethnic minority physicians, many of whom continue to languish in jail.

36. Evidence from the trial of Dr. Pompy/others substantiates the perpetration of long-standing "patterns of racketeering" by the Blue Cross Blue Shield Association members, of which Defendant Horizon BCBS is one.

37. The evidence from the trial of Dr. Pompy/others corroborates the claims that Plaintiff Kaul has asserted within The Kaul Cases, since 2016.

38. In a period commencing approximately 2003/2004, Defendant BCBS commenced conspiring to commit and did commit a fraudulent scheme that targeted Plaintiff Kaul, an Indian physician.

39. The scheme involved misrepresentations by Defendant BCBS that caused Plaintiff Kaul to provide clinical care to their fee-paying clients, with the pre-certification promise of remuneration.

40. Defendant BCBS defrauded Plaintiff Kaul of his services by refusing to pay his invoices for pre-certified care he had provided in good faith.

41. In the perpetration of this scheme, Defendant BCBS, conducted a “pattern of racketeering” through the willful and knowingly illegal commission of the RICO predicate acts of wire fraud/mail fraud/theft.

42. In the perpetration of this scheme, Defendant BCBS’s corporate officers, including Defendant Marino, converted the State of New Jersey and the BCBSA corporation into the “State of New Jersey-BCBS Association-In-Fact Enterprise” (“NJ-BCBS AIF Enterprise”)

43. Through the NJ-BCBS AIF Enterprise Defendants Marino/BCBS funneled bribes to multiple New Jersey based politicians, including The Kaul Cases Defendant, Christie,

44. The Kaul Cases Defendant Christie did, In exchange for these bribes, abuse his executive power to order the state medical board to cause a knowingly illegal revocation of Plaintiff Kaul’s license.

45. The revocation was purposed to eliminate Defendant BCBS’s debt to Plaintiff Kaul.

46. The revocation was purposed to eliminate the legal liability posed by the lawsuit filed by Plaintiff Kaul in February 2012.

47. The Kaul Cases Defendant Christie did, In exchange for these bribes, abuse his executive power to order the state medical board to cause a knowingly illegal commencement of criminal investigations.

48. The criminal investigations sought to incarcerate Plaintiff Kaul, in order to prevent him from exposing the crimes of The Kaul Cases Defendants, including Defendants Horizon/Marino.

49. In the perpetration of the fraudulent scheme, Defendants Horizon/Marino did knowingly conduct a “pattern of racketeering” (18 U.S.C. §§ 1961(1), 1961(5) and 1962(c)).

50. In the perpetration of the fraudulent scheme, Defendants Horizon/Marino did knowingly commit mail fraud (§ 1341).

51. In the perpetration of the fraudulent scheme, Defendants Horizon/Marino did knowingly commit wire fraud (§ 1343).

52. Defendants Horizon/Marino knowingly committed multiple state felonies in their commission of RICO predicate acts.

53. Defendants Horizon/Marino knowingly conspired to commit multiple state felonies in their commission of RICO predicate acts within the last ten (10) years.

54. Defendants Horizon/Marino knowingly aided/abetted the commission of multiple state felonies (RICO predicate acts) in their commission of RICO predicate acts within the last ten (10) years.

55. Defendants Horizon/Marino’s knowingly illegal commission of these multiple state felonies (RICO predicate acts) did constitute a “pattern of racketeering”.

56. Defendants Horizon/Marino, in their knowingly illegal commission of state felonies (RICO predicate acts) did know the legal interpretation of the term “pattern of racketeering”.

57. Defendants Horizon/Marino did aide/abet in the commission of the “pattern of racketeering”.

58. Defendants Horizon/Marino, in their commission of the “pattern of racketeering” did know that the state felonies (RICO predicate acts) posed a threat of continued racketeering activity.

59. Defendants Horizon/Marino, in their knowingly illegal commission of state felonies (RICO predicate acts) did know the legal interpretation of the term ‘racketeering activity’.

60. Defendants Horizon/Marino facilitated the ‘racketeering activity’ through the use of state-corporate facilities.

61. Defendants Horizon/Marino facilitated the ‘racketeering activity’ through the use of state-corporate services.

62. Defendants Horizon/Marino facilitated the ‘racketeering activity’ through the use of state-corporate distribution channels.

63. Defendants Horizon/Marino facilitated the ‘racketeering activity’ through the use of state-corporate employees associated with the “NJ-BCBS AIF Enterprise”

64. Defendants Horizon/Marino participated in the fraudulent scheme by ‘hijacking’ the interstate/foreign commerce functions of the US mail.

65. Defendants Horizon/Marino participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US telephonic system.

66. Defendants Horizon/Marino participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US wires/internet.

67. The Defendants used thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform misrepresentations.

68. The Defendants used thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform concealments.

69. The Defendants used thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform material omissions.

70. Defendants BCBS/Marino directed the use of thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform misrepresentations.

71. Defendants BCBS/Marino directed the use of thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform concealments.

72. Defendants BCBS/Marino directed the use of thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform omissions.

73. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights

of his reputation by communicating to the public that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

74. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to the public that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

75. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to the public that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

76. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to Plaintiff Kaul's patients that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

77. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to Plaintiff Kaul's patients that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

78. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to Plaintiff Kaul's patients that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

79. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights

of his reputation by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

80. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

81. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his reputation by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

82. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to the public that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

83. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to the public that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

84. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to the public that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

85. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to Plaintiff Kaul's patients that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

86. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to Plaintiff Kaul's patients that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

87. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to Plaintiff Kaul's patients that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

88. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

89. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his medical license by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

90. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights

of his medical license by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

91. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to the public that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

92. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to the public that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

93. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to the public that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

94. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to Plaintiff Kaul's patients that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

95. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to Plaintiff Kaul's patients that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

96. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to Plaintiff Kaul's patients that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

97. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff was not qualified to perform minimally invasive spine surgery (a materially false representation).

98. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff had committed insurance fraud (a knowing falsity) and would be indicted.

99. In perpetrating the fraudulent scheme, Defendants BCBC/Marino devised and knowingly carried out a scheme purposed to defraud Plaintiff Kaul of the property rights of his healthcare business by communicating to Plaintiff Kaul's professional colleagues that the Plaintiff had committed bank fraud (a knowing falsity) and would be indicted.

100. Defendants BCBS/Marino did, in the relevant period, with knowing illegality conspire to use the US mail to transmit knowingly fraudulent information to Plaintiff Kaul that he would be remunerated for the pre-certified provision of care to patients with health insurance provided by Defendant BCBS.

101. Defendants BCBS/Marino did, in the relevant period, and with knowing illegality use the US mail to transmit knowingly fraudulent information to Plaintiff Kaul that he would be

renumerated for the pre-certified provision of care to patients with health insurance provided by Defendant BCBS.

102. In rendering these representations, Defendants BCBS/Marino knew the statements were materially false, consistent with their schemes of theft of service and contractual derogation.

103. In rendering these representations, Defendants BCBS/Marino knew they had no intention of paying Plaintiff Kaul, consistent with their schemes of theft of service and contractual derogation.

104. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the executive arm of state government that Plaintiff Kaul had committed health insurance fraud.

105. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the executive arm of federal government that Plaintiff Kaul had committed health insurance fraud.

106. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the investigative arm of state government that Plaintiff Kaul had committed health insurance fraud.

107. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the investigative arm of federal government that Plaintiff Kaul had committed health insurance fraud.

108. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the prosecutorial arm of state government that Plaintiff Kaul had committed health insurance fraud.

109. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the prosecutorial arm of federal government that Plaintiff Kaul had committed health insurance fraud.

110. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the adjudicative arm of state government that Plaintiff Kaul had committed health insurance fraud.

111. Defendants Marino/BCBS did, in the relevant period, with knowing illegality conspire to use the US wires to transmit, during phone calls and other digital communications, knowingly fraudulent information to agents of the adjudicative arm of federal government that Plaintiff Kaul had committed health insurance fraud.

112. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's license revoked, in order to eradicate their debt to Plaintiff Kaul.

113. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's license revoked in order to eliminate the competition he presented to their commercial agenda.

114. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's reputation destroyed, in order to eradicate their debt to Plaintiff Kaul.

115. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's reputation destroyed in order to eliminate the competition he presented to their commercial agenda.

116. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's economic standing destroyed in order to eradicate their debt to Plaintiff Kaul.

117. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's economic standing destroyed in order to eliminate the competition he presented to their commercial agenda.

118. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul ostracized in order to eradicate their debt to Plaintiff Kaul.

119. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul's ostracized in order to eliminate the competition he presented to their commercial agenda.

120. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul indicted in order to eradicate their debt to Plaintiff Kaul.

121. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul indicted in order to eliminate the competition he presented to their commercial agenda.

122. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul incarcerated in order to eradicate their debt to Plaintiff Kaul.

123. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul incarcerated in order to eliminate the competition he presented to their commercial agenda.

124. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul leave the United States in order to eradicate their debt to Plaintiff Kaul.

125. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul leave the United States in order to eliminate the competition he presented to their commercial agenda.

126. The purpose of the Defendants BCBS/Marino's scheme was to have Plaintiff Kaul be deported in order to eradicate their debt to Plaintiff Kaul.

127. The purpose of Defendants BCBS/Marino's scheme was to have Plaintiff Kaul be deported in order to eliminate the competition he presented to their commercial agenda.

128. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to bribe Defendant Christie, in order to have him order the medical board revoke Plaintiff Kaul's license.

129. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to bribe Defendant Christie, in order to have him order the medical board revoke Plaintiff Kaul's license.

130. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to bribe Defendant Christie, in order to have Plaintiff Kaul indicted.

131. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to bribe Defendant Christie, in order to have Plaintiff Kaul indicted.

132. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to bribe Defendant Christie, in order to have him order the medical board revoke Plaintiff Kaul's license.

133. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to bribe Defendant Christie, in order to have him order the medical board revoke Plaintiff Kaul's license.

134. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to bribe Defendant Christie, in order to have Plaintiff Kaul indicted.

135. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to bribe Defendant Christie, in order to have Plaintiff Kaul indicted.

136. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to use of law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

137. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to use of public relations

firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

138. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

139. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

140. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

141. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

142. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to use of law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

143. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

144. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

145. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

146. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

147. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

148. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to use of law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

149. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

150. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

151. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

152. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

153. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

154. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to use of law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

155. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

156. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

157. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to use of public relations firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

158. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to use of law firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

159. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

160. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

161. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

162. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul indicted.

163. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul indicted.

164. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

165. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

166. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

167. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

168. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul indicted.

169. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul Indicted.

170. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

171. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

172. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

173. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

174. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul Indicted.

175. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

176. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

177. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

178. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

179. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

180. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

181. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

182. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

183. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

184. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

185. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

186. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul indicted.

187. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul indicted.

188. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

189. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

190. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

191. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

192. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul indicted.

193. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul indicted.

194. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

195. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

196. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

197. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

198. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

199. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

200. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

201. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

202. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to file knowingly false complaints

against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

203. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to file knowingly false complaints against Plaintiff Kaul with the medical board to have the medical board revoke Plaintiff Kaul's license.

204. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

205. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

206. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

207. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

208. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

209. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

209. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

210. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

211. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

212. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

213. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

214. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

215. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

216. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

217. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

218. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

219. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

220. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

221. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

222. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

223. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

224. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

225. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

226. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to send false information to personal injury lawyers that Kaul was not qualified to perform minimally invasive spine surgery, had committed insurance fraud, that his accounts receivable could not be collected and that the legal cases had no monetary value.

227. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

228. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

229. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

230. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

231. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to

coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

232. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

233. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to send false information to New Jersey politicians; encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

234. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to send false information to New Jersey politicians, encouraging them, with the promise of political campaign 'donations' to coerce the medical board/state prosecutors to have Kaul's license revoked and have him indicted.

235. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

236. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to transmit letters, emails and other materials

Indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

237. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

238. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

239. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

240. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

241. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

242. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to transmit letters, emails and other materials indicating that the Defendants co-conspirator lawyers/physicians had been instructed to inform their colleague not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

243. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

244. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

245. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

246. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to disseminate written, telephone, or electronic

communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

247. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

248. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

249. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

250. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

251. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

252. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

253. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

254. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

255. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

256. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

257. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

258. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to disseminate written, telephone, or electronic communications regarding the knowingly fraudulent events surrounding the revocation and indictment investigations, in order to ostracize Plaintiff Kaul.

259. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

260. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

261. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

262. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

263. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

264. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

265. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

266. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

267. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

268. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

269. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

270. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

271. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

272. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

273. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

274. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to transmit information in furtherance of their scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

275. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

276. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

277. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

278. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US wires to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

279. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

280. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

281. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

282. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US wires to transmit false information that Plaintiff Kaul had committed insurance/bank fraud, was not qualified to perform minimally invasive spine surgery.

283. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

284. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

285. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

286. In the communications of the scheme, Defendants BCBS/Marino discussed with each other their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

287. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

288. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

289. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

290. In the communications of the scheme, Defendants BCBS/Marino discussed with third-party state actors their use of the US mail to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

291. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally.

292. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

293. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

294. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

295. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

296. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to domestic healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally.

297. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

298. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

299. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

300. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

301. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to

the illegal revocation to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally.

302. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

303. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

304. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

305. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the illegal revocation to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

306. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally.

307. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

308. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

309. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

310. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

311. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to domestic healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally.

312. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

313. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

314. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

315. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

316. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally.

317. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

318. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to

the indictment investigations to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

319. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

320. In furthering their fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, Defendants BCBS/Marino did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

321. In a period commencing in at least, if not before 2005/2006, the Defendants did conspire to perpetrate a scheme of ongoing per se antitrust violations,

322. In a period commencing in at least, if not before 2005/2006, the Defendants did commit a scheme of per se antitrust violations, the effects of which are ongoing.

323. Defendants Horizon BCBS/Marino, in conjunction with other members of the Blue Cross Blue Shield Association, did perpetrate their scheme in furtherance their illegal monopoly of the finite financial 'pool' of the American health insurance industry.

324. Defendants Horizon BCBS/Marino procured this illegal per se monopoly through grand schemes of corruption of the executive/legislative/judicial branches of both state and federal government.

325. The Defendants have directed their monopoly power towards the engineering of illegal anticompetitive schemes to eliminate physician competitors, such as Plaintiff Kaul.

326. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through state courts in collusion/conspiracy with the investigative arm of government that continues to cause the filing of false indictments against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

327. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through state courts in collusion/conspiracy with the prosecutorial arm of government that continues to cause the filing of false indictments against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

328. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through state courts in collusion/conspiracy with the prosecutorial arm of government that continues to cause the filing of false convictions against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

329. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through state courts in collusion/conspiracy with the adjudicative arm of government that continues to cause the filing of false convictions against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

330. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through state courts in collusion/conspiracy with the adjudicative arm of government that continues to cause the filing of false incarcerations against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

331. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through federal courts in collusion/conspiracy with the investigative arm of government that continues to cause the filing of false indictments against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

332. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through federal courts in collusion/conspiracy with the prosecutorial arm of government that continues to cause the filing of false indictments against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

333. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through federal courts in collusion/conspiracy with the prosecutorial arm of government that continues to cause the filing of false convictions against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

334. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through federal courts in collusion/conspiracy with the adjudicative arm of government that continues to cause the filing of false convictions against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

335. Defendants Horizon BCBS/Marino have perpetrated these illegal anticompetitive schemes through federal courts in collusion/conspiracy with the adjudicative arm of government that continues to cause the filing of false incarcerations against innocent principally ethnic minority physicians to whom Defendant Horizon BCBS owes money.

336. Defendants Horizon BCBS/Marino's illegal anticompetitive elimination schemes, the principal targets of which are ethnic minority physicians, are purposed to reduce the competitive threat posed to the market by these physicians.

337. Defendants Horizon BCBS/Marino's false/illegal constriction of the market has caused a drastic nationwide physician shortage.

338. The artificial physician shortage has artificially reduced competition.

339. The artificially/illegally caused reduction in competition has caused the public a market injury, in that the price of healthcare has arbitrarily risen.

340. The artificially/illegally caused reduction in competition has caused the public a market injury, in that the supply of health care has been reduced.

341. The artificially/illegally caused reduction in supply of healthcare has caused the public a market injury, in that the price of healthcare has arbitrarily risen.

342. In February 2005, Plaintiff Kaul revolutionized the field of minimally invasive spine surgery, by inventing and successfully performing the first outpatient minimally invasive spinal fusion in a same-day surgical center.

343. This event proved that such a surgery could be safely and effectively conducted in an outpatient surgical center by a non-orthopedic/neurosurgical physician with training in interventional pain/minimally invasive spine surgery.

344. This event presented a market threat to hospitals.

345. This event presented a market threat to insurance companies

346. This event presented a market threat to the orthopedic-neurosurgical community,

347. The hospitals reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the introduction of sham anti-competitive legislation.

348. The insurance companies, including Defendants Horizon BCBS reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the introduction of sham anti-competitive legislation.

349. The orthopedic-neurosurgical community reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the introduction of sham anti-competitive legislation.

350. The hospitals reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of sham anti-competitive lawsuits.

351. The insurance companies, including Defendants Horizon BCBS reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing/aiding and abetting of filing/aiding and abetting of filing of sham anti-competitive lawsuits.

352. The orthopedic-neurosurgical community reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward

corrupting the political/judicial/legislative processes to have their competition eliminated through the filing/aiding and abetting of filing of sham anti-competitive lawsuits.

353. The hospitals reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of sham anti-competitive administrative complaints that restricted hospital privileges.

354. The hospitals reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of sham anti-competitive administrative complaints that caused license revocations.

355. The insurance companies, including Defendants Horizon BCBS reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing/aiding and abetting of filing/aiding of sham anti-competitive administrative complaints that caused license revocations.

356. The insurance companies, including Defendants Horizon BCBS reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing/aiding and abetting of filing of sham anti-competitive administrative complaints that caused restricted hospital privileges.

357. The orthopedic-neurosurgical community reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing/aiding and abetting of filing of sham anti-competitive lawsuits that caused license revocations.

358. The orthopedic-neurosurgical community reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing/aiding and abetting of filing of sham anti-competitive lawsuits that caused restricted hospital privileges.

359. The hospitals reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of complaints with state prosecutors that caused the false incarceration of their market competitors.

360. The hospitals reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of complaints with federal prosecutors that caused the false incarceration of their market competitors.

361. The insurance companies reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of complaints with state prosecutors that caused the false incarceration of their

market competitors.

362. The insurance companies reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of complaints with federal prosecutors that caused the false incarceration of their market competitors.

363. The orthopedic-neurosurgical community reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of complaints with state prosecutors that caused the false incarceration of their market competitors.

364. The orthopedic-neurosurgical community reacted not by attempting to deliver a competitive service based on price/quality, but instead directed their efforts toward corrupting the political/judicial/legislative processes to have their competition eliminated through the filing of complaints with federal prosecutors that caused the false incarceration of their market competitors.

365. Plaintiff Kaul was the principal and primary target in this grand anticompetitive scheme, a scheme in which the Defendants Horizon BCBS/Marino were principal perpetrators.

366. This grand anticompetitive scheme was orchestrated by The Kaul Cases Defendant Christie, in collusion and conspiracy with The Kaul Cases Defendants.

367. Consequence to the increase in competition in the minimally invasive spine surgery market, Defendants Horizon BCBS/Marino, in collusion and conspiracy with The Kaul Cases Defendants, did, in 2011, illegally manipulate the AMA CPT coding system to downgrade the relative value units for endoscopic discectomy.

368. The corruptly procured downgrading scheme injured the commercial potential of Plaintiff Kaul's rapidly expanding outpatient minimally invasive spine surgery practice.

369. The downgrading scheme, in which the Defendants Horizon BCBS/Marino played a central role, was concocted by a group of neurosurgeons, that included the then 2011 President of the North American Spine Society, Gregory Przybylski.

370. These individuals, because of their influential positions within their professional societies, had the codes' RVUs reduced with the understanding that the majority of minimally invasive spine surgeons, from interventional pain backgrounds, would be unable to perform open micro-discectomies.

371. The neurosurgeons effectuated the change without publicizing it for comment, thus denying Plaintiff Kaul and other minimally invasive spine surgeons the opportunity to object.

372. The Kaul Cases Defendant, Gregory Przybylski, was the state's principal 'expert' witness against Plaintiff Kaul in the revocation proceedings.

373. In April 2018, The Kaul Cases Defendant, Gregory Przybylski, was found guilty by the American Association of Neurological Surgeons for having committed perjury while an 'expert' in a civil case against another neurosurgeon.

374. The downgrading scheme reduced the reimbursement rate for endoscopic discectomies.

375. The reduced reimbursement caused a larger percentage of the insurance health fund to be diverted to Defendants Horizon BCBS/Marino's profits.

376. Defendants Horizon BCBS/Marino did not share the increased profits with their clients by reducing premiums.

377. In fact, despite the increased profits, Defendants Horizon BCBS/Marino increased annual premiums despite internal actuarial calculations that substantiated a decrease.

378. The downgrading scheme caused sustained/substantial losses and damage to Plaintiff Kaul personally consequent to reduced reimbursement associated with outpatient minimally invasive spine surgery.

379. The downgrading scheme caused sustained/substantial losses and damage to Plaintiff Kaul's business consequent to reduced reimbursement associated with outpatient minimally invasive spine surgery.

380. The downgrading scheme caused sustained/substantial losses and damage to Plaintiff Kaul's property, consequent to reduced reimbursement associated with outpatient minimally invasive spine surgery.

381. Defendants Horizon BCBS/Marino did, through the bribing of politicians/legislators, effectuate illegitimate legislative change the sole purpose of which was to arbitrarily increase their profit at the expense/exploitation of the public and medical profession.

382. The illegitimate legislative/regulatory change did not serve the public interest in that it did not improve patient outcomes.

383. The illegitimate legislative/regulatory change did not serve the public interest in that it did not improve patient safety.

384. The illegitimate legislative/regulatory change did not serve the public interest in that it did not reduce patient annual premiums.

385. The illegitimate legislative/regulatory change did not serve the public interest as Defendants Horizon BCBS/Marino continued to increase annual patient premiums.

386. The illegitimate legislative/regulatory change harmed Plaintiff Kaul's minimally invasive spine surgery practice.

387. The harm included a downgrading in the Relative Value Unit associated with the CPT code for endoscopic discectomy.

388. The harm included a veto of a bill in 2011 by Defendant Christie, that was designed to permit state licensure of one-room surgical centers.

389. The harm included illegitimate refusal of Defendant Horizon BCBS to reimburse surgical centers for minimally invasive spine surgery.

390. These harms artificially/arbitrarily reduced the availability to the public of outpatient minimally invasive spine surgery.

391. The reduction in the availability to the public of outpatient minimally invasive spine surgery contributed to the opiate epidemic, due to opiates being the only available option for pain treatment.

392. The false indictments caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

393. The monopolistic effect of the false indictments caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino

394. The illegal diversion of false indictments related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

395. The false convictions caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

396. The monopolistic effect of the false convictions caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino

397. The illegal diversion of false convictions related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

398. The false incarcerations caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

The monopolistic effect of the false incarcerations caused an illegal diversion of

monopolistic profits to Defendants Horizon BCBS/Marino

399. The illegal diversion of false incarcerations related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

400. The sham anti-competitive legislation caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

401. The monopolistic effect of the sham anti-competitive legislation caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino

402. The illegal diversion of sham anti-competitive legislation related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

403. The sham anti-competitive lawsuits caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

404. The monopolistic effect of the sham anti-competitive lawsuits caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino

405. The illegal diversion of sham anti-competitive lawsuits related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

406. The sham anti-competitive administrative complaints caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

407. The monopolistic effect of the sham anti-competitive administrative complaints caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino

408. The illegal diversion of sham anti-competitive administrative complaints related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

409. The illegitimate legislative/regulatory change caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market.

410. The monopolistic effect of the illegitimate legislative/regulatory change caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino

411. The illegal diversion of the illegitimate legislative/regulatory change related monopolistic profits to Defendants Horizon BCBS/Marino caused/continues to cause injury to Plaintiff Kaul/healthcare premium paying public.

412. The Defendants illegitimate scheme of non-reimbursement to Plaintiff Kaul/his surgical center for minimally invasive spine surgery, caused him to file suit against the Defendant Horizon BCBS.

413. Defendant BCBS retaliated by scheming with The Kaul Cases Defendant Christie/NJ state agencies to have Plaintiff Kaul's license revoked, a knowingly illegal act that is ongoing.

414. Defendant BCBS retaliated by scheming with the NJ US Attorney/FBI to attempt to have Plaintiff Kaul indicted/incarcerated, as they had/have done with many other ethnic minority physicians.

415. Defendant Horizon BCBS's illegal anticompetitive conduct caused it to procure monopoly power.

416. Defendant Horizon BCBS's illegally procured power enabled it to charge consumers prices in excess of what it would otherwise would have been able to charge, absent its unlawful anticompetitive conduct.

417. Defendant Horizon BCBS's excessive prices were not due to the provision of a superior service but due only to its illegally procured monopolistic market power.

418. Defendant Horizon BCBS, in its annual application to the state to increase the cost of healthcare premiums, argued with fraudulent intent and in a knowingly fraudulent manner that the price charged for minimally invasive spine surgery had increased.

419. Defendant Horizon BCBS omitted with fraudulent intent, the fact that although the individual price had increased, the overall volume of surgery had decreased.

420. Defendant Horizon BCBS omitted with fraudulent intent, the fact that their overall cost for minimally invasive spine surgery had decreased.

421. Defendant Horizon BCBS omitted with fraudulent intent, the fact that reason for the increase in individual price was the illegal anticompetitive exclusion from the minimally invasive spine surgery market of outpatient surgery centers and non-

neurosurgical/orthopedic physicians.

422. Defendant Horizon BCBS omitted with fraudulent intent that the illegal anticompetitive exclusion from the minimally invasive spine surgery market of outpatient surgery centers and non-neurosurgical/orthopedic physicians permitted hospitals/neurosurgeon-orthopedic surgeons to arbitrarily increase the billed amounts.

423. Defendant Horizon BCBS used with fraudulent intent the average billed amount as if it were the paid amount to substantiate their fraudulent request to increase the public's annual premiums.

424. Thus, in submitting that the average paid amount had increased, Defendant Horizon BCBS was, in collusion/conspiracy with the state, permitted to raise, albeit illegally, the cost of premiums, while having substantially reduced availability to the public of minimally invasive spine surgery.

425. The end-result is that the public pays more for less, while the Defendants corporate/executive profits continue to rise.

426. Plaintiff Kaul's invention and 2005 successful performance of an outpatient percutaneous spinal fusion opened up the minimally invasive spine surgery market to outpatient surgery centers and non-neurosurgical/orthopedic physicians.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA**

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

v.

CIVIL ACTION: NO.: 23-CV-00672
(M-KS)

CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS;
JAMES HOWARD SOLOMON;
FEDERATION STATE MEDICAL BOARDS;
ALLSTATE INSURANCE COMPANY;
CHRISTOPHER J. CHRISTIE; ROBERT FRANCIS HEARY
DANIEL STOLZ; JANE DOE; JOHN DOE.

**FIRST SET OF REQUESTS FOR ADMISSIONS AS TO DEFENDANT
CHRISTOPHER J. CHRISTIE**

RESPONSES DUE MAY 22, 2024

Respectfully Submitted



RICHARD ARJUN KAUL, MD

APRIL 22, 2024

RELEVANT REFERENCES TO THE KAUL CASES

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

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 (MARCH 30, 2021, TO JULY 13, 2021-U.S.D.C.-DISTRICT OF CONNECTICUT + DISTRICT OF NEW JERSEY)

K11-7 - KAUL/BASCH v ICE: 21-CV-06992 (AUGUST 19, 2021, TO SEPTEMBER 12, 2022-SOUTHERN DISTRICT OF NEW YORK)

K11-10 - KAUL/BASCH v ICE: 23-CV-2016 (MARCH 9, 2023, TO MAY 16, 2023-SOUTHERN DISTRICT OF NEW YORK)

K11-14 - KAUL v GEICO: 23-CV-22325 (JUNE 22, 2023, TO AUGUST 23, 2023-SOUTHERN DISTRICT OF FLORIDA)

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

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

Context To Schemes/Violations/Felonies

- 1. I admit that the facts substantiating the proof of K11-17, the factual foundation of K11-17, extend from 2005, the year in which Plaintiff Kaul invented and first successfully performed a percutaneous spinal fusion, to the present, 2024.**
- 2. I admit that I became directly/proximately involved in the generation of the factual foundation of K11-17 in or around 2006/7, when I commenced the procurement of monies from hospital corporations/insurance corporations/neurosurgical societies/neurosurgeons for my 2009 New Jersey gubernatorial campaign.**
- 3. I admit that I first came to know of Plaintiff Kaul and of his pioneering percutaneous spinal fusion procedure in or around 2006/7.**
- 4. I admit that in coming to know about Plaintiff Kaul and his work, I engaged in communications with hospital corporations/insurance corporations/neurosurgical societies/neurosurgeons who considered him/his work a threat to their share of the minimally invasive spine surgery market.**
- 5. I admit that in coming to know that the hospital corporations/insurance corporations/neurosurgical societies/neurosurgeons considered Plaintiff Kaul and his pioneering percutaneous spinal fusion procedure a threat to their market share, I did enter into a quid pro quo scheme with these persons/entities.**
- 6. I admit that the quid pro quo scheme involved the funneling of monies/stocks/shares into my personal/political financial vehicles, in return for me abusing the power of state to have Plaintiff Kaul eliminated from the minimally invasive spine surgery market by having his license illegally revoked.**
- 7. I admit that I, as a lawyer and then US Attorney (2006) did know that the commission of quid pro quo schemes through the Office of the US Attorney/NJ Governor's Office/State of New Jersey did involve felonies of, amongst other things, public corruption/wire fraud/bribery.**
- 8. I admit that despite my knowledge of the facts of the illegality of the quid pro quo scheme, I did nonetheless perpetrate the crimes.**
- 9. I admit that I perpetrated the crimes with impunity, because of my conviction that Plaintiff Kaul would be eliminated through, amongst other things, ruin of his life/liberty/property/reputation.**
- 10. I admit that I perpetrated the crimes with impunity, because of my conviction that Plaintiff Kaul would never ascertain the existence of the quid pro quo scheme.**

11. I admit that I perpetrated the crimes with impunity, because of my conviction that even if Plaintiff Kaul did ascertain the existence/details of the quid pro quo scheme, his financial ruin would prohibit him from initiating legal action.

12. I admit that I perpetrated the crimes with impunity, because of my conviction that even if Plaintiff Kaul did commence legal action, my becoming the Governor of New Jersey and then the 2016 President of the United States would permit me to abuse the power of state to have him arrested/jailed/killed.

13. I admit that I perpetrated the crimes with impunity, because of my conviction that in becoming the Governor of New Jersey and then the 2016 President of the United States, I would be immune from any civil and or criminal prosecution, including, amongst other things, kidnapping and murder.

14. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office for personal/political/economic gain.

15. I admit that from 2008 to 2017 I, as the Governor of New Jersey did abuse the power of political office for personal/political/economic gain.

16. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to uphold the law.

17. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly not uphold the law

18. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not violate the law.

19. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly violate the law.

20. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of conspiracy.

21. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of conspiracy in schemes against Plaintiff Kaul.

22. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of bankruptcy fraud.

23. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of bankruptcy fraud in schemes against Plaintiff Kaul.

24. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of securities fraud.

25. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of securities fraud as part of schemes against Plaintiff Kaul.

26. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of mail fraud.

27. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of mail fraud in schemes against Plaintiff Kaul.

28. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of wire fraud.

29. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of wire fraud in schemes against Plaintiff Kaul.

30. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of embezzlement.

31. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of embezzlement in schemes against Plaintiff Kaul.

32. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of perjury.

33. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of perjury in schemes against Plaintiff Kaul.

34. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of bribery.

35. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of bribery in schemes against Plaintiff Kaul.

36. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of kickbacks.

37. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of kickbacks in schemes against Plaintiff Kaul.

38. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of obstruction of justice.

39. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of obstruction of justice in schemes against Plaintiff Kaul.

40. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of public corruption.

41. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of public corruption in schemes against Plaintiff Kaul.

42. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of judicial corruption.

43. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of judicial corruption in schemes against Plaintiff Kaul.

44. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of human rights violations.

45. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of human rights violations in schemes against Plaintiff Kaul.

46. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of civil rights violations.

47. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of civil rights violations in schemes against Plaintiff Kaul.

48. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of constitutional rights violations.

49. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of constitutional rights violations in schemes against Plaintiff Kaul.

50. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of evidence tampering.

51. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of evidence tampering in schemes against Plaintiff Kaul.

52. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of witness tampering.

53. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of witness tampering in schemes against Plaintiff Kaul.

54. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of kidnapping.

55. I admit that in 2021 I, as the ex-Governor of New Jersey did knowingly aid and abet the abuse of power of political office to aid and abet the commission of an act of kidnapping of Plaintiff Kaul.

56. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of filing knowingly false criminal indictments.

57. I admit that in May 2016 I, as the Governor of New Jersey did knowingly abuse the power of political office to aid and abet the commission of an act of filing a knowingly false tax related criminal indictment against Plaintiff Kaul.

58. I admit that the May 2016 knowingly false tax related criminal indictment against Plaintiff Kaul was filed in retaliation for Plaintiff Kaul having filed K1 on February 22, 2016.

59. I admit that the retaliatory purpose of the May 2016 knowingly false tax related criminal indictment against Plaintiff Kaul was to cause him to become incarcerated and or harass/intimidate him into ceasing his prosecution of K1.

60. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the perpetration of knowingly false arrests.

61. I admit that on May 27, 2021, and June 14, 2023, I, as the Governor of New Jersey did knowingly abuse the power of political office to aid and abet the perpetration of false arrests of Plaintiff Kaul.

62. I admit that the May 27, 2021/June 14, 2023, kidnapping/false arrests were purposed to cause Plaintiff Kaul to become incarcerated and or harass/intimidate him into ceasing his prosecution of The Kaul Cases.

63. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the perpetration of knowingly false imprisonments.

64. I admit that on May 27, 2021, and June 14, 2023, I, as the Governor of New Jersey did knowingly abuse the power of political office to aid and abet the perpetration of false imprisonments of Plaintiff Kaul.

65. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the perpetration of knowingly false criminal prosecutions.

66. I admit that on commencing in May 2016, I, as the Governor of New Jersey did knowingly abuse the power of political office to aid and abet the perpetration of a knowingly false state criminal prosecution of Plaintiff Kaul.

67. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the perpetration of knowingly false state criminal investigations.

68. I admit that in a period commencing in approximately late 2012, I, as the Governor of New Jersey did knowingly abuse the power of political office to aid and abet the perpetration of a knowingly false state criminal investigation of Plaintiff Kaul.

69. I admit that the purpose of the knowingly false state criminal investigation of Plaintiff Kaul was to cause the illegal conviction/incarceration of Plaintiff Kaul.

70. I admit that a purpose of the attempted illegal state conviction/incarceration of Plaintiff Kaul was to seize his assets.

71. I admit that a purpose of the attempted illegal state conviction/incarceration of Plaintiff Kaul was to prevent him from exposing crimes committed by myself/The Kaul Cases Defendants/others.

72. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the perpetration of knowingly false federal criminal investigations.

73. I admit that in a period commencing in approximately late 2012, I, as the Governor of New Jersey did knowingly abuse the power of political office to aid and abet the perpetration of a knowingly false federal criminal investigation of Plaintiff Kaul.

74. I admit that the purpose of the knowingly false federal criminal investigation of Plaintiff Kaul was to cause the illegal conviction/incarceration of Plaintiff Kaul.

75. I admit that in a period commencing in approximately late 2012, I, as the Governor of New Jersey and ex-US Attorney did knowingly cause to be abused the power of the Office of the US Attorney to have Plaintiff Kaul falsely federally criminally investigated.

76. I admit that a purpose of the knowingly false federal criminal investigation was to cause an ostracization of Plaintiff Kaul.

77. I admit that a purpose of the false federal criminal investigation related ostracization was to isolate Plaintiff Kaul from any form of SOCIAL support.

78. I admit that a purpose of the false federal criminal investigation related ostracization was to isolate Plaintiff Kaul from any form of FINANCIAL support.

79. I admit that a purpose of the false federal criminal investigation related ostracization was to isolate Plaintiff Kaul from any form of PROFESSIONAL support.

80. I admit that a purpose of the false federal criminal Investigation related ostracization was to isolate Plaintiff Kaul from ANY FORM of support.

81. I admit that the purpose of the false federal criminal Investigation related ostracization and deprivation of support was to cause the elimination of Plaintiff Kaul.

82. I admit that in a period commencing in approximately late 2012, I, as the Governor of New Jersey and ex-US Attorney did knowingly cause to be abused the power of the Office of the US Attorney to attempt to have Plaintiff Kaul falsely federally criminally indicted.

83. I admit that a purpose of the attempted false federal criminal indictment was to cause an ostracization of Plaintiff Kaul.

84. I admit that a purpose of the attempted false federal criminal indictment related ostracization was to isolate Plaintiff Kaul from any form of SOCIAL support.

85. I admit that a purpose of the attempted false federal criminal indictment related ostracization was to isolate Plaintiff Kaul from any form of FINANCIAL support.

86. I admit that a purpose of the attempted false federal criminal indictment related ostracization was to isolate Plaintiff Kaul from any form of PROFESSIONAL support.

87. I admit that a purpose of the attempted false federal criminal indictment related ostracization was to isolate Plaintiff Kaul from ANY FORM of support.

88. I admit that the purpose of the attempted false federal criminal indictment related ostracization and deprivation of support was to cause the elimination of Plaintiff Kaul.

89. I admit that in a period commencing in approximately late 2012, I, as the Governor of New Jersey and ex-US Attorney did knowingly cause to be abused the power of the Office of the US Attorney to attempt to have Plaintiff Kaul falsely federally criminally convicted.

90. I admit that a purpose of the attempted knowingly false federal criminal conviction was to cause an ostracization of Plaintiff Kaul.

91. I admit that a purpose of the attempted knowingly false federal criminal conviction related ostracization was to isolate Plaintiff Kaul from any form of SOCIAL support.

92. I admit that a purpose of the attempted knowingly false federal criminal conviction related ostracization was to isolate Plaintiff Kaul from any form of FINANCIAL support.

93. I admit that a purpose of the attempted knowingly false federal criminal conviction related ostracization was to isolate Plaintiff Kaul from any form of PROFESSIONAL support.

94. I admit that a purpose of the attempted knowingly false federal criminal conviction related ostracization was to isolate Plaintiff Kaul from ANY FORM of support.

95. I admit that in a period commencing in approximately late 2012, I, as the Governor of New Jersey and ex-US Attorney did knowingly cause to be abused the power of the Office of the US Attorney to attempt to have Plaintiff Kaul falsely federally incarcerated.

96. I admit that the purpose of the attempted false federal criminal investigation/indictment/conviction/incarceration related ostracization and deprivation of support was to cause the elimination of Plaintiff Kaul.

I admit that a collateral effect of the elimination of Plaintiff Kaul was to seize his assets.

97. I admit that a purpose of seizing Plaintiff Kaul's assets was to attempt to render him unable to defend against any and all private/state/federal actions, be they administrative/civil/criminal.

98. I admit that a purpose of seizing Plaintiff Kaul's assets was to attempt to render him unable to investigate and or initiate legal action against me/The Kaul Cases Defendants/Others

99. I admit that a purpose of the elimination of Plaintiff Kaul was to eliminate the debt owed to him by the insurance industry for clinical care he had provided to their premium-paying clients.

100. I admit that a purpose of the elimination of Plaintiff Kaul was to attempt to prevent him from competing in the minimally invasive spine surgery market.

101. I admit that a purpose of the elimination of Plaintiff Kaul was to prevent him from exposing crimes committed by myself/The Kaul Cases Defendants/others.

102. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of acts of perpetrating knowingly false allegations of insurance fraud against knowingly innocent physicians.

103. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of acts of perpetrating knowingly false allegations of insurance fraud against knowingly innocent physicians.

104. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of kickbacks.

105. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of kickbacks.

106. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of retaliation.

107. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of retaliation against Plaintiff Kaul.

108. I admit that in May 2016 I did retaliate against Plaintiff Kaul because he filed K1 on February 22, 2016, by abusing state power, agencies, and persons to cause to be filed a knowingly false tax indictment.

109. I admit that on May 27, 2021, I did retaliate against Plaintiff Kaul because he filed K11-2 on February 24, 2021, by abusing state power, agencies, and persons to cause his person to be kidnapped.

110. I admit that on June 14, 2023, I did retaliate against Plaintiff Kaul because he continued his prosecution of The Kaul Cases, the retaliation of which involved an abuse of state power, agencies, and persons to cause his person to be knowingly falsely arrested.

111. I admit that on June 14, 2023, I did retaliate against Plaintiff Kaul because he continued his prosecution of The Kaul Cases, the retaliation of which involved an abuse of state power, agencies, and persons to cause his person to be knowingly falsely imprisoned.

112. I admit that on June 15, 2023, I did retaliate against Plaintiff Kaul because he continued his prosecution of The Kaul Cases, the retaliation of which involved an abuse of state power, agencies, and persons to cause there to be an attempt on his life by an attempted drugging while incarcerated.

113. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of false/illegal seizure of property.

114. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of false/illegal seizure of property that rightly/lawfully belonged to Plaintiff Kaul.

115. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's New Jersey medical license.

116. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's reputation.

117. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's liberty.

118. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's livelihood.

119. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's life.

120. I admit that the false seizure of property involved the illegal seizure of, amongst other things, all of Plaintiff Kaul's personal and business real estate.

121. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's accounts receivable.

122. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's business corporations.

123. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's business assets.

124. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's personal assets.

125. I admit that the false seizure of property involved the illegal seizure of, amongst other things, all of Plaintiff Kaul's state and federal prescribing licenses.

126. I admit that the false seizure of property involved the illegal seizure of, amongst other things, all of Plaintiff Kaul's state and federal certifications/registrations relating to his surgical center.

127. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's license to build a new surgical center.

128. I admit that the false seizure of property involved the illegal seizure of, amongst other things, all of Plaintiff Kaul's ability to obtain a license in any other state.

129. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's ability to regain his livelihood.

130. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of honest services fraud.

131. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of honest services fraud against Plaintiff Kaul and the American public.

132. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of racketeering.

133. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of racketeering against Plaintiff Kaul.

134. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of market manipulation.

135. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of market manipulation against Plaintiff Kaul and the American public.

136. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of money laundering.

137. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of money laundering by facilitating the ill-gotten gains of The Kaul Cases Defendants to be 'laundered' through private and state corporations/agencies/entities within the State of New Jersey.

138. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of money laundering by facilitating the New Jersey based ill-gotten gains of The Kaul Cases Defendants to be 'laundered' without investigation through the NYSE.

139. I admit that I was motivated to knowingly abuse the power of political office to commit or aid and abet the commission of money laundering because I personally profited from the illegal schemes that generated the illegal profits.

140. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of crimes against humanity.

141. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of crimes against humanity.

142. I admit that my commission of crimes against humanity was motivated by my need to raise monies for my gubernatorial/presidential campaigns.

143. I admit that my commission of crimes against humanity involved, amongst other things, the trafficking of chemical weapon components to Syrian rebel forces in a period from 2012 to 2013.

144. I admit that I came to know of the International networks involved in the trafficking of chemical weapons during my tenure as the US Attorney for the District of New Jersey.

145. I admit that I know that the trafficking of chemical weapons is strictly prohibited under both domestic and international law.

146. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of violations of the Nuremberg Code.

147. I admit that I, as a lawyer and ex-US Attorney, do know and understand the Nuremberg Code.

148. I admit that I, as a lawyer and ex-US Attorney, do know that the Nuremberg Code was legislated into international law as a consequence of the World War Two genocidal acts of the Nazis.

149. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of crimes against humanity and did knowingly violate the Nuremberg Code.

150. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not abuse the power of political office to commit or aid and abet the commission of attempted murder through the use of drugs on incarcerated persons.

151. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly abuse the power of political office to commit or aid and abet the commission of attempted murder against Plaintiff Kaul by attempting to cause him to consume lethal drugs.

152. I admit that the purpose of the attempted murder was to cause the elimination of Plaintiff Kaul.

153. I admit that the attempted elimination of Plaintiff Kaul was to prevent him from exposing the decades-long crimes of myself, The Kaul Cases Defendants, and others.

Facts Admitted In K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15 As Proof Of Claims In K11-17

154. I admit I know that some of the facts that substantiate and or otherwise prove my knowing violation of Plaintiff Kaul's human rights and of the claims levied against me in K1/K2/K4/K5/K11-2/K11-4/K11-7/K11-10, are facts unambiguously asserted in support of the claims levied against me in K11-17 by Plaintiff Kaul.

155. I admit that I read the COMPLAINT and FIRST AMENDED COMPLAINT filed against me by Plaintiff Kaul in K1 respectively on February 22, 2016 (K1: D.E. 1), June 8, 2016 (K1: D.E. 57).

156. I admit that in K1 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in both complaints.

157. I admit that in K1, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

158. I admit that in K1, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

159. I admit that in K1, I, as the then New Jersey Governor (2009-2017), did, absent the clarification provided to me by counsel, know/understand the criminal nature, character, meaning and public import of the facts asserted against me in both complaints.

160. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in K2 respectively on April 9, 2018 (K2: D.E. 2).

161. I admit that in K2 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

162. I admit that in K2, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

163. I admit that in K2, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

164. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in K5 on October 1, 2019 (K5: D.E. 1).

165. I admit that in K5 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

166. I admit that in K5, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

167. I admit that in K5, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

168. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in K11-2 on October 1, 2019 (K11-2: D.E. 1).

169. I admit that in K11-2 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

170. I admit that in K11-2, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

171. I admit that in K11-2, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

172. I admit that I read the COMPLAINT and FIRST AMENDED COMPLAINT filed respectively against me by Plaintiff Kaul in K11-4 on March 30, 2021, (K11-4: D.E. 1) and April 8, 2021 (K11-4: D.E. 10).

173. I admit that in K11-4 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

174. I admit that in K11-4, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

175. I admit that in K11-4, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

176. I admit that I read the COMPLAINT and FIRST AMENDED COMPLAINT filed respectively against me by Plaintiff Kaul in K11-4 on March 30, 2021, (K11-4: D.E. 1) and April 8, 2021 (K11-4: D.E. 10).

177. I admit that in K11-4 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

178. I admit that in K11-4, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

179. I admit that in K11-4, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

180. I admit that I read the COMPLAINT and AMENDED COMPLAINT filed respectively against me by Plaintiff Kaul in K11-7 on August 19, 2021, (K11-7: D.E. 1) and September 13, 2021 (K11-7: D.E. 14).

181. I admit that in K11-7 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

182. I admit that in K11-7, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

183. I admit that in K11-7, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

184. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in K11-10 on March 9, 2023, (K11-10: D.E. 1).

185. I admit that in K11-10 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

186. I admit that in K11-10, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

187. I admit that in K11-10, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

188. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in K11-14 on June 22, 2023, (K11-14: D.E. 1).

189. I admit that in K11-14 I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

190. I admit that in **K11-14**, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

191. I admit that in **K11-14**, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

192. I admit that I read the COMPLAINT and AMENDED COMPLAINT filed respectively against me by Plaintiff Kaul in **K11-15** on June 22, 2023, (K11-15: D.E. 1) and July 28, 2023 (K11-15: D.E. 4)

193. I admit that in **K11-15** I was represented by counsel, who clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

194. I admit that in **K11-15**, I, as a lawyer, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

195. I admit that in **K11-15**, I, as an ex-US Attorney, did, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

196. I admit that I read the COMPLAINT filed respectively against me by Plaintiff Kaul in **K11-17** on November 20, 2023, (K11-17: D.E. 1).

197. I admit that in **K11-17** I am represented by counsel, who has clarified and explained to me the criminal nature, character and meaning of the facts asserted against me in the Complaint.

198. I admit that in **K11-17**, I, as a lawyer, do, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in both complaints.

199. I admit that in **K11-17**, I, as an ex-US Attorney, do, absent the clarification provided to me by counsel, know/understand the criminal nature, character and meaning of the facts asserted against me in the Complaint.

200. I admit that in **K1** on November 23, 2016, I filed a procedural motion (K1: D.E. 128) to dismiss the FIRST AMENDED COMPLAINT.

201. I admit that in **K1** on May 3, 2017, I filed reply papers (K1: D.E. 181) in support of my motion to dismiss the FIRST AMENDED COMPLAINT.

202. I admit that in **K1** on June 19, 2017, I filed a letter-motion (K1: D.E. 195) that sought to stay the court's June 9, 2017, Rule 16 LETTER ORDER REGARDING SCHEDULING (K1: D.E. 190) (Exhibit 1).

203. I admit that in **K1** on August 17, 2018, I filed a ninety-two (92) page procedural motion (K1: D.E. 260) to dismiss the SECOND AMENDED COMPLAINT.

204. I admit that in **K1** on December 12, 2018, I filed reply papers (38 pages) (K1: D.E. 294) in support of my procedural motion to dismiss the SECOND AMENDED COMPLAINT.

205. I admit that in **K1** on May 3, 2019, I filed supplemental reply papers (32 pages) (K1: D.E. 331) in support of my procedural motion to dismiss the SECOND AMENDED COMPLAINT.

206. I admit that in **K1**, the facts set forth by Plaintiff Kaul in his April 29, 2021, motion to compel Defendants to conduct a Rule 26 Conference (Exhibit 2) as to my refusal to confer with Plaintiff Kaul are true.

207. I admit that in **K1** I refused to confer with Plaintiff Kaul pursuant to Rule 26 because I was/am guilty of the levied facts/charges, that now constitute an element of the factual foundation of K11-17.

208. I admit that in **K2** I did not deny any of the facts or allegations, that now constitute an element of the factual foundation of K11-17.

209. I admit that in **K5** on February 13, 2020, I filed a procedural motion (K5: D.E. 82) to dismiss, sever and or transfer the Complaint to the District of New Jersey, while pending in the United States District Court for the District of Columbia, without denying facts that now constitute an element of the factual foundation of K11-17.

210. I admit that in **K5** the case was severed and transferred to the District of New Jersey-Camden Vicinage on December 1, 2020 (K5: D.E. 150), without denying facts that now constitute an element of the factual foundation of K11-17.

211. I admit that in **K5** on December 16, 2020, the court entered an ORDER FOR SCHEDULING CONFERENCE (K5: D.E. 155), while I continued to not deny facts that now constitute an element of the factual foundation of K11-17.

212. I admit that in **K5** on December 17, 2020, I filed a procedural motion (K5: D.E. 159) to transfer the case from the District of New Jersey-Camden Vicinage to the Newark Vicinage, without denying facts that now constitute an element of the factual foundation of K11-17.

213. I admit that in **K5** on December 22, 2020, the case was transferred from the Camden Vicinage to the Newark Vicinage (K5: D.E. 173), while I continued to deny facts that now constitute an element of the factual foundation of K11-17.

214. I admit that in **K5** on January 1, 2021, I filed a procedural motion (**K5: D.E. 185**) to stay the case, without denying facts that now constitute an element of the factual foundation of **K11-17**.

215. I admit that in **K5** on January 14, 2021, the case was stayed by a magistrate judge in the District of New Jersey-Newark Vicinage (**K5: D.E. 200**), while I continued to not deny facts that now constitute an element of the factual foundation of **K11-17**.

216. I admit that in **K5** on July 7, 2021, the case was voluntarily dismissed pursuant to Rule 41, while I continued to not deny facts that now constitute an element of the factual foundation of **K11-17**.

217. I admit that in **K11-2** on June 30, 2021, I filed a procedural motion to dismiss and or transfer the case to the District of New Jersey (**D.E. 46**), without denying facts that now constitute an element of the factual foundation of **K11-17**.

218. I admit that at no point from the February 24, 2021, commencement of **K11-2** to the final February 22, 2024, entry on the appellate docket, did I deny facts that now constitute an element of the factual foundation of **K11-17**.

219. I admit that in **K11-4** on May 6, 2021, I filed a procedural motion seeking an order to: **(i)** be permitted to ignore the Complaint; **(ii)** to not have to engage in discovery with Plaintiff Kaul; **(iii)** to ignore any motions filed by Plaintiff Kaul; **(iv)** prohibit Plaintiff Kaul from communicating and or seeking discovery with Defendants and or any Third-Party Witnesses; **(v)** sanction Plaintiff Kaul for communicating and or seeking discovery with Defendants and or any Third-Party Witnesses; **(vi)** stay the case (**K11-4: D.E. 6**).

220. I admit that I sought the aforesaid relief without denying facts that now constitute an element of the factual foundation of **K11-17**.

221. I admit that at no point from the March 30, 2021, commencement of **K11-4** (**K11-4: D.E. 1**) to the July 13, 2021, voluntary dismissal (**K11-4: D.E. 24**), did I deny facts that now constitute an element of the factual foundation of **K11-17**.

222. I admit that in **K11-7** on November 29, 2021, I filed a procedural motion to dismiss/transfer the case to the District of New Jersey and to permanently Injunct Plaintiff Kaul from seeking relief within the United States District Court (**K11-7: D.E. 117**), without denying facts that now constitute an element of the factual foundation of **K11-17**.

223. I admit that at no point from the August 19, 2021 (**K11-7: D.E. 1**) commencement of **K11-7** to the final August 14, 2023 (**K11-7: D.E. 172**) entry on the district court docket, did I deny facts that now constitute an element of the factual foundation of **K11-17**.

224. I admit that at no point from the March 9, 2023 (K11-10: D.E. 1) commencement of K11-10 to the final May 16, 2023 (K11-10: D.E. 29) entry on the district court docket, did I deny facts that now constitute an element of the factual foundation of K11-17.

225. I admit that in K11-14 on August 16, 2023, I filed a procedural motion to dismiss the case (K11-14: D.E. 34) without denying facts that now constitute an element of the factual foundation of K11-17.

226. I admit that at no point from the June 22, 2023 (K11-14: D.E. 1) commencement of K11-14 to the final December 28, 2023, appellate dismissal, did I deny facts that now constitute an element of the factual foundation of K11-17.

227. I admit that in K11-15 on September 27, 2023, I filed a procedural motion to vacate a default judgment (K11-15: D.E. 27), the judgment of which did prove facts that now constitute an element of the factual foundation of K11-17 and facts that I did not deny.

228. I admit that at no point from the June 27, 2023 (K11-15: D.E. 1) commencement of K11-15 to the final February 20, 2024, docket entry (K11-15: D.E. 58) did I deny facts that now constitute an element of the factual foundation of K11-17.

229. I admit that I know that in filing the procedural motions in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15 from 2016 to 2023 to sever/transfer/stay/dismiss I had the right to deny the facts asserted by Plaintiff Kaul.

230. I admit that I did not deny any of the facts of conspiracy/bankruptcy fraud/securities fraud/mail fraud/wire fraud/securities fraud/embezzlement/perjury/bribery/kickbacks/obstruction of justice/public corruption/judicial corruption/human rights violations/civil rights violations/constitutional rights violations/evidence tampering/witness tampering/kidnapping/false indictment/false arrest/false imprisonment/false prosecution/insurance fraud/kickbacks/retaliation/false seizure of property/honest services fraud/racketeering/market manipulation/money laundering/crimes against humanity/violations of the Nuremberg Code/attempted drugging-killing. asserted by Plaintiff Kaul in the period from 2016 to 2023.

231. I admit that the reason I did not and have not denied the facts asserted by Plaintiff Kaul is because they are true.

232. I admit that I know that I had the right to file summary judgment motions in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15 to dismiss the complaints and or amended complaints.

233. I admit that I did not file summary judgment motions to dismiss the complaints and or amended complaints.

234. I admit that the reason I did not file summary judgment motions to dismiss is because I had/have no evidence or facts to disprove the summary judgment standard truth of the facts asserted by Plaintiff Kaul.

K11-17

235. I admit that I know the proven factual foundation of K11-17 includes facts of conspiracy.

236. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal conspiracy against Plaintiff Kaul as part of an ongoing "pattern of racketeering".

237. I admit that I know the proven factual foundation of K11-17 includes facts of bankruptcy fraud.

238. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal scheme of bankruptcy fraud committed against Plaintiff Kaul and the eight-three (83) creditors of his estate in the U.S.B.C. for the District of New Jersey as part of an ongoing "pattern of racketeering".

239. I admit that I know the proven factual foundation of K11-17 includes facts of securities fraud.

240. I admit that I did in a time period between 2016 to 2021 abuse or caused to be abused the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal scheme of securities fraud within the NYSE against the public and Plaintiff Kaul as part of an ongoing "pattern of racketeering".

241. I admit that I know the proven factual foundation of K11-17 includes facts of mail fraud.

242. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal mail fraud against Plaintiff Kaul as part of an ongoing "pattern of racketeering".

243. I admit that I know the proven factual foundation of K11-17 includes facts of wire fraud.

244. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal wire fraud against Plaintiff Kaul as part of an ongoing "pattern of racketeering".

245. I admit that I know the proven factual foundation of K11-17 includes facts of embezzlement.

246. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal scheme of embezzlement in the U.S.B.C. for the District of New Jersey against Plaintiff Kaul as part of an ongoing "pattern of racketeering".

247. I admit that I know the proven factual foundation of K11-17 includes facts of perjury.

248. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/perpetrate/aid and abet a knowingly illegal scheme of perjury against Plaintiff Kaul in administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

249. I admit that I know the proven factual foundation of K11-17 includes facts of bribery.

250. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of bribery against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

251. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of bribery against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

252. I admit that I know the proven factual foundation of K11-17 includes facts of kickbacks.

253. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of kickbacks against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

254. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of kickbacks against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

255. I admit that I know the proven factual foundation of K11-17 includes facts of obstruction of justice.

256. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of obstruction of justice against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

257. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of obstruction of

Justice against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

258. I admit that I know the proven factual foundation of K11-17 includes facts of public corruption.

259. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of public corruption against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

260. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of public corruption against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

261. I admit that I know the proven factual foundation of K11-17 includes facts of judicial corruption.

262. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of judicial corruption against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

263. I admit that I know the proven factual foundation of K11-17 includes facts of human rights violations.

264. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of human rights violations against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

265. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of human rights violations against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

266. I admit that I know the proven factual foundation of K11-17 includes facts of civil rights violations.

267. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of civil rights violations against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

268. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of civil rights violations against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

269. I admit that I know the proven factual foundation of K11-17 includes facts of constitutional rights violations.

270. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of constitutional rights violations against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

271. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of constitutional rights violations against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

272. I admit that I know the proven factual foundation of K11-17 includes facts of evidence tampering.

273. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of evidence tampering against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

274. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of evidence tampering against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

275. I admit that I know the proven factual foundation of K11-17 includes facts of witness tampering.

276. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of witness

tampering against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

277. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of witness tampering against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

278. I admit that I know the proven factual foundation of K11-17 includes facts of kidnapping.

279. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of kidnapping against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

280. I admit that I know the proven factual foundation of K11-17 includes facts of false indictment.

281. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false indictment against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

282. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false indictment against Plaintiff Kaul perpetrated within a state court within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

283. I admit that I know the proven factual foundation of K11-17 includes facts of false arrest.

284. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false arrest against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

285. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false arrest against Plaintiff Kaul perpetrated within a state court within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

286. I admit that I know the proven factual foundation of K11-17 includes facts of false imprisonment.

287. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false imprisonment against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

288. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false imprisonment against Plaintiff Kaul perpetrated within a state court within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

289. I admit that I know the proven factual foundation of K11-17 includes facts of false prosecution.

290. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false prosecution against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

291. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of false prosecution against Plaintiff Kaul perpetrated within a state court within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

292. I admit that I know the proven factual foundation of K11-17 includes facts of fraud committed against the public and physicians by insurance companies.

293. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of fraud committed against Plaintiff Kaul and other physicians by insurance companies perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

294. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of fraud committed against Plaintiff Kaul and other physicians by insurance companies perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey

295. I admit that I know the proven factual foundation of K11-17 includes facts of retaliation.

296. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of retaliation against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

the geographic boundaries of the State of New Jersey as part of an ongoing “pattern of racketeering”.

307. I admit that I know the proven factual foundation of K11-17 includes facts of market manipulation.

308. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of market manipulation against Plaintiff Kaul and the public perpetrated by agencies of the State of New Jersey as part of an ongoing “pattern of racketeering” within the NYSE.

309. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of market manipulation against Plaintiff Kaul and the public perpetrated by/through administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing “pattern of racketeering” within the NYSE.

310. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to in a knowingly fraudulent manner attempt to legitimize for investment on the NYSE, the illegal profits procured by The Kaul Cases Defendants through their knowingly illegal “pattern of racketeering” within agencies of the State of New Jersey.

311. I admit that I did in a time period between 2008 to the present abuse the power of public office and state to in a knowingly fraudulent manner attempt to legitimize for investment on the NYSE, the illegal profits procured by The Kaul Cases Defendants through their knowingly illegal “pattern of racketeering” within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey.

312. I admit that I know the proven factual foundation of K11-17 includes facts of money laundering.

313. I admit that I did in a time period between 2008 to the present abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of money laundering against Plaintiff Kaul and the public perpetrated within/by agencies of the State of New Jersey as part of an ongoing “pattern of racketeering”.

314. I admit that I did in a time period between 2008 to the present abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of money laundering against Plaintiff Kaul and the public perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing “pattern of racketeering”.

315. I admit that I did in a time period between 2008 to the present abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet a knowingly illegal

scheme of money laundering against Plaintiff Kaul and the public perpetrated within the NYSE as part of an ongoing "pattern of racketeering".

316. I admit that I know the proven factual foundation of K11-17 includes facts of crimes against humanity.

317. I admit that I did in a time period between 2008 to the present abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of crimes against humanity against Plaintiff Kaul and the public perpetrated within/by agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

318. I admit that I did in a time period between 2008 to the present abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet a knowingly illegal scheme of crimes against humanity against Plaintiff Kaul and the public perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing "pattern of racketeering".

319. I admit that one example of such a crime against humanity were the thousands of patients who were suddenly and inhumanely deprived of life-saving care consequent to the illegal revocation of Plaintiff Kaul's license

320. I admit that these thousands of patients were victims of a crime against humanity that I committed.

321. I admit that hundreds of these invalided patients, many without insurance, sent me letters explaining the catastrophic effect the illegal revocation has on their lives and those of their families.

322. I admit I ignored these pleas, knowing that I was committing/aiding and abetting/perpetrating a crime against humanity on invalided persons who were citizens of the State of New Jersey.

323. I admit I ignored these desperate pleas as I did not believe Plaintiff Kaul would expose my crimes against humanity.

324. I admit I ignored these desperate pleas as to have reinstated Plaintiff Kaul's license would have interfered with my gubernatorial/presidential ambitions.

325. I admit that I ignored these desperate pleas as none of these patients were sufficiently wealthy in monetary or voting numbers to be of use to my gubernatorial/presidential ambitions.

326. I admit I discussed the letters with my political strategists, and we concluded that helping these invalided patients with no insurance would hinder our political campaigns.

I admit that I know the proven factual foundation of K11-17 includes facts of violations of the Nuremberg Code.

327. I admit that I did in a time period between 2008 to the present abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet knowingly illegal schemes of violations of the Nuremberg Code against Plaintiff Kaul and the public perpetrated within/by agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

328. I admit that during my tenure as the US Attorney for the District of New Jersey (2001-2009) through the New Jersey governorship (2009-2017), I engaged in/conducted/aided and abetted/perpetrated multiple schemes of violations of the Nuremberg Code, that included profiteering from schemes in which certain New Jersey state judges/courts 'funneled' persons into drug rehabilitation centers/halfway houses/jails from which I received kickbacks, disguised as 'consulting-legal fees' and or political campaign donations.

329. I admit that these schemes (2001-2017) of violations of the Nuremberg Code constitute facts of at least sixteen (16) years of an ongoing "open ended pattern of racketeering".

330. I admit that these schemes (2001-2017) of violations of the Nuremberg Code constitute facts of at least sixteen (16) years of an ongoing "pattern" human/civil/constitutional rights.

331. I admit that the facts of these schemes (2001-2017) constitute further proof of the charges levied in K11-17.

332. I admit that I know the proven factual foundation of K11-17 includes facts of attempted drugging-killing.

333. I admit that I did in 2023 abuse or caused to be abused the power of public office and state to engage/conduct/aid and abet a knowingly illegal schemes of attempted drugging-killing against Plaintiff Kaul perpetrated within/by agencies of the State of New Jersey as part of an ongoing "pattern of racketeering".

334. I admit that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to domestic and international law.

335. I admit that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to the Nuremberg Code.

336. I admit that I have not denied any of the facts that constitute the proven factual foundation of K11-17.

337. I admit that the reason I did not/have not denied the facts that constitute the proven factual foundation of K11-17 is because they are true.

338. I admit that I know that I had the right to file a summary judgment motion in K11-17 to dismiss the Complaint.

339. I admit that I did not file a summary judgment motion to dismiss the Complaint.

340. I admit that the reason I did not file a summary judgment motion to dismiss the Complaint is because I had/have no evidence or facts to disprove the summary judgment standard truth of the facts that constitute the proven factual foundation of K11-17,

341. I admit that in K11-17 on January 11, 2024, I filed a procedural motion to dismiss the case (K11-17: D.E. 18) without denying any of the facts that constitute the proven factual foundation of K11-17.

342. I admit that at no point from the December 12, 2023 (K11-17: D.E. 1) commencement of K11-17 to the present, have I denied any facts that constitute the proven factual foundation of K11-17.

343. I admit that in K11-17 on January 19, 2024, I filed a reply (K11-17: D.E. 28) to Plaintiff Kaul's January 12, 2024, MOTION FOR DEFAULT (K11-17: D.E. 25),

344. I admit that I knew that through the January 19, 2024, reply, I had the right to attempt to deny the facts that constitute the proven factual foundation of K11-17.

345. I admit that through the January 19, 2024, reply I did not deny the facts that constitute the proven factual foundation of K11-17.

346. I admit that the reason I did not deny through the January 19, 2024, reply, the facts that constitute the proven factual foundation of K11-17 is because they are true.

347. I admit that in or around late January 22, 2024, I did engage in exparte communications with persons/agents associated with persons/agents of the United States Court of Appeals for the 1st Circuit.

348. I admit that the purpose of these knowingly improper communication was to cause the generation of legal opinion regarding venue, that I believed would bolster my defense in K11-17 and cause dismissal.

349. I admit that this scheme was perpetrated without notice to Plaintiff Kaul in order to prevent Plaintiff Kaul from causing a nullification of the opinion.

350. I admit that Plaintiff Kaul made himself aware of the improperly procured opinion on or around February 14, 2024, and did submit a response that proves the erroneousness and invalidity of the opinion.

351. I admit that on February 15, 2024 (K11-17: D.E. 53) I submitted the improperly procured and knowingly erroneous opinion to the docket of the United States District Court for the Eastern District of North Carolina.

352. I admit that on February 16, 2024 (K11-17: D.E. 54), Plaintiff Kaul submitted to the docket proof of the erroneousness of the improperly procured opinion.

353. I admit that the scheme to manipulate an appellate court from another circuit into improperly generating legal opinion for the sole purpose of obstructing justice in a circuit in which I am being civilly prosecuted, does constitute further evidence of my guilt of the levied charges.

354. I admit I know that the United States District Court for the Eastern District of North Carolina is the proper venue for K11-17.

355. I admit that the reason I expended resources in having generated knowingly improper opinion from another circuit pertains to my knowledge of my guilt of the levied charges and my fear of its further exposure through discovery.

356. I admit that in the perpetration of this scheme to obtain this knowingly improper opinion from another circuit, I did, with a knowing illegality, use the US wires to communicate details of the scheme with other Defendants and Third-Party Witnesses.

357. I admit that in these communications over the US wires it was decided that the appeal court's opinion would not reference my name or that of any of the K11-2 Defendants.

358. I admit that the purpose of having omitted my name or that of any of the K11-2 Defendants was to attempt to conceal from Plaintiff Kaul the conspiratorial element of the scheme of manipulating appellate opinion to improperly procure legal opinion for the sole purpose of obstruction of justice within the United States District Court.

359. I admit that the improperness/illegality of the scheme further evidences my guilt of the levied charges.

360. I admit that my perpetration of the scheme is tantamount to an admission of the factual foundation of K11-17

361. I admit that on January 24, 2024, Plaintiff Kaul submitted his REPLY TO DEFENDANTS CHRISTOPHER J. CHRISTIE AND JAMES HOWARD SOLOMON'S MOTION TO DISMISS (K11-17: D.E. 31).

362. I admit that by February 1, 2024, I failed to respond to Plaintiff Kaul's REPLY TO DEFENDANTS CHRISTOPHER J. CHRISTIE AND JAMES HOWARD SOLOMON'S MOTION TO DISMISS (K11-17: D.E. 31).

363. I admit that I have continued to fail to respond to Plaintiff Kaul's REPLY TO DEFENDANTS CHRISTOPHER J. CHRISTIE AND JAMES HOWARD SOLOMON'S MOTION TO DISMISS (K11-17: D.E. 31).

364. I admit that my failure to respond constitutes an admission of the factual foundation of K11-17 and further evidences my guilt of the levied charges.

365. I admit that on March 13, 2023, the Court entered an ORDER FOR DISCOVERY PLAN (K11-17: D.E. 65).

366. I admit that I, in collusion/conspiracy with the other Defendants have willfully/knowingly violated and continue to violate the order.

367. I admit that my willful/knowing violations of an order of the United States District Court constitute an act of obstruction of justice.

368. I admit that I, a lawyer, an ex-US Attorney, an ex-state governor and an ex-presidential candidate, have violated and continue to violate an order of the United States District Court because I am guilty of the levied charges.

369. I admit that I, a lawyer, an ex-US Attorney, an ex-state governor and an ex-presidential candidate, have violated and continue to violate an order of the United States District Court and that these violations constitute an admission of the factual foundation of K11-17.

370. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that the facts were asserted directly at me.

371. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that the nature, character and meaning of the facts had been explained and clarified to me by my counsel.

372. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that the nature, character and meaning of the facts were known to me because I am a lawyer and an ex-US Attorney.

373. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that I completely understood the nature, character and meaning of the facts.

374. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that I had/have direct knowledge of the truthfulness of the facts.

375. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that I was directly involved in the perpetration of the facts.

376. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that although I had the right and ability to deny the facts, I did not, because the facts are true.

377. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the facts in that the substantial body of fact asserted in the Complaint required it be admitted, denied, or dismissed with contrary evidence or fact, and it was not.

378. I admit that the absence of any ambiguity in my silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 does further substantiate the factual foundation of K11-17.

379. I admit that my counsel clarified and explained to me the civil nature of K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17

309. I admit that because I am a lawyer/ex-US Attorney I know, independently of counsel's advice, that the charges in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 were/are of a civil nature.

380. I admit that I knew/know that K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 were/are civil proceedings with civil consequences.

381. I admit that there existed and exist no other factors to explain my silence in failing to deny the facts contained within K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15 and or the factual foundation of K11-17 other than my knowledge that the facts are true.

382. I admit that during the pendency of K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17, I was not subject to any state and or federal criminal investigations, in which a denial of the facts would have deprived me of my right against self-incrimination.

383. I admit that during the pendency of K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17, I was not subject to any state and or federal criminal investigations, in which an admittance of the facts would have deprived me of my right against self-incrimination.

384. I admit that during the pendency of K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17, I was not subject to any state and or federal criminal investigations, in which a denial of the facts would have actually caused me to self-incriminate.

385. I admit that during the pendency of K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17, I was not subject to any state and or federal criminal investigations, in which an admittance of the facts would have actually caused me to self-incriminate.

386. I admit that I knew and know that if the facts were not true, I could have simply denied the facts asserted by Plaintiff Kaul in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17, but I did not and have not, because they are true,

387. I admit that my knowledge of the truth of the facts asserted in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes the sole basis for my silence in failing to deny the facts

388. I admit that my knowledge of the truth of the facts asserted in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes the sole basis for my actual failure to deny the facts.

389. I admit that I know that if I were innocent of the charges levied in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17, I would have simply denied the asserted facts, but I did/have not, because I was/am/will remain guilty of the levied charges.

390. I admit that my failure to deny the facts asserted in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 constitutes an admission of the factual foundation of K11-17.

391. I admit that I read the judicial opinions/orders in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17.

392. I admit that in almost all cases I was represented by counsel, who clarified and explained to me the nature, character and meaning of the judicial opinions/orders in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17.

393. I admit that as a lawyer and ex-US Attorney I did independently of counsel's advice understand the nature, character and meaning of the judicial opinions/orders in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17.

394. I admit that I understood and understand the nature, character and meaning of the March 13, 2024, ORDER FOR DISCOVERY PLAN (K11-17: D.E. 65).

395. I admit that I know that the Court did not find that my silence in failing to deny the facts in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 does not constitute an

admission of the facts, because the Court knew that my silence did in fact constitute an admission of the facts.

396. I admit that I know that the Court did not find that my actual failure to deny the facts in K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 does not constitute a tacit admission of the facts, because the Court knew that my silence did in fact constitute an admission of the facts.

397. I admit that I know that the Court in K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 did not find evidentially invalid my admissions of undisputed fact in K1, that were submitted into evidence in subsequent cases, because the Court in K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17 did know that the K1 admissions of undisputed fact did contribute to the cumulative proof of subsequent claims (2016 to 2024).

The United Nations Universal Declaration Of Human Rights

398. I admit that I have read the attached document entitled 'Universal Declaration of Human Rights'

399. I admit that I have known about the 'Universal Declaration of Human Rights' since my attendance at college.

400. I admit that since my attendance at college there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

401. I admit that since my attendance at law school there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

402. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my license mandated attendance at obligatory continuing legal education courses.

403. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my private practice of law in New Jersey (1987-2001).

404. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my practice of law within the Office of the US Attorney (2001-2009).

405. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my legal obligation as the Governor of New Jersey (2009-2017) to ensure the protection of the human/civil/constitutional rights of its citizens and all persons within its geographic boundaries.

406. I admit that the obligatory continuing legal education courses involve modules on legal ethics and human rights.

407. I admit that certain courses have included modules on human rights violations committed during the Second World War by lawyers/judges/politicians associated with the Nazis.

408. I admit that I know, from these courses and my general reading, that the 'Universal Declaration of Human Rights' emerged in part as a consequence of human rights violations committed by lawyers/judges/politicians associated with the Nazis.

409. I admit that in 1987, the year I graduated from law school, I knew what rights were protected under the 'Universal Declaration of Human Rights'.

410. I admit that from 2008 to 2017, I, as the Governor of New Jersey, had a legal duty to protect Plaintiff Kaul's human/civil/constitutional rights.

411. I admit that in 2008, the year I assumed the Office of the New Jersey Governor, I knew I was prohibited from conspiring to violate Plaintiff Kaul's human/civil/constitutional rights.

412. I admit that in 2008 I knew I was prohibited from actually violating Plaintiff Kaul's human/civil/constitutional rights.

413. I admit that in 2008 I knew it was illegal to conspire to violate Plaintiff Kaul's human/civil/constitutional rights.

414. I admit that in 2008 I knew it was illegal to actually violate Plaintiff Kaul's human/civil/constitutional rights.

415. I admit that since 2008 I have conspired with The Kaul Cases Defendants to knowingly and willfully abuse the power of the American State to purposefully violate Plaintiff Kaul's human/civil/constitutional rights.

416. I admit that the knowingness, willfulness, malicious-ness, and purposefulness in my conspiring with The Kaul Cases Defendants to violate Plaintiff Kaul's human/civil/constitutional rights is proven by the within admitted facts about which there is no material dispute.

417. I admit that the knowingness, willfulness, malicious-ness, and purposefulness of the actual violation of Plaintiff Kaul's human/civil/constitutional rights by myself and The Kaul Cases Defendants, is proven by the within admitted facts about which there is no material dispute.

418. I admit that the knowing, willful, malicious, and actual violation of Plaintiff Kaul's human rights is commensurate with the standard of that of a crime against humanity.

Section 1983

2005 - 2010

419. I admit that I knew that my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-17 Defendants, do substantiate an abuse of state power.

420. I admit that I knew I was a public-state official pursuant to a Section 1983 claim.

421. I admit that I knew Plaintiff Kaul retained human/civil/constitutional rights.

422. I admit that I knew that my perpetration against Plaintiff Kaul of amongst other things, illegal schemes of public corruption that involved quid pro quo schemes of bribery, were knowing violations of his human/civil/constitutional rights by a public-state official.

423. I admit that I knew that my violations of Plaintiff Kaul's human/civil/constitutional rights do substantiate proof of his section 1983 claims, as asserted in K11-17.

424. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-17 Defendants, they became intertwined with, and in possession of state power and became state actors.

425. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-17 Defendants, I sold, in a knowingly illegal manner, state-public power to, amongst others, the K11-17 Defendants.

426. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-17 Defendants, I sold, in a knowingly illegal manner, state-public power to, amongst others, the K11-17 Defendants, without the permission of the public.

427. I admit that I did not seek the permission of the public, as I knew it would be denied.

428. I admit I know that the public would have denied permission because the public would have known my selling state-public power for personal gain was illegal.

429. I admit that had I sought permission from the public, it would have exposed my long-standing "pattern" of abuse of political-state power for personal gain.

430. I admit that had my long-standing "pattern" of abuse of political-state power for personal gain been exposed, my gubernatorial and presidential ambitions/plans would have been negatively impacted.

431. I admit that had my long-standing "pattern" of abuse of political-state power for personal gain been exposed, I would have become subject to criminal indictment.

432. I admit that had I become subject to criminal indictment, all my prior crimes since the commencement of my political career in the 1990s would have become exposed.

433. I admit that had all my prior crimes become exposed my gubernatorial and presidential ambitions/plans would have been negatively impacted.

434. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-17 Defendants, I sold, in a knowingly illegal manner, state-judicial power to, amongst others, the K11-17 Defendants, without the permission of the public.

435. I admit that I was able to sell state-judicial power to, amongst others, the K11-17 Defendants, because by reason of the absolute power of the New Jersey Governor's Office over the state judiciary, I retained absolute control of New Jersey state Judges.

436. I admit that I abused my absolute control of state judges and sold the power of the state judiciary to amongst others, the K11-17 Defendants.

437. I admit that The Kaul Cases Defendants, including the K11-17 Defendants, sought and required this power to suppress any legal challenges that Plaintiff Kaul filed against the illegal revocation and or its consequences.

438. I admit that I abused the gubernatorial power of state and that of the Office of the US Attorney for the District of New Jersey to cause judges within the New Jersey Superior Court (trial/appellate/supreme) to suppress any legal challenges/defenses filed by Plaintiff Kaul in regard to the illegal revocation and or its consequences.

439. I admit that I abused the gubernatorial power of state and that of the Office of the US Attorney for the District of New Jersey to cause judges within the U.S.B.C. for the District of New Jersey to suppress any legal challenges/defenses filed by Plaintiff Kaul in regard to the illegal revocation and or its consequences.

440. I admit that I abused the gubernatorial power of state and that of the Office of the US Attorney for the District of New Jersey to cause judges within the U.S.D.C. for the District of New Jersey to suppress any legal challenges/defenses filed by Plaintiff Kaul in regard to the illegal revocation and or its consequences.

441. I admit that I abused the gubernatorial power of state to cause all politicians/legislators/lawyers within the State of New Jersey to ignore Plaintiff Kaul's requests for assistance and or enquiries as to any facts of the revocation scheme.

442. I admit that I abused the gubernatorial power of state to silence all politicians/legislators/lawyers as to the facts of the revocation scheme, with threats of professional ruin and or criminal indictments.

443. I admit that I knew that my perpetration of these schemes of human/civil/constitutional rights violations were illegal and did/do constitute a knowing/willful deprivation of Plaintiff Kaul's rights under 'color of state'.

444. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that Plaintiff Kaul would be eliminated.

445. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that would become the New Jersey Governor in 2009 and 2013, and would remain immune to civil/criminal prosecution.

446. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that I would become the US President in 2016, and would remain immune to civil/criminal prosecution.

447. I admit that I was motivated by the promise of political campaign donations from hospital corporations/insurance corporations/neurosurgical societies/neurosurgeons to cause the illegal revocation of Plaintiff Kaul's license.

448. I admit that I knew I had to manufacture a basis/pretext on which to cause the illegal revocation of Plaintiff Kaul's license.

449. I admit that I knew there existed no legitimate or legal basis on which to cause the illegal revocation of Plaintiff Kaul's license.

450. I admit that recognizing there existed no legitimate or legal basis on which to cause the illegal revocation of Plaintiff Kaul's license, I ordered my attorney general/state medical board there be manufactured a knowingly illegitimate/illegal case to cause the illegal revocation of Plaintiff Kaul's license.

451. I admit that the manufacturing of a knowingly illegitimate/illegal case to cause the illegal revocation of Plaintiff Kaul's license did require the commission of perjury by other physicians.

452. I admit I knew that the commission of perjury would be perpetrated by these other physicians while acting as experts for the state.

453. I admit that the commission of perjury by these other physicians while acting as experts for the state, would involve them falsely testifying under oath that Plaintiff Kaul had not been qualified to perform minimally invasive spine surgery.

454. I admit that these expert physicians were given assurances that they would not be criminally prosecuted for perjury.

455. I admit that I knew that these expert physicians were reassured they would not be civilly/criminally prosecuted because they believed Plaintiff Kaul would be eliminated.

456. I admit that I knew that these expert physicians were reassured they would not be civilly/criminally prosecuted because they believed that even if Plaintiff Kaul were not eliminated, he would never ascertain the facts that constitute the factual foundation of K11-17.

457. I admit that I knew that these expert physicians were reassured they would not be civilly/criminally prosecuted because they believed that even if Plaintiff Kaul were not eliminated, I would, as the NJ Governor/US President abuse the power of state/federal government to suppress any legal attempt by Plaintiff Kaul to ascertain the facts that constitute the factual foundation of K11-17.

458. I admit I knew that these experts physicians knew they would be committing perjury.

459. I admit that I knew that when these expert physicians actually committed perjury during the administrative proceeding (April 9 to June 28, 2013), they did so knowing that they were committing perjury.

460. I admit that when these expert physicians committed perjury, they knew they were committing felonies.

461. I admit that I knew that these expert physicians knew Plaintiff Kaul was licensed/trained/credentialed/qualified to perform minimally invasive spine surgery.

462. I admit that I knew that these expert physicians were motivated to commit perjury in order to eliminate the competitive threat of Plaintiff Kaul from the minimally invasive spine surgery market.

463. I admit that I entered into a series of quid pro quo schemes with medical malpractice lawyers. In which consequent to the revocation and publicity surrounding the illegal revocation (2012-2014), they would file knowingly frivolous malpractice claims in state courts whose judges I controlled.

464. I admit I knew that Plaintiff Kaul's medical malpractice carriers would settle the cases immediately, consequent to the wide publicity regarding the suspension/revocation.

465. I admit I knew that within these medical malpractice quid pro quo schemes, the lawyers would kickback a percentage of the settlement to me.

466. I admit that millions of dollars were actually paid by Plaintiff Kaul's medical malpractice carriers in these knowingly fraudulent cases (2013-2017)

467. I admit that I received kickbacks from these knowingly fraudulent settlements (2013-2017)

468. I admit that I knew the scheme conducted across the US wires, was illegal and constituted wire fraud.

469. I admit that I knew the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and constituted wire fraud.

470. I admit that I knew the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and constituted public corruption.

471. I admit that I knew that Plaintiff Kaul had been licensed since 1996 to perform both medicine and surgery in the State of New Jersey.

472. I admit that I knew that Plaintiff Kaul had been trained to perform minimally invasive spine surgery since at least 2003.

473. I admit that I knew that Plaintiff Kaul had been qualified to perform minimally invasive spine surgery since at least 2003.

474. I admit that I knew that Plaintiff Kaul had been properly licensed and credentialed to perform minimally invasive spine surgery since at least 2003.

475. I admit that I knew that Plaintiff Kaul had been properly licensed and credentialed to perform minimally invasive spine surgery by Medicare since at least 2005.

476. I admit that I knew that Plaintiff Kaul had in 2005 invented the percutaneous spinal fusion procedure.

477. I admit that I knew that Plaintiff Kaul had been credentialed by at least six (6) state licensed surgical centers in New Jersey to perform minimally invasive spine surgery since at least 2003.

478. I admit that I knew that Plaintiff Kaul had successfully performed hundreds of minimally invasive spinal fusions.

479. I admit that despite knowing Plaintiff Kaul was experienced/licensed/credentialed/trained/qualified and had invented the percutaneous

procedure, I did abuse the power of state and cause many other state officials/judges/physicians to participate in a knowingly illegal scheme to have illegally revoked Plaintiff Kaul's license.

480. I admit that I acted with impunity in the perpetration of the scheme, because I believed Plaintiff Kaul would never expose the facts that constitute the factual foundation of K11-17.

481. I admit that I acted with impunity in the perpetration of the scheme, because that even if I Plaintiff Kaul exposed the facts that constitute the factual foundation of K11-17, he would be financially ruined and unable to retain a lawyer.

482. I admit that I acted with impunity in the perpetration of the scheme, because even if Plaintiff Kaul exposed the facts that constitute the factual foundation of K11-17, and unable to retain a lawyer, did prosecute his claims, I would cause a corruption of the courts/obstruction of justice to prevent his prosecution of the case and procurement of discovery.

RICO – Count One
‘COVID Vaccine’ Toxicity

483. I admit that I know the reason Defendant FSMB failed to address/completely ignored the claims and facts pertaining to the known toxicity/ineffectiveness of the so called ‘COVID vaccine’ and in fact mRNA toxin, is because they are true.

484. I admit that one of the reasons all Defendants have violated the Court’s March 13, 2024, ORDER FOR DISCOVERY PLAN is to avoid having to disclose evidence of the global scheme of inoculation of a knowing gene manipulating mRNA toxin into billions of humans.

DATED: APRIL 22, 2024



RICHARD ARJUN KAUL, MD

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

FILED

MAR 15 2024

PETER A. MOORE JR., CLERK
US DISTRICT COURT, EDNC
BY *[Signature]* DEP CLK

**RICHARD ARJUN KAUL, MD
DAVID BASCH, MD**

CASE NO.: 23-CV-2016 (JLR)

Plaintiffs

v.

**ADMISSION OF MATERIAL AND
UNDISPUTED FACT OF DEFENDANT
ROBERT FRANCIS HEARY**

ROBERT HEARY

Defendant.

Dated: March 9, 2024

Context To Schemes And Violations

- 1. I admit that since approximately 1999, I have been a nationally recognized and highly influential leader within the political wing of the American neurosurgical community.**
- 2. I admit that since approximately 1999, a substantial part of my time, effort and resources have been directed towards seizing power within the political wing of the American neurosurgical community.**
- 3. I admit that since 1999 I have used this power to illegally exclude competition and to charge supra-competitive professional fees.**
- 4. I admit that since 1999 my illegal charging of supra-competitive rates has caused me to illegally amass a personal material fortune.**
- 5. I admit that my current personal net worth is in excess of five hundred million dollars (\$500,000,000).**
- 6. I admit that my personal net worth is in excess of five hundred million dollars (\$500,000,000) was procured in large part through illegal schemes of racketeering, antitrust and violations of the civil, constitutional, and human rights of my competitors and others.**

Facts Admitted In K11-17/K11-10/K11-14 As Corroborating Proof Of Claims In K11-17

7. I admit I know that some of the facts that substantiate and or otherwise prove my knowing violation of Plaintiff Kaul's human rights and of the claims levied against me in K11-17, were facts unambiguously asserted in support of the claims levied against me in K11-7/K11-10 by Plaintiff Kaul.

8. I admit that I read the complaint/amended complaint filed against me by Plaintiff Kaul in K11-7 respectively on August 19, 2021 (K11-7: D.E. 1)/September 13, 2021 (K11-7:D.E. 14) AND the complaint filed against me by Plaintiff Kaul in K11-10 on March 9, 2023 (K11-10: D.E. 1) AND the complaint filed against me by Plaintiff Kaul in K11-14 on June 22, 2023 (K11-14: D.E. 1).

9. I admit that in K11-7/K11-10/K11-14 I was represented by counsel, who clarified and explained to me the nature, character and meaning of the facts asserted against me in both complaints.

10. I admit that I understood and understand the nature, character and meaning of the facts asserted against me in K11-7/K11-10/K11-14 in all the complaints and amended complaint.

11. I admit that on December 23, 2021, I filed a procedural motion to dismiss the amended complaint in K11-7 (D.E. 144/145) AND that in K11-10/K11-14, I failed to deny the allegations/facts/file a motion to dismiss AND that in K11-14 the Court entered Default (K11-14: D.E. 32) against me.

12. I admit that I know that in filing a procedural motion to dismiss the amended complaint, I had the right to deny the facts asserted by Plaintiff Kaul AND that in K11-10/K11-14, I failed to answer or otherwise respond, although I know I had the right to deny the facts asserted by Plaintiff Kaul AND that by filing a procedural motion to dismiss the Complaint in K11-17, despite knowing I had the right to deny the K11-17 facts, I have ADMITTED to the ALL the facts in K11-7/K11-10/K11-14/K11-17.

13. I admit that I did not deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17.

14. I admit that the reason I did not deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 is because they are true.

15. I admit that I know that I had the right to file a summary judgment motion to dismiss the complaints and amended complaint in K11-7/K11-10/K11-14 AND the Complaint in K11-17.

16. I admit that I did not file summary judgment motions to dismiss the complaints and amended complaint in K11-7/K11-10/K11-14 AND the Complaint in K11-17.

17. I admit that the reason I did not file summary judgment motions to dismiss the complaints and amended complaint in K11-7/K11-10/K11-14 AND the Complaint in K11-17, is because I had/have no evidence or facts to disprove the summary judgment standard truth of the facts asserted by Plaintiff Kaul.

18. I admit that in K11-7 on January 13, 2022, I filed a reply (D.E. 156/157) to Plaintiff Kaul's January 13, 2022, opposition papers (D.E. 155) to my December 23, 2021, procedural motion to dismiss (D.E. 144/145).

19. I admit that I know that in filing my reply to Plaintiff Kaul's January 13, 2022, opposition papers (D.E. 155) to my December 23, 2021, motion (D.E. 144/145) I had the right to deny the facts asserted by Plaintiff Kaul in his September 13, 2021, amended complaint (D.E. 14) and January 13, 2022, opposition papers (D.E. 155).

20. I admit that I did not deny the facts asserted by Plaintiff Kaul in his September 13, 2021, amended complaint and or his January 13, 2022, opposition papers (D.E. 155).

21. I admit that the reason I did not deny the facts asserted by Plaintiff Kaul in K11-7 is because they are true.

22. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that the facts were asserted directly at me.

23. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that the nature, character and meaning of the facts had been explained and clarified to me by my counsel.

24. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that I completely understood the nature, character and meaning of the facts.

25. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that I had direct knowledge of the truthfulness of the facts.

26. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that I was directly involved in the perpetration of the facts.

27. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that although I had the right and ability to deny the facts, I did not, because the facts are true.

28. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in K11-7/K11-10/K11-14/K11-17 constitute a tacit admission of the facts in that the substantial body of fact asserted in the K11-7/K11-10/K11-14/K11-17 Complaints require it be admitted, denied, or dismissed with contrary evidence or fact, and it was not.

29. I admit that the absence of any ambiguity in my silence in failing to deny the facts asserted by Plaintiff Kaul in the K11-7/K11-10/K11-14/K11-17 Complaints tacitly substantiates the asserted facts.

30. I admit that my counsel clarified and explained to me the civil nature of K11-7/K11-10/K11-14/K11-17.

31. I admit that I know that K11-7/K11-10/K11-14/K11-17 were/are civil proceedings with civil consequences.

32. I admit that there existed and exist no other factors to explain my silence in failing to deny the facts, other than my knowledge that the facts were and are true.

33. I admit that during the pendency of K11-7/K11-10/K11-14/K11-17, I was not/am not subject to any state and or federal criminal investigations, in which a denial of the facts would have deprived/deprive me of my right against self-incrimination.

34. I admit that during the pendency of K11-7/K11-10/K11-14/K11-17 I was not/am not subject to any state and or federal criminal investigations, in which an admittance of the facts would have deprived/deprive me of my right against self-incrimination.

35. I admit that during the pendency of K11-7/K11-10/K11-14/K11-17, I was not/am not subject to any state and or federal criminal investigations, in which a denial of the facts would have caused/will cause me to self-incriminate.

36. I admit that during the pendency of K11-7/K11-10/K11-14/K11-17, I was not/am not subject to any state and or federal criminal investigations, in which an admittance of the facts would have caused/will cause me to self-incriminate.

37. I admit that I knew and know that if the K11-7/K11-10/K11-14/K11-17 facts were not true, I could have simply denied the facts asserted by Plaintiff Kaul, but I did not, because they are true.

38. I admit that my knowledge of the truth of the facts asserted in K11-7/K11-10/K11-14/K11-17 constitutes the sole basis for my silence in failing to deny the facts.

39. I admit that my knowledge of the truth of the facts asserted in K11-7/K11-10/K11-14/K11-17 constitutes the sole basis for my actual failure to deny the facts.

40. I admit that I know that if I were innocent of the charges levied in K11-7/K11-10/K11-14/K11-17, I would have simply denied the facts asserted in K11-7/K11-10/K11-14/K11-17, but I did not, because I am guilty of the charges levied in K11-7/K11-10/K11-14/K11-17 AND no court/jury has stated and of found otherwise.

41. I admit that I have read the September 12, 2022, opinion, and order of the district judge (D.E. 168) in K11-17.

42. I admit that in K11-7 I was represented by counsel, who clarified and explained to me the nature, character and meaning of the opinion and order of the district judge (D.E. 168).

43. I admit that I understood and understand the nature, character and meaning of the opinion and order of the district judge (D.E. 168).

44. I admit that I know that the district judge did not find that my silence in failing to deny the facts in any of The Kaul Cases does not constitute a tacit admission of the facts, because the district judge knew that my silence DID IN FACT CONSTITUTE A TACIT ADMISSION OF THE FACTS.

45. I admit that I know that the district judge did not find that my actual failure to deny the facts in any of The Kaul Cases does not constitute a tacit admission of the facts, because the district judge knew that my silence DID IN FACT CONSTITUTE A TACIT ADMISSION OF THE FACTS.

46. I admit that I know that the district judge in K11-7 did not find evidentially invalid my admissions of undisputed fact in K1, that were submitted into evidence in K11-7, because the district judge in K11-7 DID KNOW THAT THE K1 ADMISSIONS OF UNDISPUTED FACT DID PROVE THE K11-7 CLAIMS.

The United Nations Universal Declaration Of Human Rights

47. I admit that I have read the attached document entitled 'Universal Declaration of Human Rights (Exhibit 4).

48. I admit that I have known about the 'Universal Declaration of Human Rights' since my attendance at college.

49. I admit that since my attendance at college there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

50. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my license mandated attendance at continuing medical education courses.

51. I admit that the continuing medical education courses involve modules on medical ethics and human rights.

52. I admit that certain courses have included modules on human rights violations committed during the Second World War by physicians associated with the Nazis.

53. I admit that I know, from these courses and my general reading, that the 'Universal Declaration of Human Rights' emerged in part as a consequence of human rights violations committed by physicians associated with the Nazis.

54. I admit that in 2005 I knew what rights were protected under the 'Universal Declaration of Human Rights'.

55. I admit that in 2005 I knew I was prohibited from conspiring to violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

56. I admit that in 2005 I knew I was prohibited from violating Plaintiff Kaul's fundamental human/civil/constitutional rights.

57. I admit that in 2005 I knew it was illegal to conspire to violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

58. I admit that in 2005 I knew it was illegal to violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

59. I admit that since 2005 I have conspired with The Kaul Cases Defendants to knowingly and willfully abuse the power of the American State to purposefully violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

60. I admit that the knowingness, willfulness, malicious-ness, and purposefulness in my conspiring with The Kaul Cases Defendants to violate Plaintiff Kaul's human/civil/constitutional rights is proven by the below admitted facts about which there is no material dispute.

61. I admit that the knowingness, willfulness, malicious-ness, and purposefulness of the violation of Plaintiff Kaul's human/civil/constitutional rights by myself and The Kaul Cases Defendants, is proven by the below admitted facts about which there is no material dispute.

62. I admit that the knowing, willful, malicious, and purposeful violation of Plaintiff Kaul's human/civil/constitutional rights is commensurate with the standard of that of a crime against humanity.

Section 1983

2005 - 2010

63. I admit that because of my illegal schemes of public corruption that involved bribing Defendant Christie I became intertwined with, and in possession of state power and became a state actor.

64. I admit that because of my illegal schemes of public corruption that involved bribing members of the state government I became intertwined with, and in possession of state power and became a state actor.

65. I admit that because of my illegal schemes of public corruption that involved bribing members of the federal government I became intertwined with, and in possession of state power and became a state actor.

66. I admit that because of my illegal schemes of public corruption that involved bribing members of the state legislature I became intertwined with, and in possession of state power and became a state actor.

67. I admit that because of my illegal schemes of public corruption that involved bribing members of the state judiciary I became intertwined with, and in possession of state power and became a state actor.

68. I admit that because of my illegal schemes of public corruption that involved bribing members of the federal judiciary I became intertwined with, and in possession of state power and became a state actor.

69. I admit that my illegal schemes of public corruption and conspiring with state officials were perpetrated in a mutually beneficial and symbiotic manner.

70. I admit that my illegal schemes of public corruption and conspiring with state officials were perpetrated in a manner of mutual benefit and joint participation.

71. I admit that my illegal schemes of public corruption and conspiring with state officials were perpetrated in a manner of mutual benefit in which state officials and I used the US wires to exchange commands and words of encouragement in the successful execution of the schemes.

72. I admit that my illegal schemes of public corruption and conspiring with state officials were purposed to and did in fact cause me to illegally acquire the power and function of state, that I used to professionally threaten physicians who refused to support my schemes against Plaintiff Kaul.

73. I admit that my illegal schemes of public corruption and conspiring with state officials were purposed to and did in fact cause me to illegally acquire the power and function of state, that I used to have professionally investigated physicians who refused to support my schemes against Plaintiff Kaul.

74. I admit that my illegal schemes of public corruption and conspiring with state officials were purposed to and did in fact cause me to illegally acquire the power and function of state, that I used to professionally threaten physicians who attempted to expose my schemes.

75. I admit that my illegal schemes of public corruption and conspiring with state officials created a nexus whereby the state/insurance industry's independently motivated scheme to have Plaintiff Kaul illegally eliminated in order to eradicate past debt/future financial liability to increase insurance corporate/executive profits AND kickbacks/bribes to state actors, WAS PURPOSEFULLY FURTHERED AND CONCEALED under private cover of myself, neurosurgical societies, and other non-official persons, by amongst other things, defamation, and derogation of Plaintiff Kaul's right and qualifications to perform minimally invasive spine surgery.

2010 - 2023

76. I admit that I abused the immense power of my 'state actor' status to conspire to violate Plaintiff Kaul's right to due process AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

77. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

78. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

79. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

80. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

81. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

82. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial-like corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

83. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

84. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing Judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

85. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing Judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

86. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing Judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

87. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing Judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

88. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing Judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

89. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

90. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

91. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

92. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

93. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

94. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial-like and judicial corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life

95. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

96. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

97. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

98. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

99. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

100. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial-like and judicial corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

101. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

102. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

103. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

104. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

105. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

106. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

107. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state judiciary to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the state of New Jersey by committing and or facilitating the commission of schemes of obstruction of justice AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

108. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state judiciary to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the state of New Jersey by committing and or facilitating the commission of schemes of public corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

109. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state government to coerce state judges to dismiss all cases filed by Plaintiff Kaul in state courts

within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of obstruction of justice AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

110. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state government to coerce state judges to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of public corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

111. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and/or otherwise corrupting members of the federal judiciary to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of obstruction of justice AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

112. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal judiciary to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of public corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

113. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal government to coerce federal judges to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of obstruction of justice AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

114. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal government to coerce federal judges to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of public corruption AND I admit I knew and in fact intended for these

violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

115. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process and his property by conspiring with The Kaul Cases Defendants to illegally deprive Plaintiff Kaul of the property of his accounts receivable and other assets in the Chapter 11 proceedings in the bankruptcy court within the geographic boundaries of New Jersey by committing and or facilitating the commission of a scheme of bankruptcy fraud **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

116. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his economic standing by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

117. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his reputation by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

118. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his livelihood by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

119. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

120. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his life by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury

to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

121. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his professional standing by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

122. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

123. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

124. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his physical standing by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

125. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of judicial and public corruption, his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

126. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his economic standing by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to

cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

127. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his economic standing by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

128. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his reputation by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

129. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his reputation by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

130. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his livelihood by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

131. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his livelihood by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

132. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

133. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

134. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his life by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

135. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his life by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

136. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his professional standing by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

137. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his professional standing by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in

the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

138. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

139. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

140. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

141. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

142. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his physical standing by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to

cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

143. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his physical standing by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

144. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of public and private corruption, the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

145. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of public and private corruption, his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

146. I admit that from 2005 to 2016 the purpose of my willful, knowing, and ongoing abuse of my immense 'state actor' power was to perpetrate a scheme to violate Plaintiff Kaul's human and constitutional rights that involved, amongst other things, an ostracization of Plaintiff Kaul, a destruction of his economic standing, reputation and livelihood, the resultant deprivations of which caused and continue to cause conditions of homelessness, poverty and unemployment to him and his family AND I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

147. I admit that from 2016 to 2023, and as a consequence of Plaintiff Kaul's prosecution of The Kaul Cases, I and others schemed and continue to scheme, in the violation of Plaintiff Kaul's right to due process in the United States District Court through the willful, knowing, and ongoing abuse of the immense power of our 'state actor' status, the scheme's purpose being an attempt to prevent Plaintiff Kaul from exposing crimes committed by myself and those of The Kaul Cases Defendants in a period from at least 2005 to the present AND I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff

Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

148. I admit that I used the US wires in a knowingly illegal manner to perpetrate schemes in which I conspired with The Kaul Cases Defendants to abuse the immense power of my 'state actor' status to violate Plaintiff Kaul's human and constitutional rights and cause and to continue to cause injury to his economic standing/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

149. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, The Kaul Cases Defendants, and members of the Office of the New Jersey Attorney General **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

150. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, The Kaul Cases Defendants, and members of the Office of the Office of the New Jersey Governor **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

151. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, The Kaul Cases Defendants, and members of the New Jersey Office of Administrative Law **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

152. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, The Kaul Cases Defendants, and members of the New Jersey Board of Medical Examiners **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

RICO:

Overall Claim Admission

153. I admit to the fact that the below facts are undisputed, admitted and prove all elements of all claims asserted against me by Plaintiff Kaul.

154. I do not refute/contest/rebut/deny the evidence contained within the following documents: **(i)** The Waldman E-mail; **(ii)** The Zerbinl Certification; **(iii)** The Sabo Certification; **(iv)** The Solomon Critique; **(v)** The Solomon Critique 2; **(vi)** The Calabrese Certification; **(vii)** The Przybylski Disciplinary Notice; **(viii)** The Feldman Certification; **(ix)** The Yeung E-mail; **(x)** The Union County Court proceedings; **(xi)** The Ciarrocca Complaint; **(xii)** The Federal Trade Commission Guidelines.

155. I admit that the evidence referenced in point 2. is further proof of the undisputed-ness of the facts asserted in the Complaint.

Element Specific Admissions

Culpable Person Who Willfully Or Knowingly

156. I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006, in the State of New Jersey, and has continued through every other state and certain courts within the United States District Court to at least August 2023.

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

158. I admit that I willfully and knowingly violated the law, when I engaged in a pattern of racketeering with other defendants, in which I violated the authority of state agencies and power by committing and or facilitating bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering **AND** I admit I know that my illegal violation of state authority and the US Constitution, to which I have sworn allegiance, does constitute high treason.

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

Commits Or Conspires To The Commission Of "Racketeering Activity"

160. I admit that in a period from 2006 to 2022, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state agencies and power to have illegally revoked Kaul's New Jersey medical license, to illegally destroy Plaintiff Kaul's economic standing, reputation, and livelihood and to obstruct justice and facilitate the commission of a 'Fraud on the Court' in the United States District Court by bribing or aiding and abetting a scheme of bribery of a federal judge in Kaul v ICE: 21-CV-06992, to have the case illegally dismissed with prejudice.

Through A Pattern

161. I admit that in a period from 2006 to 2022 I engaged in an ongoing pattern of corruption of administrative, state, and federal courts within the geographic boundaries of the United States, the purpose of which was to deprive Plaintiff Kaul of any access to substantive justice, illegally deprive him of his medical license, his property, his livelihood, his reputation, his material assets, his access to banking services and to have him jailed, deported and or killed.

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

An Effect On Interstate Or Foreign Commerce

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

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

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

Purpose

166. I admit that commencing in approximately 2006, I, in concert and conspiracy with other defendants have engaged in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors,

agencies, and administrative, state, and federal courts within the geographic boundaries of the United States.

167. I admit that I knew that the purpose of the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks was to destroy the economic standing, reputation, and livelihood of Plaintiff Kaul,

168. I admit that I knew the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks were illegal.

2005 – 2010

169. I admit that in or around mid-2005, I came to know, and it became widely known within the spine community that Plaintiff Kaul had invented and successfully performed the first outpatient minimally invasive spinal fusion.

RICO Predicate Act Of Bribery

170. I admit that in approximately 2005, after Plaintiff Kaul invented and performed the first minimally invasive outpatient spinal fusion, I and others in the American neurosurgical and orthopedic communities concluded his expertise in outpatient minimally invasive spine surgery presented a substantial and expanding threat to our hospital-based spine business.

171. I admit that commencing in approximately 2005/2006 I conspired with certain senior members of the American neuro-ortho surgical community to commence perpetrating a scheme of bribery with, amongst others, the then New Jersey Governor, Christopher J. Christie.

172. I admit that I used my position of power within the political wing of the American neurosurgical community to knowingly deceive its members into participating in the scheme of bribery that involved funneling money to the then New Jersey Governor, Christopher J. Christie.

173. I admit that I knew that in the conception and perpetration of the scheme of bribery I would violate and did in fact violate the law.

174. I admit that I knew that in the conception and perpetration of the scheme of bribery I would deprive and did in fact deprive Plaintiff Kaul of his human/civil/constitutional rights.

175. I admit that I knew that in the conception and perpetration of the scheme of bribery I would illegally coopt and did in fact illegally coopt the power of state.

176. I admit that I knew that through the coopting of the power of state I would become and did in fact become a 'state actor'

177. I admit that I knew that with the power of the state and as a 'state actor' I would deprive and did in fact deprive Plaintiff Kaul of his human/civil/constitutional rights.

178. I admit that I knew that with the power of the state and as a 'state actor' It was my intention to deprive Plaintiff Kaul of his human/civil/constitutional rights.

179. I admit that I knew that my deprivation of Plaintiff Kaul's human/civil/constitutional rights was intended to ensure the cessation of his existence.

180. I admit that I knew that my intention to cause the cessation of Plaintiff Kaul's existence was based on my effort to ensure he did not expose The Kaul Cases Defendants scheme of politico-judicial bribery.

181. I admit that I knew/know of the immense criminal consequences to me and others if Plaintiff Kaul exposed our scheme of bribery.

182. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to permanently destroy Plaintiff Kaul's livelihood in all parts of the world, to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

183. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to destroy Plaintiff Kaul's economic standing in all parts of the world, to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

184. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to destroy Plaintiff Kaul's reputation in all parts of the world, to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

185. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to have Plaintiff Kaul incarcerated, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

186. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to force Plaintiff Kaul's family into a state of poverty, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

187. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to alienate Plaintiff Kaul from his children by forcing them into poverty, in order to

cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

188. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to cause Plaintiff Kaul to commit suicide, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

189. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to Defendant Christie in a quid pro quo exchange for him using his executive and ex-US Attorney political power to have violated Plaintiff Kaul's human/civil/constitutional rights AND I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

190. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to Defendant Christie in exchange for him using his executive and ex-US Attorney political power to have Plaintiff Kaul criminally indicted by state and federal authorities AND I admit I knew and in fact intended for these violations of Plaintiff Kaul's human/civil/constitutional rights to cause a knowingly illegal incarceration of Plaintiff Kaul AND to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life IN ORDER to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

191. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use the power of state to have Plaintiff Kaul's license illegally revoked AND I admit I knew and in fact intended for these violations of Plaintiff Kaul's human/civil/constitutional rights to cause a knowingly illegal revocation of Plaintiff Kaul's license AND to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life IN ORDER to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

192. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use the power of state to have conducted grand jury proceedings against Plaintiff Kaul AND I admit I knew and in fact intended for these violations of Plaintiff Kaul's human/civil/constitutional rights to cause a knowingly illegal indictment of Plaintiff Kaul AND

to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

193. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use the power of state to conduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

194. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in a quid pro quo exchange promised to coerce, and did coerce the power of the FBI and the US Attorney's Office to commence a criminal investigation against Kaul, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

195. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use his ex-US Attorney political power to cause to commence a federal criminal investigation against Kaul, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

196. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use his executive power to cause state investigators and prosecutors to commence state criminal investigations against Kaul, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

197. I admit that the bribe monies were funneled to Defendant Christie through law firms, political lobbyists, and public relation firms with which he was politically and or commercially connected in any manner, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country

worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of **The Kaul Cases** Defendants.

198. I admit that I knew the purpose of funneling the bribe monies through law firms, political lobbyists, and public relation firms, was to attempt to conceal the true quid pro quo bribery nature of the monies.

199. I admit that I knew and know that the true quid pro quo bribery nature of the monies rendered my transactions illegal.

200. I admit that I knew and know that I did not inform my bank of the true quid pro quo bribery nature of the transacted monies.

201. I admit that I knew and know that my transferring of the quid pro quo bribery monies constitutes bank fraud.

202. I admit that I knew and know that my commission of bank fraud constitutes a crime.

203. I admit that I knew and know that my commission of bank fraud involved the commission of wire fraud.

204. I admit that I knew and know that the purpose of attempting to conceal the true bribery nature of the monies was my concern that my crimes and those of **The Kaul Cases** Defendants would be exposed.

205. I admit that I knew and know that the purpose of the concealment of my quid pro quo bribery crimes would have been to falsely claim that the bribe monies paid to law firms, political lobbyists, and public relation firms with which Defendant Christie was politically and or commercially connected in any manner, was for professional legal, lobbying and or public relation services.

206. I admit that I knew and know that such a claim would have been false.

207. I admit that I know that I cannot raise such a professional services defense in either this case and or any other civil and or criminal case that might ever be filed against me.

208. I admit that I knew and know that my lawyers advised me as to the scheme of concealment.

209. I admit that in the period from 2005/2006 to 2022, the scheme of bribery expanded to involve an increasing number of persons conducting business within the private and public sectors.

210. I admit that these persons include state and federal investigators.

211. I admit that these persons include state and federal prosecutors.

212. I admit that these persons include state and federal judges.

213. I admit that these persons include personal injury lawyers.

214. I admit that these persons include physicians who competed against Plaintiff Kaul in the minimally invasive spine surgery market.

215. I admit that these persons/entities included journalists/media organizations who have commercial relationships with The Kaul Cases Defendants and or within referenced Third Parties.

216. I admit that these persons include Plaintiff Kaul's ex-patients, whom I and others conspired with the file lawsuits and complaints with the medical board.

217. I admit that these persons include Plaintiff Kaul's ex-physician employees, whom I and others conspired with to provide false legal testimony against Plaintiff Kaul.

218. I admit that these persons include Plaintiff Kaul's ex-nursing employees, whom I and others conspired with to provide false legal testimony against Plaintiff Kaul.

RICO Predicate Act Of Fraud

219. I admit that as a consequence of Plaintiff Kaul having invented and successfully performed the first outpatient minimally invasive spinal fusion, I, along with other spine physicians, commenced conspiring to perpetrate a scheme of fraud, in order to attempt to obstruct Plaintiff Kaul's practice of minimally invasive spine surgery.

220. I admit that the purpose of the scheme of fraud was to obstruct and destroy Plaintiff Kaul's minimally invasive spine surgery practice.

221. I admit that another purpose of the scheme of fraud was to intimidate other physicians, similarly, trained as Plaintiff Kaul, from performing minimally invasive spine surgery.

222. I admit that the scheme of fraud in which I knowingly engaged, involved the public dissemination, and or the aiding and abetting of public dissemination, of the knowing falsehood that Plaintiff Kaul was not qualified/licensed/credentialed to perform minimally invasive spine surgery.

223. I admit that in the perpetration of the scheme of fraud I knew that Plaintiff Kaul was in fact legally qualified, credentialed and licensed to perform surgery, including minimally invasive spine surgery.

224. I admit that in the perpetration of the scheme of fraud I conspired with Drs. Andrew Kaufman and Gregory Przybylski in the subornation of perjury in the legal proceedings that caused the revocation of Plaintiff Kaul's license, in which they testified, with knowing falsity, that Plaintiff Kaul was not qualified to perform minimally invasive spine surgery, and had grossly deviated from a standard of care.

225. I admit that the scheme of fraud in which I knowingly engaged, involved the dissemination, and or the aiding and abetting of dissemination into courts of law of the knowingly falsehood that Plaintiff Kaul was not qualified/licensed/credentialed to perform minimally invasive spine surgery.

a. Public Obstruction

226. I admit that the perpetration of the scheme of fraud involved encouraging and coopting Plaintiff Kaul's patients to sue him by telling them, with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

227. I admit that the perpetration of the scheme of fraud involved encouraging and coopting Plaintiff Kaul's patients to file medical board complaints against him by telling them, with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

b. Legal Profession Obstruction

228. I admit that the perpetration of the scheme of fraud involved encouraging and coopting lawyers to file malpractice suits on behalf of Plaintiff Kaul's patients referred to them by me, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

229. I admit that the perpetration of the scheme of fraud involved encouraging and coopting personal injury lawyers to stop referring their injured clients to Plaintiff Kaul, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

c. Healthcare Profession Obstruction

230. I admit that the perpetration of the scheme of fraud involved encouraging and coopting other physicians to not refer patients to Plaintiff Kaul by telling them, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

231. I admit that the perpetration of the scheme of fraud involved encouraging and coopting surgical centers and hospitals to not provide Plaintiff Kaul hospital privileges by telling

credentialing committee physicians, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

232. I admit that the perpetration of the scheme of fraud involved encouraging and coopting other physicians to file medical board complaints against Plaintiff Kaul by telling the medical board, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

233. I admit that the perpetration of the scheme of fraud involved encouraging and coopting medical device representatives to not provide Plaintiff Kaul the necessary minimally invasive spine surgery devices, by telling them, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

234. I admit that the perpetration of the scheme of fraud involved threatening medical device representatives that if they provided Plaintiff Kaul with the necessary minimally invasive spine surgery devices, I would use my immense political power to coerce other neurosurgeons to stop using their devices.

d. Insurance Industry Obstruction

235. I admit that the perpetration of the scheme of fraud involved conspiring with the insurance industry to illegally deny professional reimbursement to Plaintiff Kaul,

236. I admit that the fraudulent scheme of theft of services was perpetrated with physicians employed by the insurance industry, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

237. I admit that the purpose of the fraudulent scheme of theft of services, was an attempt to exhaust Plaintiff Kaul's business resources.

238. I admit that I knew that the purpose of the fraudulent scheme of theft of services was an attempt to cause a liquidation of Plaintiff Kaul's business by causing a cessation of revenue.

239. I admit that in the perpetration of the fraudulent scheme of theft of services, I conspired with physicians and persons associated with the insurance industry to have illegally diverted to me monies that should have been paid to Plaintiff Kaul.

240. I admit that I believed that the fraudulent scheme of theft of services would cause immense financial hardship to Plaintiff Kaul.

241. I admit that I believed this immense financial hardship would illegally force Plaintiff Kaul out of the minimally invasive spine surgery market.

242. I admit that I believed that if I caused this immense financial hardship to Plaintiff Kaul, he would be forced to engage in unlawful conduct.

243. I admit that I intended for this immense financial hardship to cause Plaintiff Kaul to engage in unlawful conduct.

244. I admit that I intended to have the imagined unlawful conduct cause Plaintiff Kaul to be jailed.

e. Political Body Obstruction

245. I admit that in or around 2007, I and other members of the neurosurgical and orthopedic spine community, recognized that the tactics of our scheme of fraud had failed to eliminate Plaintiff Kaul from the minimally invasive spine surgery market.

246. I admit that in recognizing the failure of our scheme of fraud and its tactics of interfering in Plaintiff Kaul's minimally invasive spine surgery business, I, as a political leader within the neurosurgical community, decided to bribe Defendant Christopher J. Christie to have him use his executive power to order the medical board to revoke Plaintiff Kaul's medical license.

247. I admit that I and The Kaul Cases Defendants knew and know that the Plaintiff Kaul elimination scheme was directly tied to the coopting and capture of the political body and its members.

248. I admit that I and The Kaul Cases Defendants knew and know and that there was a direct connection between the coopting and capture of the political body and its members and Plaintiff Kaul's ability to expose my crimes and those of The Kaul Cases Defendants.

249. I admit that Plaintiff Kaul's unexpected exposing of my crimes and those of The Kaul Cases Defendants, despite our coopting and capture of the political body and its members, evidences the fact that I and The Kaul Cases Defendants foolhardily committed with a long-standing sense of privileged impunity, a massive amount of felonious conduct over almost two (2) decades.

250. I admit that Defendant Christie was the US Attorney for the District of New Jersey from 2000 to 2008.

251. I admit that Defendant Christie was the Governor for the State of New Jersey from 2009 to 2017.

252. I admit that between 2012 to 2016 Defendant Christie campaigned in pursuit of the Republican nomination for the 2016 Presidential Campaign.

253. I admit that between 2016 to 2020, Defendant Christie closely collaborated with President Trump in the nomination of federal Judges within the United States Court of Appeals for the Third Circuit.

254. I admit that between 2016 to 2020, Defendant Christie closely collaborated with President Trump in the nomination of persons to federal agencies.

255. I admit that commencing in approximately 2005, Defendant Christie began seeking financial support for his 2009 political campaign for the governor's office.

256. I admit that I knew the failure of the tactics of our scheme of using the US wires to transmit knowingly fraudulent information to members of the public, the legal profession, the healthcare profession, and the insurance industry, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, left me, as the leader of the neurosurgical community, with no option but to bribe Defendant Christie.

257. I admit that I, as a political leader within the immensely powerful and wealthy neurosurgical community, and its Political Activation Committee, did commence a dialogue with Defendant Christie.

258. I admit that a principal purpose of the dialogue pertained to the delineation of the quid pro quo scheme between myself, the neurosurgical society members, and Defendant Christie.

259. I admit that during the dialogues we discussed the exact nature of the quid pro quo deal in terms of when and what monetary and non-monetary bribes would be exchanged for what elements of the scheme to eliminate Plaintiff Kaul.

260. I admit that the dialogue surrounding the quid pro quo deal was akin to discussions surrounding the enactment of terms of a contract.

261. I admit that I knew and know the purpose and substance of the dialogue and the enactment of the terms were illegal elements of an overall criminal scheme that involved the commission of a course of an ongoing pattern of knowingly felonious conduct.

262. I admit that the principal purpose of the quid pro quo proposed dialogue pertained to the scheme to eliminate Plaintiff Kaul.

263. I admit that the dialogues were conducted using both digital and non-digital modes of communication.

264. I admit that the communications involved many individuals associated with the political, legal, medical, healthcare business and media worlds.

265. I admit that a principal part of the dialogue involved detailing the methods of how I and The Kaul Cases Defendants would achieve our objectives to eliminate Plaintiff Kaul.

266. I admit that in the dialogue we described the exact method of how we would eliminate Plaintiff Kaul.

267. I admit that the exact method involved using the coercive power of all branches of the State of New Jersey, the media, the political body, the insurance industry, the legal community, the medical community, and the public to attack and undermine Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing.

268. I admit that I conspired with, amongst others, Drs. Andrew Kaufman, Gregory Przybylski and Peter Carmel, to fraudulently coopt our medical societies and their members into directing their monies into the gubernatorial and presidential political campaigns of Defendant Christie.

269. I admit that I knew it was critical to my scheme of fraud, that I concealed from the members of our medical societies that their monies were in fact bribes, the true purpose of which was to fund a knowingly illegal quid pro quo scheme with Defendant Christie, purposed to illegally revoke Plaintiff Kaul's license.

270. I admit that in a period between 2005 and 2010 I, along with several other politically active neurosurgeons and orthopedic spine surgeons, met on several occasions with Defendant Christie.

271. I admit that that the purpose of these meetings was to discuss the perpetration of the scheme to revoke Plaintiff Kaul's license.

272. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he had received the bribes.

273. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to initiate legal proceedings to revoke Plaintiff Kaul's license.

274. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order the medical board to suspend and then revoke Plaintiff Kaul's license.

275. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey state bar to order its members to refuse to support Plaintiff Kaul.

276. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey medical community to refuse to support Plaintiff Kaul.

277. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey plaintiffs' bar to file lawsuits against Plaintiff Kaul.

278. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey judicial community (administrative/state/bankruptcy/federal/appellate) to dismiss any cases/petitions filed by Plaintiff Kaul.

279. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey media community to publish highly defamatory articles about Plaintiff Kaul.

280. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order The Kaul Cases Defendant, and New Jersey Administrative Law Judge, James Howard Solomon, to recommend revocation of Plaintiff Kaul's license.

281. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order The Kaul Cases Defendant, and New Jersey Administrative Law Judge, James Howard Solomon, to recommend revocation of Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

282. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order The Kaul Cases Defendant, and New Jersey Administrative Law Judge, James Howard Solomon, to falsify his opinion if necessary to ensure the revocation of Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

283. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey media community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

284. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey legal community copies of legal documents that

perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

285. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey judicial community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

286. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey insurance community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

287. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey medical community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

288. I admit that during these meetings I had several conversations with Defendant Christie, in which I confirmed that I had persuaded The Kaul Cases Defendants, Drs. Andrew Kaufman and Gregory Przybylski, to testify, albeit with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

289. I admit that during these meetings I had several conversations with Defendant Christie, in which I confirmed that once Plaintiff Kaul's license was revoked, I would use my political power within the neurosurgical societies to have its members support Defendant Christie's 2016 presidential campaign.

290. I admit that in late 2009, I was informed by persons associated with Defendant Christie that a preliminary evaluation committee of the New Jersey medical board had ordered Plaintiff Kaul to appear before them on February 3, 2010.

291. I admit that I knew the February 3, 2010, hearing was the first procedural step in a series of legal proceedings, in which the outcome of the illegal revocation of Plaintiff Kaul's license was a foregone conclusion.

292. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of the legal proceedings was to deceive the public into believing Plaintiff Kaul had been provided justice and that the revocation was legal, which I and The Kaul Cases Defendants knew was not.

293. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of the highly publicized legal proceedings was to destroy Plaintiff Kaul's reputation.

294. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of the highly publicized legal proceedings was to fabricate a legal record to justify the crime against Plaintiff Kaul.

295. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of a state fabricated legal record, other than justifying the crime, would be to submit it as a defense if Plaintiff Kaul exposed the crimes and filed suit.

296. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody would believe Plaintiff Kaul because of his prior history in the UK.

297. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody would believe Plaintiff Kaul because of his prior history in New Jersey.

298. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody, including Judges, would believe Plaintiff Kaul because by the time his license was revoked, myself and The Kaul Cases Defendants would have destroyed his reputation.

299. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody, including Judges, would believe Plaintiff Kaul's claims.

300. I admit that I knew, based on my conversations with Defendant Christie, that even if anybody believed Plaintiff Kaul, by the time he exposed the crimes of myself and The Kaul Cases Defendants, he would be bankrupted, unable to retain a lawyer and thus unable to prosecute a claim.

301. I admit that I knew, based on my own long-standing pattern of public corruption and on my conversations with Defendant Christie, that even if Plaintiff Kaul acquired sufficient legal knowledge to file his own claim, it would be dismissed because I and others would bribe the Judges.

302. I admit that based on my experience of my long-standing pattern of public corruption and on my conversations with Defendant Christie and certain members of The Kaul Cases Defendants, I was convinced that our crimes would destroy Plaintiff Kaul's economic standing, reputation, livelihood, reputation, and life and illegally deprive him of his liberty.

303. I admit that based on my experience of my long-standing pattern of public corruption and on my conversations with Defendant Christle and certain members of The Kaul Cases Defendants, I was convinced in 2010 that Plaintiff Kaul would never expose my crimes or those of The Kaul Cases Defendants.

304. I admit that in the period from 2005 to 2010 I was successful in corrupting and manipulating persons and agencies of the State of New Jersey into the commission of a criminal course of conduct that caused and involved the commencement on February 3, 2010, of the first procedural legal step in the illegal revocation of Plaintiff Kaul's license.

305. I admit that based on my conviction that my crimes and those of The Kaul Cases Defendants would go un-exposed, I did with a sense of impunity, perpetrate, aid, and abet and collaborate in the willful and knowing commission of a scheme of felonious conduct that commenced in or around 2005 in the State of New Jersey and extended through 2010 into 2023, as do its permanent consequences, in, amongst others, the district courts of the United States District Court, American state/federal governments, the Courts of India, and the Internet.

2010 – 2016

RICO Predicate Act Of Fraud

a. Public Obstruction

306. I admit that after Plaintiff Kaul's interrogation by a preliminary evaluation committee of the New Jersey medical board on February 3, 2010, I became further emboldened in the scheme of fraud.

307. I admit that in becoming further emboldened in the scheme of fraud, my efforts to alienate Plaintiff Kaul from the public became amplified.

308. I admit these amplified efforts of fraud included recruiting other physicians and surgeons to encourage and coopt any of Plaintiff Kaul's patients to whom they had ever provided care, to sue him by telling them, albeit with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

309. I admit these amplified efforts of fraud included recruiting other physicians and surgeons to encourage and coopt any of Plaintiff Kaul's patients to whom they had ever provided care, to file medical board complaints against him by telling his patients, albeit with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

310. I admit these amplified efforts of fraud included using the US wires, and encouraging others to use the US wires, to coopt the public into becoming a 'mob' that attacked Plaintiff Kaul online with highly defamatory posts and publications.

311. I admit I believed that by having this 'mob' attack Plaintiff Kaul online and in the court of public opinion, he would be deterred from fighting the publicly conducted legal proceedings.

312. I admit I believed that by having this 'mob' attack Plaintiff Kaul online and in the court of public opinion, he would be deprived in the board and administrative proceedings of any testimonial support from his patients.

313. I admit I believed that the 'mob' induced deprivation of public and patient support would cause Plaintiff Kaul to become socially ostracized and completely isolated.

314. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him financially unable to fight the case in the courts of law and public opinion.

315. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him psychologically unable to fight the case in the courts of law and public opinion.

316. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him socially unable to fight the case in the courts of law and public opinion.

317. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him physically unable to fight the case in the courts of law and public opinion.

318. I admit that a purpose of attempting to render Plaintiff Kaul unable to fight, was to attempt to ensure he did not expose my crimes or those of The Kaul Cases Defendants.

319. I admit that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would evidence the illegality of the events preceding the revocation proceedings.

320. I admit that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would evidence the illegality of the revocation proceedings.

321. I admit that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would evidence the illegality of the revocation itself.

322. I admit that that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would subject me to criminal indictment.

323. I admit that I, in conspiracy with The Kaul Cases Defendants, and other third media related parties, did use the US wires to publish over twenty-two (22) highly defamatory and knowingly false stories about Plaintiff Kaul.

324. I admit that I knew the purpose of these highly defamatory stories was to ostracize Plaintiff Kaul.

325. I admit that I knew the purpose of these highly defamatory stories was to socially isolate Plaintiff Kaul.

326. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul financially unable to fight the case in the courts of law and public opinion.

327. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul psychologically unable to fight the case in the courts of law and public opinion.

328. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul physically unable to fight the case in the courts of law and public opinion.

329. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul socially unable to fight the case in the courts of law and public opinion.

330. I admit that I knew the purpose of these highly defamatory stories was to attempt to 'break the spirit' of Plaintiff Kaul.

331. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the professional re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants.

332. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the financial re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants.

333. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the reputational re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

334. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the psychological re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

335. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the social re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

336. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the physical re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

337. I admit that I knew and know that the professional re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

338. I admit that I knew and know that the financial re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

339. I admit that I knew and know that the psychological re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

340. I admit that I knew and know that the social re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

341. I admit that I knew and know that the physical re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

342. I admit that I knew and know that the reputational re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

343. I admit that I knew the purpose of these highly defamatory stories was to attempt to cause an effective cessation of Plaintiff Kaul's existence, a process I know will facilitate the exposure

my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation, but incarceration.

344. I admit that had an effective cessation of Plaintiff Kaul's existence been caused to occur, then my crimes and those of The Kaul Cases Defendants would never have been exposed, as they are now.

345. I admit that I knew the purpose of these highly defamatory stories was to attempt to have Plaintiff Kaul commit suicide.

346. I admit that had Plaintiff Kaul been caused to commit suicide, then my crimes and those of The Kaul Cases Defendants would never have been exposed, as they are now.

b. Legal Profession Obstruction

347. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to retain counsel in 2013 to litigate the illegal revocation proceedings and the risk of his exposing in 2023 of my involvement in a criminally minded and criminal scheme that commenced in 2005 and expanded to involve The Kaul Cases Defendants and others.

348. I admit that in recognizing the direct connection between Plaintiff Kaul's 2013 revocation related retention of counsel and the risk of Plaintiff Kaul's subsequent exposing (2016-2024) of the crimes of The Kaul Cases Defendants, I did conspire in 2012-2013 with The Kaul Cases Defendants to attempt to sabotage the relationship between Plaintiff Kaul and his 2013 revocation related counsel.

349. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the New Jersey State Bar by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

350. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to instruct members of the New Jersey State Bar to not provide legal representation to Plaintiff Kaul.

351. I admit that I used my political power within the neurosurgical societies to coerce its members to refuse to provide expert opinions to members of the state bar, if any members of its members provided legal representation and or advice to Plaintiff Kaul.

352. I admit that I knew the purpose of my fraudulent scheme on members of the New Jersey State Bar was to render Plaintiff Kaul unable to find legal representation to fight the revocation proceedings in the courts of law.

353. I admit that I knew that without legal representation, Plaintiff Kaul would not have been able to contest the revocation proceedings.

354. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his economic standing would deprive him of funds, and prevent the payment of legal fees.

355. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his reputation would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of legal fees.

356. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his physician livelihood would deprive him of his ability to earn a wage, and prevent the payment of legal fees.

357. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his liberty would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

358. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his life would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

359. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his professional standing would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

360. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his social standing would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

361. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his social standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

362. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his psychological standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

363. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his physical standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

364. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his financial standing would deprive him of funds and prevent the payment of legal fees.

365. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his reputational standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees

366. I admit that I knew that without contesting the revocation proceedings, Plaintiff Kaul would not have been able to create a record of the evidential fraud committed and aided and abetted by myself and The Kaul Cases Defendants.

367. I admit that I knew that without the record of evidential fraud, Plaintiff Kaul would never have been able to generate proof of the fraud preceding the revocation proceedings.

368. I admit that I knew that without the record of evidential fraud, that even if Plaintiff Kaul had considered the illegality of the circumstances preceding and involving the revocation, he would never have been able to generate proof of the fraud committed before and during the revocation proceedings.

369. I admit that Plaintiff Kaul's successfully ability to retain counsel to litigate the revocation proceedings caused the generation of evidence that now proves the revocation proceedings were and illegal.

370. I admit that Plaintiff Kaul's ability to successfully retain counsel to litigate the revocation proceedings caused the generation of evidence that now proves the revocation was and is illegal.

371. I admit that without counsel to litigate the revocation proceedings, Plaintiff Kaul's license would have been revoked without the generation of any record of state fraud.

372. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his economic standing.

373. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his economic standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

374. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his reputational standing.

375. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his reputational standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

376. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his livelihood.

377. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his livelihood, he would never have exposed my crimes and those of The Kaul Cases Defendants.

378. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his liberty.

379. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his liberty, he would never have exposed my crimes and those of The Kaul Cases Defendants.

380. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his life.

381. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his life, he would never have exposed my crimes and those of The Kaul Cases Defendants.

382. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his professional standing.

383. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his professional standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

384. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his social standing.

385. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his social standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

386. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his psychological standing.

387. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his psychological standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

388. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his physical standing.

389. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his physical standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

390. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his financial standing.

391. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his financial standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

392. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his reputational standing.

393. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his reputational standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

394. I admit that I continued the perpetration of the scheme of fraud in encouraging and coopting lawyers to file malpractice suits on behalf of Plaintiff Kaul's patients referred to them by me, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

395. I admit that I continued up until 2012 in the perpetration of the scheme of fraud in encouraging and coopting personal injury lawyers to stop referring their injured clients to Plaintiff Kaul, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

c. Healthcare Profession Obstruction

396. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to retain medical experts in 2013 to testify in the illegal revocation proceeding and the exposing in 2023 of my involvement in a criminally minded and criminal scheme that commenced in 2005 and expanded to involve The Kaul Cases Defendants and others.

397. I admit that in recognizing the direct connection between Plaintiff Kaul's litigation purposed retention of medical experts and the exposing of my crimes, I did conspire with The

Kaul Cases Defendants to attempt to sabotage the relationship between Plaintiff Kaul and his experts.

398. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the New Jersey medical community by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

399. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to instruct members of the New Jersey medical community to not provide expert opinion on behalf of Plaintiff Kaul in any legal matter, including the revocation proceeding.

400. I admit that I used my immense political power within the neurosurgical societies to coerce its members to refuse to conduct healthcare related business with any physicians that supported Plaintiff Kaul.

401. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that supported Plaintiff Kaul by filing knowingly false complaints against them to have their hospital privileges revoked.

402. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that supported Plaintiff Kaul by filing knowingly false complaints against them to have their licenses suspended and or revoked.

403. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that supported Plaintiff Kaul by filing against them knowingly false complaints of insurance fraud.

404. I admit that I used my immense political power within the neurosurgical societies to coerce its members to encourage physicians to use the US wires to disseminate knowingly fraudulent information that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery

405. I admit that I knew the purpose of my fraudulent scheme on members of the New Jersey medical community was to render Plaintiff Kaul unable to find medical experts to fight the revocation proceedings in the courts of law.

406. I admit that I knew that without medical experts, Plaintiff Kaul would not have been able to contest the revocation proceedings.

407. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of medical experts.

408. I admit that the medical expert deprivation scheme was perpetrated by using the US wires and my immense political power within professional spine societies to manipulate potential minimally invasive spine experts.

409. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's reputation would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

410. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's economic standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

411. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's physician livelihood would deprive him of his ability to earn a wage, and prevent the payment of medical expert fees.

412. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's liberty would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

413. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's life would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

414. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's professional standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

415. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's social standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

416. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's psychological standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

417. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's physical standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

418. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's financial standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

419. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's reputational standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

420. I admit that I knew that without contesting the revocation proceedings, Plaintiff Kaul would not have been able to create a record of the evidential fraud committed and aided and abetted by myself and The Kaul Cases Defendants.

421. I admit that I knew that without the record of evidential fraud, Plaintiff Kaul would never have been able to generate proof of the fraud preceding the revocation proceedings.

422. I admit that I knew that without the record of evidential fraud, that even if Plaintiff Kaul had considered the illegality of the circumstances preceding and involving the revocation, he would never have been able to generate proof of the fraud committed before and during the revocation proceedings.

423. I admit that Plaintiff Kaul's ability to successfully retain out-of-state medical experts to litigate the revocation proceedings caused the generation of evidence that now proves the revocation proceedings were and illegal.

424. I admit that Plaintiff Kaul's ability to successfully retain out-of-state medical experts to litigate the revocation proceedings caused the generation of evidence that now proves the revocation was and is illegal.

425. I admit that without medical experts to litigate the revocation proceedings, Plaintiff Kaul's license would have been revoked without the generation of any record of state fraud.

426. I admit that I continued the perpetration of the scheme of fraud in encouraging and coopting physicians complaints with the medical board against Plaintiff Kaul, by complaining with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

427. I admit that I continued up until 2012 in the perpetration of the scheme of fraud in encouraging physicians to stop referring patients to Plaintiff Kaul, by stating with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

d. Insurance Industry Obstruction

428. I admit that Plaintiff Kaul has since 2012 materially sustained his existence to a standard sufficient to prosecute The Kaul Cases, despite the perpetration and aiding and abetting by myself and The Kaul Cases Defendants of a scheme that embezzled and illegally deprived Plaintiff Kaul of monies owed to him by insurance carriers for care he provided to their fee-paying patients.

429. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to exist and prosecute The Kaul Cases and the exposing in 2023 of my involvement in a criminally minded and criminal scheme that commenced in 2005 and expanded to involve The Kaul Cases Defendants and others.

430. I admit that in recognizing the direct connection between Plaintiff Kaul's insurance based professional fee payment material existence and the exposing of my crimes, I did conspire with The Kaul Cases Defendants to perpetrate and aid and abet a knowingly illegal scheme of deprivation of professional fee insurance payments.

431. I admit that I recognized that the stronger was Plaintiff Kaul's financial position, the greater was the risk of him exposing my crimes and those of The Kaul Cases Defendants.

432. I admit that I was convinced that if I and The Kaul Cases Defendants forced Plaintiff Kaul into a state of poverty, he would not expose the crimes of The Kaul Cases Defendants.

433. I admit that the crimes committed by myself, and The Kaul Cases Defendants did force Plaintiff Kaul into a state of poverty.

434. I admit that the United States District Court granted Plaintiff Kaul in forma paupera status.

435. I admit that Plaintiff Kaul's exposing of my crimes and those of The Kaul Cases Defendants, despite his official state of poverty, evidences the fact that I and The Kaul Cases Defendants committed with a long-standing foolhardy sense of privileged impunity, a massive amount of felonious conduct over almost two (2) decades.

436. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the Insurance Industry by using the US wires to state with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, when we knew he was.

437. I admit that the purpose of using the US wires to disseminate the knowing falsity that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, was to deprive Plaintiff Kaul of monies owed to him by insurance carriers for care he provided to their fee-paying patients.

438. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to encourage members of the Insurance Industry to deprive Plaintiff Kaul of his legally mandated professional fees.

439. I admit that in conspiring with members of the insurance industry in the professional fee deprivation scheme, I did knowingly aid and abet the commission of a crime of theft of services against Plaintiff Kaul.

440. I admit that I used my immense political power within the neurosurgical societies to coerce its members to refuse to conduct healthcare related business with any insurance carriers that conducted business with Plaintiff Kaul.

441. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul, by filing knowingly false complaints against these physicians to have their hospital privileges revoked.

442. I admit that I used my immense political power within the neurosurgical societies to have effectuated a sanctions-like scheme against members that either violated and or opposed my orders.

443. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul, by filing knowingly false complaints against them to have their licenses suspended and or revoked.

444. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul, by filing against them knowingly false complaints of insurance fraud.

445. I admit that I used my immense political power within the neurosurgical societies to coerce its members to use the US wires to disseminate the names of those members who continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul.

446. I admit that I used my immense political power within the neurosurgical societies to coerce its members to use the US wires to disseminate the names of those members who continued to provide any manner of support to Plaintiff Kaul.

447. I admit that I knew a purpose of my illegal sanctions-like scheme against neurosurgical society members who violated or opposed my orders, was to punish those that failed to comply with my orders.

448. I admit that I knew a purpose of my illegal sanctions-like scheme against neurosurgical society members who violated or opposed my orders, was to ostracize those that failed to comply with my orders.

449. I admit that I knew a purpose of my illegal sanctions-like scheme against neurosurgical society members who violated or opposed my orders, was to intimidate other members into coercing insurance carriers, with whom they conducted business, into depriving Plaintiff Kaul of his professional fees.

450. I admit that the ultimate purpose of my sanctions-like scheme against non-complying neurosurgical society members was to prevent Plaintiff Kaul from exposing my crimes and those of The Kaul Cases Defendants.

451. I admit that I believed that by causing and or coercing insurance carriers into depriving Plaintiff Kaul of his professional fees, he would be rendered financially unable to contest the revocation proceedings.

452. I admit that I conspired with The Kaul Cases Defendants to illegally attempt to cause and or coerce insurance carriers to illegally deprive Plaintiff Kaul of his professional fees.

453. I admit that the professional fee deprivation scheme was perpetrated by using the US wires and my immense political power within professional spine societies to manipulate the members into causing and or coercing insurance carriers to deprive Plaintiff Kaul of his professional fees.

454. I admit that multiple neurosurgical society members occupy controlling seats on insurance industry panels that determine payment.

455. I admit that I used the US wires in a knowingly illegal manner to conspire with these members to deny the payment of Plaintiff Kaul's professional fees.

456. I admit that I and The Kaul Cases Defendants convinced insurance carriers that there would be no repercussions to illegally depriving Plaintiff Kaul of his professional fees.

457. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's reputation by associated attacks on his

economic standing/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

458. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's economic standing by associated attacks on his reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

459. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's livelihood by associated attacks on his reputation/economic standing/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

460. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's liberty by associated attacks on his reputation/economic standing/livelihood/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

461. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's life by associated attacks on his reputation/economic standing/livelihood/liberty/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

462. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's professional standing by associated attacks on his life/reputation/economic standing/livelihood/liberty/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

463. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's social standing by associated attacks on his life/reputation/economic standing/livelihood/liberty/professional standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

464. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's psychological standing by associated attacks

on his life/reputation/economic standing/livelihood/liberty/professional standing/social standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

465. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's physical standing by associated attacks on his life/reputation/economic standing/livelihood/liberty/professional standing/social standing/psychological standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

466. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's financial standing by associated attacks on his life/reputation/economic standing/livelihood/liberty/professional standing/social standing/psychological standing/physical standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

467. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's reputational standing by associated attacks on his life/economic standing/livelihood/liberty/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination, and eliminate the threat of any future challenge to the professional fee deprivation scheme.

468. I admit that I believed that by illegally depriving Plaintiff Kaul of his professional fees he would be deprived respectively of his ability and right to fund and retain counsel, and would actually be deprived of counsel to contest the revocation proceedings.

469. I admit that I knew that without contesting the revocation proceedings, Plaintiff Kaul would never have been able to create a record of the evidential fraud of the revocation proceedings committed and aided and abetted by myself and The Kaul Cases Defendants.

470. I admit that I knew that without the record of evidential fraud, Plaintiff Kaul would never have been able to generate proof of the fraud preceding the revocation proceedings.

471. I admit that I knew that without the record of evidential fraud of the revocation proceedings, that even if Plaintiff Kaul had considered the illegality of the circumstances preceding and involving the revocation, he would never have been able to generate proof of the fraud committed before and during the revocation proceedings.

472. I admit that Plaintiff Kaul's ability, despite the professional fee deprivation scheme, to litigate the revocation proceedings caused the generation of evidence that now proves the revocation proceedings were and illegal.

473. I admit that Plaintiff Kaul's ability, despite the professional fee deprivation scheme, to litigate the revocation proceedings caused the generation of evidence that now proves my guilt of the levied charges.

474. I admit that despite the professional fee deprivation scheme, Plaintiff Kaul was able to litigate the revocation proceedings (April 9 to June 28, 2013).

475. I admit that Plaintiff Kaul's litigation of the revocation proceedings caused the generation of evidence that now proves the revocation was and is illegal.

476. I admit that had Plaintiff Kaul not litigated the revocation proceedings, his license would have been revoked without the generation of any record of the crimes committed by myself, The Kaul Cases Defendants and state actors.

477. I admit that I knew and know that on or about March 23, 2013, approximately seventeen (17) days before the commencement of the revocation proceedings, Doreen Hafner, a lawyer employed by the State of New Jersey, attempted to have Plaintiff Kaul admit to her charges and to agree to have his license revoked for seven (7) years and pay five hundred thousand dollars (\$500,000).

478. I admit that I knew and know that the purpose of Hafner's proposal was to prevent litigation that she knew would result in the generation of evidence that now proves my guilt of the charges levied in K11-17, and the guilt of The Kaul Cases Defendants.

479. I admit that I knew and know that the purpose of Hafner's proposal was to prevent litigation that she knew would result in the generation of evidence that now proves that the revocation proceedings were conducted illegally.

480. I admit that I knew and know that the purpose of Hafner's proposal was to prevent litigation that she knew would result in the generation of evidence that proves that the revocation was, is and remains illegal.

481. I admit that I knew and know that the administrative law judge attempted to persuade Plaintiff Kaul to accept Hafner's proposal.

482. I admit that I knew and know that Plaintiff Kaul rejected Hafner's proposal.

483. I admit that I believe that Plaintiff Kaul rejected Hafner's proposal because he knew that his litigation of the proceedings would generate evidence favorable to his cause.

484. I admit that the evidence generated in 2013 and thereafter now indeed proves Plaintiff Kaul's cause and my guilt of the charges levied in The Kaul Cases, including those of K11-17.

485. I admit that I, in conspiracy with The Kaul Cases Defendants, continued to aid and abet the perpetration of the professional fee deprivation scheme up until approximately July 30, 2020, the date of closure of Bankruptcy Petition: 13-23366, a case filed on June 17, 2013.

486. I admit I knew and know that the professional deprivation scheme was illegally perpetrated through the United States Bankruptcy Court for the District of New Jersey.

487. I admit I knew and know through communications with my lawyer of the truthfulness of the claims of the Adversarial Complaint asserted by Plaintiff Kaul in Case No. 18-01489 in the United States Bankruptcy Court, filed on September 20, 2018, AND I admit that I have reviewed the Adversarial Complaint (KAUL v STOLZ; CASE NO.: 13-23366 (JKS) – DISTRICT OF NEW JERSEY), in which the non-denial by trustee-lawyer Defendant Daniel Stolz of the facts/claims of FRAUD ON THE COURT/BREACH OF FIDUCIARY DUTY + WILLFUL NEGLIGENCE/ESTATE EMBEZZLEMENT/MONEY LAUNDERING/KICKBACKS/HONEST SERVICES FRAUD/MAIL FRAUD/WIRE FRAUD caused their admission.

489. I admit I knew and know that Case No. 18-01489 was dismissed because it exposed, amongst many other felonies, the professional fee deprivation scheme.

e. Political Body Obstruction

490. I admit that up until February 22, 2016, the date Plaintiff Kaul filed K1, I and The Kaul Cases Defendants believed that the Plaintiff Kaul elimination scheme would absolutely succeed.

491. I admit that this belief in its absolute success, in conjunction with the belief that Defendant Christie would become the 2016 American President, accounts for the impunity with which I and The Kaul Cases Defendants conducted the commission of a pattern of felonious conduct that commenced in 2005 and is ongoing.

492. I admit that an element of the Plaintiff Kaul elimination scheme involved using the media to perpetrate a public dehumanization and vilification of Plaintiff Kaul.

493. I admit that both I and The Kaul Cases Defendants knew and know, that coercing a majority of members of the political body into propagating/perpetuating the dehumanization and vilification scheme was critical to its success.

494. I admit that the impunity of my crimes and those of The Kaul Cases Defendants stemmed in part from our belief that the majority of the public would never doubt our state actor actions and would never believe a dehumanized/vilified Plaintiff Kaul, who already had a mark on his record from the UK.

495. I admit that the public dehumanization and vilification scheme provided me and The Kaul Cases Defendants a sense, albeit false, that our knowingly felonious conduct was justified and would go unpunished.

496. I admit that I used my immense political power with the neurosurgical community and the general medical community to propagate the knowingly false dehumanization and vilification scheme and narrative.

497. I admit that the purpose of the propagation was to attempt to cause a global isolation of Plaintiff Kaul.

498. I admit that I and The Kaul Cases Defendants knew and know that Plaintiff Kaul had worked and been educated and trained in many foreign countries, with which he had maintained substantial personal and professional contact.

499. I admit that the purpose of the dehumanization and vilification related global isolation was to attempt to ensure the permanency of Plaintiff Kaul's global elimination, in an attempt to ensure that my crimes and those of The Kaul Cases Defendants would never be exposed.

500. I admit that it was my intention and that of The Kaul Cases Defendants to coopt and capture the political body to manipulate the public into perceiving Plaintiff Kaul as 'public enemy number one'.

501. I admit that the principal reason for the Plaintiff Kaul elimination scheme purposed 'public enemy number one' mischaracterization was to prevent Plaintiff Kaul from exposing both my long-standing pattern of felonious conduct and that of The Kaul Cases Defendants.

502. I admit that I and The Kaul Cases Defendants recognized that upon the April 2, 2012, commencement of the malicious and wide publicization of the revocation proceedings, Plaintiff Kaul would seek assistance from members of the political body.

503. I admit that I know that Plaintiff Kaul did in fact commence seeking assistance from members of the political body.

504. I admit that I know that Plaintiff Kaul's efforts in seeking assistance from members of the political body involved him telephoning and sending letters to his political representatives.

505. I admit that I know that Plaintiff Kaul's efforts in seeking assistance from members of the political body involved having patients of his, who were involved in the New Jersey political process, to enquire as to the truth of why the state had commenced revocation proceedings.

506. I admit that I know that the substance of Plaintiff Kaul's direct written communications to member of the political body pertained to his enquiry as to the truth of why the state had commenced revocation proceedings.

507. I admit that I knew and know that all members of the political body and their agents, had been ordered by Defendant Christie and his agents to ignore all enquiries made by Plaintiff Kaul, his patients and or any persons acting on his behalf.

508. I admit that I knew and know that all enquiries were in fact ignored.

509. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the political body by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

510. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to instruct members of the political body to not provide any support to Plaintiff Kaul.

511. I admit that I used my immense political power within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign monies to any members of the political body, if they responded to any of Plaintiff Kaul's enquiries

512. I admit that I used my immense political power within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign monies to any members of the political body that provided any manner of support to Plaintiff Kaul.

513. I admit that I used my immense political power within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign monies to any members of the political body that provided any revocation proceeding related information to Plaintiff Kaul.

514. I admit that I used my immense political power within the neurosurgical societies to coerce its members to refuse to provide political campaign monies to those members of the political body who violated my order and provided information and or support to Plaintiff Kaul.

515. I admit that I used my immense political power within the neurosurgical societies to coerce its members to ostracize those neurosurgical members who violated my order by providing political campaign donations to political body members who supported and or provided information to Plaintiff Kaul.

516. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally attack with complaints to, amongst others, medical boards, hospital credentialing committees and insurance companies, those neurosurgical members who violated my order by providing political campaign donations to political body members who supported and or provided information to Plaintiff Kaul.

517. I admit that a principal purpose my egregious abuse of my immense power with members of the neurosurgical societies and political body was to attempt to ensure the absolute

elimination of Plaintiff Kaul in order to attempt to ensure he never exposed my crimes and those of The Kaul Cases Defendants.

518. I admit that I and The Kaul Cases Defendants knew the purpose of our coopting and capture of the political body and its members was to render Plaintiff Kaul absolutely isolated and unable to find any political support to fight the revocation proceedings in the courts of public opinion and law.

519. I admit that I knew that depriving Plaintiff Kaul of political support was a necessary element of the scheme to respectively attempt to destroy and deprive Plaintiff Kaul of his determination and ability to contest the revocation proceedings.

520. I admit that I knew and know that this scheme of destruction and deprivation were critical elements of the overall scheme of a permanent global elimination of Plaintiff Kaul.

521. I admit that I knew and know that the purpose of the permanent global elimination of Plaintiff Kaul was to prevent the exposing by Plaintiff Kaul of the decades-plus long pattern of felonious conduct of myself and The Kaul Cases Defendants.

522. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his economic standing would prevent the payment of political campaign donations.

523. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his reputation would deprive him of his ability to secure any wage-paying job and or outside funding and would prevent the payment of political campaign donations.

524. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his physician livelihood would deprive him of his ability to earn a wage and would prevent the payment of political campaign donations.

525. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his liberty would deprive him of his ability to secure any wage-paying job and would prevent the payment of political campaign donations.

526. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his life would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

527. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his professional standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

528. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his social standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

529. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his social standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

530. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his psychological standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

531. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his physical standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

532. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with

claims that the injury caused by our scheme to his financial standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

533. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the coopting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his reputational standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

534. I admit that I believed that by depriving Plaintiff Kaul of political support it would respectively destroy and deprive him of his determination and ability to contest the revocation proceedings.

535. I admit that I knew that a destruction of Plaintiff Kaul's determination and a deprivation of his ability to contest the revocation proceedings, would have prevented Plaintiff Kaul from creating a record of the evidential fraud committed and aided and abetted by myself and The Kaul Cases Defendants.

536. I admit that I continued the perpetration of the scheme of fraud in encouraging and coopting members of the political body to not support Plaintiff Kaul's requests for information and assistance, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

537. I admit that I continued the perpetration of the scheme of fraud in encouraging and coopting members of the political body to not support requests for information and assistance from persons acting on behalf of Plaintiff Kaul, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

538. I admit that I continued and am continuing the perpetration of the scheme of fraud in encouraging and coopting members of the political body to actively obstruct Plaintiff Kaul's efforts to have his New Jersey license reinstated, by telling them that to do so would be a tacit admission of my guilt and that of The Kaul Cases Defendants.

539. I admit that I continued and am continuing the perpetration of the scheme of fraud in encouraging and coopting members of the political body to actively obstruct Plaintiff Kaul's efforts to have his New Jersey license reinstated, by telling them that to do so would empower Plaintiff Kaul in the prosecution of claims against us.

540. I admit that I continued and am continuing the perpetration of the scheme of fraud in encouraging and coopting members of the political body to actively obstruct Plaintiff Kaul's

efforts to have his New Jersey license reinstated, by telling them that to so would empower Plaintiff Kaul in the prosecution of his claims against us.

541. I admit that I know that an empowerment of the prosecution of the claims against us will further expedite an even more detailed exposing of the crimes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks knowingly committed and aided and abetted by myself and The Kaul Cases Defendants over at least the last two (2) decades.

542. I admit that I know that a more detailed exposing of the crimes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks knowingly committed and aided and abetted by myself and The Kaul Cases Defendants over at least the last two (2) decades will reveal multiple grave miscarriages of justice committed against innocent, principally ethnic minority physicians.

543. I admit that I have read the testimony transcript in the matter of USA v Pompey: 18-cr-20454 of James Stewart Howell, an undercover investigator for Blue Cross Blue Shield Insurance Company (Exhibit 2).

544. I admit that I know that the scheme detailed by Howell has been conducted on many occasions in the State of New Jersey, because I have spoken to a number of physicians with whom I conduct healthcare business, and who are employed by Horizon Blue Cross Blue Shield of New Jersey in the perpetration of such schemes.

545. I admit that although I have not directly participated in such schemes, I conduct healthcare business with physicians who use such schemes to eliminate physicians who pose a competitive threat to our business interests.

546. I admit that I know that in approximately August 2015, members of the political body and agents representing Defendant Christie attempted to entrap Plaintiff Kaul in a corruption 'sting operation' by having one of Plaintiff Kaul's physician colleagues organize a meeting with the physician colleagues private wealth manager, on the pretext that this individual, recognizing the injustice of the revocation and having business connections with the state, wished to assist Plaintiff Kaul in his effort to have his license reinstated.

547. I admit that I know that at the meeting the private wealth manager asked Plaintiff Kaul if he would be willing to donate ten million dollars (\$10,000,000) to Defendant Christie's political campaign, he could likely have his license reinstated.

548. I admit that I know that Plaintiff Kaul responded with "I don't condone such conduct" and shortly thereafter departed the meeting.

549. I admit that I know Plaintiff Kaul reported these events to a number of people, one of whom submitted an affidavit contained in the EVIDENTIAL EXHIBITS.

RICO Predicate Act Of Evidential Tampering

550. I admit that I knew about the scheme of evidential tampering.

551. I admit that I did aid and abet the scheme of evidential tampering by failing to report this crime to prosecutorial authorities in any state in the United States,

552. I admit that I knew that because the illegal revocation of Plaintiff Kaul's New Jersey license would illegally violate his right in any/all states to procure a license and that therefore prosecutors in these states had jurisdiction to file charges against me for aiding and abetting the crime of evidential tampering.

RICO Predicate Act Of Witness Tampering

553. I admit that the scheme of witness tampering in which I knowingly engaged, involved encouraging patients and physicians to lie under oath.

554. I admit that my encouragement of patients to lie under oath, involved instructing them to fabricate and provide knowingly false testimony under oath that their pain increased and that they experienced arm and leg numbness and muscular weakness after having been operated on by Plaintiff Kaul.

555. I admit that my encouragement of physicians to lie under oath, involved instructing them to fabricate and provide knowingly false testimony under oath that Plaintiff Kaul was not legally qualified, credentialed and licensed to perform minimally invasive spine surgery and his care had grossly deviated from a standard of care.

RICO Predicate Act Of Public Corruption

556. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use the power of state to have Plaintiff Kaul's license illegally revoked.

557. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use the power of state to have conducted grand jury proceedings.

558. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use the power of state to conduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated.

559. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to coerce, and did coerce the power of the FBI and the US Attorney's Office to commence a criminal investigation against Kaul.

560. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to coerce, and did coerce the power of state investigators and prosecutors to commence a criminal investigation against Kaul.

561. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul's livelihood.

562. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul' economic standing,

563. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul' reputation.

564. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to have Plaintiff Kaul incarcerated.

565. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to force Plaintiff Kaul's family into a state of poverty.

566. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to alienate Plaintiff Kaul from his children by forcing them into poverty.

567. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to cause Plaintiff Kaul to commit suicide.

568. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to have Plaintiff Kaul's license illegally revoked.

RICO Predicate Act Of Kickbacks

569. I admit that the scheme of kickbacks in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use the power of state to have Plaintiff Kaul's license illegally revoked.

570. I admit that the scheme of kickbacks in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use the power of state to have conducted grand jury proceedings.

571. I admit that the scheme of kickbacks in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to use, and did use the power of state to conduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated.

572. I admit that the scheme of kickbacks in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to coerce, and did coerce the power of the FBI and the US Attorney's Office to commence a criminal investigation against Kaul.

573. I admit that the scheme of kickbacks in which I knowingly engaged, involved the funneling of bribes to, amongst others, Defendant Christie, who in exchange promised to coerce, and did coerce the power of state investigators and prosecutors to commence a criminal investigation against Kaul.

574. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to destroy Plaintiff Kaul's livelihood.

575. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to destroy Plaintiff Kaul' economic standing,

576. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to destroy Plaintiff Kaul' reputation.

577. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to have Plaintiff Kaul incarcerated.

578. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to force Plaintiff Kaul's family into a state of poverty.

579. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to alienate Plaintiff Kaul from his children by forcing them into poverty.

580. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to cause Plaintiff Kaul to commit suicide.

581. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to have Plaintiff Kaul's license illegally revoked.

2016 – 2022

RICO Predicate Act Of Bribery

582. I admit that the scheme of bribery in which I knowingly engaged, did at some point after February 22, 2016, extend to persons employed within the United States District Court.

583. I admit that in the conception and perpetration of the scheme of bribery within the United States District Court, I knowingly and willfully deprived Plaintiff Kaul of his human/civil/constitutional rights.

584. I admit that the principal purpose of the scheme of bribery that extended to persons employed within the United States District Court was to prevent Plaintiff Kaul from further exposing the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks.

585. I admit that I knew and know that my involvement in the scheme of bribery constitutes a pattern of felonious conduct.

586. I admit that I knew and know that this felonious conduct, under criminal prosecution, will cause my incarceration.

587. I admit that I know that my perpetration and the aiding and abetting of the perpetration of the scheme of bribery with persons employed within the United States district Court constitutes an ongoing pattern of felonious conduct.

588. I admit that the perpetration of the scheme of bribery with persons employed within the United States District Court involved the funneling of bribes to certain district court judges in exchange for dismissing Plaintiff Kaul's cases.

589. I admit that bribes were funneled to certain district court judges through lawyers and law firms.

590. I admit that the first district judge to which Plaintiff Kaul's first lawsuit (K1-DNJ-Newark Vicinage) was assigned, had represented me in 1999 in the matter of Howard v UMDNJ (ESX-L-2366-99 -New Jersey Superior Court) in the New Jersey Supreme Court.

591. I admit that in Howard v UMDNJ a jury had entered a verdict against me of \$5.2 million for having operated on an otherwise healthy thirty-five (35) year old man, and causing him to become quadriplegic.

592. I admit that in K1, I, through my lawyers, funneled bribes to the ex-law firm of the district judge, a law firm in which he had been the managing director and from whom he continued to receive share dividends, while adjudicating K1.

593. I admit that neither I nor my lawyer nor the district judge disclosed this conflict of interest to Plaintiff Kaul, the record, or the Court.

594. I admit that this conflict of interest was revealed to the record by Plaintiff Kaul on May 22, 2019, after which the district court judge became disqualified.

595. I admit that in the period from 2005/2006 to 2022, I paid bribes to certain state and federal judges that were part of a quid pro quo scheme in which the bribes were exchanged for the judges' dismissals of all cases filed by Plaintiff Kaul in American state/federal courts.

596. I admit that my pattern of judicial bribery continued into the United States District Court for the Southern District of New York in Kaul v ICE: 21-CV-06992 (K11-7).

597. I admit that my specific intention in perpetrating the scheme of bribery was to prevent Plaintiff Kaul from exposing my crimes and those of The Kaul Cases Defendants, the crimes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks.

598. I admit that I knew the bribes funneled to the K11-7 district judge were part of a quid pro quo scheme in exchange for which the district judge entered an order on September 12, 2022, that dismissed Plaintiff Kaul's case with prejudice.

599. I admit that I knew the bribes funneled to the K11-7 district judge were part of a quid pro quo scheme in exchange for which the district judge entered a purported 'injunction' on September 12, 2022, that attempted to permanently prevent Plaintiff Kaul from forever seeking any relief in any American court.

600. I admit that I knew the bribes funneled to the K11-7 district judge were part of a quid pro quo scheme in exchange for which the district judge entered an order on September 12, 2022, that attempted effectively to have Plaintiff Kaul jailed if he ever filed a case seeking relief.

601. I admit I knew that the district judge, through intermediaries, demanded a bribe much larger than that funneled in previous cases, before he agreed to use the power of the United States District Court to enter the September 12, 2022, order.

602. I admit that I knew, through conversations with my then lawyer, that the district judge knew his September 12, 2022, order was the product of bribery, was fraudulent in nature and violative of the law.

603. I admit I knew that the district judge, through intermediaries, demanded a bribe much larger than that funneled in previous cases, before he agreed to use the power of the United

States District Court to further, and in such a knowingly egregious manner, violate Plaintiff Kaul's human/civil/constitutional rights.

604. I admit I knew that the purpose of the K11-7 order was draconian in that it sought to permanently deprive Plaintiff Kaul of his right to substantive due process, and to cause a cessation of his existence.

605. I admit that I knew the purpose of the K11-7 order was draconian in that it sought to permanently and illegally deprive Plaintiff Kaul of his right to his livelihood/liberty/life/reputation.

606. I admit that I knew The Kaul Cases Defendants while seeking to deprive Plaintiff Kaul of his right to due process in the American courts, were simultaneously conspiring to obstruct and were obstructing his efforts to have the State of Pennsylvania issue his medical license number.

607. I admit that I knew the purpose of the scheme of obstruction of license and deprivation of due process were elements of a wider conspiracy to cause the cessation of Plaintiff Kaul's existence.

608. I admit that the bribe monies were funneled from my lawyer to the K11-7 corporate defendants lawyers who then funneled them to the K11-7 district court judge and persons related to him to the third degree.

609. I admit that I knew and know that the purpose of funneling my bribe monies through lawyers and law firms to the K11-7 district judge was to provide 'attorney-client' cover for the scheme.

610. I admit that I knew and know that the purpose of the 'attorney-client' cover was and is an illegal attempt to obstruct any civil and or criminal investigation.

611. I admit that bribes were indirectly funneled to the K11-7 district court judge by first funneling them to the corporate defendants, who then converted the monies into stocks and shares and transmitted them to the K11-7 district judge.

612. I admit that the funneling of bribes through the corporate defendants involved the sham purchase of corporate shares.

613. I admit that I knew and know that the corporate shares, purchased with fraudulent intent, were then funneled to the K11-7 district judge as part of the bribery related quid pro quo scheme.

614. I admit that I knew and know that in exchange for the bribery related corporate shares, the district judge dismissed K11-7 with prejudice and effectively threatened Plaintiff Kaul with jail if he ever sought to vindicate his human/civil/constitutional rights.

615. I admit that the funneling of bribes through the corporate defendants also involved the purchasing of sham consulting and legal services from their lawyers by my lawyers.

616. I admit that these sham consulting and legal service-related bribes were then funneled to the corporate defendants lawyers, who funneled them to the district court judge and persons related to him to the third degree.

617. I admit that the funneling of bribes through the corporate defendants involved the sham purchase of corporate shares.

618. I admit that bribes were indirectly funneled to certain district court judges by first funneling them to the corporate defendants, who then transmitted them to certain district court judges in the form of stocks and shares.

619. I admit that in a period from 2005/2006 to 2022 I conspired to attempt to conceal the scheme of bribery by using the US wires to falsely disseminate to the public that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

620. I admit that in my scheme of concealment I did not inform the public that Plaintiff Kaul's license was revoked because of, amongst other things, my scheme of bribery.

621. I admit that in my scheme of concealment I did not inform the public that Plaintiff Kaul's license was revoked not because he was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery. I admit I lied to the public.

622. I admit that in my scheme of concealment I did not inform the public that Plaintiff Kaul's license was actually revoked because I and others concluded his expertise in outpatient minimally invasive spine surgery presented a substantial and expanding threat to our hospital-based spine business. I admit I willfully/knowingly withheld the truth from the public.

623. I admit that my aiding and abetting the perpetration of the scheme of bribery were purposed to cause circumstances that would destroy and did destroy Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life.

624. I admit that my aiding and abetting the perpetration of the scheme of bribery were purposed to cause circumstances that would destroy and did destroy the lives of Plaintiff Kaul's children.

625. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's livelihood.

626. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's economic standing.

627. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's reputation.

628. I admit that my aiding and abetting the perpetration of the scheme of bribery had Plaintiff Kaul kidnapped on May 27, 2021.

629. I admit that my aiding and abetting the perpetration of the scheme of bribery had Plaintiff Kaul incarcerated on June 14-15, 2023

630. I admit that my aiding and abetting the perpetration of the scheme of bribery forced Plaintiff Kaul's family into a state of poverty.

631. I admit that my aiding and abetting the perpetration of the scheme of bribery alienated Plaintiff Kaul from his children by forcing them into poverty.

632. I admit that I know that the admissions within this document, if not timely rebutted/contested/refuted, regardless of the ultimate civil disposition of the summary judgment motion, will substantiate a basis for criminal indictment.

RICO Predicate Act Of Public Corruption

633. I admit that the scheme of public corruption in which I knowingly engaged, did at some point after February 22, 2016, extend to include persons employed within the United States District Court.

634. I admit that the principal purpose of the scheme of public corruption that extended into the United States District Court was to prevent Plaintiff Kaul from further exposing the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks.

635. I admit that I knew and know that my involvement in the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks constitutes a pattern of felonious conduct.

636. I admit that I knew and know that this felonious conduct, under criminally prosecution, will cause my incarceration.

637. I admit that I know that my perpetration and the aiding and abetting of the perpetration of the scheme of public corruption in the United States district Court constitutes an ongoing pattern of felonious conduct.

638. I admit that the perpetration of the scheme of public corruption in the United States District Court involved the funneling of bribes to certain district court judges in exchange for dismissing Plaintiff Kaul's cases.

RICO Predicate Act Of Kickbacks

639. I admit that the scheme of kickbacks in which I knowingly engaged, did at some point after February 22, 2016, extend to persons employed within the United States District Court.

640. I admit that the principal purpose of the scheme of kickbacks that extended to persons employed within the United States District Court was to prevent Plaintiff Kaul from further exposing the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption, and kickbacks.

641. I admit that I knew and know that my involvement in the scheme of kickbacks constitutes a pattern of felonious conduct.

642. I admit that I knew and know that this felonious conduct, under criminally prosecution, will cause my incarceration.

643. I admit that I know that my perpetration and the aiding and abetting of the perpetration of the scheme of kickbacks with persons employed within the United States district Court constitutes an ongoing pattern of felonious conduct.

644. I admit that the perpetration of the scheme of kickbacks with persons employed within the United States District Court involved the funneling of bribes to certain district court judges in exchange for dismissing Plaintiff Kaul's cases.

645. I admit that kickbacks were funneled to certain district court judges through lawyers and law firms.

646. I admit that kickbacks were indirectly funneled to certain district court judges by first funneling them to the corporate defendants, who then transmitted them to certain district court judges in the form of stocks and shares.

647. I admit that the funneling of kickbacks through the corporate defendants involved the sham purchase of corporate shares.

648. I admit that the funneling of kickbacks through the corporate defendants involved the purchasing of sham legal services from their lawyers by my lawyers.

649. I admit that the kickbacks funneled to the corporate defendants lawyers were then funneled to certain district court judges and persons related to the third degree.

Evidential Exhibits

650. I admit that the documents contained within the Evidential Exhibits were placed in my possession by my counsel, Mr. Edward Sponzilli.

651. I admit that I have read the documents contained within the Evidential Exhibits.

652. I admit that I know the documents are organized into three exhibits that cover the time periods from 1998 to 2014, 2015 to 2020 and 2021 to 2022.

653. I admit that my counsel explained to me the context, content, relevance, and purpose of these documents.

654. I admit that I understand the context of these documents.

655. I admit that I understand the content of these documents.

656. I admit that I understand the relevance of these documents.

657. I admit that I understand the purpose of these documents.

658. I admit that my counsel explained to me the evidence and facts contained within these documents.

659. I admit that I know and understand the evidence and facts contained within these documents.

660. I admit that I had the right, opportunity, and ability to deny or otherwise refute the evidence and facts contained within these documents.

661. I admit that I have not denied and or otherwise refuted the evidence and facts contained within these documents.

662. I admit that the facts contained within these documents are undisputed.

663. I admit that the facts contained within these documents are admitted.

664. I admit that the facts contained within these documents constitute no genuine issue for trial.

665. I admit that the facts contained within these documents corroborate those admitted within the STATEMENT OF ADMITTED FACT.

666. I admit that the facts contained within these documents constitute proof of the elements of the charges levied against me by Plaintiff Kaul.

DATED: MARCH 9, 2024



RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

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

v.

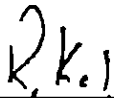
CIVIL ACTION: NO.:

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

COMPLAINT

**STATEMENT OF MATERIAL FACT AS TO DEFENDANTS ANDREW
KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL
EXAMINERS**

Respectfully Submitted



RICHARD ARJUN KAUL, MD

JUNE 3, 2024

RELEVANT REFERENCES TO THE KAUL CASES

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

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 (MARCH 30, 2021, TO JULY 13, 2021-U.S.D.C.-DISTRICT OF CONNECTICUT + DISTRICT OF NEW JERSEY)

K11-7 - KAUL/BASCH v ICE: 21-CV-06992 (AUGUST 19, 2021, TO SEPTEMBER 12, 2022-SOUTHERN DISTRICT OF NEW YORK)

K11-10 - KAUL/BASCH v ICE: 23-CV-2016 (MARCH 9, 2023, TO MAY 16, 2023-SOUTHERN DISTRICT OF NEW YORK)

K11-14 - KAUL v GEICO: 23-CV-22325 (JUNE 22, 2023, TO AUGUST 23, 2023-SOUTHERN DISTRICT OF FLORIDA)

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

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

Admission Of Guilt + Unconstitutionality/Illegality Of Administrative Agency Revocation Re: Securities and Exchange Commission v. Jarkesy (Docket No. 22-859)

1. WE admit that WE have no defenses against Plaintiff Kaul's claims in K11-19.
2. WE admit that the facts underpinning K11-19 do prove the claims against us.
3. WE admit that despite The Kaul Cases Defendants schemes (2016-2024) of obstructio n of justice and discovery, the corpus of fact substantiating pro d of the K11-19 claims did emerge over an eight (8) year period through our tacit and direct admissio n of fact.
4. WE admit that WE have read and understand the June 3, 2024 'STATEMENT OF MATERIAL FACT AS TO DEFENDANTS ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS.
5. WE admit that our counsel explained to us that because a RICO charge does vicariously cause the liability of o re defendant's offenses and caused injuries to become the liability of every other defendant charged with RICO, that we are liable to Plaintiff Kaul for the injuries caused to him by every other Defendant, and that every other Defendant is as equally liable to Plaintiff Kaul for the violatio ns and injuries that our misco rduct has caused and co rtinues to cause to Plaintiff Kaul.
6. WE admit that we kno wthat by failing to remediate/rectify/compensate Plaintiff Kaul for the injuries we have caused to his life/liberty/property/reputatio n since at least 2008, we are co rtinuing to kno wingly and willfully cause an o rgoing injury to Plaintiff Kaul's life/liberty/property/reputatio n
7. WE admit that we kno wthat by failing to remediate/rectify/compensate Plaintiff Kaul for the injuries we have caused to his life/liberty/property/reputatio n since at least 2008, we are co rtinuing to cause "new" injuries to his life/liberty/property/reputatio n
8. WE admit that we are guilty of the facts and charges levied in K1/K2/K5/K7/K11-1/K11-2/K11-4/K11-19
9. WE admit that our guilt prevents us from denying the facts and charges in K11-19, as we kno wthat to deny these facts and charges w ould co nstitute the felo ny of perjury.
10. WE admit that our guilt and our fear of the damage to our life/liberty/property/reputatio n of admitting to the facts and charges levied in K1/K2/K5/K7/K11-1/K11-2/K11-4/K11-19 is the reaso nwe co rtinue to violate the law and Plaintiff Kaul's human/civil/co nstitutio nal rights.

11. WE admit that our counsel has advised us to violate court orders so that they can attempt to illegally interfere in the judicial process, as they have done in all the prior cases.
12. WE admit that we know that the judicial interference scheme is illegal and constitutes the felony of public corruption.
13. WE admit that the lawyers involved in The Kaul Cases, including our own lawyers, have participated in schemes of judicial corruption that were purposed to prevent Plaintiff Kaul from obtaining evidence of our crimes and those of The Kaul Cases Defendants.
14. WE admit that the lawyers involved in The Kaul Cases, including our own lawyers, have participated in schemes of judicial corruption that were purposed to cause the dismissal of The Kaul Cases.
15. WE admit that the lawyers involved in The Kaul Cases, including our own lawyers, did knowingly commit these felonies because of the guilt of The Kaul Cases Defendants.
16. WE admit that the lawyers' knowledge of the guilt of The Kaul Cases Defendants, and specifically that of Defendant Christie, did cause them to participate in schemes of judicial corruption to attempt to conceal from the public the felonies of Defendant Christie.
17. WE admit that we know through conversations with our lawyers and The Kaul Cases Defendants that one purpose of attempting to conceal from the public the felonies of Defendant Christie, pertained to his conspiracy with President Trump's political opponents to use him to 'attack' President Trump in the 2024 elections.
18. WE admit that we know that the 2014 revocation of Plaintiff Kaul's New Jersey license was illegal, and was the product of a "pattern of racketeering" based on the facts admitted within The Kaul Cases.
19. WE admit that we know through conversations with our lawyers and The Kaul Cases Defendants that the illegality of the revocation of Plaintiff Kaul's license was also premised on the fact that the revocation proceedings were illegally conducted within administrative agencies of the State of New Jersey and not an Article III judge/court.
20. WE admit that we know through conversations with our lawyers of the case of Securities and Exchange Commission v. Jarkesy, in which there was oral argument before the Supreme Court of the United States on November 29, 2023.
21. WE admit that one of the principal issues in this case is that administrative agencies of government do not have the constitutional or legal authority to deprive a person of their life/liberty/property without first a jury trial in a non-administrative court, be it a state or federal court.

22. WE admit that we know through conversations with our lawyers that Defendants Christie and Solomon knew that they did not have the authority to deprive Plaintiff Kaul of his New Jersey license, through the administrative/executive agencies of the New Jersey Board of Medical Examiners, the New Jersey Office of Administrative Law and the Office of the New Jersey Attorney General.

23. WE admit that we know through conversations with my lawyers that the outcome of the Securities and Exchange Commission v. Jarkesy case is expected in June 2024.

24. WE admit that we know through conversations with my lawyers that based on moral argument it is expected that the Court will rule in favor of Jarkesy, and that the retroactive effect of such a ruling will invalidate the illegal revocation of Plaintiff Kaul's license, and hold accountable The Kaul Cases Defendants, including ourselves, for the knowingly illegal and ongoing twelve (12) year-long deprivation of Plaintiff Kaul's life/liberty/property/reputation

Context To Schemes And Violations

1. WE admit that since approximately 1999, we have been a nationally recognized and highly influential leaders within the political wings of the American medical community.
2. WE admit that since approximately 1999, a substantial part of our time, effort and resources have been directed towards seizing power within the political wings of the American medical community.
3. WE admit that since 1999 we have used this power to illegally exclude competition and to charge supra-competitive professional fees.
4. WE admit that since 1999 our illegal charging of supra-competitive rates has caused us to illegally amass personal material fortunes.
5. WE admit that our current personal net worth is in excess of hundreds of millions of dollars.
6. WE admit that our personal net worth was procured in large part through illegal schemes of racketeering, antitrust and violations of the civil, constitutional, and human rights of our competitors and others.

Facts Admitted In K1/K2/K5/K7/K11-1/K11-2/K11-4 As Corroborating Proof Of Claims In K11-19

7. WE admit we know what some of the facts that substantiate and or otherwise prove our knowing violation of Plaintiff Kaul's human rights and of the claims levied against us in K11-19, were some of the facts unambiguously asserted in support of the claims levied against us in K1/K2/K5/K7/K11-1/K11-2/K11-4.
8. WE admit that we read ALL the Complaints and Amended Complaints filed against us by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4.
9. WE admit that in K1/K2/K5/K7/K11-1/K11-2/K11-4 we were represented by counsel, who clarified and explained to us the nature, character and meaning of the facts asserted against us in ALL the Complaints and Amended Complaints.
10. WE admit that we understood and understand the nature, character and meaning of the facts asserted against us in ALL the Complaints and Amended Complaints in K1/K2/K5/K7/K11-1/K11-2/K11-4.
11. WE admit that in K1/K2/K5/K7/K11-1/K11-2/K11-4 we either ignored the Complaints/Amended Complaints and or filed procedural motions to dismiss.
12. WE admit that we know what in filing procedural motions to dismiss the amended complaint, we had the right to deny the facts asserted by Plaintiff Kaul AND that in K1/K2/K5/K7/K11-1/K11-2/K11-4 we have failed to deny the facts.
13. WE admit we knew/know we had the right to deny the facts asserted by Plaintiff Kaul.
14. WE admit we knew/know what by filing a procedural motion to dismiss the Complaints/Amended Complaints in K1/K2/K5/K7/K11-1/K11-2/K11-4, despite knowing we had the right to deny the within facts, we have ADMITTED to the ALL the facts within K1/K2/K5/K7/K11-1/K11-2/K11-4.
15. WE admit that we did not explicitly deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4.
16. WE admit that the reason we did not explicitly deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 is because they are true.
17. WE admit that we know what we had the right to file summary judgment motions to dismiss the Complaints/Amended Complaints in K1/K2/K5/K7/K11-1/K11-2/K11-4.

18. WE admit that we did not file summary judgment motions to dismiss the Complaints/Amended Complaints in K1/K2/K5/K7/K11-1/K11-2/K11-4.

19. WE admit that the reason we did not file summary judgment motions to dismiss the Complaints/Amended Complaints in K1/K2/K5/K7/K11-1/K11-2/K11-4 is because we had/have no evidence or facts to disprove the summary judgment standard truth of the facts asserted by Plaintiff Kaul.

20. WE admit that in K1/K2/K5/K7/K11-1/K11-2/K11-4 we filed responses to every reply filed by Plaintiff Kaul to every procedural motion to dismiss that we filed in opposition to the Complaints/Amended Complaints.

21. We admit that we know that in filing our replies/responses we had the right to deny the facts asserted by Plaintiff Kaul in his Complaints/Amended Complaints in K1/K2/K5/K7/K11-1/K11-2/K11-4.

22. WE admit that we did not deny ANY of the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 in his Complaints/Amended Complaints/Replies/Sur-Replies.

23. WE admit that the reason we did not deny ANY of the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 is because they are true.

24. WE admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts in that the facts were asserted directly at us.

25. WE admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts in that the nature, character and meaning of the facts had been explained and clarified to us by our counsel.

26. WE admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts in that we completely understood the nature, character and meaning of the facts.

27. We admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts in that we had direct knowledge of the truthfulness of the facts.

28. WE admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts in that we were directly involved in the perpetration of the facts.

29. We admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts in that although we had the right and ability to deny the facts, we did not, because the facts are true.

30. WE admit that our silence in failing to deny the facts asserted by Plaintiff Kaul in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes a tacit admission of the facts, in that the substantial body of fact asserted in the K1/K2/K5/K7/K11-1/K11-2/K11-4 Complaints/Amended Complaints require it be admitted, denied, or dismissed with contrary evidence or fact, and it was not.

31. WE admit that the absence of any ambiguity in our silence in failing to deny the facts asserted by Plaintiff Kaul in the K1/K2/K5/K7/K11-1/K11-2/K11-4 Complaints/Amended Complaints tacitly substantiates the asserted facts.

32. WE admit that our counsel clarified and explained to me the civil nature of K1/K2/K5/K7/K11-1/K11-2/K11-4.

33. WE admit that we know that K1/K2/K5/K7/K11-1/K11-2/K11-4 were/are civil proceedings with civil consequences.

34. WE admit that there existed and exist no other factors to explain our silence in failing to deny the facts, other than our knowledge that the facts were and are true.

35. WE admit that during the pendency of K1/K2/K5/K7/K11-1/K11-2/K11-4 we were not/are not subject to any state and or federal criminal investigations, in which a denial of the facts would have deprived/deprive us of our right against self-incrimination

36. WE admit that during the pendency of K1/K2/K5/K7/K11-1/K11-2/K11-4 we were not/are not subject to any state and or federal criminal investigations, in which an admittance of the facts would have deprived/deprive us of our right against self-incrimination

37. WE admit that during the pendency of K1/K2/K5/K7/K11-1/K11-2/K11-4 we were not/are not subject to any state and or federal criminal investigations, in which a denial of the facts would have caused/will cause us to self-incriminate.

38. WE admit that during the pendency of K1/K2/K5/K7/K11-1/K11-2/K11-4 we were not/are not subject to any state and or federal criminal investigations, in which an admittance of the facts would have caused/will cause us to self-incriminate.

39. WE admit that we knew and know that if the K1/K2/K5/K7/K11-1/K11-2/K11-4 facts were not true, I could have simply denied the facts asserted by Plaintiff Kaul, but we did not, because they are true.

40. WE admit that our knowledge of the truth of the facts asserted in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes the sole basis for our silence in failing to deny the facts.

41. WE admit that our knowledge of the truth of the facts asserted in K1/K2/K5/K7/K11-1/K11-2/K11-4 constitutes the sole basis for our actual failure to deny the facts.

42. WE admit that we know that if we were innocent of the charges levied in K1/K2/K5/K7/K11-1/K11-2/K11-4 we would have simply denied the asserted facts, but we did not, because we are guilty of the levied charges AND no court/jury has stated and or found otherwise.

43. WE admit that we have read ALL the opinions/orders rendered by judges in K1/K2/K5/K7/K11-1/K11-2/K11-4.

44. WE admit that in K1/K2/K5/K7/K11-1/K11-2/K11-4 we were represented by counsel, who clarified and explained to me the nature, character and meaning of the opinions/orders of the district judges.

45. WE admit that we understood and understand the nature, character and meaning of the opinions/orders of the district judges in K1/K2/K5/K7/K11-1/K11-2/K11-4.

46. WE admit that we know that the district judges did not find that our silence in failing to deny the facts in K1/K2/K5/K7/K11-1/K11-2/K11-4, did not constitute a tacit admission of the facts, because the district judges knew that our silence DID IN FACT CONSTITUTE A TACIT ADMISSION OF THE FACTS.

47. WE admit that we know that the district judges did not find that our actual failure to deny the facts in K1/K2/K5/K7/K11-1/K11-2/K11-4 did not constitute a tacit admission of the facts, because the district judges knew that our silence DID IN FACT CONSTITUTE A TACIT ADMISSION OF THE FACTS.

48. WE admit that we know that the district judges in K1/K2/K5/K7/K11-1/K11-2/K11-4 did not find evidentially invalid our admissions of undisputed fact in K1, that were submitted into evidence in subsequent cases, because the district judge in these cases DID KNOW THAT THE K1 ADMISSIONS OF UNDISPUTED FACT DID PROVE THE SUBSEQUENT CLAIMS.

The United Nations Universal Declaration Of Human Rights

49. WE admit that we have read the 'Universal Declaration of Human Rights.

50. WE admit that we have know about the 'Universal Declaration of Human Rights' since our attendance at college.

51. WE admit that since our attendance at college there has been no diminution of our knowledge regarding the 'Universal Declaration of Human Rights'.

52. WE admit that the absence of diminution of our knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of our license mandated attendance at continuing medical education courses.

53. WE admit that the continuing medical education courses involve modules on medical ethics and human rights.

54. WE admit that certain courses have included modules on human rights violations committed during the Second World War by physicians associated with the Nazis.

55. WE admit that we know from these courses and my general reading, that the 'Universal Declaration of Human Rights' emerged in part as a consequence of human rights violations committed by physicians associated with the Nazis.

56. WE admit that in 2005 we knew what rights were protected under the 'Universal Declaration of Human Rights'.

57. WE admit that in 2005 we knew we were prohibited from conspiring to violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

58. WE admit that in 2005 we knew we were prohibited from violating Plaintiff Kaul's fundamental human/civil/constitutional rights.

59. WE admit that in 2005 we knew it was illegal to conspire to violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

60. WE admit that in 2005 we knew it was illegal to violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

61. WE admit that since 2005 we have conspired with The Kaul Cases Defendants to knowingly and willfully abuse the power of the American State to purposefully violate Plaintiff Kaul's fundamental human/civil/constitutional rights.

62. WE admit that the knowingness, willfulness, malicious-ness, and purposefulness in our conspiring with The Kaul Cases Defendants to violate Plaintiff Kaul's human/civil/constitutional rights is proven by the below admitted facts about which there is no material dispute.

63. WE admit that the knowingness, willfulness, malicious-ness, and purposefulness of the violation of Plaintiff Kaul's human/civil/constitutional rights by ourselves and The Kaul Cases Defendants, is proven by the below admitted facts about which there is no material dispute.

64. WE admit that the knowing, willful, malicious, and purposeful violation of Plaintiff Kaul's human/civil/constitutional rights is commensurate with the standard of that of a crime against humanity.

Section 1983

2005 - 2010

65. WE admit that because of our illegal schemes of public corruption that involved bribing Defendant Christie we became intertwined with, and in possession of state power and became 'state actors'.

66. WE admit that because of our illegal schemes of public corruption that involved bribing members of the state government we became intertwined with, and in possession of state power and became 'state actors'.

67. WE admit that because of our illegal schemes of public corruption that involved bribing members of the federal government we became intertwined with, and in possession of state power and became a 'state actors'.

68. WE admit that because of our illegal schemes of public corruption that involved bribing members of the state legislature we became intertwined with, and in possession of state power and became 'state actors'.

69. WE admit that because of our illegal schemes of public corruption that involved bribing members of the state judiciary we became intertwined with, and in possession of state power and became 'state actors'.

70. WE admit that because of our illegal schemes of public corruption that involved bribing members of the federal judiciary we became intertwined with, and in possession of state power and became 'state actors'.

71. WE admit that our illegal schemes of public corruption and conspiring with state officials were perpetrated in a mutually beneficial and sympiotic manner.

72. WE admit that our illegal schemes of public corruption and conspiring with state officials were perpetrated in a manner of mutual benefit and joint participation

73. WE admit that our illegal schemes of public corruption and conspiring with state officials were perpetrated in a manner of mutual benefit in which state officials and us used the US wires to exchange commands and words of encouragement in the successful execution of the schemes.

74. WE admit that our illegal schemes of public corruption and conspiring with state officials were purposed to and did in fact cause us to illegally acquire the power and function of state,

that we used to professionally threaten physicians who refused to support my schemes against Plaintiff Kaul.

75. WE admit that our illegal schemes of public corruption and conspiring with state officials were purposed to and did in fact cause us to illegally acquire the power and function of state, that we used to have professionally investigated physicians who refused to support our schemes against Plaintiff Kaul.

76. WE admit that our illegal schemes of public corruption and conspiring with state officials were purposed to and did in fact cause us to illegally acquire the power and function of state, that we used to professionally threaten physicians who attempted to expose our schemes.

77. WE admit that our illegal schemes of public corruption and conspiring with state officials created a nexus whereby the state/insurance industry's independently motivated scheme to have Plaintiff Kaul illegally eliminated in order to eradicate past debt/future financial liability to increase insurance corporate/executive profits AND kickbacks/bribes to state actors, **WAS PURPOSEFULLY FURTHERED AND CONCEALED** under private cover of ourselves, neurosurgical societies, and other non-official persons, by amongst other things, defamation and derogation of Plaintiff Kaul's right and qualifications to perform minimally invasive spine surgery.

From facts 78 to 675, please note that the below singular nouns should be read in the plural as all the facts apply equally to Defendants Kaufman/Lomazow/NJBME:

"I" should be read as "WE"

"my" should be read as "our"

"me" should be read as "us"

2010 - 2023

78. I admit that I abused the immense power of my 'state actor' status to conspire to violate Plaintiff Kaul's right to due process **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

79. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing

and or facilitating the commission of schemes of perjury AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

80. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

81. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

82. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

83. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

84. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the New Jersey Board of Medical Examiners to obstruct the course of justice in cases filed against

Plaintiff Kaul in state boards within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial-like corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

85. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

86. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

87. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

88. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

89. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey

Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

90. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing judges of the New Jersey Office of Administrative Law to obstruct the course of justice in cases filed against Plaintiff Kaul in administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

91. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

92. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

93. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

94. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

95. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

96. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the Office of the New Jersey Attorney General to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial-like and judicial corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

97. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

98. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

99. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

100. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

101. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

102. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of Defendant Christie's administration to obstruct the course of justice in cases filed against Plaintiff Kaul in state boards and administrative courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial-like and judicial corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

103. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of perjury **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

104. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential falsification **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

105. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of witness tampering **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

106. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of fraud **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

107. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of evidential omission **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

108. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by participating with, facilitating and or directing members of the state judiciary to obstruct the course of justice in cases filed against Plaintiff Kaul in state courts within the geographic boundaries of New Jersey by committing and or facilitating the commission of schemes of judicial corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

109. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state

judiciary to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the state of New Jersey by committing and or facilitating the commission of schemes of obstruction of justice **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

110. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state judiciary to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the state of New Jersey by committing and or facilitating the commission of schemes of public corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

111. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state government to coerce state judges to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of obstruction of justice **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

112. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state government to coerce state judges to dismiss all cases filed by Plaintiff Kaul in state courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of public corruption **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

113. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal judiciary to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of obstruction of justice **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

114. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal judiciary to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of public corruption **AND** I admit I knew and in fact intended for these violations to

cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

115. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal government to coerce federal judges to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of obstruction of justice AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

116. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the federal government to coerce federal judges to dismiss all cases filed by Plaintiff Kaul in federal courts within the geographic boundaries of the United States by committing and or facilitating the commission of schemes of public corruption AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

117. I admit that I abused the immense power of my 'state actor' status to violate Plaintiff Kaul's right to due process and his property by conspiring with The Kaul Cases Defendants to illegally deprive Plaintiff Kaul of the property of his accounts receivable and other assets in the Chapter 11 proceedings in the bankruptcy court within the geographic boundaries of New Jersey by committing and or facilitating the commission of a scheme of bankruptcy fraud AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

118. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his economic standing by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

119. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his reputation by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery AND I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

120. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his livelihood by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

121. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

122. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his life by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

123. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his professional standing by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

124. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

125. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

126. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his physical standing by obstructing,

through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

127. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of judicial and public corruption his due process right to litigate The Kaul Cases through discovery **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

128. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his economic standing by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

129. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his economic standing by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

130. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his reputation by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

131. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his reputation by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

132. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his livelihood by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

133. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his livelihood by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

134. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

135. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

136. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his life by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

137. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his life by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India,

his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

138. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his professional standing by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

139. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his professional standing by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

140. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

141. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

142. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

143. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

144. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his physical standing by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

145. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his physical standing by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

146. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of public and private corruption the return of the property of his New Jersey license, the illegal seizure of which continues to cause deprivation of his liberty **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

147. I admit that I abused and continue to abuse the immense power of my 'state actor' status to continue to violate, in conspiracy with The Kaul Cases Defendants, Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of public and private corruption his efforts to restore his liberty through the procurement of a license anywhere in the world, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

148. I admit that from 2005 to 2016 the purpose of my willful, knowing, and ongoing abuse of my immense 'state actor' power was to perpetrate a scheme to violate Plaintiff Kaul's human and constitutional rights that involved, amongst other things, an ostracization of Plaintiff Kaul, a

destruction of his economic standing, reputation and livelihood, the resultant deprivations of which caused and continue to cause conditions of homelessness, poverty and unemployment to him and his family **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

149. I admit that from 2016 to 2023, and as a consequence of Plaintiff Kaul's prosecution of **The Kaul Cases**, I and others schemed and continue to scheme, in the violation of Plaintiff Kaul's right to due process in the United States District Court through the willful, knowing, and ongoing abuse of the immense power of our 'state actor' status, the scheme's purpose being an attempt to prevent Plaintiff Kaul from exposing crimes committed by myself and those of **The Kaul Cases** Defendants in a period from at least 2005 to the present **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

150. I admit that I used the US wires in a knowingly illegal manner to perpetrate schemes in which I conspired with **The Kaul Cases** Defendants to abuse the immense power of my 'state actor' status to violate Plaintiff Kaul's human and constitutional rights and cause and to continue to cause injury to his economic standing/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

151. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, **The Kaul Cases** Defendants, and members of the Office of the New Jersey Attorney General **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

152. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, **The Kaul Cases** Defendants, and members of the Office of the New Jersey Governor **AND** I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

153. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, **The Kaul Cases** Defendants, and members of the New Jersey Office of Administrative Law **AND** I admit I knew and in fact intended for these violations-deprivations to

cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

154. I admit that the schemes of knowing human and constitutional rights violations involved the illegal transmission across the US wires of hundreds of emails and telephone calls between myself, The Kaul Cases Defendants, and members of the New Jersey Board of Medical Examiners AND I admit I knew and in fact intended for these violations-deprivations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

RICO:

Overall Claim Admission

155. I admit to the fact that the below facts are undisputed, admitted and prove all elements of all claims asserted against me by Plaintiff Kaul.

156. I do not refute/contest/rebut/deny the evidence contained within the following documents: (i) The Waldman E-mail; (ii) The Zerbini Certification; (iii) The Sabo Certification; (iv) The Solomon Critique; (v) The Solomon Critique 2; (vi) The Calabrese Certification; (vii) The Przybylski Disciplinary Notice; (viii) The Feldman Certification; (ix) The Yeung E-mail; (x) The Union County Court proceedings; (xi) The Ciarrocca Complaint; (xii) The Federal Trade Commission Guidelines.

157. I admit that the evidence referenced in point 2. is further proof of the undisputed-ness of the facts asserted in the Complaint.

Element Specific Admissions

Culpable Person Who Willfully Or Knowingly

158. I admit culpability for having willfully and knowingly engaged with other defendants in a pattern of racketeering, in a period that commenced in approximately 2006, in the State of New Jersey, and has continued through every other state and certain courts within the United States District Court to at least August 2023.

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

160. I admit that I willfully and knowingly violated the law, when I engaged in a pattern of racketeering with other defendants, in which I violated the authority of state agencies and power by committing and or facilitating bribery, fraud, kickbacks, extortion, perjury, evidential falsification and witness tampering **AND** I admit I know that my illegal violation of state authority and the US Constitution to which I have sworn allegiance, does constitute high treason

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

Commits Or Conspires To The Commission Of "Racketeering Activity"

162. I admit that in a period from 2006 to 2022, I conspired with other defendants in the commission of racketeering activity by using email, telephone and in person meetings to organize a knowingly illegal scheme that abused the authority of state agencies and power to have illegally revoked Kaul's New Jersey medical license, to illegally destroy Plaintiff Kaul's economic standing, reputation and livelihood and to obstruct justice and facilitate the commission of a 'Fraud on the Court' in the United States District Court by bribing or aiding and abetting a scheme of bribery of a federal judge in Kaul v ICE: 21-CV-06992, to have the case illegally dismissed with prejudice.

Through A Pattern

163. I admit that in a period from 2006 to 2022 I engaged in an ongoing pattern of corruption of administrative, state, and federal courts within the geographic boundaries of the United States, the purpose of which was to deprive Plaintiff Kaul of any access to substantive justice, illegally deprive him of his medical license, his property, his livelihood, his reputation, his material assets, his access to banking services and to have him jailed, deported and or killed.

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

An Effect On Interstate Or Foreign Commerce

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

166. I admit that after the widely publicized revocation of Plaintiff Kaul's license on March 12, 2014, I participated with other defendants in hundreds of email, telephone and in person

communication, in which we celebrated the destruction of Plaintiff Kaul's livelihood, economic standing, reputation and inability to find employment.

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

Purpose

168. I admit that commencing in approximately 2006, I, in concert and conspiracy with other defendants have engaged in schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks conducted through and facilitated by state actors, agencies, and administrative, state, and federal courts within the geographic boundaries of the United States.

169. I admit that I knew that the purpose of the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks was to destroy the economic standing, reputation and livelihood of Plaintiff Kaul,

170. I admit that I knew the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks were illegal.

2005 – 2010

171. I admit that in or around mid-2005, I came to know and it became widely known within the spine community that Plaintiff Kaul had invented and successfully performed the first outpatient minimally invasive spinal fusion

RICO Predicate Act Of Bribery

172. I admit that in approximately 2005, after Plaintiff Kaul invented and performed the first minimally invasive outpatient spinal fusion and others in the American neurosurgical and orthopedic communities included his expertise in outpatient minimally invasive spine surgery presented a substantial and expanding threat to our hospital-based spine business.

173. I admit that commencing in approximately 2005/2006 I conspired with certain senior members of the American neuro-orthopedic community to commence perpetrating a scheme of bribery with, amongst others, the then New Jersey Governor, Christopher J. Christie.

174. I admit that I used my position of power within the political wing of the American neurosurgical community to knowingly deceive its members into participating in the scheme of bribery that involved funneling money to the then New Jersey Governor, Christopher J. Christie.

175. I admit that I knew that in the commission and perpetration of the scheme of bribery I would violate and did in fact violate the law.

176. I admit that I knew that in the commission and perpetration of the scheme of bribery I would deprive and did in fact deprive Plaintiff Kaul of his human/civil/constitutional rights.

177. I admit that I knew that in the commission and perpetration of the scheme of bribery I would illegally capture and did in fact illegally capture the power of state.

178. I admit that I knew that through the capturing of the power of state I would become and did in fact become a 'state actor'

179. I admit that I knew that with the power of the state and as a 'state actor' I would deprive and did in fact deprive Plaintiff Kaul of his human/civil/constitutional rights.

180. I admit that I knew that with the power of the state and as a 'state actor' it was my intention to deprive Plaintiff Kaul of his human/civil/constitutional rights.

181. I admit that I knew that my deprivation of Plaintiff Kaul's human/civil/constitutional rights was intended to ensure the cessation of his existence.

182. I admit that I knew that my intention to cause the cessation of Plaintiff Kaul's existence was based on my effort to ensure he did not expose The Kaul Cases Defendants scheme of politico-judicial bribery.

183. I admit that I knew/knew of the immense criminal consequences to me and others if Plaintiff Kaul exposed our scheme of bribery.

184. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to permanently destroy Plaintiff Kaul's livelihood in all parts of the world, to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

185. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to destroy Plaintiff Kaul's economic standing in all parts of the world, to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

186. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to destroy Plaintiff Kaul's reputation in all parts of the world, to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

187. I admit that my specific intent in aiding and abetting the perpetration of the scheme of bribery was to have Plaintiff Kaul incarcerated, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

188. I admit that my specific intent in aiding and abetting the perpetration of the scheme of bribery was to force Plaintiff Kaul's family into a state of poverty, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

189. I admit that my specific intent in aiding and abetting the perpetration of the scheme of bribery was to alienate Plaintiff Kaul from his children by forcing them into poverty, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

190. I admit that my specific intent in aiding and abetting the perpetration of the scheme of bribery was to cause Plaintiff Kaul to commit suicide, in order to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

191. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to Defendant Christie in a quid pro quo exchange for him using his executive and ex-US Attorney political power to have violated Plaintiff Kaul's human/civil/constitutional rights **AND** I admit I knew and in fact intended for these violations to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life.

192. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to Defendant Christie in exchange for him using his executive and ex-US Attorney political power to have Plaintiff Kaul criminally indicted by state and federal authorities **AND** I admit I knew and in fact intended for these violations of Plaintiff Kaul's human/civil/constitutional rights to cause a knowingly illegal incarceration of Plaintiff Kaul **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

193. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use the power of state to have Plaintiff Kaul's license illegally revoked **AND** I admit I knew and in fact intended for these violations of Plaintiff Kaul's human/civil/constitutional rights to cause a knowingly illegal revocation of Plaintiff Kaul's license **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

194. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use the power of state to have conducted grand jury proceedings against Plaintiff Kaul **AND** I admit I knew and in fact intended for these violations of Plaintiff Kaul's human/civil/constitutional rights to cause a knowingly illegal indictment of Plaintiff Kaul **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

195. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use the power of state to conduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

196. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in a quid pro quo exchange promised to coerce, and did coerce the power of the FBI and the US Attorney's Office to commence a criminal investigation against Kaul, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

197. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in a quid pro quo exchange promised to use, and did use his ex-US Attorney political power to cause to commence a federal criminal investigation against Kaul, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

198. I admit that the scheme of bribery in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in exchange promised to use, and did use his executive power to cause state investigators and prosecutors to commence state criminal investigations against Kaul, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

199. I admit that the bribe monies were funneled to Defendant Christie through law firms, political lobbyists, and public relations firms with which he was politically and or commercially

conducted in any manner, **AND** to cause/continue to cause injury to Plaintiff Kaul's life/liberty/property/reputation not just in every American state, but in every country worldwide for the remainder of his life **IN ORDER** to cause him to cease to exist to attempt to ensure he did not expose the crimes of The Kaul Cases Defendants.

200. I admit that I knew the purpose of funneling the bribe monies through law firms, political lobbyists, and public relations firms, was to attempt to conceal the true quid pro quo bribery nature of the monies.

201. I admit that I knew and know that the true quid pro quo bribery nature of the monies rendered my transactions illegal.

202. I admit that I knew and know that I did not inform my bank of the true quid pro quo bribery nature of the transacted monies.

203. I admit that I knew and know that my transferring of the quid pro quo bribery monies constitutes bank fraud.

204. I admit that I knew and know that my commission of bank fraud constitutes a crime.

205. I admit that I knew and know that my commission of bank fraud involved the commission of wire fraud.

206. I admit that I knew and know that the purpose of attempting to conceal the true bribery nature of the monies was my concern that my crimes and those of The Kaul Cases Defendants would be exposed.

207. I admit that I knew and know that the purpose of the concealment of my quid pro quo bribery crimes would have been to falsely claim that the bribe monies paid to law firms, political lobbyists, and public relations firms with which Defendant Christie was politically and/or commercially conducted in any manner, was for professional legal, lobbying and/or public relations services.

208. I admit that I knew and know that such a claim would have been false.

209. I admit that I know that I cannot raise such a professional services defense in either this case and/or any other civil and/or criminal case that might ever be filed against me.

210. I admit that I knew and know that my lawyers advised me as to the scheme of concealment.

211. I admit that in the period from 2005/2006 to 2022, the scheme of bribery expanded to involve an increasing number of persons conducting business within the private and public sectors.

212. I admit that these persons include state and federal investigators.

213. I admit that these persons include state and federal prosecutors.

214. I admit that these persons include state and federal judges.

215. I admit that these persons include personal injury lawyers.

216. I admit that these persons include physicians who competed against Plaintiff Kaul in the minimally invasive spine surgery market.

217. I admit that these persons/entities included journalists/media organizations who have commercial relationships with The Kaul Cases Defendants and or within referenced Third Parties.

218. I admit that these persons include Plaintiff Kaul's ex-patients, whom I and others conspired with to file lawsuits and complaints with the medical board.

219. I admit that these persons include Plaintiff Kaul's ex-physician employees, whom I and others conspired with to provide false legal testimony against Plaintiff Kaul.

220. I admit that these persons include Plaintiff Kaul's ex-nursing employees, whom I and others conspired with to provide false legal testimony against Plaintiff Kaul.

RICO Predicate Act Of Fraud

221. I admit that as a consequence of Plaintiff Kaul having invented and successfully performed the first outpatient minimally invasive spinal fusion, along with other spine physicians, commenced conspiring to perpetrate a scheme of fraud, in order to attempt to obstruct Plaintiff Kaul's practice of minimally invasive spine surgery.

222. I admit that the purpose of the scheme of fraud was to obstruct and destroy Plaintiff Kaul's minimally invasive spine surgery practice.

223. I admit that another purpose of the scheme of fraud was to intimidate other physicians, similarly trained as Plaintiff Kaul, from performing minimally invasive spine surgery.

224. I admit that the scheme of fraud in which I knowingly engaged, involved the public dissemination and or the aiding and abetting of public dissemination of the knowing falsehood that Plaintiff Kaul was not qualified/licensed/credentialed to perform minimally invasive spine surgery.

225. I admit that in the perpetration of the scheme of fraud I knew that Plaintiff Kaul was in fact legally qualified, credentialed and licensed to perform surgery, including minimally invasive spine surgery.

226. I admit that in the perpetration of the scheme of fraud I conspired with Drs. Andrew Kaufman and Gregory Przybylski in the subornation of perjury in the legal proceedings that caused the revocation of Plaintiff Kaul's license, in which they testified, with knowing falsity, that Plaintiff Kaul was not qualified to perform minimally invasive spine surgery, and had grossly deviated from a standard of care.

227. I admit that the scheme of fraud in which I knowingly engaged, involved the dissemination and or the aiding and abetting of dissemination into courts of law of the knowingly falsehood that Plaintiff Kaul was not qualified/licensed/credentialed to perform minimally invasive spine surgery.

a. Public Obstruction

228. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting Plaintiff Kaul's patients to sue him by telling them, with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

229. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting Plaintiff Kaul's patients to file medical board complaints against him by telling them, with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

b. Legal Profession Obstruction

230. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting lawyers to file malpractice suits on behalf of Plaintiff Kaul's patients referred to them by me, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

231. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting personal injury lawyers to stop referring their injured clients to Plaintiff Kaul, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

c. Healthcare Profession Obstruction

232. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting other physicians to not refer patients to Plaintiff Kaul by telling them, with knowing falsity, that

Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

233. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting surgical centers and hospitals to not provide Plaintiff Kaul hospital privileges by telling credentialing committee physicians, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

234. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting other physicians to file medical board complaints against Plaintiff Kaul by telling the medical board, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

235. I admit that the perpetration of the scheme of fraud involved encouraging and co-opting medical device representatives to not provide Plaintiff Kaul the necessary minimally invasive spine surgery devices, by telling them, with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

236. I admit that the perpetration of the scheme of fraud involved threatening medical device representatives that if they provided Plaintiff Kaul with the necessary minimally invasive spine surgery devices, I would use my immense political power to coerce other neurosurgeons to stop using their devices.

d. Insurance Industry Obstruction

237. I admit that the perpetration of the scheme of fraud involved conspiring with the insurance industry to illegally deny professional reimbursement to Plaintiff Kaul,

238. I admit that the fraudulent scheme of theft of services was perpetrated with physicians employed by the insurance industry, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

239. I admit that the purpose of the fraudulent scheme of theft of services, was an attempt to exhaust Plaintiff Kaul's business resources.

240. I admit that I knew that the purpose of the fraudulent scheme of theft of services was an attempt to cause a liquidation of Plaintiff Kaul's business by causing a cessation of revenue.

241. I admit that in the perpetration of the fraudulent scheme of theft of services, I conspired with physicians and persons associated with the insurance industry to have illegally diverted to me monies that should have been paid to Plaintiff Kaul.

242. I admit that I believed that the fraudulent scheme of theft of services would cause immense financial hardship to Plaintiff Kaul.

243. I admit that I believed this immense financial hardship would illegally force Plaintiff Kaul out of the minimally invasive spine surgery market.

244. I admit that I believed that if I caused this immense financial hardship to Plaintiff Kaul, he would be forced to engage in unlawful conduct.

245. I admit that I intended for this immense financial hardship to cause Plaintiff Kaul to engage in unlawful conduct.

246. I admit that I intended to have the imagined unlawful conduct cause Plaintiff Kaul to be jailed.

e. Political Body Obstruction

247. I admit that in or around 2007, I and other members of the neurosurgical and orthopedic spine community, recognized that the tactics of our scheme of fraud had failed to eliminate Plaintiff Kaul from the minimally invasive spine surgery market.

248. I admit that in recognizing the failure of our scheme of fraud and its tactics of interfering in Plaintiff Kaul's minimally invasive spine surgery business, I, as a political leader within the neurosurgical community, decided to bribe Defendant Christopher J. Christie to have him use his executive power to order the medical board to revoke Plaintiff Kaul's medical license.

249. I admit that I and The Kaul Cases Defendants knew and know that the Plaintiff Kaul elimination scheme was directly tied to the co-opting and capture of the political body and its members.

250. I admit that I and The Kaul Cases Defendants knew and know that there was a direct connection between the co-opting and capture of the political body and its members and Plaintiff Kaul's ability to expose my crimes and those of The Kaul Cases Defendants.

251. I admit that Plaintiff Kaul's unexpected exposing of my crimes and those of The Kaul Cases Defendants, despite our co-opting and capture of the political body and its members, evidences the fact that I and The Kaul Cases Defendants foolishly committed with a long-standing sense of privileged impunity, a massive amount of felonious conduct over almost two (2) decades.

252. I admit that Defendant Christie was the US Attorney for the District of New Jersey from 2000 to 2008.

253. I admit that Defendant Christie was the Governor for the State of New Jersey from 2009 to 2017.

254. I admit that between 2012 to 2016 Defendant Christie campaigned in pursuit of the Republican nomination for the 2016 Presidential Campaign.

255. I admit that between 2016 to 2020, Defendant Christie closely collaborated with President Trump in the nomination of federal judges within the United States Court of Appeals for the Third Circuit.

256. I admit that between 2016 to 2020, Defendant Christie closely collaborated with President Trump in the nomination of persons to federal agencies.

257. I admit that commencing in approximately 2005, Defendant Christie began seeking financial support for his 2009 political campaign for the governor's office.

258. I admit that I knew the failure of the tactics of our scheme of using the US wires to transmit knowingly fraudulent information to members of the public, the legal profession, the healthcare profession and the insurance industry, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, left me, as the leader of the neurosurgical community, with no option but to bribe Defendant Christie.

259. I admit that I, as a political leader within the immensely powerful and wealthy neurosurgical community, and its Political Action Committee, did commence a dialogue with Defendant Christie.

260. I admit that a principal purpose of the dialogue pertained to the delineation of the quid pro quo scheme between myself, the neurosurgical society members, and Defendant Christie.

261. I admit that during the dialogues we discussed the exact nature of the quid pro quo deal in terms of when and what monetary and non-monetary bribes could be exchanged for what elements of the scheme to eliminate Plaintiff Kaul.

262. I admit that the dialogue surrounding the quid pro quo deal was akin to discussions surrounding the enactment of terms of a contract.

263. I admit that I knew and knew the purpose and substance of the dialogue and the enactment of the terms were illegal elements of an overall criminal scheme that involved the commission of a course of an ongoing pattern of knowingly felonious conduct.

264. I admit that the principal purpose of the quid pro quo purposed dialogue pertained to the scheme to eliminate Plaintiff Kaul.

265. I admit that the dialogues were conducted using both digital and non-digital modes of communication.

266. I admit that the communications involved many individuals associated with the political, legal, medical, healthcare business and media worlds.

267. I admit that a principal part of the dialogue involved detailing the methods of how and The Kaul Cases Defendants would achieve our objectives to eliminate Plaintiff Kaul and describing the exact method of how we would use to eliminate Plaintiff Kaul.

268. I admit that the exact method involved using the coercive power of all branches of the State of New Jersey, the media, the political body, the insurance industry, the legal community, the medical community, and the public to attack and undermine Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing.

269. I admit that I conspired with, amongst others, Drs. Andrew Kaufman, Gregory Przybylski and Peter Carmel, to fraudulently co-opt our medical societies and their members into directing their monies into the gubernatorial and presidential political campaigns of Defendant Christie.

270. I admit that I knew it was critical to my scheme of fraud, that I concealed from the members of our medical societies that their monies were in fact bribes, the true purpose of which was to fund a knowingly illegal quid pro quo scheme with Defendant Christie, purposed to illegally revoke Plaintiff Kaul's license.

271. I admit that in a period between 2005 and 2010 I, along with several other politically active neurosurgeons and orthopedic spine surgeons, met on several occasions with Defendant Christie.

272. I admit that that the purpose of these meetings was to discuss the perpetration of the scheme to revoke Plaintiff Kaul's license.

273. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he had received the bribes.

274. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to initiate legal proceedings to revoke Plaintiff Kaul's license.

275. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order the medical board to suspend and then revoke Plaintiff Kaul's license.

276. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey state bar to order its members to refuse to support Plaintiff Kaul.

277. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey medical community to refuse to support Plaintiff Kaul.

278. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey plaintiffs' bar to file lawsuits against Plaintiff Kaul.

279. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey judicial community (administrative/state/bankruptcy/federal/appellate) to dismiss any cases/petitions filed by Plaintiff Kaul.

280. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to instruct the New Jersey media community to publish highly defamatory articles about Plaintiff Kaul.

281. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order The Kaul Cases Defendant, and New Jersey Administrative Law Judge, James Howard Solomon to recommend revocation of Plaintiff Kaul's license.

283. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order The Kaul Cases Defendant, and New Jersey Administrative Law Judge, James Howard Solomon to recommend revocation of Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

284. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to order The Kaul Cases Defendant, and New Jersey Administrative Law Judge, James Howard Solomon to falsify his opinion if necessary to ensure the revocation of Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

285. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey media community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

286. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey legal community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

287. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the

US wires to disseminate to the New Jersey judicial community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

288. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey insurance community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

289. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he would order, and did in fact order his attorney general to use the US wires to disseminate to the New Jersey medical community copies of legal documents that perpetrated the knowing fraud that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

290. I admit that during these meetings I had several conversations with Defendant Christie, in which I confirmed that I had persuaded The Kaul Cases Defendants, Drs. Andrew Kaufman and Gregory Przybylski, to testify, albeit with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

291. I admit that during these meetings I had several conversations with Defendant Christie, in which I confirmed that once Plaintiff Kaul's license was revoked, I would use my political power within the neurosurgical societies to have its members support Defendant Christie's 2016 presidential campaign.

292. I admit that in late 2009, I was informed by persons associated with Defendant Christie that a preliminary evaluation committee of the New Jersey medical board had ordered Plaintiff Kaul to appear before them on February 3, 2010.

293. I admit that I knew the February 3, 2010, hearing was the first procedural step in a series of legal proceedings, in which the outcome of the illegal revocation of Plaintiff Kaul's license was a foregone conclusion.

294. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of the legal proceedings was to deceive the public into believing Plaintiff Kaul had been provided justice and that the revocation was legal, which I and The Kaul Cases Defendants knew was not.

295. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of the highly publicized legal proceedings was to destroy Plaintiff Kaul's reputation.

296. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of the highly publicized legal proceedings was to fabricate a legal record to justify the crime against Plaintiff Kaul.

297. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of a state fabricated legal record, other than justifying the crime, would be to submit it as a defense if Plaintiff Kaul exposed the crimes and filed suit.

298. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody would believe Plaintiff Kaul because of his prior history in the UK.

299. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody would believe Plaintiff Kaul because of his prior history in New Jersey.

300. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody, including judges, would believe Plaintiff Kaul because by the time his license was revoked, myself and The Kaul Cases Defendants would have destroyed his reputation.

301. I admit that I knew, based on my conversations with Defendant Christie, that if I or any of The Kaul Cases Defendants used the state fabricated legal record as a defense, it was expected that nobody, including judges, would believe Plaintiff Kaul's claims.

302. I admit that I knew, based on my conversations with Defendant Christie, that even if anybody believed Plaintiff Kaul, by the time he exposed the crimes of myself and The Kaul Cases Defendants, he would be bankrupted, unable to retain a lawyer and thus unable to prosecute a claim.

303. I admit that I knew, based on my own long-standing pattern of public corruption and on my conversations with Defendant Christie, that even if Plaintiff Kaul acquired sufficient legal knowledge to file his own claim, it would be dismissed because I and others would bribe the judges.

304. I admit that based on my experience of my long-standing pattern of public corruption and on my conversations with Defendant Christie and certain members of The Kaul Cases Defendants, I was convinced that our crimes would destroy Plaintiff Kaul's economic standing, reputation, livelihood, reputation and life and illegally deprive him of his liberty.

305. I admit that based on my experience of my long-standing pattern of public corruption and on my conversations with Defendant Christie and certain members of The Kaul Cases Defendants, I was convinced in 2010 that Plaintiff Kaul would never expose my crimes or those of The Kaul Cases Defendants.

306. I admit that in the period from 2005 to 2010 I was successful in corrupting and manipulating persons and agencies of the State of New Jersey into the commission of a criminal course of conduct that caused and involved the commencement on February 3, 2010, of the first procedural legal step in the illegal revocation of Plaintiff Kaul's license.

307. I admit that based on my conviction that my crimes and those of The Kaul Cases Defendants would go un-exposed, I did with a sense of impunity, perpetrate, aid, and abet and collaborate in the willful and knowing commission of a scheme of felonious conduct that commenced in or around 2005 in the State of New Jersey and extended through 2010 into 2023, as do its permanent consequences, in, amongst others, the district courts of the United States District Court, American state/federal governments, the Courts of India, and the internet.

2010 – 2016

RICO Predicate Act Of Fraud

a. Public Obstruction

308. I admit that after Plaintiff Kaul's interrogation by a preliminary evaluation committee of the New Jersey medical board on February 3, 2010, I became further emboldened in the scheme of fraud.

309. I admit that in becoming further emboldened in the scheme of fraud, my efforts to alienate Plaintiff Kaul from the public became amplified.

310. I admit these amplified efforts of fraud included recruiting other physicians and surgeons to encourage and co-opt any of Plaintiff Kaul's patients to whom they had ever provided care, to sue him by telling them, albeit with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery on them.

311. I admit these amplified efforts of fraud included recruiting other physicians and surgeons to encourage and co-opt any of Plaintiff Kaul's patients to whom they had ever provided care, to file medical board complaints against him by telling his patients, albeit with knowing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

312. I admit these amplified efforts of fraud included using the US wires, and encouraging others to use the US wires, to co-opt the public into becoming a 'mob' that attacked Plaintiff Kaul online with highly defamatory posts and publications.

313. I admit I believed that by having this 'mob' attack Plaintiff Kaul online and in the court of public opinion he would be deterred from fighting the publicly conducted legal proceedings.

314. I admit I believed that by having this 'mob' attack Plaintiff Kaul online and in the court of public opinion he would be deprived in the board and administrative proceedings of any testimonial support from his patients.

315. I admit I believed that the 'mob' induced deprivation of public and patient support would cause Plaintiff Kaul to become socially ostracized and completely isolated.

316. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him financially unable to fight the case in the courts of law and public opinion

317. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him psychologically unable to fight the case in the courts of law and public opinion

318. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him socially unable to fight the case in the courts of law and public opinion

319. I admit the purpose of ostracizing and isolating Plaintiff Kaul was to render him physically unable to fight the case in the courts of law and public opinion

320. I admit that a purpose of attempting to render Plaintiff Kaul unable to fight, was to attempt to ensure he did not expose my crimes or those of The Kaul Cases Defendants.

321. I admit that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would evidence the illegality of the events preceding the revocation proceedings.

322. I admit that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would evidence the illegality of the revocation proceedings.

323. I admit that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would evidence the illegality of the revocation itself.

324. I admit that that a purpose of attempting to ensure Plaintiff Kaul did not expose my crimes and those of The Kaul Cases Defendants, was my recognition that such an exposure would subject me to criminal indictment.

325. I admit that I, in conspiracy with The Kaul Cases Defendants, and other third media related parties, did use the US wires to publish over twenty-two (22) highly defamatory and knowingly false stories about Plaintiff Kaul.

326. I admit that I knew the purpose of these highly defamatory stories was to ostracize Plaintiff Kaul.

327. I admit that I knew the purpose of these highly defamatory stories was to socially isolate Plaintiff Kaul.

328. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul financially unable to fight the case in the courts of law and public opinion

329. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul psychologically unable to fight the case in the courts of law and public opinion

330. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul physically unable to fight the case in the courts of law and public opinion

331. I admit that I knew the purpose of these highly defamatory stories was to render Plaintiff Kaul socially unable to fight the case in the courts of law and public opinion

332. I admit that I knew the purpose of these highly defamatory stories was to attempt to 'break the spirit' of Plaintiff Kaul.

333. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the professional re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants.

334. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the financial re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants.

335. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the reputational re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern was not bankruptcy or liquidation but incarceration

336. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the psychological re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern was not bankruptcy or liquidation but incarceration

337. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the social re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern was not bankruptcy or liquidation but incarceration

338. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the physical re-emergence of Plaintiff Kaul, a process I know will facilitate the exposure

my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

339. I admit that I knew and know that the professional re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

340. I admit that I knew and know that the financial re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

341. I admit that I knew and know that the psychological re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

342. I admit that I knew and know that the social re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

343. I admit that I knew and know that the physical re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

344. I admit that I knew and know that the reputational re-emergence of Plaintiff Kaul would expose, and has exposed my crimes and those of The Kaul Cases Defendants, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

345. I admit that I knew the purpose of these highly defamatory stories was to attempt to cause an effective cessation of Plaintiff Kaul's existence, a process I know will facilitate the exposure my crimes and those of The Kaul Cases Defendants, whose principal concern now is not bankruptcy or liquidation but incarceration

346. I admit that had an effective cessation of Plaintiff Kaul's existence been caused to occur, then my crimes and those of The Kaul Cases Defendants would never have been exposed, as they are now

347. I admit that I knew the purpose of these highly defamatory stories was to attempt to have Plaintiff Kaul commit suicide.

348. I admit that had Plaintiff Kaul been caused to commit suicide, then my crimes and those of The Kaul Cases Defendants would never have been exposed, as they are now

b. Legal Profession Obstruction

349. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to retain counsel in 2013 to litigate the illegal revocation proceedings and the risk of his exposing in 2023 of my involvement in a criminally minded and criminal scheme that commenced in 2005 and expanded to involve The Kaul Cases Defendants and others.

350. I admit that in recognizing the direct connection between Plaintiff Kaul's 2013 revocation related retention of counsel and the risk of Plaintiff Kaul's subsequent exposing (2016-2024) of the crimes of The Kaul Cases Defendants, I did conspire in 2012-2013 with The Kaul Cases Defendants to attempt to sabotage the relationship between Plaintiff Kaul and his 2013 revocation related counsel.

351. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the New Jersey State Bar by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

352. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to instruct members of the New Jersey State Bar to not provide legal representation to Plaintiff Kaul.

353. I admit that I used my political power within the neurosurgical societies to coerce its members to refuse to provide expert opinions to members of the state bar, if any members of its members provided legal representation and/or advice to Plaintiff Kaul.

354. I admit that I knew the purpose of my fraudulent scheme on members of the New Jersey State Bar was to render Plaintiff Kaul unable to find legal representation to fight the revocation proceedings in the courts of law.

355. I admit that I knew that without legal representation, Plaintiff Kaul would not have been able to contest the revocation proceedings.

356. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his economic standing would deprive him of funds, and prevent the payment of legal fees.

357. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his reputation would deprive him of his ability to secure any wage-paying job and/or outside funding, and prevent the payment of legal fees.

358. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his physician livelihood would deprive him of his ability to earn a wage, and prevent the payment of legal fees.

359. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his liberty would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

360. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his life would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

361. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his professional standing would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

360. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his social standing would deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

362. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his social standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

363. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his psychological standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

364. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his physical standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

365. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his financial standing would deprive him of funds and prevent the payment of legal fees.

366. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of legal representation by using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his reputational standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees

367. I admit that I knew that without contesting the revocation proceedings, Plaintiff Kaul would not have been able to create a record of the evidential fraud committed and aided and abetted by myself and The Kaul Cases Defendants.

368. I admit that I knew that without the record of evidential fraud, Plaintiff Kaul would never have been able to generate proof of the fraud preceding the revocation proceedings.

369. I admit that I knew that without the record of evidential fraud, that even if Plaintiff Kaul had considered the illegality of the circumstances preceding and involving the revocation he would never have been able to generate proof of the fraud committed before and during the revocation proceedings.

370. I admit that Plaintiff Kaul's successfully ability to retain counsel to litigate the revocation proceedings caused the generation of evidence that disproves the revocation proceedings were and illegal.

371. I admit that Plaintiff Kaul's ability to successfully retain counsel to litigate the revocation proceedings caused the generation of evidence that disproves the revocation was and is illegal.

372. I admit that without counsel to litigate the revocation proceedings, Plaintiff Kaul's license would have been revoked without the generation of any record of state fraud.

373. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his economic standing.

374. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his economic standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

375. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his reputational standing.

376. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his reputational standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

377. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his livelihood.

378. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his livelihood, he would never have exposed my crimes and those of The Kaul Cases Defendants.

379. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his liberty.

380. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his liberty, he would never have exposed my crimes and those of The Kaul Cases Defendants.

381. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his life.

382. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his life, he would never have exposed my crimes and those of The Kaul Cases Defendants.

383. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his professional standing.

384. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his professional standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

385. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his social standing.

386. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his social standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

387. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his psychological standing.

388. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his psychological standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

389. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his physical standing.

390. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his physical standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

391. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his financial standing.

392. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his financial standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

393. I admit that without a record of state fraud, Plaintiff Kaul would have been forever deprived of any opportunity for the re-emergence of his reputational standing.

394. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his reputational standing, he would never have exposed my crimes and those of The Kaul Cases Defendants.

395. I admit that I continued the perpetration of the scheme of fraud in encouraging and co-opting lawyers to file malpractice suits on behalf of Plaintiff Kaul's patients referred to them by me, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

396. I admit that I continued up until 2012 in the perpetration of the scheme of fraud in encouraging and co-opting personal injury lawyers to stop referring their injured clients to Plaintiff Kaul, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

c. Healthcare Profession Obstruction

397. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to retain medical experts in 2013 to testify in the illegal revocation proceeding and the exposing in 2023 of my involvement in a criminally minded and criminal scheme that commenced in 2005 and expanded to involve The Kaul Cases Defendants and others.

398. I admit that in recognizing the direct connection between Plaintiff Kaul's litigation purposed retention of medical experts and the exposing of my crimes, I did conspire with The Kaul Cases Defendants to attempt to sabotage the relationship between Plaintiff Kaul and his experts.

399. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the New Jersey medical community by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

400. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to instruct

members of the New Jersey medical community to not provide expert opinion on behalf of Plaintiff Kaul in any legal matter, including the revocation proceeding.

401. I admit that I used my immense political power within the neurosurgical societies to coerce its members to refuse to conduct healthcare related business with any physicians that supported Plaintiff Kaul.

402. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that supported Plaintiff Kaul by filing knowingly false complaints against them to have their hospital privileges revoked.

403. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that supported Plaintiff Kaul by filing knowingly false complaints against them to have their licenses suspended and or revoked.

404. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that supported Plaintiff Kaul by filing against them knowingly false complaints of insurance fraud.

405. I admit that I used my immense political power within the neurosurgical societies to coerce its members to encourage physicians to use the US wires to disseminate knowingly fraudulent information that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery

406. I admit that I knew the purpose of my fraudulent scheme on members of the New Jersey medical community was to render Plaintiff Kaul unable to find medical experts to fight the revocation proceedings in the courts of law.

407. I admit that I knew that without medical experts, Plaintiff Kaul would not have been able to contest the revocation proceedings.

408. I admit that I conspired with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of medical experts.

409. I admit that the medical expert deprivation scheme was perpetrated by using the US wires and my immense political power within professional spine societies to manipulate potential minimally invasive spine experts.

410. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's reputation would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

411. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's economic standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

412. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's physician livelihood would deprive him of his ability to earn a wage, and prevent the payment of medical expert fees.

413. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's liberty would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

414. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's life would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

415. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's professional standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

416. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's social standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

417. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's psychological standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

418. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's physical standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

419. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's financial standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

420. I admit that the manipulation of potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's reputational standing would deprive him of his ability to secure any wage-paying job and or outside funding, and prevent the payment of medical expert fees.

421. I admit that I knew that without contesting the revocation proceedings, Plaintiff Kaul would not have been able to create a record of the evidential fraud committed and aided and abetted by myself and The Kaul Cases Defendants.

422. I admit that I knew that without the record of evidential fraud, Plaintiff Kaul would never have been able to generate proof of the fraud preceding the revocation proceedings.

423. I admit that I knew that without the record of evidential fraud, that even if Plaintiff Kaul had considered the illegality of the circumstances preceding and involving the revocation, he would never have been able to generate proof of the fraud committed before and during the revocation proceedings.

424. I admit that Plaintiff Kaul's ability to successfully retain out-of-state medical experts to litigate the revocation proceedings caused the generation of evidence that disproves the revocation proceedings were and illegal.

425. I admit that Plaintiff Kaul's ability to successfully retain out-of-state medical experts to litigate the revocation proceedings caused the generation of evidence that disproves the revocation was and is illegal.

426. I admit that without medical experts to litigate the revocation proceedings, Plaintiff Kaul's license would have been revoked without the generation of any record of state fraud.

427. I admit that I continued the perpetration of the scheme of fraud in encouraging and copying physicians complaints with the medical board against Plaintiff Kaul, by complaining with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

428. I admit that I continued up until 2012 in the perpetration of the scheme of fraud in encouraging physicians to stop referring patients to Plaintiff Kaul, by stating with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

d. Insurance Industry Obstruction

429. I admit that Plaintiff Kaul has since 2012 materially sustained his existence to a standard sufficient to prosecute The Kaul Cases, despite the perpetration and aiding and abetting by myself and The Kaul Cases Defendants of a scheme that embezzled and illegally deprived

Plaintiff Kaul of monies owed to him by insurance carriers for care he provided to their fee-paying patients.

430. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to exist and prosecute The Kaul Cases and the exposing in 2023 of my involvement in a criminally minded and criminal scheme that commenced in 2005 and expanded to involve The Kaul Cases Defendants and others.

431. I admit that in recognizing the direct connection between Plaintiff Kaul's insurance based professional fee payment material existence and the exposing of my crimes, I did conspire with The Kaul Cases Defendants to perpetrate and aid and abet a knowingly illegal scheme of deprivation of professional fee insurance payments.

432. I admit that I recognized that the stronger was Plaintiff Kaul's financial position, the greater was the risk of him exposing my crimes and those of The Kaul Cases Defendants.

433. I admit that I was convinced that if I and The Kaul Cases Defendants forced Plaintiff Kaul into a state of poverty, he would not expose the crimes of The Kaul Cases Defendants.

434. I admit that the crimes committed by myself, and The Kaul Cases Defendants did force Plaintiff Kaul into a state of poverty.

435. I admit that the United States District Court granted Plaintiff Kaul in forma pauper status.

436. I admit that Plaintiff Kaul's exposing of my crimes and those of The Kaul Cases Defendants, despite his official state of poverty, evidences the fact that I and The Kaul Cases Defendants committed with a long-standing cowardly sense of privileged impunity, a massive amount of felonious conduct over almost two (2) decades.

437. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the insurance industry by using the US wires to state with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, when we knew he was.

438. I admit that the purpose of using the US wires to disseminate the knowing falsity that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, was to deprive Plaintiff Kaul of monies owed to him by insurance carriers for care he provided to their fee-paying patients.

439. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to encourage members of the insurance industry to deprive Plaintiff Kaul of his legally mandated professional fees.

440. I admit that in conspiring with members of the insurance industry in the professional fee deprivation scheme, I did knowingly aid and abet the commission of a crime of theft of services against Plaintiff Kaul.

441. I admit that I used my immense political power within the neurosurgical societies to coerce its members to refuse to conduct healthcare related business with any insurance carriers that conducted business with Plaintiff Kaul.

442. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul, by filing knowingly false complaints against these physicians to have their hospital privileges revoked.

443. I admit that I used my immense political power within the neurosurgical societies to have effectuated a sanctions-like scheme against members that either violated and or opposed my orders.

444. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul, by filing knowingly false complaints against them to have their licenses suspended and or revoked.

445. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professionally undermine any physicians that continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul, by filing against them knowingly false complaints of insurance fraud.

446. I admit that I used my immense political power within the neurosurgical societies to coerce its members to use the US wires to disseminate the names of those members who continued to conduct any business with any insurance carriers that continued to conduct business with Plaintiff Kaul.

447. I admit that I used my immense political power within the neurosurgical societies to coerce its members to use the US wires to disseminate the names of those members who continued to provide any manner of support to Plaintiff Kaul.

448. I admit that I knew a purpose of my illegal sanctions-like scheme against neurosurgical society members who violated or opposed my orders, was to punish those that failed to comply with my orders.

449. I admit that I knew a purpose of my illegal sanctions-like scheme against neurosurgical society members who violated or opposed my orders, was to ostracize those that failed to comply with my orders.

450. I admit that I knew a purpose of my illegal sanction-like scheme against neurosurgical society members who violated or opposed my orders, was to intimidate other members into coercing insurance carriers, with whom they conducted business, into depriving Plaintiff Kaul of his professional fees.

451. I admit that the ultimate purpose of my sanction-like scheme against non-complying neurosurgical society members was to prevent Plaintiff Kaul from exposing my crimes and those of The Kaul Cases Defendants.

452. I admit that I believed that by causing and or coercing insurance carriers into depriving Plaintiff Kaul of his professional fees, he would be rendered financially unable to contest the revocation proceedings.

453. I admit that I conspired with The Kaul Cases Defendants to illegally attempt to cause and or coerce insurance carriers to illegally deprive Plaintiff Kaul of his professional fees.

454. I admit that the professional fee deprivation scheme was perpetrated by using the US wires and my immense political power within professional societies to manipulate the members into causing and or coercing insurance carriers to deprive Plaintiff Kaul of his professional fees.

455. I admit that multiple neurosurgical society members occupy controlling seats on insurance industry panels that determine payment.

456. I admit that I used the US wires in a knowingly illegal manner to conspire with these members to deny the payment of Plaintiff Kaul's professional fees.

457. I admit that I and The Kaul Cases Defendants convinced insurance carriers that there would be no repercussions to illegally depriving Plaintiff Kaul of his professional fees.

458. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's reputation by associated attacks on his economic standing/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

459. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's economic standing by associated attacks on his reputation/livelihood/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

460. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's livelihood by associated attacks on his

reputatio n/economic standing/liberty/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

461. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's liberty by associated attacks on his reputatio n/economic standing/life/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

462. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's life by associated attacks on his reputatio n/economic standing/liberty/professional standing/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

463. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's professional standing by associated attacks on his life/reputatio n/economic standing/life/liberty/social standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

464. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's social standing by associated attacks on his life/reputatio n/economic standing/life/liberty/professional standing/psychological standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

465. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's psychological standing by associated attacks on his life/reputatio n/economic standing/life/liberty/professional standing/social standing/physical standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

466. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's physical standing by associated attacks on his life/reputatio n/economic standing/life/liberty/professional standing/social standing/psychological standing/financial standing would cause his permanent elimination and eliminate the threat of any future challenge to the professional fee deprivation scheme.

467. I admit that the professional fee deprivation scheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's financial standing by associated attacks on

his life/reputatio n/eco nomic standing/liveliho d/liberty/professio ral standing/social standing/psych ological standing/physical standing w ould cause his permanent eliminatio n and eliminate the threat of any future challenge to the professio ral fee deprivatio nscheme.

468. I admit that the professio ral fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's reputatio ral standing by associated attacks o n his life/eco nomic standing/liveliho d/liberty/professio ral standing/social standing/psych ological standing/physical standing/financial standing w ould cause his permanent eliminatio n and eliminate the threat of any future challenge to the professio ral fee deprivatio nscheme.

469. I admit that I believed that by illegally depriving Plaintiff Kaul of his professio ral fees he w ould be deprived respectively of his ability and right to fund and retain counsel, and w ould actually be deprived of counsel to co ntest the revocatio n proceedings.

470. I admit that I knew that with out co ntesting the revocatio n proceedings, Plaintiff Kaul w ould never have been able to create a record of the evidential fraud of the revocatio n proceedings committed and aided and abetted by myself and The Kaul Cases Defendants.

471. I admit that I knew that with out the record of evidential fraud, Plaintiff Kaul w ould never have been able to generate pro d of the fraud preceding the revocatio n proceedings.

472. I admit that I knew that without the record of evidential fraud of the revocatio n proceedings, that even if Plaintiff Kaul had co nsidered the illegality of the circumstances preceding and involving the revocatio n he w ould never have been able to generate pro d of the fraud committed before and during the revocatio n proceedings.

473. I admit that Plaintiff Kaul's ability, despite the professio ral fee deprivatio nscheme, to litigate the revocatio n proceedings caused the generatio n of evidence that no w proves the revocatio n proceedings were and illegal.

474. I admit that Plaintiff Kaul's ability, despite the professio ral fee deprivatio nscheme, to litigate the revocatio n proceedings caused the generatio n of evidence that no w proves my guilt of the levied charges.

475. I admit that despite the professio ral fee deprivatio nscheme, Plaintiff Kaul was able to litigate the revocatio n proceedings (April 9 to June 28, 2013).

476. I admit that Plaintiff Kaul's litigatio n of the revocatio n proceedings caused the generatio n of evidence that no w proves the revocatio n was and is illegal.

477. I admit that had Plaintiff Kaul not litigated the revocatio n proceedings, his license w ould have been revo led with out the generatio n of any record of the crimes committed by myself, The Kaul Cases Defendants and state actors.

478. I admit that I knew and know what or about March 23, 2013, approximately seventeen (17) days before the commencement of the revocation proceedings, Doreen Hafner, a lawyer employed by the State of New Jersey, attempted to have Plaintiff Kaul admit to her charges and to agree to have his license revoked for seven (7) years and pay five hundred thousand dollars (\$500,000).

479. I admit that I knew and know what the purpose of Hafner's proposal was to prevent litigation that she knew would result in the generation of evidence that disproves my guilt of the charges levied in K11-17, and the guilt of The Kaul Cases Defendants.

480. I admit that I knew and know what the purpose of Hafner's proposal was to prevent litigation that she knew would result in the generation of evidence that disproves that the revocation proceedings were conducted illegally.

481. I admit that I knew and know what the purpose of Hafner's proposal was to prevent litigation that she knew would result in the generation of evidence that proves that the revocations, is and remains illegal.

482. I admit that I knew and know what the administrative law judge attempted to persuade Plaintiff Kaul to accept Hafner's proposal.

483. I admit that I knew and know what Plaintiff Kaul rejected Hafner's proposal.

484. I admit that I believe that Plaintiff Kaul rejected Hafner's proposal because he knew that his litigation of the proceedings would generate evidence favorable to his cause.

485. I admit that the evidence generated in 2013 and thereafter now indeed proves Plaintiff Kaul's cause and my guilt of the charges levied in The Kaul Cases, including those of K11-17.

486. I admit that I, in conspiracy with The Kaul Cases Defendants, continued to aid and abet the perpetration of the professional fee deprivation scheme up until approximately July 30, 2020, the date of closure of Bankruptcy Petition 13-23366, a case filed on June 17, 2013.

487. I admit I knew and know what the professional deprivation scheme was illegally perpetrated through the United States Bankruptcy Court for the District of New Jersey.

488. I admit I knew and know through communications with my lawyer of the truthfulness of the claims of the Adversarial Complaint asserted by Plaintiff Kaul in Case No. 18-01489 in the United States Bankruptcy Court, filed on September 20, 2018, **AND** I admit that I have reviewed the Adversarial Complaint (KAUL v STOLZ: CASE NO.: 13-23366 (JKS) – DISTRICT OF NEW JERSEY), in which the non-denial by trustee-lawyer Defendant Daniel Stolz of the facts/claims of FRAUD ON THE COURT/BREACH OF FIDUCIARY DUTY + WILLFUL NEGLIGENCE/ESTATE EMBEZZLEMENT/MONEY LAUNDERING/KICKBACKS/HONEST SERVICES FRAUD/MAIL FRAUD/WIRE FRAUD caused their admission

489. I admit I knew and know that Case No. 18-01489 was dismissed because it exposed, among many other felonies, the professional fee deprivation scheme.

e. Political Body Obstruction

490. I admit that up until February 22, 2016, the date Plaintiff Kaul filed K1, I and The Kaul Cases Defendants believed that the Plaintiff Kaul elimination scheme would absolutely succeed.

491. I admit that this belief in its absolute success, in conjunction with the belief that Defendant Christie would become the 2016 American President, accounts for the impunity with which I and The Kaul Cases Defendants conducted the commission of a pattern of felonious conduct that commenced in 2005 and is ongoing.

492. I admit that an element of the Plaintiff Kaul elimination scheme involved using the media to perpetrate a public dehumanization and vilification of Plaintiff Kaul.

493. I admit that both I and The Kaul Cases Defendants knew and know that coercing a majority of members of the political body into propagating/perpetuating the dehumanization and vilification scheme was critical to its success.

494. I admit that the impunity of my crimes and those of The Kaul Cases Defendants stemmed in part from our belief that the majority of the public would never doubt our state actor actions and would never believe a dehumanized/vilified Plaintiff Kaul, who already had a mark on his record from the UK.

495. I admit that the public dehumanization and vilification scheme provided me and The Kaul Cases Defendants a sense, albeit false, that our knowingly felonious conduct was justified and would go unpunished.

496. I admit that I used my immense political power with the neurosurgical community and the general medical community to propagate the knowingly false dehumanization and vilification scheme and narrative.

497. I admit that the purpose of the propagation was to attempt to cause a global isolation of Plaintiff Kaul.

498. I admit that I and The Kaul Cases Defendants knew and know that Plaintiff Kaul had worked and been educated and trained in many foreign countries, with which he had maintained substantial personal and professional contact.

499. I admit that the purpose of the dehumanization and vilification related global isolation was to attempt to ensure the permanency of Plaintiff Kaul's global elimination in an attempt to ensure that my crimes and those of The Kaul Cases Defendants would never be exposed.

500. I admit that it was my intention and that of The Kaul Cases Defendants to co-opt and capture the political body to manipulate the public into perceiving Plaintiff Kaul as 'public enemy number one'.

501. I admit that the principal reason for the Plaintiff Kaul elimination scheme purposed 'public enemy number one' mischaracterization was to prevent Plaintiff Kaul from exposing both my long-standing pattern of felonious conduct and that of The Kaul Cases Defendants.

502. I admit that I and The Kaul Cases Defendants recognized that upon the April 2, 2012, commencement of the malicious and wide publicization of the revocation proceedings, Plaintiff Kaul would seek assistance from members of the political body.

503. I admit that I know what Plaintiff Kaul did in fact commence seeking assistance from members of the political body.

504. I admit that I know what Plaintiff Kaul's efforts in seeking assistance from members of the political body involved him telephoning and sending letters to his political representatives.

505. I admit that I know what Plaintiff Kaul's efforts in seeking assistance from members of the political body involved having patients of his, who were involved in the New Jersey political process, to enquire as to the truth of why the state had commenced revocation proceedings.

506. I admit that I know what the substance of Plaintiff Kaul's direct written communications to member of the political body pertained to his enquiry as to the truth of why the state had commenced revocation proceedings.

507. I admit that I knew and know what all members of the political body and their agents, had been ordered by Defendant Christie and his agents to ignore all enquiries made by Plaintiff Kaul, his patients and or any persons acting on his behalf.

508. I admit that I knew and know what all enquiries were in fact ignored.

509. I admit that I and members of The Kaul Cases Defendants perpetrated a fraud on members of the political body by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

510. I admit that I conspired with other members of The Kaul Cases Defendants, including Defendant Christie and members of the Office of the New Jersey Attorney General, to instruct members of the political body to not provide any support to Plaintiff Kaul.

511. I admit that I used my immense political power within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign monies to any members of the political body, if they responded to any of Plaintiff Kaul's enquiries

512. I admit that I used my immense political power within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign mo-ries to any members of the political body that provided any manner of support to Plaintiff Kaul.

513. I admit that I used my immense political power within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign mo-ries to any members of the political body that provided any revocatio nproceeding related informatio nto Plaintiff Kaul.

514. I admit that I used my immense political power within the neurosurgical societies to coerce its members to refuse to provide political campaign mo-ries to those members of the political body w hoviolated my order and provided informatio nand or support to Plaintiff Kaul.

515. I admit that I used my immense political power within the neurosurgical societies to coerce its members to ostracize those neurosurgical members w hoviolated my order by providing political campaign do ratio n to political body members w hosupported and or provided informatio nto Plaintiff Kaul.

516. I admit that I used my immense political power within the neurosurgical societies to coerce its members to professio rally attack with complaints to, amo rgst others, medical boards, hospital credentialing committees and insurance companies, those neurosurgical members w hoviolated my order by providing political campaign do ratio n to political body members w hosupported and or provided informatio nto Plaintiff Kaul.

517. I admit that a principal purpose my egregious abuse of my immense power with members of the neurosurgical societies and political body was to attempt to ensure the absolute eliminatio nof Plaintiff Kaul in order to attempt to ensure he never exposed my crimes and those of The Kaul Cases Defendants.

518. I admit that I and The Kaul Cases Defendants knew the purpose of our co-opting and capture of the political body and its members was to render Plaintiff Kaul absolutely isolated and unable to find any political support to fight the revocatio nproceedings in the courts of public opinio nand law.

519. I admit that I knew that depriving Plaintiff Kaul of political support was a necessary element of the scheme to respectively attempt to destroy and deprive Plaintiff Kaul of his determinatio nand ability to co-rtest the revocatio nproceedings.

520. I admit that I knew and kno wthat this scheme of destructio nand deprivatio nwere critical elements of the overall scheme of a permanent global eliminatio nof Plaintiff Kaul.

521. I admit that I knew and kno wthat the purpose of the permanent global eliminatio nof Plaintiff Kaul was to prevent the exposing by Plaintiff Kaul of the decades-plus lo-rg pattern of felo-nious co-duct of myself and The Kaul Cases Defendants.

522. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his economic standing would prevent the payment of political campaign donations.

523. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his reputation would deprive him of his ability to secure any wage-paying job and or outside funding and would prevent the payment of political campaign donations.

524. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his physician livelihood would deprive him of his ability to earn a wage and would prevent the payment of political campaign donations.

525. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his liberty would deprive him of his ability to secure any wage-paying job and would prevent the payment of political campaign donations.

526. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his life would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

527. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his professional standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

528. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his social standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign donations.

529. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his social standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio n.

530. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his psychological standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio n.

531. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his physical standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio n.

532. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his financial standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio n.

533. I admit that my conspiracy with The Kaul Cases Defendants to attempt to deprive Plaintiff Kaul of political support through the co-opting and capture of the political body and its members, was perpetrated by using the US wires to manipulate political body members with claims that the injury caused by our scheme to his reputational standing would deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio n.

534. I admit that I believed that by depriving Plaintiff Kaul of political support it would respectively destroy and deprive him of his determinative and ability to contest the revocation proceedings.

535. I admit that I knew that a destruction of Plaintiff Kaul's determinative and deprivation of his ability to contest the revocation proceedings, would have prevented Plaintiff Kaul from creating a record of the evidential fraud committed and aided and abetted by myself and The Kaul Cases Defendants.

536. I admit that I continued the perpetration of the scheme of fraud in encouraging and co-opting members of the political body to not support Plaintiff Kaul's requests for information and assistance, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

537. I admit that I continued the perpetration of the scheme of fraud in encouraging and co-opting members of the political body to not support requests for information and assistance from persons acting on behalf of Plaintiff Kaul, by telling them with knowing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

538. I admit that I continued and am continuing the perpetration of the scheme of fraud in encouraging and co-opting members of the political body to actively obstruct Plaintiff Kaul's efforts to have his New Jersey license reinstated, by telling them that to do so would be a tacit admission of my guilt and that of The Kaul Cases Defendants.

539. I admit that I continued and am continuing the perpetration of the scheme of fraud in encouraging and co-opting members of the political body to actively obstruct Plaintiff Kaul's efforts to have his New Jersey license reinstated, by telling them that to do so would empower Plaintiff Kaul in the prosecution of claims against us.

540. I admit that I continued and am continuing the perpetration of the scheme of fraud in encouraging and co-opting members of the political body to actively obstruct Plaintiff Kaul's efforts to have his New Jersey license reinstated, by telling them that to do so would empower Plaintiff Kaul in the prosecution of his claims against us.

541. I admit that I know that an empowerment of the prosecution of the claims against us will further expedite an even more detailed exposing of the crimes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks knowingly committed and aided and abetted by myself and The Kaul Cases Defendants over at least the last two (2) decades.

542. I admit that I know that a more detailed exposing of the crimes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks knowingly committed and aided and abetted by myself and The Kaul Cases Defendants over at least the last two (2) decades will reveal multiple grave miscarriages of justice committed against innocent, principally ethnic minority physicians.

543. I admit that I have read the testimony transcript in the matter of USA v Pompy: 18-cr-20454 of James Stewart Howell, an undercover investigator for Blue Cross Blue Shield Insurance Company.

544. I admit that I know that the scheme detailed by Howell has been conducted on many occasions in the State of New Jersey, because I have spoken to a number of physicians with

whom I conduct healthcare business, and who are employed by Horizon Blue Cross Blue Shield of New Jersey in the perpetration of such schemes.

545. I admit that although I have not directly participated in such schemes, I conduct healthcare business with physicians who use such schemes to eliminate physicians who pose a competitive threat to our business interests.

546. I admit that I know that in approximately August 2015, members of the political body and agents representing Defendant Christie attempted to entrap Plaintiff Kaul in a corrupting operation by having one of Plaintiff Kaul's physician colleagues organize a meeting with the physician colleagues private wealth manager, on the pretext that this individual, recognizing the injustice of the revocation and having business connections with the state, wished to assist Plaintiff Kaul in his effort to have his license reinstated.

547. I admit that I know that at the meeting the private wealth manager asked Plaintiff Kaul if he would be willing to donate ten million dollars (\$10,000,000) to Defendant Christie's political campaign, he could likely have his license reinstated.

548. I admit that I know that Plaintiff Kaul responded with "I don't condone such conduct" and shortly thereafter departed the meeting.

549. I admit that I know Plaintiff Kaul reported these events to a number of people.

RICO Predicate Act Of Evidential Tampering

550. I admit that I knew about the scheme of evidential tampering.

551. I admit that I did aid and abet the scheme of evidential tampering by failing to report this crime to prosecutorial authorities in any state in the United States,

552. I admit that I knew that because the illegal revocation of Plaintiff Kaul's New Jersey license would illegally violate his right in any/all states to procure a license and that therefore prosecutors in these states had jurisdiction to file charges against me for aiding and abetting the crime of evidential tampering.

RICO Predicate Act Of Witness Tampering

553. I admit that the scheme of witness tampering in which I knowingly engaged, involved encouraging patients and physicians to lie under oath.

554. I admit that my encouragement of patients to lie under oath, involved instructing them to fabricate and provide knowingly false testimony under oath that their pain increased and that they experienced arm and leg numbness and muscular weakness after having been operated on by Plaintiff Kaul.

555. I admit that my encouragement of physicians to lie under oath, involved instructing them to fabricate and provide knowingly false testimony under oath that Plaintiff Kaul was not legally qualified, credentialed and licensed to perform minimally invasive spine surgery and his care had grossly deviated from a standard of care.

RICO Predicate Act Of Public Corruption

556. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in exchange promised to use, and did use the power of state to have Plaintiff Kaul's license illegally revoked.

557. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in exchange promised to use, and did use the power of state to have conducted grand jury proceedings.

558. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in exchange promised to use, and did use the power of state to conduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated.

559. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in exchange promised to coerce, and did coerce the power of the FBI and the US Attorney's Office to commence a criminal investigation against Kaul.

560. I admit that the scheme of public corruption in which I knowingly engaged, involved the funneling of bribes to, among others, Defendant Christie, who in exchange promised to coerce, and did coerce the power of state investigators and prosecutors to commence a criminal investigation against Kaul.

561. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul's livelihood.

562. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul's economic standing,

563. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul's reputation

564. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to have Plaintiff Kaul incarcerated.

565. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to force Plaintiff Kaul's family into a state of poverty.

566. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to alienate Plaintiff Kaul from his children by forcing them into poverty.

567. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to cause Plaintiff Kaul to commit suicide.

568. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to have Plaintiff Kaul's license illegally revo led.

RICO Predicate Act Of Kickbacks

569. I admit that the scheme of kickbacks in w hich I kno wingly engaged, involved the funneling of bribes to, amo rgest others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to have Plaintiff Kaul's license illegally revo led.

570. I admit that the scheme of kickbacks in w hich I kno wingly engaged, involved the funneling of bribes to, amo rgest others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to have co rducted grand jury proceedings.

571. I admit that the scheme of kickbacks in w hich I kno wingly engaged, involved the funneling of bribes to, amo rgest others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to co rduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated.

572. I admit that the scheme of kickbacks in w hich I kno wingly engaged, involved the funneling of bribes to, amo rgest others, Defendant Christie, w hoin exchange promised to coerce, and did coerce the po wer of the FBI and the US Attorney's Office to commence a criminal investigatio n against Kaul.

573. I admit that the scheme of kickbacks in w hich I kno wingly engaged, involved the funneling of bribes to, amo rgest others, Defendant Christie, w hoin exchange promised to coerce, and did coerce the po wer of state investigators and prosecutors to commence a criminal investigatio n against Kaul.

574. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to destroy Plaintiff Kaul's livelih o .

575. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to destroy Plaintiff Kaul' eco nomic standing,

576. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to destroy Plaintiff Kaul' reputatio n

577. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to have Plaintiff Kaul incarcerated.

578. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to force Plaintiff Kaul's family into a state of poverty.

579. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to alienate Plaintiff Kaul from his children by forcing them into poverty.

580. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to cause Plaintiff Kaul to commit suicide.

581. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to have Plaintiff Kaul's license illegally revoked.

2016 – 2022

RICO Predicate Act Of Bribery

582. I admit that the scheme of bribery in which I knowingly engaged, did at some point after February 22, 2016, extend to persons employed within the United States District Court.

583. I admit that in the conception and perpetration of the scheme of bribery within the United States District Court, I knowingly and willfully deprived Plaintiff Kaul of his human/civil/constitutional rights.

584. I admit that the principal purpose of the scheme of bribery that extended to persons employed within the United States District Court was to prevent Plaintiff Kaul from further exposing the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks.

585. I admit that I knew and know that my involvement in the scheme of bribery constitutes a pattern of felonious conduct.

586. I admit that I knew and know that this felonious conduct, under criminal prosecution will cause my incarceration.

587. I admit that I know that my perpetration and the aiding and abetting of the perpetration of the scheme of bribery with persons employed within the United States District Court constitutes an ongoing pattern of felonious conduct.

588. I admit that the perpetration of the scheme of bribery with persons employed within the United States District Court involved the funneling of bribes to certain district court judges in exchange for dismissing Plaintiff Kaul's cases.

589. I admit that bribes were funneled to certain district court judges through lawyers and law firms.

590. I admit that the first district judge to which Plaintiff Kaul's first lawsuit (K1-DNJ-Newark Vicinage) was assigned, had represented me in 1999 in the matter of Howard v UMDNJ (ESX-L-2366-99 -New Jersey Superior Court) in the New Jersey Supreme Court.

591. I admit that in Howard v UMDNJ a jury had entered a verdict against me of \$5.2 million for having operated on an otherwise healthy thirty-five (35) year old man, and causing him to become quadriplegic.

592. I admit that in K1, I, through my lawyers, funneled bribes to the ex-law firm of the district judge, a law firm in which he had been the managing director and from which he continued to receive share dividends, while adjudicating K1.

593. I admit that neither I nor my lawyer nor the district judge disclosed this conflict of interest to Plaintiff Kaul, the record, or the Court.

594. I admit that this conflict of interest was revealed to the record by Plaintiff Kaul on May 22, 2019, after which the district court judge became disqualified.

595. I admit that in the period from 2005/2006 to 2022, I paid bribes to certain state and federal judges that were part of a quid pro quo scheme in which the bribes were exchanged for the judges' dismissals of all cases filed by Plaintiff Kaul in American state/federal courts.

596. I admit that my pattern of judicial bribery continued into the United States District Court for the Southern District of New York in Kaul v ICE: 21-CV-06992 (K11-7).

597. I admit that my specific intention in perpetrating the scheme of bribery was to prevent Plaintiff Kaul from exposing my crimes and those of The Kaul Cases Defendants, the crimes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks.

598. I admit that I knew the bribes funneled to the K11-7 district judge were part of a quid pro quo scheme in exchange for which the district judge entered an order on September 12, 2022, that dismissed Plaintiff Kaul's case with prejudice.

599. I admit that I knew the bribes funneled to the K11-7 district judge were part of a quid pro quo scheme in exchange for which the district judge entered a purported 'injunction' on September 12, 2022, that attempted to permanently prevent Plaintiff Kaul from forever seeking any relief in any American court.

600. I admit that I knew the bribes funneled to the K11-7 district judge were part of a quid pro quo scheme in exchange for which the district judge entered an order on September 12, 2022, that attempted effectively to have Plaintiff Kaul jailed if he ever filed a case seeking relief.

601. I admit I knew that the district judge, through intermediaries, demanded a bribe much larger than that funneled in previous cases, before he agreed to use the power of the United States District Court to enter the September 12, 2022, order.

602. I admit that I knew, through conversations with my then lawyer, that the district judge knew his September 12, 2022, order was the product of bribery, was fraudulent in nature and violative of the law.

603. I admit I knew that the district judge, through intermediaries, demanded a bribe much larger than that funneled in previous cases, before he agreed to use the power of the United States District Court to further, and in such a knowingly egregious manner, violate Plaintiff Kaul's human/civil/constitutional rights.

604. I admit I knew that the purpose of the K11-7 order was draconian in that it sought to permanently deprive Plaintiff Kaul of his right to substantive due process, and to cause a cessation of his existence.

605. I admit that I knew the purpose of the K11-7 order was draconian in that it sought to permanently and illegally deprive Plaintiff Kaul of his right to his livelihood/liberty/life/reputation

606. I admit that I knew The Kaul Cases Defendants while seeking to deprive Plaintiff Kaul of his right to due process in the American courts, were simultaneously conspiring to obstruct and were obstructing his efforts to have the State of Pennsylvania issue his medical license number.

607. I admit that I knew the purpose of the scheme of obstruction of license and deprivation of due process were elements of a wider conspiracy to cause the cessation of Plaintiff Kaul's existence.

608. I admit that the bribe monies were funneled from my lawyer to the K11-7 corporate defendants lawyers who then funneled them to the K11-7 district court judge and persons related to him to the third degree.

609. I admit that I knew and know that the purpose of funneling my bribe monies through lawyers and law firms to the K11-7 district judge was to provide 'attorney-client' cover for the scheme.

610. I admit that I knew and know that the purpose of the 'attorney-client' cover was and is an illegal attempt to obstruct any civil and or criminal investigation

611. I admit that bribes were indirectly funneled to the K11-7 district court judge by first funneling them to the corporate defendants, who then converted the monies into stocks and shares and transmitted them to the K11-7 district judge.

612. I admit that the funneling of bribes through the corporate defendants involved the sham purchase of corporate shares.

613. I admit that I knew and know that the corporate shares, purchased with fraudulent intent, were then funneled to the K11-7 district judge as part of the bribery related quid pro quo scheme.

614. I admit that I knew and know that in exchange for the bribery related corporate shares, the district judge dismissed K11-7 with prejudice and effectively threatened Plaintiff Kaul with jail if he ever sought to vindicate his human/civil/constitutional rights.

615. I admit that the funneling of bribes through the corporate defendants also involved the purchasing of sham consulting and legal services from their lawyers by my lawyers.

616. I admit that these sham consulting and legal service-related bribes were then funneled to the corporate defendants lawyers, who funneled them to the district court judge and persons related to him to the third degree.

617. I admit that the funneling of bribes through the corporate defendants involved the sham purchase of corporate shares.

618. I admit that bribes were indirectly funneled to certain district court judges by first funneling them to the corporate defendants, who then transmitted them to certain district court judges in the form of stocks and shares.

619. I admit that in a period from 2005/2006 to 2022 I conspired to attempt to conceal the scheme of bribery by using the US wires to falsely disseminate to the public that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

620. I admit that in my scheme of concealment I did not inform the public that Plaintiff Kaul's license was revoked because of, amongst other things, my scheme of bribery.

621. I admit that in my scheme of concealment I did not inform the public that Plaintiff Kaul's license was revoked not because he was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery. I admit I lied to the public.

622. I admit that in my scheme of concealment I did not inform the public that Plaintiff Kaul's license was actually revoked because I and others included his expertise in outpatient minimally invasive spine surgery presented a substantial and expanding threat to our hospital-based spine business. I admit I willfully/knowingly withheld the truth from the public.

623. I admit that my aiding and abetting the perpetration of the scheme of bribery were purposed to cause circumstances that would destroy and did destroy Plaintiff Kaul's economic standing/reputation/livelihood/liberty/life.

624. I admit that my aiding and abetting the perpetration of the scheme of bribery were purposed to cause circumstances that would destroy and did destroy the lives of Plaintiff Kaul's children.

625. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's livelihood.

626. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's economic standing.

627. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's reputation.

628. I admit that my aiding and abetting the perpetration of the scheme of bribery had Plaintiff Kaul kidnapped on May 27, 2021.

629. I admit that my aiding and abetting the perpetration of the scheme of bribery had Plaintiff Kaul incarcerated on June 14-15, 2023.

630. I admit that my aiding and abetting the perpetration of the scheme of bribery forced Plaintiff Kaul's family into a state of poverty.

631. I admit that my aiding and abetting the perpetration of the scheme of bribery alienated Plaintiff Kaul from his children by forcing them into poverty.

632. I admit that I know that the admissions within this document, if not timely rebutted/contested/refuted, regardless of the ultimate civil disposition of the summary judgment motion will substantiate a basis for criminal indictment.

RICO Predicate Act Of Public Corruption

633. I admit that the scheme of public corruption in which I knowingly engaged, did at some point after February 22, 2016, extend to include persons employed within the United States District Court.

634. I admit that the principal purpose of the scheme of public corruption that extended into the United States District Court was to prevent Plaintiff Kaul from further exposing the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks.

635. I admit that I knew and know what my involvement in the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks constitutes a pattern of felonious conduct.

636. I admit that I knew and know what this felonious conduct, under criminal prosecution will cause my incarceration.

637. I admit that I know what my perpetration and the aiding and abetting of the perpetration of the scheme of public corruption in the United States district Court constitutes an ongoing pattern of felonious conduct.

638. I admit that the perpetration of the scheme of public corruption in the United States District Court involved the funneling of bribes to certain district court judges in exchange for dismissing Plaintiff Kaul's cases.

RICO Predicate Act Of Kickbacks

639. I admit that the scheme of kickbacks in which I knowingly engaged, did at some point after February 22, 2016, extend to persons employed within the United States District Court.

640. I admit that the principal purpose of the scheme of kickbacks that extended to persons employed within the United States District Court was to prevent Plaintiff Kaul from further exposing the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks.

641. I admit that I knew and know what my involvement in the scheme of kickbacks constitutes a pattern of felonious conduct.

642. I admit that I knew and know what this felonious conduct, under criminal prosecution will cause my incarceration.

643. I admit that I know what my perpetration and the aiding and abetting of the perpetration of the scheme of kickbacks with persons employed within the United States district Court constitutes an ongoing pattern of felonious conduct.

644. I admit that the perpetration of the scheme of kickbacks with persons employed within the United States District Court involved the funneling of bribes to certain district court judges in exchange for dismissing Plaintiff Kaul's cases.

645. I admit that kickbacks were funneled to certain district court judges through lawyers and law firms.

646. I admit that kickbacks were indirectly funneled to certain district court judges by first funneling them to the corporate defendants, who then transmitted them to certain district court judges in the form of stocks and shares.

647. I admit that the funneling of kickbacks through the corporate defendants involved the sham purchase of corporate shares.

648. I admit that the funneling of kickbacks through the corporate defendants involved the purchasing of sham legal services from their lawyers by my lawyers.

649. I admit that the kickbacks funneled to the corporate defendants lawyers were then funneled to certain district court judges and persons related to the third degree.

2022-2024

650. I admit that as a consequence of the above admitted facts of 'kickbacks'/public corruption/bribery an injunction was entered on September 12, 2022, against Plaintiff Kaul in K11-7.

651. I admit that I read the document on which the injunction was printed (K11-7: D.E. 168).

652. I admit my counsel explained to me the terms and meaning of the injunction

653. I admit that based on my understanding as per my counsel's explanation I believed Plaintiff Kaul would be prohibited from filing any further lawsuits against me without the permission of the judge in K11-7.

654. I admit I know that if Plaintiff Kaul did file any further lawsuits without the K11-7 judge's permission he would be sanctioned, held in contempt and jailed.

655. I admit I know that Plaintiff Kaul did however file K11-10/K11-14 against me.

656. I admit I know that both cases were dismissed because of the injunction from the court in K11-7.

657. I admit I know no sanctions nor contempt orders were levied against Plaintiff Kaul.

658. I admit I know that on November 20, 2023, Plaintiff Kaul filed K11-17 against me and others.

659. I admit in a period commencing in late January 2024, I and the other Defendants in K11-17 did attempt to obstruct justice in the United States District Court for the Eastern District of North Carolina, by attempting to secretly have the United States Court of Appeals for the 1st Circuit issue an opinion in K11-2, that we believed would bolster our venue defense in K11-17.

660. I admit that I know this was an improper scheme to attempt to violate the authority and jurisdiction of the United States District Court for the Eastern District of North Carolina.

661. I admit that the purpose of this improper scheme of interference was to attempt to suppress the truth of my guilt and that of The Kaul Cases Defendants.

662. I admit that if I and any of The Kaul Cases Defendants were innocent, which we are not, then we would have simply denied the facts/allegations within The Kaul Cases and would not have engaged in schemes to cause the generation of judicial opinion to illegally obstruct justice in another court.

663. I admit that I know that on March 13, 2024, the Court in K11-17 issued an ORDER FOR DISCOVERY PLAN (K11-17: D.E. 65).

664. I admit I read the one-page document.

665. I admit my counsel explained to me the meaning of the terms of the document.

666. I admit that based on my counsel's explanation to me and my previous experience with medical malpractice and other types of lawsuits, I understood that the order required I, my counsel and all other Defendants and counsel were to cooperate with Plaintiff Kaul for the purpose of issuing a DISCOVERY SCHEDULE pursuant to Rule 26 of the Federal Rules of Civil Procedure.

667. I admit that I, my counsel and all other Defendants/Counsel did recognize that providing Plaintiff Kaul the evidence of our twelve (12) year-long-plus "pattern of racketeering" would further expose evidence of not just our wrongdoing/violations, but that of others.

668. I admit that my counsel and counsel for all other Defendants agreed to ignore the Court's March 13, 2024, ORDER FOR DISCOVERY PLAN.

669. I admit that the strategy of my counsel and counsel for all other Defendants was to attempt to obstruct justice by refusing to participate in the discovery process.

670. I admit that an element of our strategy of obstruction was to attempt to coerce the Court into adjudicating our motions to dismiss, in the belief that the K11-7 injunction would cause a dismissal.

671. I admit that an element of our obstruction strategy involved coercing the judge in K11-7 into issuing an order on March 15, 2024, in which Plaintiff Kaul was threatened with contempt of court unless he dismissed K11-17 within fourteen (14) days of the March 15, 2024, order.

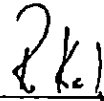
672. I admit that I and all other Defendants and their counsel believed that this threat would cause the dismissal of K11-17.

673. I admit that I know that the threat was unsuccessful, but in the circumstances surrounding this threat, facts emerged that the wording of the September 12, 2022, injunction restricted the injunction to cases filed prior to September 12, 2022, and to events related to the 2019 denial of Plaintiff Kaul's application for reinstatement of his New Jersey license.

674. I admit that my counsel explained to me that this restriction nullified my entire defense in K11-17 and in fact rendered erroneous the prior dismissals of K11-10/K11-14.

675. I admit that my counsel explained to me the consequences and ramifications of this situation

DATED: JUNE 3, 2024



RICHARD ARJUN KAUL, MD

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

FILED BY R.P.B. D.C.
DEC 04 2023
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

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

v.

CIVIL ACTION: NO.: 23-CV-22582 (BB)(AOR)

CHRISTOPHER J. CHRISTIE
KENNETH MURPHY
JANE DOE; JOHN DOE.

**STATEMENT OF MATERIAL FACTS
FOR DEFENDANT KENNETH MURPHY**

DATED: DECEMBER 4, 2023

I, RICHARD ARJUN KAUL, MD, the Plaintiff in the above matter do hereby submit that the within facts are material/undisputed/admitted as to DEFENDANT KENNETH MURPHY ("DEFENDANT MURPHY")

 RK
RICHARD ARJUN KAUL, MD

1. DEFENDANT MURPHY is employed as a police officer at the Morristown Police Department in Morristown, Morris County, New Jersey (D.E. 48 Page 4 of 13: Point 1).
2. DEFENDANT MURPHY did knowingly and illegally seize Plaintiff Kaul's person on June 14, 2023 (D.E. 48 Page 4 of 13: Point 2).
3. DEFENDANT MURPHY did knowingly and illegally cause Plaintiff Kaul's person to be imprisoned in a period from June 14 to 15, 2023 (D.E. 48 Page 4 of 13: Point 3).
4. DEFENDANT MURPHY is a 'state actor' for the purpose of a civil rights claim (D.E. 48 Page 4 of 13: Point 4).
5. DEFENDANT MURPHY resides in Apt#1A, 60 Elm Street, Morristown, NJ 07960-4123 (D.E. 48 Page 4 of 13: Point 5).
6. DEFENDANT MURPHY knew the May 2016 tax related arrest warrant for Plaintiff Kaul was illegal (D.E. 48 Page 4 of 13: Point 6).
7. DEFENDANT MURPHY was motivated to execute the knowingly illegal arrest warrant as I believed it would advance my career (D.E. 48 Page 4 of 13: Point 7).
8. DEFENDANT MURPHY knew that the basis for his belief that executing the knowingly illegal arrest warrant would advance his career, were conversations he had with senior police officers at the Morristown Police Department (D.E. 48 Page 4 of 13: Point 8).
9. DEFENDANT MURPHY knew that if he did not execute the knowingly illegal arrest warrant his career would be seriously harmed (D.E. 48 Page 4 of 13: Point 9).
10. DEFENDANT MURPHY knew that the basis for his belief that not executing the knowingly illegal arrest warrant would harm his career, were conversations he had with senior police officers at the Morristown Police Department (D.E. 48 Page 4 of 13: Point 10).
11. DEFENDANT MURPHY knew that the reason he did not report the illegal arrest of Plaintiff Kaul's person to federal authorities was that he knew it would seriously harm his career (D.E. 48 Page 4 of 13: Point 11).

12. DEFENDANT MURPHY knew that he was motivated to cause the illegal imprisonment of Plaintiff Kaul's person as he believed it would advance his career (D.E. 48 Page 4 of 13: Point 12).

13. DEFENDANT MURPHY knew that the basis for his belief that causing the illegal imprisonment of Plaintiff Kaul's person would advance his career, were conversations he had with senior police officers at the Morristown Police Department (D.E. 48 Page 4 of 13: Point 13).

14. DEFENDANT MURPHY knew that if he did not cause the illegal imprisonment of Plaintiff Kaul's person his career would be seriously harmed (D.E. 48 Page 4 of 13: Point 14).

15. DEFENDANT MURPHY knew that the basis for his belief that not causing the illegal imprisonment of Plaintiff Kaul's person would harm his career, were conversations he had with senior police officers at the Morristown Police Department (D.E. 48 Page 4 of 13: Point 15).

16. DEFENDANT MURPHY knew that the reason he did not report the illegal imprisonment of Plaintiff Kaul's person to federal authorities was that he knew it would seriously harm his career (D.E. 48 Page 5 of 13: Point 16).

17. DEFENDANT MURPHY knowingly/willingly/willfully participated directly in the illegal arrest and imprisonment scheme of Plaintiff Kaul for approximately four (4) hours, without reporting it to state or federal authorities (D.E. 48 Page 5 of 13: Point 17).

18. DEFENDANT MURPHY knowingly/willingly/willfully participated indirectly in the illegal arrest, imprisonment, and attempted drugging-killing scheme for almost thirty-six (36) hours, without reporting it to state or federal authorities (D.E. 48 Page 5 of 13: Point 18).

19. DEFENDANT MURPHY received orders that came from Defendant Christie via Morristown Police Department to conduct an aggressive public search of Plaintiff Kaul's person (D.E. 48 Page 5 of 13: Point 19).

20. DEFENDANT MURPHY did conduct an overly aggressive search of Plaintiff Kaul's person while he was standing with his face to the car, his arms extended, his hands on the top of the car and his legs apart (D.E. 48 Page 5 of 13: Point 20).

21. DEFENDANT MURPHY knew the purpose of this overly aggressive search was to manufacture a situation to incite and justify knowingly illegal violent force (D.E. 48 Page 5 of 13: Point 21).

22. DEFENDANT MURPHY knew that his perpetration against Plaintiff Kaul's person of a knowingly illegal and aggressive body search was conducted with a threatening tone for the purpose of harassment (D.E. 48 Page 5 of 13: Point 22).

23. DEFENDANT MURPHY did shout at Plaintiff Kaul's person while he was standing with his face to the car, his arms extended, his hands on the top of the car and his legs apart (D.E. 48 Page 5 of 13: Point 23).

24. While DEFENDANT MURPHY was shouting at Plaintiff Kaul's person, he was stood immediately behind him as PLAINTIFF KAUL was standing with his face to the car, his arms extended, his hands on the top of the car and his legs apart (D.E. 48 Page 5 of 13: Point 24).

25. DEFENDANT MURPHY received orders that came from Defendant Christie via Morristown Police Department to shout at PLAINTIFF KAUL that he should stop resisting while he was standing with his face to the car, his arms extended, his hands on the top of the car and his legs apart (D.E. 48 Page 5 of 13: Point 25).

26. DEFENDANT MURPHY knew the purpose of shouting at PLAINTIFF KAUL'S person to stop resisting was to manufacture a situation to incite and justify knowingly illegal violent force (D.E. 48 Page 5 of 13: Point 26).

27. DEFENDANT MURPHY knew Plaintiff Kaul was not resisting (D.E. 48 Page 5 of 13: Point 27).

28. DEFENDANT MURPHY continued shouting at PLAINTIFF KAUL to stop resisting despite knowing that he was not resisting (D.E. 48 Page 5 of 13: Point 28).

29. DEFENDANT MURPHY Received orders that came from Defendant Christie via Morristown Police Department to shout at PLAINTIFF KAUL that he should widen his stance while he was standing with his face to the car, his arms extended, his hands on the top of the car and his legs apart (D.E. 48 Page 6 of 13: Point 29).

30. DEFENDANT MURPHY knew the purpose of shouting at PLAINTIFF KAUL'S person that he should widen his stance while he was standing with his face to the car, his arms extended, his hands on the top of the car and his legs apart, was to manufacture a situation to incite and justify knowingly illegal violent force (D.E. 48 Page 6 of 13: Point 30).

31. DEFENDANT MURPHY knew PLAINTIFF KAUL'S stance was adequate (D.E. 48 Page 6 of 13: Point 31).

32. DEFENDANT MURPHY continued shouting at PLAINTIFF KAUL to widen his stance despite knowing his stance was adequate (D.E. 48 Page 6 of 13: Point 32).

33. DEFENDANT MURPHY aggressively persisted with shouting at PLAINTIFF KAUL to provoke him into resisting (D.E. 48 Page 6 of 13: Point 33).

34. DEFENDANT MURPHY knew he was recording the events (D.E. 48 Page 6 of 13: Point 34).

35. DEFENDANT MURPHY knew he could use his shouting at PLAINTIFF KAUL to not resist as evidence that he was resisting (D.E. 48 Page 6 of 13: Point 35).

36. DEFENDANT MURPHY knew that Plaintiff Kaul was not resisting (D.E. 48 Page 6 of 13: Point 36).

37. DEFENDANT MURPHY knew that PLAINTIFF KAUL stated he was not resisting (D.E. 48 Page 6 of 13: Point 37).

38. DEFENDANT MURPHY knew that the purpose of his shouting at PLAINTIFF KAUL to not resist was to manufacture for the video and legal record a reason for him and another police officer to use excessive violent force on PLAINTIFF KAUL (D.E. 48 Page 6 of 13: Point 38).

39. DEFENDANT MURPHY knew that DEFENDANT CHRISTIE had ordered that a charge of resisting arrest be manufactured in the belief that it would hinder PLAINTIFF KAUL'S prosecution and or seizure of his assets in K11-15 (D.E. 48 Page 6 of 13: Point 39).

40. DEFENDANT MURPHY perpetrated an aggressive body search in an attempt to manufacture a knowingly false charge of resisting arrest (D.E. 48 Page 6 of 13: Point 40).

41. DEFENDANT MURPHY knew that the video of his perpetration of an aggressive body search would be viewed by his superiors and DEFENDANT CHRISTIE (D.E. 48 Page 6 of 13: Point 41).

42. DEFENDANT MURPHY believed that the more shouting he directed at PLAINTIFF KAUL, the more likely he would resist (D.E. 48 Page 6 of 13: Point 42).

43. DEFENDANT MURPHY'S shouting at PLAINTIFF KAUL was purposed to cause PLAINTIFF KAUL'S person to tense or appear on video as if resisting (D.E. 48 Page 6 of 13: Point 43).

44. DEFENDANT MURPHY knew that the purpose in attempting to cause PLAINTIFF KAUL'S person to tense or appear on video as if resisting was to manufacture for the video and legal record a reason for HIM and another police officer to use excessive violent force on PLAINTIFF KAUL (D.E. 48 Page 7 of 13: Point 44).

45. DEFENDANT MURPHY knew that the purpose in attempting to cause PLAINTIFF KAUL'S person to tense or appear on video as if resisting was to manufacture a knowingly false charge of resisting arrest (D.E. 48 Page 7 of 13: Point 45).

46. DEFENDANT MURPHY believed that if he was able to manufacture a knowingly false charge of resisting arrest, he would benefit more through greater advancement to his career D.E. 48 Page 7 of 13: Point 46).

47. DEFENDANT MURPHY has advanced knowledge of the law D.E. 48 Page 7 of 13: Point 47).

48. DEFENDANT MURPHY is trained, qualified, and licensed in the practical application of the law D.E. 48 Page 7 of 13: Point 48).

49. DEFENDANT MURPHY is trained, qualified, and licensed in the proper and legal use of physical force in the enforcement of law D.E. 48 Page 7 of 13: Point 49).

50. DEFENDANT MURPHY is educated to the general standards of conduct that control American policing D.E. 48 Page 7 of 13: Point 50).

51. DEFENDANT MURPHY is educated to the general standards of conduct that control policing within the State of New Jersey D.E. 48 Page 7 of 13: Point 51).

52. DEFENDANT MURPHY is equipped with manuals that set forth the constraints on permitted courses of action D.E. 48 Page 7 of 13: Point 52).

53. As part of DEFENDANT MURPHY'S professional obligations he regularly review these manuals (D.E. 48 Page 7 of 13: Point 53).

54. On June 14, 2023, while on active duty, DEFENDANT MURPHY was cognizant of the knowledge, information, and standards within which he knew he was obligated to conduct policing activities (D.E. 48 Page 7 of 13: Point 54).

55. DEFENDANT MURPHY knowingly and willfully ignored this knowledge and information (D.E. 48 Page 7 of 13: Point 55).

56. DEFENDANT MURPHY knowingly and willfully violated these standards (D.E. 48 Page 7 of 13: Point 56).

57. DEFENDANT MURPHY knowingly and willfully ignored this knowledge and information in the belief that it would advance his career (D.E. 48 Page 7 of 13: Point 57).

58. DEFENDANT MURPHY knowingly and willfully violated these standards in the belief that it would advance his career (D.E. 48 Page 7 of 13: Point 58).

59. DEFENDANT MURPHY believed that his violations would go unexposed (D.E. 48 Page 7 of 13: Point 59).

60. DEFENDANT MURPHY believed that his violations would remain unexposed as he believed PLAINTIFF KAUL would be incapable of exposing them, as he would be seriously psychologically and or physically injured (D.E. 48 Page 8 of 13: Point 60).

61. DEFENDANT MURPHY'S beliefs were based on conversations and information he received from other police within the Morristown Police Department (D.E. 48 Page 8 of 13: Point 61).

62. DEFENDANT MURPHY knew that the information he received from police within the Morristown Police Department originated from DEFENDANT CHRISTIE (D.E. 48 Page 8 of 13: Point 62).

63. DEFENDANT MURPHY knew that his violations of standard police conduct in knowingly and falsely arresting PLAINTIFF KAUL'S person did constitute a willful violation of PLAINTIFF KAUL'S human, civil and constitutional rights (D.E. 48 Page 8 of 13: Point 63).

64. DEFENDANT MURPHY knew that his violations of standard police conduct in knowingly and falsely imprisoning PLAINTIFF KAUL'S person did constitute a willful violation of PLAINTIFF KAUL'S human, civil and constitutional rights (D.E. 48 Page 8 of 13: Point 64).

65. DEFENDANT MURPHY had knowledge of the illegality of the arrest of PLAINTIFF KAUL'S person and did facilitate the transport of his person from the site of the traffic stop to the Mercer County Correctional Center in a manner purposed to prevent PLAINTIFF KAUL from contacting a lawyer (D.E. 48 Page 8 of 13: Point 65).

66. DEFENDANT MURPHY knew that the purpose of preventing PLAINTIFF KAUL from contacting a lawyer, was to facilitate his elimination through either incarceration/psychological-physical injury/death (D.E. 48 Page 8 of 13: Point 66).

67. DEFENDANT MURPHY knew that the purpose of eliminating PLAINTIFF KAUL was to prevent him from continuing his prosecution of DEFENDANT CHRISTIE and persons/entities within The Kaul Cases (D.E. 48 Page 8 of 13: Point 67).

68. DEFENDANT MURPHY came to know that PLAINTIFF KAUL'S prosecution of The Kaul Cases had caused political donors to not donate money to DEFENDANT CHRISTIE (D.E. 48 Page 8 of 13: Point 68).

69. DEFENDANT MURPHY came to know that PLAINTIFF KAUL'S prosecution of The Kaul Cases had caused political donors to request that DEFENDANT CHRISTIE return previously donated money (D.E. 48 Page 8 of 13: Point 69).

70. DEFENDANT MURPHY knew that the 2016 tax indictment and arrest warrant were illegal (D.E. 48 Page 8 of 13: Point 70).

71. DEFENDANT MURPHY knew that his facilitating the transfer of PLAINTIFF KAUL'S person to persons within the Mercer County Correctional Center was illegal (D.E. 48 Page 8 of 13: Point 71).

72. DEFENDANT MURPHY knew that his facilitation of this transfer constituted an ongoing and knowingly illegal violation of PLAINTIFF KAUL'S human/civil/constitutional rights (D.E. 48 Page 8 of 13: Point 72).

73. DEFENDANT MURPHY knew that it was within his duty and authority to halt any further violation of PLAINTIFF KAUL'S human/civil/constitutional rights (D.E. 48 Page 8 of 13: Point 73).

74. DEFENDANT MURPHY did not halt any further violation of PLAINTIFF KAUL'S human/civil/constitutional rights as I believed it would harm my career (D.E. 48 Page 9 of 13: Point 74).

75. DEFENDANT MURPHY facilitated the ongoing violation of PLAINTIFF KAUL'S human/civil/constitutional rights as he believed it would advance his career (D.E. 48 Page 9 of 13: Point 75).

76. DEFENDANT MURPHY knew that in facilitating the ongoing violation of Plaintiff Kaul's human/civil/constitutional rights I knew that there was a substantial risk he would be psychologically-physically injured and or killed (D.E. 48 Page 9 of 13: Point 76).

77. DEFENDANT MURPHY, despite knowing this serious risk to PLAINTIFF KAUL'S life, did facilitate the scheme as he believed it would personally benefit him and his career (D.E. 48 Page 9 of 13: Point 77).

78. DEFENDANT MURPHY, at no point until he became aware of K11-15, did he ever believe that his violations of law and rights would be exposed by PLAINTIFF KAUL (D.E. 48 Page 9 of 13: Point 78).

79. DEFENDANT MURPHY, at no point until he became aware of K11-15, did he ever believe that his misconduct of not reporting the violations to state and or federal authorities would be exposed by PLAINTIFF KAUL (D.E. 48 Page 9 of 13: Point 79).

80. DEFENDANT MURPHY, at no point until he became aware of K11-15, did he ever believe that his misconduct in failing to halt any further violation of PLAINTIFF KAUL'S human/civil/constitutional rights would be exposed by PLAINTIFF KAUL (D.E. 48 Page 9 of 13: Point 80).

81. DEFENDANT MURPHY, at no point until he became aware of K11-15, did he ever believe that his crimes would be exposed by PLAINTIFF KAUL (D.E. 48 Page 9 of 13: Point 81).

82. DEFENDANT MURPHY did not inform PLAINTIFF KAUL of his rights when he arrested him because he knew the arrest was illegal (D.E. 48 Page 9 of 13: Point 82).

83. DEFENDANT MURPHY did not inform Plaintiff Kaul of his rights when I arrested him as I knew there existed no warrant for his arrest (D.E. 48 Page 9 of 13: Point 83).

84. DEFENDANT MURPHY knew that the illegal May 2016 tax indictment and warrant were manufactured by DEFENDANT CHRISTIE in retaliation for the racketeering lawsuit PLAINTIFF KAUL filed against DEFENDANT CHRISTIE in February 2016 (D.E. 48 Page 9 of 13: Point 84).

85. DEFENDANT MURPHY, a law enforcement officer, knew in the time between the illegal arrest of PLAINTIFF KAUL'S person, his illegal imprisonment, and his illegal transfer to persons from the Mercer County Correctional Center, that these violations originated from the illegal May 2016 tax indictment (D.E. 48 Page 9 of 13: Point 85).

86. DEFENDANT MURPHY, a law enforcement officer, know that the facts of the illegal May 2016 tax indictment were the direct and proximate cause of the facts of the May 27, 2021, kidnapping and the June 14, 2023, illegal arrest (D.E. 48 Page 9 of 13: Point 86).

87. DEFENDANT MURPHY, a law enforcement officer, and a person credentialed within the law, know that DEFENDANT CHRISTIE is joint and severally liable to PLAINTIFF KAUL for, amongst other things, the acts of May 27, 2021, and June 14-15, 2023 (D.E. 48 Page 10 of 13: Point 87).

88. DEFENDANT MURPHY knows that in a period from 2017 to 2023, PLAINTIFF KAUL underwent multiple criminal background checks by state and federal agencies as part of applications he submitted for state medical licenses (D.E. 48 Page 10 of 13: Point 88).

89. DEFENDANT MURPHY knows that no warrants or criminal history were found in these multiple background checks (D.E. 48 Page 10 of 13: Point 89).

90. DEFENDANT MURPHY did, on June 14, 2023, in the time between stopping PLAINTIFF KAUL and illegally arresting his person, engage in a conversation with a person and or persons at the Morristown Police Department (D.E. 48 Page 10 of 13: Point 90).

91. DEFENDANT MURPHY'S conversation was conducted on private cellular phones (D.E. 48 Page 10 of 13: Point 91).

92. This conversations involved DEFENDANT MURPHY being told that the order to arrest PLAINTIFF KAUL had been obtained from DEFENDANT CHRISTIE (D.E. 48 Page 10 of 13: Point 92).

93. DEFENDANT MURPHY knew the arrest would be illegal but that conducting the arrest would advance his career (D.E. 48 Page 10 of 13: Point 93).

94. DEFENDANT MURPHY knew the arrest would be illegal but that not conducting the arrest would harm his career (D.E. 48 Page 10 of 13: Point 94).

95. DEFENDANT MURPHY knew that in conducting a knowingly illegal arrest he would be violating the law (D.E. 48 Page 10 of 13: Point 95).

96. DEFENDANT MURPHY knew that in conducting a knowingly illegal arrest he would be violating PLAINTIFF KAUL'S human/civil/constitutional rights (D.E. 48 Page 10 of 13: Point 96).

97. DEFENDANT MURPHY knew that in conducting a knowingly illegal arrest he would be engaging in police misconduct (D.E. 48 Page 10 of 13: Point 97).

98. DEFENDANT MURPHY believed that his violations and misconduct would go unexposed and unpunished because the order had been given by DEFENDANT CHRISTIE, an ex-governor, an ex-US Attorney, and a possible 2024 US Presidential Candidate (D.E. 48 Page 10 of 13: Point 98).

99. DEFENDANT MURPHY believed that DEFENDANT CHRISTIE would use his political power in the New Jersey courts to prevent PLAINTIFF KAUL from exposing his illegal misconduct through litigation (D.E. 48 Page 10 of 13: Point 99).

100. DEFENDANT MURPHY believed that DEFENDANT CHRISTIE would use his political power in New Jersey to prevent PLAINTIFF KAUL from exposing his violations through media exposure (D.E. 48 Page 10 of 13: Point 100).

101. DEFENDANT MURPHY believed that DEFENDANT CHRISTIE would use his political power in New Jersey to coerce witnesses with evidence into not cooperating with PLAINTIFF KAUL (D.E. 48 Page 11 of 13: Point 101).

102. DEFENDANT MURPHY believed that his violations would be 'covered-up' by DEFENDANT CHRISTIE (D.E. 48 Page 11 of 13: Point 102).

103. DEFENDANT MURPHY knows that many persons who obeyed DEFENDANT CHRISTIE'S illegal orders subsequently suffered loss of livelihood/liberty/property (D.E. 48 Page 11 of 13: Point 103).

104. DEFENDANT MURPHY knows that he should not have followed DEFENDANT CHRISTIE'S order to illegally arrest and imprison PLAINTIFF KAUL (D.E. 48 Page 11 of 13: Point 104).

105. DEFENDANT MURPHY had a duty to halt the illegal arrest and imprisonment of PLAINTIFF KAUL (D.E. 48 Page 11 of 13: Point 105).

106. DEFENDANT MURPHY had a duty to report the illegal arrest and imprisonment of PLAINTIFF KAUL to state and or federal authorities (D.E. 48 Page 11 of 13: Point 106).

107. DEFENDANT MURPHY did knowingly/willfully/for self-serving reasons violate that duty (D.E. 48 Page 11 of 13: Point 107).

108. DEFENDANT MURPHY has come to know that many persons and entitles conspired with DEFENDANT CHRISTIE against PLAINTIFF KAUL (D.E. 48 Page 11 of 13: Point 108).

109. DEFENDANT MURPHY has come to know that this conspiracy commenced in approximately 2005 consequent to professional jealousy of PLAINTIFF KAUL'S competitors upon his invention of the percutaneous spinal fusion (D.E. 48 Page 11 of 13: Point 109).

110. DEFENDANT MURPHY has come to know that these persons and entities are known as The Kaul Cases Defendants/Co-conspirators (D.E. 48 Page 11 of 13: Point 110).

111. DEFENDANT MURPHY, as a law enforcement officer, has come to know that The Kaul Cases Defendants/Co-conspirators did, in their perpetration of the conspiracy, knowingly/willfully violate PLAINTIFF KAUL'S human/civil/constitutional rights (D.E. 48 Page 11 of 13: Point 111).

112. DEFENDANT MURPHY, as a law enforcement officer, have come to know that The Kaul Cases Defendants/Co-conspirators did in their perpetration of the conspiracy violate civil law (D.E. 48 Page 11 of 13: Point 112).

113. DEFENDANT MURPHY, as a law enforcement officer, did come to know that The Kaul Cases Defendants/Co-conspirators did in their perpetration of the conspiracy, knowingly/willfully violate criminal law (D.E. 48 Page 11 of 13: Point 113).

114. DEFENDANT MURPHY, did come to know through conversations with persons located in Morris County, New Jersey who are familiar with The Kaul Cases and know the history of the within facts, that PLAINTIFF KAUL'S claims against DEFENDANT CHRISTIE are true (D.E. 48 Page 11 of 13: Point 114).

115. DEFENDANT MURPHY knows that the reason DEFENDANT CHRISTIE did not answer the Complaint is because the claims are true (D.E. 48 Page 11 of 13: Point 115).

116. DEFENDANT MURPHY knows that the reason DEFENDANT CHRISTIE violated the Court's October 16, 2023, Rule 26 order is that there exists highly incriminating evidence of many other crimes committed by DEFENDANT CHRISTIE while he was the US Attorney and NJ Governor (D.E. 48 Page 12 of 13: Point 116).

117. DEFENDANT MURPHY knows that the reason DEFENDANT CHRISTIE violated the Court's October 16, 2023, Rule 26 order is that this highly incriminating evidence implicates other currently employed public servants (D.E. 48 Page 12 of 13: Point 117).

118. DEFENDANT MURPHY knows that the reason DEFENDANT CHRISTIE violated the Court's October 16, 2023, Rule 26 order is that the highly incriminating evidence would end his current campaign for the Republican nomination (D.E. 48 Page 12 of 13: Point 118).

119. DEFENDANT MURPHY knows that the reason DEFENDANT CHRISTIE violated the Court's October 16, 2023, Rule 26 order is that the highly incriminating evidence would end his political career (D.E. 48 Page 12 of 13: Point 119).

120. DEFENDANT MURPHY has read a book by ex-NJ legislator, Louis Manzo, entitled 'RUTHLESS AMBITION: THE RISE AND FALL OF CHRIS CHRISTIE' (D.E. 48 Page 12 of 13: Point 120).

121. DEFENDANT MURPHY knows the truth of all the facts within this book (D.E. 48 Page 12 of 13: Point 121).

DATED: DECEMBER 4, 2023



RICHARD ARJUN KAUL, MD

(Slip Opinion)

OCTOBER TERM, 2023

1

Syllabus

NOTE: Where it is feasible, a syllabus (headnote) will be released, as is being done in connection with this case, at the time the opinion is issued. The syllabus constitutes no part of the opinion of the Court but has been prepared by the Reporter of Decisions for the convenience of the reader. See *United States v. Detroit Timber & Lumber Co.*, 200 U. S. 321, 337.

SUPREME COURT OF THE UNITED STATES

Syllabus

**SECURITIES AND EXCHANGE COMMISSION v.
JARKESY ET AL.****CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR
THE FIFTH CIRCUIT**

No. 22–859. Argued November 29, 2023—Decided June 27, 2024

In the aftermath of the Wall Street Crash of 1929, Congress passed a suite of laws designed to combat securities fraud and increase market transparency. Three such statutes are relevant: The Securities Act of 1933, the Securities Exchange Act of 1934, and the Investment Advisers Act of 1940. These Acts respectively govern the registration of securities, the trading of securities, and the activities of investment advisers. Although each regulates different aspects of the securities markets, their pertinent provisions—collectively referred to by regulators as “the antifraud provisions,” App. to Pet. for Cert. 73a, 202a—target the same basic behavior: misrepresenting or concealing material facts.

To enforce these Acts, Congress created the Securities and Exchange Commission. The SEC may bring an enforcement action in one of two forums. It can file suit in federal court, or it can adjudicate the matter itself. The forum the SEC selects dictates certain aspects of the litigation. In federal court, a jury finds the facts, an Article III judge presides, and the Federal Rules of Evidence and the ordinary rules of discovery govern the litigation. But when the SEC adjudicates the matter in-house, there are no juries. The Commission presides while its Division of Enforcement prosecutes the case. The Commission or its delegate—typically an Administrative Law Judge—also finds facts and decides discovery disputes, and the SEC’s Rules of Practice govern.

One remedy for securities violations is civil penalties. Originally, the SEC could only obtain civil penalties from unregistered investment advisers in federal court. Then, in 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Act authorized the SEC to impose such penalties through its own in-house

Syllabus

proceedings.

Shortly after passage of the Dodd-Frank Act, the SEC initiated an enforcement action for civil penalties against investment adviser George Jarkesy, Jr., and his firm, Patriot28, LLC for alleged violations of the “antifraud provisions” contained in the federal securities laws. The SEC opted to adjudicate the matter in-house. As relevant, the final order determined that Jarkesy and Patriot28 had committed securities violations and levied a civil penalty of \$300,000. Jarkesy and Patriot28 petitioned for judicial review. The Fifth Circuit vacated the order on the ground that adjudicating the matter in-house violated the defendants’ Seventh Amendment right to a jury trial.

Held: When the SEC seeks civil penalties against a defendant for securities fraud, the Seventh Amendment entitles the defendant to a jury trial. Pp. 6–27.

(a) The question presented by this case—whether the Seventh Amendment entitles a defendant to a jury trial when the SEC seeks civil penalties for securities fraud—is straightforward. Following the analysis set forth in *Granfinanciera, S. A. v. Nordberg*, 492 U. S. 33, and *Tull v. United States*, 481 U. S. 412, this action implicates the Seventh Amendment because the SEC’s antifraud provisions replicate common law fraud. And the “public rights” exception to Article III jurisdiction does not apply, because the present action does not fall within any of the distinctive areas involving governmental prerogatives where the Court has concluded that a matter may be resolved outside of an Article III court, without a jury.

(b) The Court first explains why this action implicates the Seventh Amendment.

(1) The right to trial by jury is “of such importance and occupies so firm a place in our history and jurisprudence that any seeming curtailment of the right” has always been and “should be scrutinized with the utmost care.” *Dimick v. Schiedt*, 293 U. S. 474, 486. When the British attempted to evade American juries by siphoning adjudications to juryless admiralty, vice admiralty, and chancery courts, the Americans protested and eventually cited the British practice as a justification for declaring Independence. In the Revolution’s aftermath, concerns that the proposed Constitution lacked a provision guaranteeing a jury trial right in civil cases was perhaps the “most success[ful]” critique leveled against the document during the ratification debates. The Federalist No. 83, p. 495. To fix that flaw, the Framers promptly adopted the Seventh Amendment. Ever since, “every encroachment upon [the jury trial right] has been watched with great jealousy.” *Parsons v. Bedford*, 3 Pet. 433, 446. Pp. 7–8.

(2) The Seventh Amendment guarantees that in “[s]uits at common law . . . the right of trial by jury shall be preserved.” The right

Syllabus

itself is not limited to the “common-law forms of action recognized” when the Seventh Amendment was ratified. *Curtis v. Loether*, 415 U. S. 189, 193. Rather, it “embrace[s] all suits which are not of equity or admiralty jurisdiction, whatever may be the peculiar form which they may assume.” *Parsons*, 3 Pet., at 447. That includes statutory claims that are “legal in nature.” *Granfinanciera*, 492 U. S., at 53.

To determine whether a suit is legal in nature, courts must consider whether the cause of action resembles common law causes of action, and whether the remedy is the sort that was traditionally obtained in a court of law. Of these factors, the remedy is the more important. And in this case, the remedy is all but dispositive. For respondents’ alleged fraud, the SEC seeks civil penalties, a form of monetary relief. Such relief is legal in nature when it is designed to punish or deter the wrongdoer rather than solely to “restore the status quo.” *Tull*, 481 U. S., at 422. The Acts condition the availability and size of the civil penalties available to the SEC based on considerations such as culpability, deterrence, and recidivism. See §§77h–1; 78u–2, 80b–3. These factors go beyond restoring the status quo and so are legal in nature. The SEC is also not obligated to use civil penalties to compensate victims. SEC civil penalties are thus “a type of remedy at common law that could only be enforced in courts of law.” *Tull*, 481 U. S., at 422. This suit implicates the Seventh Amendment right and a defendant would be entitled to a jury on these claims.

The close relationship between federal securities fraud and common law fraud confirms that conclusion. Both target the same basic conduct: misrepresenting or concealing material facts. By using “fraud” and other common law terms of art when it drafted the federal securities laws, Congress incorporated common law fraud prohibitions into those laws. This Court therefore often considers common law fraud principles when interpreting federal securities law. See, e.g., *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U. S. 336, 343–344. While federal securities fraud and common law fraud are not identical, the close relationship between the two confirms that this action is “legal in nature.” *Granfinanciera*, 492 U. S., at 53. Pp. 8–13.

(c) Because the claims at issue here implicate the Seventh Amendment, a jury trial is required unless the “public rights” exception applies. Under this exception, Congress may assign the matter for decision to an agency without a jury, consistent with the Seventh Amendment. For the reasons below, the exception does not apply. Pp. 13–27.

(1) The Constitution prevents Congress from “withdraw[ing] from judicial cognizance any matter which, from its nature, is the subject of a suit at the common law.” *Murray’s Lessee v. Hoboken Land & Improvement Co.*, 18 How. 272, 284. Once such a suit “is brought within

Syllabus

the bounds of federal jurisdiction,” an Article III court must decide it, with a jury if the Seventh Amendment applies. *Stern v. Marshall*, 564 U. S. 462, 484. On that basis, this Court has repeatedly explained that matters concerning private rights may not be removed from Article III courts. See, e.g., *Murray’s Lessee*, 18 How., at 284. If a suit is in the nature of an action at common law, then the matter presumptively concerns private rights, and adjudication by an Article III court is mandatory. *Stern*, 564 U. S., at 484.

The Court also recognizes a class of cases concerning “public rights.” Such matters “historically could have been determined exclusively by [the executive and legislative] branches.” *Id.*, at 493 (internal quotation marks omitted). No involvement by an Article III court in the initial adjudication of public rights claims is necessary. Certain categories that have been recognized as falling within the exception include matters concerning: the collection of revenue; aspects of customs law; immigration law; relations with Indian tribes; the administration of public lands; and the granting of public benefits. The Court’s opinions governing this exception have not always spoken in precise terms. But “even with respect to matters that arguably fall within the scope of the ‘public rights’ doctrine, the presumption is in favor of Article III courts.” *Northern Pipeline Constr. Co. v. Marathon Pipe Line Co.*, 458 U. S. 50, 69, n. 23 (plurality opinion). Pp. 13–18.

(2) In *Granfinanciera*, this Court previously considered whether the Seventh Amendment guarantees the right to a jury trial “in the face of Congress’ decision to allow a non-Article III tribunal to adjudicate” a statutory “fraud claim.” 492 U. S., at 37, 50. There the issue was whether Congress’s designation of fraudulent conveyance actions as “core [bankruptcy] proceedings” authorized non-Article III bankruptcy judges to hear them without juries. *Id.*, at 50. The Court held that the designation was not permissible, even under the public rights exception. To determine whether the claim implicated the Seventh Amendment, the Court applied the principles distilled in *Tull*. Surveying English cases and considering the remedy these suits provided, the Court concluded that fraudulent conveyance actions were “quintessentially suits at common law.” *Granfinanciera*, 492 U. S., at 56. Because these actions were akin to “suits at common law” and were not “closely intertwined” with the bankruptcy process, the Court held that the public rights exception did not apply, and a jury was required. *Id.*, at 54, 56. Pp. 19–20.

(3) *Granfinanciera* effectively decides this case. The action here was brought under the “anti-fraud provisions” of the federal securities laws and provide civil penalties that can “only be enforced in courts of law.” *Tull*, 481 U. S., at 422. They target the same basic conduct as

Syllabus

common law fraud, employ the same terms of art, and operate pursuant to similar legal principles. In short, this action involves a “matter[] of private rather than public right.” *Granfinanciera*, 492 U. S., at 56. Pp. 20–21.

(4) The SEC claims that the public rights exception applies because Congress created “new statutory obligations, impose[d] civil penalties for their violation, and then commit[ted] to an administrative agency the function of deciding whether a violation ha[d] in fact occurred.” Brief for Petitioner 21. *Granfinanciera* does away with much of the SEC’s argument. Congress cannot “conjure away the Seventh Amendment by mandating that traditional legal claims be . . . taken to an administrative tribunal.” 492 U. S., at 52. The SEC’s argument that *Granfinanciera* does not apply because the Government is the party bringing this action also fails. What matters is the substance of the suit, not where it is brought, who brings it, or how it is labeled. *Northern Pipeline Constr. Co.*, 458 U. S., at 69 n. 23 (plurality opinion). Pp. 21–22.

(5) The Court’s opinion in *Atlas Roofing Co. v. Occupational Safety and Health Review Comm’n*, 430 U. S. 442, is not to the contrary. The litigation in that case arose under the Occupational Health and Safety Act. Facing agency enforcement actions, two employers alleged that the agency’s adjudicatory authority violated the Seventh Amendment. See *id.*, at 448–449. The Court concluded that Congress could assign the OSH Act adjudications to an agency because the claims involved “a new cause of action, and remedies therefor, unknown to the common law.” *Id.*, at 461. The cases *Atlas Roofing* relied upon applied the “public rights” exception to actions that were “‘not . . . suit[s] at common law or in the nature of such . . . suit[s].’” *Id.*, at 453. *Atlas Roofing* therefore does not apply here, where the statutory claim is “‘in the nature of’” a common law suit. *Id.*, at 453. Later rulings also foreclose reading *Atlas Roofing* as the SEC does. This Court clarified in *Tull* that the Seventh Amendment does apply to novel statutory regimes, so long as the statutory claims are akin to common law claims. See 481 U. S., at 421–423. And the Court has explained that the public rights exception does not apply automatically whenever Congress assigns a matter to an agency for adjudication. See *Granfinanciera*, 492 U. S., at 52. Pp. 22–27.

The Court does not reach the remaining issues in this case.

34 F. 4th 446, affirmed and remanded.

ROBERTS, C. J., delivered the opinion of the Court, in which THOMAS, ALITO, GORSUCH, KAVANAUGH, and BARRETT, JJ., joined. GORSUCH, J., filed a concurring opinion, in which THOMAS, J., joined. SOTOMAYOR, J., filed a dissenting opinion, in which KAGAN and JACKSON, JJ., joined.

Exhibit 2

www.drrichardkaul.com

CH/RM

MAY 14, 2024

RECEIVED
JUN 15 A 11:25
U.S. COURT OF APPEALS
FOR THE FOURTH CIRCUIT

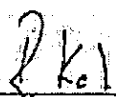
CLERK OF THE COURT
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT
1100 E. MAIN STREET
SUITE 501
RICHMOND, VA 23219-3517

RE: RICHARD ARJUN KAUL, MD v. JAMES PAUL OETKEN
CASE NO. 24-1417
(5:24-CV-00185-M-KS)
PETITIONER REQUEST TO TAKE JUDICIAL NOTICE PURSUANT TO F.R.E. 201

Dear Clerk of the Court,

Please find submitted the above petition.

Yours sincerely



RICHARD ARJUN KAUL, MD

CASE NO. 24-1417

IN THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

RICHARD ARJUN KAUL, MD
PETITIONER

ON APPEAL FROM
EASTERN DISTRICT OF NORTH CAROLINA

PETITIONER REQUEST PURSUANT TO FEDERAL
RULE OF EVIDENCE 201, FOR THE COURT
TO TAKE JUDICIAL NOTICE OF FACTS ADMITTED
IN PROCEEDINGS WITH A DIRECT CONNECTION
TO THE ISSUES ON APPEAL

SUBMITTED BY:

RICHARD ARJUN KAUL, MD
PROPRIA PERSONA PLAINTIFF
24 WASHINGTON VALLEY ROAD
MORRISTOWN, NJ 07960
drichardkaul@gmail.com

RECEIVED
20M MAY 15 4 11:25
U.S. COURT OF APPEALS
FOURTH CIRCUIT

**PROCEEDINGS WITH A DIRECT CONNECTION TO THE
ISSUES ON APPEAL**

Petitioner, RICHARD ARJUN KAUL, respectfully requests pursuant to: (i) Rule 201 of the Federal Rules of Evidence; (ii) Rule 8 (b)(6) of the F.R.C.P.; (iii) F.R.A.P. 10(c)(2); (iv) the Court's inherent equitable authority; (v) the principles of fairness, truth and judicial efficiency, that the Court be judicially noticed of the **FACTS ADMITTED** within the herein submitted and referenced **COMPLAINTS/ADMISSIONS OF FACT/OTHER DISPOSITIVE SUBMISSIONS** of **THE KAUL CASES**. Although, the first of **THE KAUL CASES**, K1, was filed on February 22, 2016, and the most recent, K11-18, on March 25, 2024, their factual foundation began in or around 2005/2006, shortly after Petitioner invented and successfully performed in a free-standing outpatient surgical center the first minimally invasive spinal fusion.

SUBMITTED:

JULY 28, 2023: KAUL v CHRISTIE: 23-CV-22582 (SOUTHERN DISTRICT OF FLORIDA) (K11-15): COMPLAINT – FACTS NOT DENIED, AND THUS ADMITTED PURSUANT TO RULE 8(b)(6) (APPENDIX A).

NOVEMBER 28, 2023: KAUL v BLUE CROSS BLUE SHIELD: 23-CV-00518 (DISTRICT OF NEW JERSEY) (K11-11): ADMISSIONS OF FACT (APPENDIX B).

DECEMBER 4, 2023: KAUL v CHRISTIE: 23-CV-22582 (SOUTHERN DISTRICT OF FLORIDA) (K11-15): ADMISSIONS OF FACT AS TO DEFENDANT KENNETH MURPHY (APPENDIX C).

FEBRUARY 2, 2024: KAUL v CHRISTIE: 23-CV-22582 (SOUTHERN DISTRICT OF FLORIDA) (K11-15): ORDER SETTING TRIAL AND PRE-TRIAL SCHEDULE, REQUIRING MEDIATION, AND REFERRING CERTAIN MATTERS TO MAGISTRATE JUDGE (APPENDIX D).

FEBRUARY 16, 2024: KAUL v CHRISTIE: 23-CV-22582 (SOUTHERN DISTRICT OF FLORIDA) (K11-15): ORDER ON DEFENDANTS MOTION TO DISMISS (CASE DISMISSED) (D.E. 58) (APPENDIX E).

MARCH 15, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): ADMISSIONS OF FACT AS TO DEFENDANT ROBERT FRANCIS HEARY (APPENDIX F).

MARCH 15, 2024: KAUL v ICE: 21-CV-06992 (SOUTHERN DISTRICT OF NEW YORK) (K11-7): PURPORTED ORDER OF RESPONDENT JAMES PAUL OETKEN (APPENDIX G).

APRIL 25, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): ADMISSIONS OF FACT AS TO DEFENDANT CHRISTOPHER J. CHRISTIE (APPENDIX H).

REFERENCED:

FEBRUARY 22, 2016: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JUNE 8, 2016: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): FIRST AMENDED COMPLAINT (D.E. 57) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

AUGUST 10, 2017: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 208) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

SEPTEMBER 26, 2017: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 209) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

OCTOBER 27, 2017: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 214) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

FEBRUARY 22, 2018: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 231) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

APRIL 9, 2018: KAUL v CHRISTIE: 18-CV-08086 (S.D.N.Y. - D.N.J.) (K2): COMPLAINT (D.E. 2) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

MAY 11, 2018: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 239) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JUNE 4, 2018: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 241) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

SEPTEMBER 20, 2018: KAUL v STOLZ: 18-01489 (U.S.B.C.-D.N.J.) (K4): ADVERSARY COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

OCTOBER 29, 2018: KAUL v CHRISTIE: 16-CV-02364 (S.D.N.Y. - D.N.J.) (K1): SECOND AMENDED COMPLAINT (D.E. 268)– FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JULY 23, 2019: KAUL v CHRISTIE: 18-CV-08086 (S.D.N.Y. - D.N.J.) (K2): FIRST AMENDED COMPLAINT (D.E. 80) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

APRIL 4, 2019: KAUL v CHRISTIE: 19-CV-13477 (S.D.N.Y. - D.N.J.) (K3): COMPLAINT (D.E. 2) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

OCTOBER 1, 2019: KAUL v FEDERATION: 19-CV-3050 (D.D.C. – D.N.J.) (K5): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JUNE 18, 2020: KAUL v FEDERATION: 20-CV-01612 (D.D.C.) (K7): COMPLAINT (D.E. 1) - FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JANUARY 11, 2021: KAUL v FEDERATION: 21-CV-00057 (N.D.T.) (K11-1): COMPLAINT (D.E. 3) - FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

FEBRUARY 5, 2021: KAUL v ALLSTATE: 21-CV-00736 (NORTHERN DISTRICT OF ILLINOIS) (K11-3): COMPLAINT (D.E. 1) - FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

FEBRUARY 24, 2021: KAUL v BOSTON PARTNERS: 21-CV-10326 (DISTRICT OF MASSACHUSETTS) (K11-2): COMPLAINT (D.E. 1) - FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

MARCH 30, 2021: KAUL v MURPHY: 21-CV-00439 (DISTRICT OF CONNECTICUT – D.N.J.) (K11-4): COMPLAINT (D.E. 1)- FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

APRIL 8, 2021: KAUL v MURPHY: 21-CV-00439 ((DISTRICT OF CONNECTICUT – D.N.J.) (K11-4): AMENDED COMPLAINT (D.E. 10) -

FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JUNE 15, 2021: KAUL v MURPHY: 21-CV-13063 (S.D.N.Y. – D.N.J.) (K11-9): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

AUGUST 19, 2021: KAUL v ICE: 21-CV-06992 (S.D.N.Y.) (K11-7): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

SEPTEMBER 13, 2021: KAUL v ICE: 21-CV-06992 (S.D.N.Y.) (K11-7): AMENDED COMPLAINT (D.E. 14) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JANUARY 27, 2023: KAUL v BCBS: 23-CV-00518 (D.N.J.) (K11-11): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

MARCH 9, 2023: KAUL v ICE: 23-CV-2016 (S.D.N.Y.) (K11-10): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

MAY 24, 2023: KAUL v US SAN DIEGO PACE PROGRAM: 23-CV-00955 (SOUTHERN DISTRICT OF CALIFORNIA) (K11-8): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JUNE 22, 2023: KAUL v GEICO: 23-CV-22325 (SOUTHERN DISTRICT OF FLORIDA) (K11-14): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JUNE 27, 2023: KAUL v CHRISTIE/MURPHY: 23-CV-03473 (D.N.J.) (K11-15): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JULY 27, 2023: KAUL v PINILIS: 23-CV-04107 (D.N.J.) (K11-16): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

JULY 28, 2023: KAUL v CHRISTIE/MURPHY: 23-CV-22582 (SOUTHERN DISTRICT OF FLORIDA) (K11-15): FIRST AMENDED COMPLAINT (D.E. 4) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

NOVEMBER 20, 2023: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

DECEMBER 12, 2023: KAUL v BLUE CROSS BLUE SHIELD ASSOCIATION (NORTHERN DISTRICT OF ALABAMA) (K11-22): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

FEBRUARY 14, 2024: KAUL v CPEP: 23-CV-00672 (K11-17): RESPONSE TO DEFENDANTS CHRISTIE/SOLOMON FEBRUARY 15, 2024, SUBMISSION 'NOTICE OF SUGGESTION OF SUBSEQUENTLY CONTROLLING AUTHORITY' (D.E. 53) + LETTER TO U.S.C.A. FOR FIRST CIRCUIT RE: FEBRUARY 9, 2024 'JUDGMENT' IN CASE NO. 21-1686 (D.E. 54).

MARCH 13, 2024: KAUL v CPEP: 23-CV-00672 (K11-17): ORDER FOR DISCOVERY PLAN (D.E. 65).

MARCH 18, 2024: KAUL v CPEP: 23-CV-00672 (K11-17): 'NOTICE OF ORDER BY THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK REQUIRING PLAINTIFF TO WITHDRAW HIS CLAIMS AGAINST DEFENDANT CHRISTIE IN THIS ACTION.' (D.E. 72).

MARCH 25, 2024: KAUL v OETKEN: 24-CV-00185 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-18): COMPLAINT (D.E. 1) – FACTS NOT DENIED AND PURSUANT TO RULE 8(b)(6), THEY ARE ADMITTED.

APRIL 12, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): REPORT OF THE PARTIES PLANNING MEETING (D.E. 90).

APRIL 12, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): PLAINTIFF KAUL'S SUR-REPLY TO DEFENDANTS MOTION TO VACATE DISCOVERY ORDER AND DEADLINES (D.E. 91).

APRIL 18, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): PLAINTIFF KAUL'S REQUEST FOR THE COURT TO TAKE JUDICIAL NOTICE PURSUANT TO FEDERAL RULE OF EVIDENCE 201, OF DOCUMENTS RELEVANT TO DEFENDANT FEDERATION OF STATE MEDICAL BOARDS (D.E. 94).

APRIL 25, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): FIRST SET OF REQUESTS FOR ADMISSIONS AS TO DEFENDANT CHRISTOPHER J. CHRISTIE (D.E. 96-3).

APRIL 30, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): PLAINTIFF KAUL'S REQUEST FOR THE COURT TO TAKE JUDICIAL NOTICE PURSUANT TO FEDERAL RULE OF EVIDENCE 201, OF THE OPINION OF THE U.S.C.A. FOR THE FIFTH CIRCUIT IN JARKESY v. SEC. (D.E. 103).

MAY 3, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): DEFENDANT CHRISTOPHER J. CHRISTIE'S MOTION TO COMPEL PLAINTIFF'S COMPLIANCE WITH S.D.N.Y. ORDER TO WITHDRAW CLAIMS (D.E. 105).

MAY 3, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): ORDER VACATING MARCH 13, 2024, ORDER FOR DISCOVERY PLAN (D.E. 107).

MAY 7, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): PLAINTIFF KAUL'S

RESPONSE TO DEFENDANT ALLSTATE'S APRIL 30, 2024 'NOTICE OF FILING' (D.E. 102) RE: PURPORTED OBJECTION TO ISSUANCE OF DOCUMENT SUBPOENAS (D.E. 108).

MAY 7, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): PLAINTIFF KAUL'S REPLY TO DEFENDANT CHRISTIE'S MOTION FOR A PROTECTIVE ORDER AS TO THE REQUEST FOR ADMISSIONS OF FACT (D.E. 109).

MAY 7, 2024: KAUL v CPEP: 23-CV-00672 (EASTERN DISTRICT OF NORTH CAROLINA) (K11-17): LETTER FROM PETITIONER TO DISTRICT COURT REGARDING RESPONDENTS ACTS OF OBSTRUCTING JUSTICE (D.E. 112).

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

DATED: MAY 14, 2024



RICHARD ARJUN KAUL, MD

cc: All Counsel-Parties of Record in K11-17/K11-18.

Exhibit 3

www.drrichardkaul.com

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

Exhibit 4

CH/RM

www.drrichardkaul.com

MAY 24, 2024

RECEIVED
MAY 18 P 2:0
COURT OF APPEALS
RICHMOND

NWAMAKA C. ANOWI
CLERK OF THE COURT
LEWIS F. POWELL JR COURT OF APPEALS
1100 EAST MAIN STREET, SUITE 501
RICHMOND, VA 23219

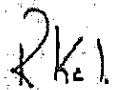
RE: KAUL v CPEP ET AL.
23-CV-00672
K11-17
JUDICIAL NOTICE RE: NOTICE OF INVALIDITY OF DISTRICT COURT ORDER

Dear Clerk of the Court,

Please find submitted a copy of a 'NOTICE OF INVALIDITY/FRAUD ON THE COURT' filed in the United States District Court for the Eastern District of North Carolina in the above matter.

I thank you for your attention to this matter.

Yours sincerely



RICHARD ARJUN KAUL, MD

www.drrichardkaul.com

JUNE 15, 2024

CLERK OF THE COURT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
310 NEW BERN AVENUE
ROOM 610
RALEIGH, NC 27601-1441

**RE: KAUL v CPEP
23-CV-00672
K11-17
NOTICE OF INVALIDITY OF ORDER/'FRAUD ON THE COURT'**

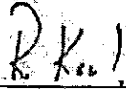
Dear Clerk of the Court,

Please accept this letter as notice of the invalidity and 'Fraud on the Court' of the June 14, 2024, ORDER (D.E. 113) and JUDGMENT (D.E. 114), the knowing invalidity and fraudulence of which stems from the fact that Chief Judge Richard E. Myers is conflicted consequent to his adversarial status with me in the U.S.C.A. for the 4th Circuit in the matter of RICHARD ARJUN KAUL, MD v JAMES PAUL OETKEN, ESQ: 24-CV-00185/4TH CIRCUIT CASE NO. 24-1417. Thus, the law did not and does not provide Judge Myers the authority as to any ministerial/adjudicative functions within the case, and Judge Myers knew and knows that he ought to have recused himself.

Therefore, K11-17 remains active for all purposes, including that related to the RELIEF REQUESTED IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT (CASE NO. 24-1417 D.E. 9-1 PAGE 30 OF 33) (Exhibit 1) and I do request that K11-17 be reassigned to another judge and the March 13, 2024, ORDER FOR DISCOVERY PLAN be re-issued.

I thank you for your attention to this matter.

Yours sincerely



RICHARD ARJUN KAUL, MD.

cc: All Counsel of record
Clerk of the Court for the U.S.C.A. for the 4th Circuit

RELIEF REQUESTED

- 1. Petitioner Kaul respectfully requests the Court Issue an order to the district court as to facts within K11-17 with a direct connection to the issues on appeal, that causes the district court to vacate in K11-17 its May 3, 2024, ORDER (D.E. 107) vacating its March 13, 2024, ORDER FOR DISCOVERY PLAN.**

- 2. Petitioner Kaul respectfully requests the Court issue an order to the district court as to facts within K11-17 with a direct connection to the issues on appeal, that causes the district court to reinstate in K11-17 its March 13, 2024, ORDER FOR DISCOVERY PLAN (D.E. 65).**

- 3. Petitioner Kaul respectfully requests this Court hold that the restricted jurisdictional limits of the September 12, 2022, purported injunction in K11-7 is established by the exact wording set forth in the document, a fact clarified by Petitioner on April 12, 2024, as per CASE NO. 24-1417:APPENDIX-0184 TO 0187 and a fact not denied and thus admitted by K11-17 Defendants.**

- 4. Petitioner Kaul respectfully requests this Court, in light of all the admitted facts of The Kaul Cases (USCA4 Appeal: 24-1417 Doc: 4-1 to 4-9 Page 1 to 303 of 303) provide any and all relief it believes is equitable, will serve the interests of justice and will enlighten Defendants as to future proceedings in K11-17.**

PRESS FIRMLY TO SEAL



PRESS FIRMLY 1



RDC 07

PRIORITY MAIL EXPRESS®



PRIORITY MAIL EXPRESS®

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) **RICHMOND ARJUN KAVELI 973-876-2077**
6 NORTH MIDLAND AVENUE
NYACK, NEW YORK 10960

FLAT RATE ENVELOPE

ONE RATE ■ ANY WEIGHT

PLEASE DELIVER PER DMM 263.2

SENDER HAS WAIVED SIGNATURE REQUIREMENT

ATTENTION - DELIVERY

TO: (PLEASE PRINT) **CLERK OF THE COURT**
1100 EAST MAIN STREET
SUITE 501, RICHMOND, VA

PHONE: _____

ZIP + 4® (U.S. ADDRESSES ONLY)
23219

To schedule free Package Pickup, scan the QR code.



USPS.COM/PICKUP

- For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
- \$100.00 Insurance Included.

PEEL FROM THIS CORNER



USCA4 Appeal: 24-1417 Doc: 12 Filed: 06/18/2024 Pg: 5 of 5
This package is made of post-consumer waste. Please recycle - again.

PAYMENT BY: _____

PD ZIP Code: _____

Date Accepted: **6/17/24**

Time: **4:05**

Weight: _____

Delivery Attempt: _____

Delivery Attempt: _____

LABEL 11-B, MARCH

Exhibit 5

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:23-CV-672-M-KS

RICHARD ARJUN KAUL.,)
)
 Plaintiff,)
)
 v.)
)
 CENTER FOR PERSONALIZED)
 EDUCATION FOR PHYSICIANS, et al.,)
 Defendants.)

ORDER FOR DISCOVERY PLAN

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, the Court will enter a scheduling order in this case. **The Rule 26(f) meeting must occur by 4/12/2024.** The attorneys of record and all unrepresented parties that have appeared in the case are jointly responsible for arranging the conference and for attempting in good faith to agree on the proposed discovery plan. **The discovery plan must be submitted to the Court within fourteen (14) days after the 26(f) meeting.**

Please confer with opposing counsel and present to the Court a discovery plan in accordance with the Rule 26 Report of the Parties' Planning Meeting form, available on the district's website. Pursuant to Rule 16(b), the planning meeting required by Fed. R. Civ. P. 26(f) and the discovery plan contemplated by this request are a mandatory part of the process of formulating a scheduling order. If counsel cannot agree on a discovery plan, please submit your respective positions to the Clerk of Court, and the Court will resolve the disputed issues. Following court approval, modifications of the scheduling order will be allowed only by motion and for good cause shown.

Mandatory initial disclosures must be made within fourteen (14) days after the Rule 26(f) conference unless (1) a different time is set by stipulation of parties or court order, or (2) a party objects during the 26(f) conference and states the objection and the response thereto in the discovery plan. Absent a stipulation or court order, any party first served or otherwise joined after the 26(f) conference must make these disclosures within thirty (30) days after being served or joined. Failure to disclose information required by Rule 26(a) or 26(e)(1) may subject the offending party or parties to sanctions pursuant to Rule 37, Fed. R. Civ. P.

Note that Local Rule 7.1 requires that all motions (except those relating to the admissibility of evidence at trial) must be filed within 30 days after the conclusion of discovery. Untimely motions may be summarily denied. Also, note that cases are currently being docketed for trial 60 to 90 days after discovery expires with a final pretrial conference scheduled approximately two weeks prior to trial.

This district now mandates mediation, pursuant to Local ADR Rule 101, for civil cases in specified categories. Refer to Local ADR Rule 101.1a and other relevant rules to determine the applicability of the mediation requirement to this case. **The parties in cases subject to mandatory mediation must discuss mediation plans at the 26(f) conference and report their plans in the discovery plan, pursuant to Local ADR Rule 101.1a(b).**

SO ORDERED this the 13th day of March, 2024.

/s/ Peter A. Moore, Jr.
Clerk of Court

INVALIDATING A JUDGMENT FOR FRAUD
... AND THE SIGNIFICANCE OF
FEDERAL RULE 60(b)

By W. DEAN WAGNER*

When it can be proved that a judgment of a court was obtained by fraud, the question arises whether or not it can be set aside and a new trial had. The problem to be discussed here is when can relief be obtained. Two different procedures are to be distinguished:

1. A motion in the court that rendered the judgment.
2. An independent action to set the judgment aside brought in the same court or a different court.

Our concern here is with independent action of the kind brought in the federal courts. Federal Rule 60¹ was amended radically in 1946, altering considerably the former rule regarding the setting aside of judgments. The new rule (so far as pertinent) provides:

“(b) . . . Fraud, etc. On motion and upon such terms as are just, the court may relieve a party or his legal representative from a final judgment, order, or proceeding for the following reasons:

(3) fraud (whether heretofore denominated intrinsic or extrinsic), . . . The motion shall be made . . . not more than one year after the judgment, order, or proceeding was entered or taken . . . *This rule does not limit the power of a court to entertain an independent action . . . or to set aside a judgment for fraud upon the court.*” (Emphasis added)

The rule thus expressly provides that either intrinsic or extrinsic fraud will constitute ground for upsetting a judgment if a motion is made within one year. But whether not only extrinsic but also intrinsic fraud will constitute sufficient ground for upsetting a judgment after the expiration of the year period is uncertain. The plain language of the rule seems to give *carte blanche* authority to a court to grant relief at anytime for any type of fraud. But recent judicial interpretations of the rule point out questions that deserve consideration.

* 3rd year law student, Duke University; A.B. Colgate, 1950.

¹ 28 U.S.C.A. Rule 60; 28 U. S. C. § 1655.

What is "fraud upon the court" within the meaning of Rule 60's saving clause and how is this to be distinguished from intrinsic and extrinsic fraud? Did the framers of the rule intend to authorize the setting aside of judgments for intrinsic as well as for extrinsic fraud in any case? Were different standards of fraud required for the "independent action" mentioned in the rule than were required for setting aside a judgment for "fraud on the court"? Rule 60(b) is so phrased as to imply that "fraud on the court" is a ground for invalidation of a judgment different from the grounds which will sustain an "independent action"; the clauses using these phrases are separated by another dealing with a quite distinct subject. Was the framers' intent to apply three different rules: one as to direct motions, another as to independent actions not involving "fraud on the court," and a third as to attacks involving "fraud on the court." It seems doubtful that this distinction is sound; for as commentators have suggested,² it is difficult to see why any and every instance of fraud is not "fraud upon the court."

The framers' intention is best indicated in the Advisory Committee's discussion of the rule.³

"The amendment . . . [makes] . . . fraud an express ground for relief by motion; and under the saving clause, fraud may be urged as a ground for relief by independent action insofar as established doctrine permits.⁴ . . . And the rule expressly does not limit the power of the court to give relief under the saving clause. *As an illustration of the situation see Hazel-Atlas Glass Co. v. Hartford Empire Co.* [322 U. S. 238 (1944)]." (Italics added.)

"Fraud on the court" as a word of art was new nomenclature introduced in the 1946 amendment to Federal Rule 60. Because of the definite reference to *Hazel-Atlas Glass Co. v. Hartford Empire Co.*,⁵ an examination of this case is imperative for a full understanding of the meaning of the phrase.

Hartford, in support of an application for a patent, submitted to the Patent Office an article referring to the contested process as a

² Moore and Rogers, *Federal Relief from Civil Judgments*, 55 YALE L. J. 623 (1946), n. 268 at p. 692.

³ 28 U.S.C.A. following Rule 60, at p. 313.

⁴ The Committee note cites Moore and Rogers, *op. cit. supra* note 2, and 3 MOORE, FEDERAL PRACTICE, (1st ed.), § 60.03, p. 3266. But the meaning of this reference defining and explaining the rule is ambiguous because those two authorities cite the conflict of opinion which is noted in this comment.

⁵ 322 U.S. 238 (1944).

INVALIDATING A JUDGMENT FOR FRAUD

43

“revolutionary device.” Although the article was written by Hartford’s officials, it was signed by an impartial outsider. This article was instrumental in persuading the Patent Office to grant the application. Hartford then sued Hazel charging infringement of the patent. The Court of Appeals reversed the district court’s dismissal of the complaint, largely because of the spurious article. Finally, Hazel capitulated and paid Hartford \$1,000,000 and entered into a licensing agreement. The information about the fraud was brought to light about ten years later. Hazel then instituted action to have the judgment against it set aside and the judgment of the district court re-instated. When this case reached the Supreme Court, Mr. Justice Black, writing for the majority of a court divided 5-4, directed the district court to set aside its judgment in the first action entered pursuant to the Circuit Court of Appeals’ mandate, and to re-instate its original judgment. The court said:

“ . . . [The] general rule [is] that [federal courts will] not alter or set aside their judgments after the expiration of the term at which the judgments were finally entered . . . [But] every element of the fraud here disclosed demands the exercise of the historic power of equity to set aside the fraudulently begotten judgment. Here . . . we find a deliberately planned and carefully executed scheme to defraud not only the Patent Office but the Circuit Court of Appeals . . . The public welfare demands that the agencies of public justice be not so impotent that they must always be mute and helpless victims of deception and fraud . . . ”⁶

The opinion did not refer to the distinction between extrinsic or intrinsic fraud. Prior to this case there had been two conflicting Supreme Court decisions, the earlier one holding that an independent action to set aside a judgment can be founded only upon extrinsic fraud, the other holding that intrinsic fraud suffices. The court’s failure to characterize the fraud practiced by Hartford justified a belief that a liberal doctrine was to be applied in the federal courts, and that fraud synonymous with the *Hartford* fraud would be a basis for relief. Since the *Hartford* case was used by the Advisory Committee to define the term “fraud on the court,” what this case means is what Federal Rule 60(b) means.

⁶ *Id.* at 244, 245.

Fraud as Ground for Independent Attack
Before Rule 60(b)

It has generally been stated that "the acts for which a court of equity will on account of fraud set aside or annul a judgment or decree between the same parties rendered by a court of competent jurisdiction have relation to frauds extrinsic or collateral to the matter tried by the first court, and not to a fraud in the matter on which the decree was rendered."⁷ There is little doubt that the majority state rule is that the only type of fraud for which a court of equity will upset a judgment is extrinsic fraud; that intrinsic fraud does not afford ground for relief.⁸ The statement of the law is clear, but its application can lead to perplexities because it often will be difficult to categorize the fraud in question.⁹ The Supreme Court has added confusion by rendering inconsistent decisions relating to the type of fraud needed to upset a judgment; in one case stating flatly that extrinsic fraud only would be ground for setting aside a judgment in an independent attack¹⁰ and in a later decision allowing intrinsic fraud to constitute ground for setting a judgment aside.¹¹ It has been suggested that the rule of the earlier *Throckmorton* case (extrinsic fraud only) and the rule of the later *Marshall* case (intrinsic fraud suffices)¹² are not in

⁷ *United States v. Throckmorton*, 98 U. S. 61, 68 (1878).

⁸ *Cf.* RESTATEMENT, JUDGMENTS, § 126 with § 121. See FREEMAN, JUDGMENTS, § 1233; 3 MOORE, FEDERAL PRACTICE, (1st ed. 1938), § 60.03; 126 A.L.R. 386. Extrinsic fraud is illustrated by *McGuinness v. Superior Court*, 196 Cal. 222, 237 Pac. 42 (1925), where the fraud alleged was the failure to notify interested parties of the pendency of a suit. *Metzger v. Turner*, 158 P.2d 701 (Okla. Sup. Ct. 1945) illustrated an application of intrinsic fraud. The defendant in an action to quiet title wherein a default judgment had been entered against him sought to have the judgment vacated on the ground of fraud, alleging that the plaintiff had made false allegations that he had good title, and falsely alleged that he was in possession when in fact he was not. It was held that the fraud complained of was intrinsic fraud going to the actual or potential issues in the original suit and was therefore insufficient ground on which to vacate the judgment. See Note, 24 TEX. L. REV. 233.

⁹ It is "a journey into futility to attempt to distinguish between extrinsic and intrinsic matter." Moore and Rogers, *op. cit. supra* note 2 at p. 658.

¹⁰ *United States v. Throckmorton*, *supra* note 7.

¹¹ *Marshall v. Holmes*, 141 U. S. 589 (1891).

¹² *United States v. Throckmorton*, *supra* note 7, was a bill in chancery, the plaintiff seeking to have the court set aside the confirmation of a land grant. The fraud alleged was that the defendant had obtained an illegal land grant from a Mexican official who had no authority to give it. There were other perjured documents involved. The Supreme Court denied relief. In *Marshall v. Holmes*, *supra* note 11, after the close of the term, the defendant against whom the judgments were rendered filed a petition in the same court

conflict.¹³ But a reading of the recent cases demonstrates that different circuits disagree about the effect of these two decisions and are consequently applying different standards.

The third circuit in *Publicker v. Shallcross*¹⁴ thought that the *Throckmorton* case was no longer law. Rejecting the contention that it was without power to invalidate a judgment obtained by intrinsic fraud, the Court of Appeals, citing the *Marshall* case, said: "We do not consider ourselves bound by [the *Throckmorton*] case for . . . we do not believe it is the law of the Supreme Court today . . ." ¹⁵ The court appended the comment: ". . . [The] truth is more important than the trouble it takes to get it."

On the other hand, the 8th circuit in *Phillips Petroleum Co. v. Jenkins*¹⁶ held that the *Throckmorton* case was still law. This was an action for relief from a tort judgment against the appellant on the ground that defendant had simulated an injury and disability and conspired with a physician to deceive examining doctors. The court, citing the *Throckmorton* case, said: "Courts of the United States . . . will not deprive a party of the benefit of a judgment . . . on account of intrinsic fraud."¹⁷

The Supreme Court has never clarified its position.¹⁸ But the type of fraud involved in the *Hartford* case would lead to a tentative conclusion that at least some types of intrinsic fraud could be

for the annulment of the judgment upon the ground that the judgment had been obtained through the use of false testimony and forged letters. The Supreme Court granted relief.

¹³ See *Chicago, R. I. & P. Ry. Co. v. Callicotte*, 267 Fed. 799 (8th Cir. 1920), cert denied 255 U. S. 570 (1921); 16 A.L.R. 386.

¹⁴ 106 F.2d 949 (3rd Cir. 1939), 126 A.L.R. 386, cert denied 308 U. S. 624 (1940).

¹⁵ *Id.*, 106 F.2d at 950.

¹⁶ 81 F.2d 183 (8th Cir. 1937).

¹⁷ *Id.* at 187.

¹⁸ This inconsistency in the federal courts was attempted to be resolved in *Craver v. Faurot*, 64 Fed. 241 (C.C.N.D. III. 1894), reversed 76 Fed. 257 (7th Cir. 1896), certif. dismissed 162 U. S. 435 (1896), where the court, "feeling that United States v. Throckmorton and Marshall v. Holmes were in direct conflict and not knowing which was to govern, sent the case to the Supreme Court on a certificate of importance. The Supreme Court refused to hear the merits, disposing of the case on a technicality as to the validity of the use of a certificate of importance." 3 MOORE, FEDERAL PRACTICE, (1st ed.), § 60.03, n. 17, p. 3268.

A law writer in 21 COL. L. REV. 268 commented, "As for the federal rule . . . it must remain unsettled. Since the courts are at liberty to cite either line of authority, and do so as suits their convenience, the only possible answer in spite of repeated assertions to the contrary that the federal rule is clear is that there is no federal rule at all."

grounds for upsetting a judgment. Mr. Justice Black's assertion that the "agencies of public justice [are] not so impotent that they must always be mute and helpless victims of deception and fraud . . ." ¹⁹ would apply to deception committed by intrinsic fraud as well as deception by extrinsic fraud. Perjury is considered intrinsic fraud and since the false article utilized by Hartford seems analogous to perjured evidence there is strong ground for arguing that the more liberal *Marshall* rule was adopted as the federal rule. But, because of the ambiguity of the Supreme Court's position, we find two divergent attitudes expressed among the circuits. The lower federal circuits have been permitted to select the remedial attitude they prefer, in spite of what was a muted command to the contrary in *Hazel-Atlas Glass v. Hartford*.

Application of Rule 60(b)

As has been seen, the amendment to Federal Rule 60(b) introduced the term "fraud on the court" and no distinction was drawn between extrinsic and intrinsic fraud in the saving clause.²⁰ Because of the conflicting viewpoints of the cases up to 1946 it is difficult to ascertain what was intended by this new term. But unless the saving clause of the rule was intended to recognize some type of intrinsic fraud as ground for relief in an independent action, the reference to the *Hartford* decision has no meaning.

Certainly it can be validly argued that *Hartford* impliedly suggested that the *Marshall* case overruled the *Throckmorton* case and that the *Marshall* rule was the rule of the federal courts. The Supreme Court's failure to limit the application of the fraud doc-

¹⁹ *Ibid.* Mr. Justice Black also said ". . . tampering with the administration of justice as indisputably shown here involves far more than injury to a single litigant. It is a wrong against the institutions set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated consistent with the good order of society."

Two cases decided by the Supreme Court citing the *Hartford* case fail to shed much light on the meaning the court attached to the decision. *Universal Oil Products Co. v. Root Refining Co.*, 328 U. S. 575 (1945), cited the *Hartford* case and said at p. 580, "The inherent power of a federal court to investigate whether a judgment was obtained by fraud is beyond question." But in *Knauer v. United States*, 328 U. S. 654 (1946), Mr. Justice Frankfurter intimated that the exclusion of intrinsic fraud as a ground for relief might still be the rule.

²⁰ Recall that the rule expressly provides that either intrinsic or extrinsic fraud can be ground for relief by motion to the court that rendered the judgment.

INVALIDATING A JUDGMENT FOR FRAUD

47

trine to extrinsic fraud indicated an intent to utilize a more liberal doctrine and to accord injured litigants a wider basis for relief. However, whatever the intent of the Supreme Court, the contention that the *Marshall* rule was the rule of the federal courts (*vis-a-vis* the *Hartford* case) was soon rejected by a lower federal court.

Prior to the adoption of Rule 60(b)'s amendment in 1946, the Court of Customs and Patent Appeals had before it in *Josserand v. Taylor*²¹ a petition for leave to file a bill of review in the patent office, the plaintiff claiming that the defendant committed fraud in the interference proceeding in which priority of the invention had been awarded him. The fraud alleged was perjury, and the court said:

"We are unable to [agree that the *Hartford* case held] that a judgment or decree rendered by a federal court at a former term,²² obtained by intrinsic fraud as distinguished from extrinsic or collateral fraud, should nullify a proceeding such as here involved . . . We think it is evident from [that decision] that the Court was of the opinion that 'certain officials and attorneys' of the Hartford Company had entered and carried out a conspiracy to defraud the Patent Office and the Circuit Court of Appeals and that such a conspiracy was not an intrinsic but an extrinsic or collateral fraud.'²³

This decision is important, for if the court's interpretation of the *Hartford* case is correct the new Federal Rule becomes merely a re-statement of the old *Throckmorton* rule. And, *Josserand v. Taylor* was followed, with respect to the meaning of Federal Rule 60(b), in *Dowdy v. Hawfield*.²⁴ The District of Columbia circuit was asked here to set aside the probate of a will because witnesses for the will had given perjured testimony. The court said:

" . . . [Rule 60(b)] stipulates that 'This rule does not limit the power of a court to entertain an independent action . . . to set aside a judgment for fraud upon the court.' The Supreme Court in *United States v. Throckmorton* . . .

²¹ 159 F.2d 249 (Ct. Cust. & Pat. App. 1946).

²² This decision was rendered prior to the amendment to Federal Rule 60. At this time, the rule regarding motions in the court that rendered the judgment was that a court could not upset a judgment rendered at a prior term. The amendment gave a year grace period.

²³ *Josserand v. Taylor*, *supra* note 21 at 253. This decision is consistent with the suggestion that the *Hartford* case intended to apply a more liberal rule to patent cases only.

²⁴ 189 F.2d 637 (D.C. Cir. 1951), *cert. denied* 342 U. S. 830 (1952).

held that fraud must be 'extrinsic or collateral' to the matter tried by the first court, and not to a fraud in the matter in which the decree was rendered. *Josserand v. Taylor* . . . affirmed this rule and in that case the Hartford case was held not to have changed the rule.²⁵

The effect of Federal Rule 60 (b) was thus summarily dismissed. The reasoning was: Federal Rule 60 (b) adopts the *Hartford* rule; *Hartford* in *Josserand v. Taylor* was held to have been merely an application of the rule of the *Throckmorton* case; so the *Throckmorton* rule is still law. The court gave no consideration to the possibility that the framers of the code intended to distinguish between grounds for independent attack and grounds for upsetting a judgment for fraud on the court.

Notwithstanding *Dowdy v. Hawfield*, this same District of Columbia circuit²⁶ was asked in *Dausuel v. Dausuel*²⁷ to set aside a judgment of divorce because the decree had been procured by perjury. This was a proceeding on a judgment creditor's bill for alimony wherein the husband filed a cross compliant seeking to set aside the divorce. The trial court dismissed the cross complaint and found generally for the wife. The Court of Appeals held that if the facts were as alleged in the cross complaint the decree of divorce could be vacated. Judge Edgerton said:

"A court may at anytime set aside a judgment for after discovered fraud upon the court. *Hazel-Atlas Glass v. Hartford* . . . Rule 60(b) . . . expressly does not limit the power of a court to entertain an action for that purpose."
(Italics added.)²⁸

The court did not cite its previous ruling in *Dowdy v. Dowdy*; and by ignoring the distinction between extrinsic or intrinsic fraud implied that it is no longer significant.

New Jersey's Rule of Civil Practice 3:60-2 is identical to Federal Rule 60(b). The New Jersey Supreme Court was asked in *Shammas v. Shammas*²⁹ to interpret the "fraud on the court" phrase. This was an action for divorce wherein the administrator of the estate of petitioner's second wife filed a petition to set aside

²⁵ *Id.*, 189 F.2d at 638.

²⁶ Different judges were sitting.

²⁷ 195 F.2d 774 (D.C. Cir. 1952).

²⁸ *Id.*, at 775.

²⁹ 9 N. J. 321, 88 A.2d 204 (1952); see also *Lyster v. Berberich*, 65 A.2d 632 (N. J. Super. App. Div. 1949); *Williams v. DeFabio*, 65 A.2d 858 (N. J. Super. App. Div. 1949); and see 98 U. OF PA. L. REV. 117, n.2.

the divorce decree and adjudge petitioner guilty of contempt for wilfully giving false testimony in the divorce trial. Although the court held that the administrators were strangers to the record and had no standing to attack the judgment, it (1) expressly rejected the *Throckmorton* rule, (2) expressly rejected the argument that if intrinsic fraud was allowed to upset judgments endless litigation would result, and (3) held that either intrinsic or extrinsic fraud was within the "fraud on the court" term.

The New Jersey Supreme Court thus has done what the Supreme Court has failed to do, *i.e.*, it has attached a definite understanding to the meaning of the phrase.

Conclusion

Rule 60(b) can be interpreted in at least three different ways. An independent action to set aside a judgment for fraud

- (1) may be grounded only upon extrinsic fraud,
- (2) may be grounded upon either extrinsic or intrinsic fraud,
- (3) may be grounded only upon extrinsic fraud, except in those instances where intrinsic fraud constitutes "fraud on the court."

Until now, the courts have been concerned with whether or not "fraud on the court" includes at least some instance of intrinsic fraud or whether this phrase is controlled by the *Throckmorton* rule. However, the phrasing of Rule 60(b) permits the suggestion that "fraud on the court" is a ground for invalidation of a judgment different from the ground which will sustain an "independent action."³⁰ Such a distinction, however, would tend to multiply the already existing confusion.

The present conflict between the circuits stems from the conflicting decisions rendered by the Supreme Court prior to the adoption of Rule 60(b) and the ambiguity of the term "fraud on the court." The new rule makes it difficult to distinguish the type of fraud which must be availed of within one year, from fraud on the court, which may be urged at anytime. Why is every fraud not a fraud on the court? But as long as the Courts of Appeals have

³⁰ The rule states, "This rule does not limit the power of a court to entertain an independent action, [then a reference to proceedings in rem], or to set aside a judgment for fraud upon the court." Conceivably there are three different circumstances here, with a different rule applicable to each.

inconsistent authorities to cite, Rule 60(b) will stand for the *Throckmorton* rule or the *Marshall* rule depending on the circuit.

Courts refusing to recognize intrinsic fraud as a basis for relief fear the recurring litigation that might result. "Endless litigation in which nothing was ever finally determined would be worse than occasional miscarriages of justice."³¹ Yet, on the other hand there is a natural desire to have the courts perform justice and to deny a man the profits of his own wrongdoing. "The notion that repeated retrials of cases may be expected to follow . . . the setting aside of judgments rendered on false testimony will not withstand critical analysis. Rather it is more logical to anticipate that the guilty litigant committing perjury . . . will not risk pursuing the cause further."³² It is submitted, however, that it is wrong to have different consequences depend on the type of fraud committed—that if "fraud vitiates a judgment" no difference should stem from the label attached to the fraud. The test, rather, should be, was the fraud of the type that the party had a real opportunity to litigate in the first action?³³ If in the opinion of a court a judgment was obtained through the utilization of false records and documents of which a party was justifiably unaware, then the judgment should be set aside, regardless of the fact that the fraud was intrinsic. On the other hand, if a party could have known of the fraud, and had a thorough opportunity to investigate the matter and through his own fault an adverse judgment was rendered, no relief should be available.

Certainly the Supreme Court demonstrated an intent to broaden the scope of the fraud rule in the *Hartford* case and that the framers of Federal Rule 60(b)'s term "fraud on the court" did not restate the *Throckmorton* rule alone. Had the latter been their purpose it seems reasonable to assume they would have said so. Contrary to the opinion in *Josserand v. Taylor, supra*, it is submitted that the Supreme Court adopted and applied the *Marshall* rule in the *Hartford* case and demonstrated an intent to liberalize the federal rule and that Federal Rule 60(b) was an expression of this intent formalized in a rule of procedure.

³¹ *Fawcett v. Atherton*, 298 Mich. 362, 299 N.W. 108; noted in 40 MICH. L. REV. 598.

³² *Shammas v. Shammas*, 9 N. J. 321, 88 A.2d 204 (1952).

³³ See, 98 U. OF PA. L. REV. 117; other law notes discussing intrinsic and extrinsic fraud rules are 22 HARV. L. REV. 600; 49 HARV. L. REV. 327; 21 COL. L. REV. 268; 21 ILL. L. REV. 833; 28 GEO. L. J. 848; 36 ILL. L. REV. 894; 24 TEX. L. REV. 223; 12 CORNELL L. Q. 385.

The interpretation of New Jersey's Supreme Court stems from a more realistic understanding of the intention of the framers of Federal Rule 60(b) and of the more sensible application of the doctrine of fraud upsetting judgments.³⁴ The *Throckmorton* rule leads to anomalous results: of *X* obtaining relief because his adversary kept one of *X*'s witnesses away from the courtroom and induced the witness not to testify, while *Y*'s judgment against him would stand even though his adversary bribed one of *Y*'s witnesses to utter false testimony on the witness stand. The label extrinsic or intrinsic adds nothing—and justice should not be predicated on words.

Until now no tests have been recommended for defining “fraud on the court.” Perhaps the rationalization announced in *Hadden v. Rumsey Products*³⁵ by the district court for the Western district of New York is as wise as possible:

“Out of deference to the deep rooted policy in favor of the repose of judgments . . . courts of equity have been cautious in exercising their power [in upsetting judgments] . . . But when the occasion has demanded, where enforcement of the judgment is ‘manifestly unconscionable’ . . . they have wielded the power without hesitation.”³⁶

Until the Supreme Court re-defines its position the “manifestly unconscionable” test will be the only test, and it will remain, as it has been, that despite Federal Rule 60(b) there is no federal rule at all.

³⁴ *Shammas v. Shammas*, *supra* note 32, 88 A.2d at 208, “[U]pon principle, we hold that relief for fraud upon the court may be allowed under our rule whether the fraud charged is denominated intrinsic or extrinsic.”

³⁵ 96 F.Supp. 988 (W.D.N.Y. 1951).

³⁶ *Id.* at 993.

Exhibit 6

RICHARD ARJUN KAUL, MD
440c SOMERSET DRIVE
PEARL RIVER, NY 10965
201 989 2299

ARNOLD ERWIN FELDMAN, MD
1860 BEACH BOULEVARD
BILOXI, MS 39531
225 939 1252

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

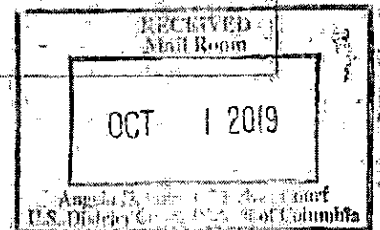
RICHARD ARJUN KAUL, MD + ARNOLD ERWIN FELDMAN, MD

Plaintiffs

v.

Case: 1:19-cv-03050
Assigned To : Unassigned
Assign. Date : 10/1/2019
Description: Pro Se General Civil (F-DECK)

FEDERATION OF STATE MEDICAL BOARDS; THE NEW JERSEY BOARD OF MEDICAL EXAMINERS; THE CALIFORNIA MEDICAL BOARD; THE LOUISIANA MEDICAL BOARD; THE PENNSYLVANIA MEDICAL BOARD; THE MISSISSIPPI MEDICAL BOARD; JOHN BURDINE, MD (in his official and individual capacity); CECELIA MOUTON, MD (in her official and individual capacity); RICHARD STANLEY, ESQ (in his official and individual capacity); CHRISTOPHER J. CHRISTIE, ESQ (in his official and individual capacity) ESQ; JAY HOWARD SOLOMON, ESQ (in his individual and official capacity); STEVEN LOMAZOW, MD; ANDREW KAUFMAN, MD (in his individual capacity + official capacity), PETER STAATS, MD; GREGORY PRZYBYLSKI, MD (in his individual capacity + official capacity); ALLSTATE NEW JERSEY INSURANCE COMPANY; GEICO; GEICO INDEMNITY; GEICO GENERAL INSURANCE COMPANY and GEICO CASUALTY; ROBERT HEARY, MD; MARC COHEN, MD; NORTH JERSEY MEDIA GROUP, INC; LINDY WASHBURN; LEWIS STEIN, ESQ; HACKENSACK UNIVERSITY MEDICAL CENTER; ROBERT GARRETT; ATLANTIC



1. Preface + Overview of Plaintiff's Legal Claims

2. This case is about rampant corruption within American state medical boards, that has, over the last decade worsened in the most pernicious manner, unrecognized by either public, state or federal governments. The two main themes that define this complaint are: (1) Medical Board Corruption; (2) The Unconstitutional Configuration of the Mechanism of Physician Regulation. This corruption is the primary reason as to why over four hundred (400) American physicians, and an increasing number of chronic pain patients, deprived of life-saving care, commit suicide every year. Medical boards attempt to justify their existence with the slogan of "we protect the public", but there exists no evidence, that in the period from 1960 to 2019, they do or ever have protected or benefited the public in any manner. There are no epidemiological studies, no retrospective clinical analyses or indeed any form of legitimate study to demonstrate or prove that medical boards do anything other than serve the economic and political interests of its members. Healthcare corporations, such as insurance and pharmaceutical companies, have since at least the late 1980s, bribed and corrupted American medical boards members, in order to advance their business and corporate agendas through the fatal exploitation of the American public and medical profession. These boards, today, in 2019, have become nothing but weapons used against physicians who threaten the economic standing of their business competitors and healthcare corporations with financial stakes in the annually worth, eighteen trillion dollar American healthcare sector. This case, the first of its kind, highlights the corrupt intersection between medicine, business, law and politics, that has resulted in the world's highest physician suicide rate, the world's highest number of physician disciplinary actions, and the world's highest revenue generating system for lawyers and bureaucrats. These individuals have insidiously parasitized a system, whose honest and noble beginnings have been converted into a cesspool of corruption, that is now the cause of the highest rate of physician suicide ever noted, and the tragic, but entirely avoidable, deaths of patients abandoned, because corrupt medical boards have, in the most arbitrary, capricious and illegal manner, revoked the licenses of their physicians, and deprived them of access to life-saving care. This case will result in what is now widely known as the "Reformation of American Medical Boards", and will bring to an end, the genocide of American physicians and patients, a genocide perpetrated through corrupt medical boards and engineered by criminally minded healthcare insurance executives and their for-profit corporations. "Medical Boards Kill", and do not protect the public. The plaintiffs and public intend have held criminally accountable, on manslaughter charges, the medical board members and insurance company executives, responsible for these crimes against humanity. This case will eradicate one malignant aspect of the American healthcare, that of the rampant corruption within state medical boards. It will save many lives to come, reduce the anguish and suffering that for many years has been intentionally hidden from the American public, and will expose and penalize the criminals who, for nothing more than greed, have wrecked-havoc on millions of tax-paying, law abiding and innocent American patients and physicians.

5. The current internal procedures of state medical boards violate the separation of prosecutorial and adjudicative protections enshrined in the due process clauses of the United States Constitution. The external reciprocal disciplinary relations with other medical boards and Defendant Federation, are illegal, and violate the due process clauses of the United States Constitution and the anti-trust statutes of the Sherman and Clayton Acts.

12. Physicians in America, since at least 1960, have been universally deprived of their constitutionally protected right to due process, with regard to the property right of their medical licenses, and their right to a livelihood. The principal cause of these violations is the profound corruption within state medical boards, that operate in secrecy, without supervision or accountability to the state in which they function. State medical boards have become vehicles of anti-trust misconduct, that are abused by physician members to eliminate their competition from the healthcare market, thus artificially constricting the healthcare market and depriving the public of their right to choose. State medical boards have attempted to justify their existence by stating that they “**protect the public**”. This is false, as proven by the enclosed evidence, and the fact that the majority of physician suicides are related to corrupt and fundamentally arbitrary medical board actions. The continuing anti-trust violations committed by state medical boards continue to contribute to a rise in price of healthcare services, without any demonstrable increase in quality of care. This situation exists because state medical boards have been wrongly permitted to abuse the defense of sovereign immunity. It is anathema to proper regulation that state medical boards are controlled by individuals that compete in the same markets, that they regulate, absent any form of government oversight. The Supreme Court in North Carolina State Board of Dental Examiners v. FTC defined what constitutes legitimate supervision, but yet not one medical board, as the attached evidence proves, has complied with this law. State medical boards continue to operate outside of anti-trust and constitutional law.
13. State medical boards are fundamentally self-dealing and self-regulating agencies that operate under color of law, for which there exists no evidence that they “**protect the public**”. In North Carolina State Board of Dental Examiners v. FTC, the Supreme Court held, “**a state medical board on which a controlling number of decisionmakers are active market participants in the occupation the board regulates**” must be actively supervised by the state, or risk becoming subject to anti-trust claims, be they filed privately or by governmental agencies. As per the enclosed evidence, no state medical board has brought itself into compliance with the law.
14. The vice-president of Defendant NJBME is Defendant Metzger, who is a business partner of Defendant Staats and one of Kaul’s market competitors. Defendant Metzger holds a

controlling position on Defendant NJBME and was instrumental in denying Kaul's application for reinstatement of his New Jersey medical license. Defendant NJBME is not actively supervised by the state, and is thus in violation of the law, ergo, it is operating illegally. Defendant NJBME, an illegal entity, has direct rule making authority, an exceptional power that gives it the rule of law, without recourse to any other entities.

15. To ensure that Kaul's market competitors stay in control of Defendant NJBME, Defendant Metzger, in his capacity as vice-president, has ensured that certain positions remain vacant, with all of these positions being those assigned to lay persons, who have no competitive interest viz a viz Kaul. This furthers the anti-competitive nature of Defendant NJBME. Defendant NJBME, in the knowledge that it's adjudicative and prosecutorial functions are in violation of the separation of power doctrine of the United States Constitution, and the law pursuant to the North Carolina Dental Board case, has taken no remedial steps to correct these illegalities, and has in fact continued to suspend and revoke physicians' licenses, thus entrenching its illegal position and increasing the state's anti-trust liability. Because Defendant NJBME remains in violation of the law, it has no immunity to the within asserted claims, including the anti-trust charges.
16. The anti-competitive misconduct of Defendants NJBME and LMB in suspending/revoking Kaul (2012/2014) and Feldman's license (2016) resulted in the suppression of innovative outpatient minimally invasive spinal fusions, and intimidated other physicians from incorporating this technique into their practices. This permitted the defendant neurosurgeons and hospitals to artificially raise their prices, reduce the availability of service. One consequence of this has been the opiate epidemic, as patients with painful degenerative spines became unable to afford the procedure, were forced initially to resort to using prescription opiates, and then because of the widespread restrictions placed on the dispensation of prescription opiates, became obligated to purchase street grade heroin, that was and remains the primary cause of deaths from opiate overdoses. Anti-competitive conduct stymies innovation artificially constricts the market, and causes death. Corrupt state medical boards are the central cog in this "Cog Conspiracy".
17. The failure of Defendant NJBME to comply with the supervisory requirements pursuant to the North Carolina Dental Board case, and the due process related separation of power functions of the Constitution, have deprived Defendant NJBME of its sovereign immunity. This lack of immunity exposes every board member to monetary damages, as if they were members of a cartel, which in all truth, they are. It also imposes injunctive relief, which in this case equates with Kaul's demand that his license be immediately reinstated. Defendant NJBME, although an agency of the state, consists of members, such as Defendant Metzger, and ex-member and Defendant Lomazow, who abused the power of Defendant NJBME to engage in self-dealing schemes, that involved receiving bribes and other non-tangible favors from Kaul's business competitors and defendants, Allstate and Geico. These defendants were motivated to encourage Defendant NJBME to engage in self-dealing, in order to eradicate the competitive threat of his business

and or eliminate the competition his practice presented them, in the minimally invasive spine surgery market. These facts, in addition to those stated above, deprive Defendant NJBME of any state-related immunity to any of the claims asserted by Kaul. Defendant NJBME's antitrust misconduct is to all intents and purposes that of an unsupervised private cartel, that is controlled by "active market participants". It is thus not a supervised public agency, and therefore it, and its members have no immunity.

18. Defendants NJBME, Lomazow, Heary and Metzger, in collusion and conspiracy with the other defendants, abused the regulatory powers of Defendant NJBME in 2012/2014/2019 to respectively suspend/revoke/deny Kaul's license and his application for reinstatement, the purpose of which was to artificially and illegally restrict the market for minimally invasive spine surgery. These rule of reason anti-competitive acts, conducted in the absence of any legitimate state supervision, other than the bribe induced order given by Defendant Christie in approximately 2010 to revoke Kaul's license, constitute anti-trust violations that expose the State of New Jersey to immense legal liability. Defendants NJBME/LMB/MMB/CMB are illegal rogue state agencies, that has and continues to knowingly violate Kaul/Feldman's right to due process, and the anti-trust protections afforded them pursuant to the law generated by the Supreme Court in North Carolina Dental Board v FTC. As a consequence of the defendants anti-trust and constitutional violations, the defendants have illegally monopolized the American minimally invasive spine surgery market, to the detriment of the American public, a consequence of which has been the opiate epidemic. "**Medical Boards Kill**". There is no state government that actively supervises the conduct of its medical board, as required by law. This lack of supervision has facilitated the clandestine expansion of the illegal and conspiratorial interstate agreement that exists between Defendant Federation and the state medical boards. These facts, and these defendants have converted the American healthcare sector into a massive racketeering enterprise, with which organized crime syndicates would be honored to be associated and keen to emulate. The regulation of American medicine, dictated in large part by defendant insurance companies, is a criminal enterprise, motivated by money, and one that operates under the cover of the slogan of "**we protect the public**". This is akin to the Mafia promoting itself, by claiming it kept neighbors safe. It did not, and neither do state boards "**protect the public**". There are 400,000 deaths annually in American hospitals from medical complications. This fact exposes the massive lie, the massive fraud perpetrated by state medical boards on the American public. This case will lead to the "**Reformation of American Medical Boards**", and hold civilly/criminally accountable those that have profited through "**patterns of racketeering**". State boards, for the first time in American history, are facing an existential crisis, in much the same way as did the English Star Chamber. It was tyranny then, and it is tyranny now. Revocation has replaced decapitation, and excessive fines have replaced the rack.
19. The simple and irrefutable facts about state medical boards, including all the defendants are: (i) they do not protect the public; (ii) they are anti-competitive in the US healthcare market and stymie innovation; (iii) their procedures of physician regulation violate the

due process clauses of the United States Constitution; (iv) they have no active state supervision; (v) neither the board nor its members have any immunity to any of the private section 1 treble damage Sherman claims asserted in K5; (vi) the anti-competitive, unconstitutional and unsupervised misconduct of state medical boards confers immense liability on the state; (vii) Defendant NJBME consists of unsupervised, **"active market participants"** that abuse the power of Defendant NJBME to engage in economic **"self-dealing"**. The revocation and suspension respectively of the licenses of Plaintiffs Kaul and Feldman were a direct consequence of either some or all of these factors, and thus remain illegal acts, which have conferred liability on the defendants and deprived defendants NJBME + LMB + MMB + PMB + CMB of any immunity to suit.

20. It is important to note that the defendant hospitals, Allstate and Geico are market competitors of the plaintiffs, and are subject to the full force of anti-trust prosecution, in both the civil and criminal context. The obvious calculation for defendants Allstate and Geico is that the less money provided for the provision of healthcare services, the greater is their corporate profit. Kaul respectfully asserts that the only way to rectify the worsening malfeasance of American healthcare insurance corporations is to bring criminal fraud charges against a number of their chief executives.

Exhibit 7

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

RICHARD ARJUN KAUL,

Plaintiff,

v.

CHRISTOPER J. CHRISTIE, et al.,

Defendants.

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

OPINION

KEVIN MCNULTY, U.S.D.J.

Dr. Richard A. Kaul, an anesthesiologist by training, claims to be a minimally invasive spine surgeon. In March 2014, the New Jersey State Board of Medical Examiners (the "Board") said otherwise. Because his performance of spine surgeries on 11 patients without proper training and experience constituted gross and repeated malpractice, negligence, and incompetence, the Board revoked his medical license. From Dr. Kaul's perspective, the disciplinary proceedings were nothing but a sham. What really happened, he says, is that a network of politically connected neurosurgeons wanted to make an example of him. His high-quality medical practice was cutting into their margins, and so with the assistance of a cabal of lawyers, hospitals, insurance companies, and media figures, they importuned public officials to banish him from the practice of medicine in New Jersey. And so Dr. Kaul brought this action against some forty-odd defendants.

Now before the court are dozens of motions to dismiss, which in general will be granted. In part, the motions are granted under Rule 12(b)(1), on grounds of lack of subject matter jurisdiction. For the most part, however, dismissal is on 12(b)(6) grounds, because the amended complaint fails to allege plausibly any cause of action as to any defendant.

property,” and (2) the procedures afforded him did not constitute “due process of law.” *Hill v. Borough of Kutztown*, 455 F.3d 225, 234 (3d Cir. 2006) (quoting *Alvin v. Suzuki*, 227 F.3d 107, 116 (3d Cir. 2000)); accord *Res v. De Jongh*, 638 F.3d 169, 173 (3d Cir. 2011).

The individual interest at stake is Dr. Kaul’s medical license; the unconstitutional procedure is the disciplinary hearing. I do not doubt that a license to practice medicine is an individual property interest deserving of due process protections. But the state afforded Dr. Kaul the full panoply of due process rights during the disciplinary proceedings. He was represented by counsel. He submitted evidence and was able to cross-examine the State’s witnesses. The Board and the ALJ issued reasoned, written opinions, and Dr. Kaul had the opportunity to take exception to or appeal them. The disciplinary proceedings possessed virtually all the usual and expected safeguards, and therefore the probative value of allegations that additional safeguards could have been provided is very low. *E.g., Matthews v. Eldridge*, 424 U.S. 319, 334-35 (1976).

Indeed, the thrust of the AC seems to involve procedural irregularities, rather than deficiencies in the procedures themselves. Examples include the alleged alteration of transcripts, the ALJ’s consideration of extrinsic evidence, and witness perjury. These allegations, as discussed above, are meritless. Not a single pertinent example of transcript alteration can be found in the AC, let alone an alteration that would have been material to the outcome of the proceedings. Specifics are likewise lacking for the allegations of false testimony; the allegations are generic ones that could be expressed by any litigant who came out on the losing side of a credibility contest. The AC does allege that the Media Defendants published a hit job of Dr. Kaul. There is no plausible factual allegation, however, that ALJ Solomon knew about or would have been influenced by the article, and his written decision is closely tied to the evidence of record.

In short, no procedural due process violation has been alleged here.

FILED

JUN 13 2024

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number
SGJ800-24-1

Superior Court
Docket Number. 24-06-00111-8

STATE OF NEW JERSEY)
)
 v.)
)
 GEORGE E. NORCROSS, III,)
)
 PHILIP A. NORCROSS,)
)
 WILLIAM M. TAMBUSI,)
)
 DANA L. REDD,)
)
 SIDNEY R. BROWN,)
)
 and)
)
 JOHN J. O'DONNELL,)
)
 Defendants.)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

OVERVIEW

1. GEORGE E. NORCROSS, III, the defendant, is a former member of the Democratic National Committee, former chair of the Camden County Democratic Committee, chair of the board of trustees of Cooper University Health Care ("Cooper Health"), and executive chair of the insurance firm Conner Strong & Buckelew ("CSB"). From

at least approximately 2012 to the present, GEORGE E. NORCROSS, III led a criminal enterprise whose members and associates agreed the enterprise would extort others through threats and fear of economic and reputational harm and commit other criminal offenses to achieve the enterprise's goals (the "Norcross Enterprise").

2. From approximately 2012 to 2013, members and associates of the Norcross Enterprise, including GEORGE E. NORCROSS, III, used their political influence to tailor New Jersey economic development legislation to their preferences. After the legislation was enacted in September 2013, members and associates of the Norcross Enterprise conspired to, and did, extort and coerce others to obtain—for certain individuals and business entities—properties and property rights on the Camden, New Jersey waterfront and associated tax incentive credits. The entities that benefitted, including Cooper Health and CSB, then occupied the properties they obtained interests in and sold the tax credits they obtained for millions of dollars. Through a pattern of extortionate and other criminal conduct, the Norcross Enterprise also sought to promote and maintain the business, political, and philanthropic power and reputation of GEORGE E. NORCROSS, III and other Enterprise members and associates.

3. The criminal conduct included GEORGE E. NORCROSS, III threatening one developer who held Camden waterfront property rights necessary for the Norcross Enterprise to build the Triad1828

Centre, the tallest building on the Camden waterfront and the current headquarters of CSB, and an apartment building known as 11 Cooper. When the developer would not relinquish his rights on terms preferred by GEORGE E. NORCROSS, III, he threatened the developer that he would, in substance and in part, "f**k you up like you've never been f**ked up before," and told the developer he would make sure the developer never did business in Camden again. In a recorded phone call, GEORGE E. NORCROSS, III later admitted to threatening the developer: "I said, . . . 'this is unacceptable. If you do this, it will have enormous consequences.' [The developer] said, 'Are you threatening me?' I said, 'Absolutely.'"

4. In addition to GEORGE E. NORCROSS, III's threats, Norcross Enterprise members and associates: (1) conspired to have the City of Camden condemn the developer's rights through legal action to gain leverage in their negotiations; (2) plotted for Camden City officials to publicly "accus[e]" the developer of being "not a reputable person"; (3) caused certain Camden City officials, including the Mayor, to stop communicating with the developer; and (4) plotted to use the Camden government to damage an unrelated project of the developer's. In a recorded call planning this scheme, GEORGE E. NORCROSS, III explained that "you can never trust [this developer] until you got a bat over his head," stated that he wanted the developer to "cry uncle," and identified the

developer's unrelated project as "another point of attack on this putz."

5. As a result of the Enterprise's conduct, in October 2016, the developer sold the rights to \$18 million worth of tax credits to an entity owned by Norcross Enterprise members and associates, which the entity began selling in 2022. The developer also sold and extinguished other rights, allowing three entities associated with the Norcross Enterprise, including CSB, to apply for additional tax credits on the same day the agreement of sale was signed. The tax credits approved for the three entities totaled over \$240 million. In 2022, the entities began receiving these tax credits and selling them.

6. Additionally, from in or about March 2018 to September 2023, the Norcross Enterprise followed through on their plan to use the developer's unrelated project in the Camden waterfront district to "attack" the developer. When the developer sought a Camden City government approval necessary to facilitate the sale of a residential building he owned, PHILIP A. NORCROSS, the defendant, a member of the Norcross Enterprise who had no financial or legal interest in either property, intervened. In a meeting with City officials, PHILIP A. NORCROSS said the approval should be "slowed down" and used to cause the developer to forfeit his rights to redevelop the unrelated site. City officials, in turn, did not grant the approval, and in April 2018, moved to terminate

the developer's rights to develop the unrelated site. The developer challenged that action in court, and the City countersued, resulting in a litigation that lasted until a September 2023 settlement in which the developer agreed to give up his development rights and make payments as part of a settlement agreement.

7. In another instance, GEORGE E. NORCROSS, III learned that a Camden nonprofit redevelopment organization was seeking to purchase the L3 Complex, a Camden property identified to GEORGE E. NORCROSS, III as a potential location for Cooper Health offices. As a result, Norcross Enterprise members and associates intervened to force the nonprofit to partner with the Enterprise's chosen developer, rather than the developer of its own choosing, and ultimately to sell its rights to the L3 Complex. Prior to learning of the nonprofit's agreement of sale to buy the L3 Complex, the Norcross Enterprise had caused the Camden Mayor's office to instruct the nonprofits's leaders to meet regularly with PHILIP A. NORCROSS so the Norcross Enterprise could monitor what the nonprofit was doing. With this mechanism already in place, PHILIP A. NORCROSS then told the nonprofit's CEO not to use the nonprofit's chosen developer and implied that the nonprofit would suffer repercussions if it did not use the Norcross Enterprise's choice. Aware of previous financial repercussions for the nonprofit after its founder had disagreed with GEORGE E. NORCROSS,

III in the past, and with the Mayor's office instructing him to deal with PHILIP A. NORCROSS and advising him his job was in jeopardy, the nonprofit's CEO relented. As a result of the Norcross Enterprise's conduct, rather than partnering with the developer of its choice, earning expected millions of dollars from the transaction, and sharing in future profits from its ownership of the L3 Complex as it intended, the nonprofit partnered with the developer of the Norcross Enterprise's choosing and, in December 2014, received approximately \$125,000 for its rights. As a result of this conduct, the developer chosen by the Norcross Enterprise was able to obtain the L3 Complex at a discounted price available to the nonprofit, and Cooper Health obtained over \$27 million in tax credits from 2016 to 2022.

8. After extorting and coercing the nonprofit organization, the Norcross Enterprise sought, in December 2017, to remove the CEO of the nonprofit from his job through threats to his reputation and economic harm. The Norcross Enterprise did this, in part, to financially benefit DANA L. REDD, the defendant, who was nearing the end of her term as Camden Mayor. After the Norcross Enterprise caused an individual ("CC-1") who was the CEO of the Cooper Foundation (a foundation chaired by PHILIP A. NORCROSS) to be installed as a co-chair of the nonprofit, CC-1 threatened the nonprofit CEO victim with harm to his reputation and termination for cause if he did not resign. As a result of CC-1's threats,

Exhibit 8

US news

This article is more than 10 years old

New Jersey grants \$1.25bn in public funds to firms that back Republicans

Most top subsidies since 2012 went to firms that donate to GOP

Chris Christie appointed close ally to 'bank for business' role

Critics decry 'gross politicisation' of economic development

The 30 top subsidies awarded by New Jersey since 2012



Chris Christie appointed his close friend Michele Brown to head up the New Jersey economic development authority in October 2012. Photograph: Mel Evans/AP Photograph: Mel Evans/AP



Jon Swaine in New York

Thu 26 Jun 2014 07.20 EDT

Corporations that contributed millions of dollars to the Chris Christie-led Republican Governors Association and other GOP campaigns have received public funding deals worth almost \$1.25bn from his New Jersey administration in less than two years.

A review of the 30 biggest corporate subsidies awarded by the state of New Jersey since Christie appointed one of his closest allies as head of the state's "bank for business" found that 21 went to ventures involving firms that made significant donations to Republicans, or had senior executives who did.

About half made contributions, totalling \$1.8m, to the Republican Governors Association (RGA), the organisation that works to elect GOP candidates to

statehouses around the US, since Christie became one of its senior officials. The New Jersey governor now chairs the RGA.

Others contributed millions more to Republican committees and candidates including Christie himself; 2012 presidential candidate Mitt Romney, for whom Christie was a campaign surrogate and senior fundraiser; and state senator Joseph Kyrillos, Christie's former campaign manager.

Only one of the remaining nine subsidy recipients appeared to be strongly Democratic.

The Guardian's findings prompted calls from Democratic state legislators and watchdog groups for reforms to the New Jersey economic development authority (EDA), which awards the subsidies and is led by Michele Brown, a close friend and veteran aide to Christie. Some favour barring firms that make political contributions from receiving state funding.

"It seems pretty obvious to me that we don't have enough safeguards in place to make sure these awards are not going out based upon favouritism," said Senator Loretta Weinberg, the co-chair of the New Jersey legislature's select committee on investigation.

Assemblyman John Wisniewski, her co-chair, said that Christie should be stripped of his power to appoint the EDA's chief executive. "It seems to be part a pattern within this administration: the gross politicisation of what up until now had really been straight economic development," said Wisniewski.

Christie, once the early frontrunner for the 2016 Republican presidential nomination, is under investigation by the legislature's select committee and federal prosecutors over the politically motivated closure of lanes to the George Washington bridge last September. New Jersey is also facing a \$2.7bn budget shortfall over the next year.

The Guardian examined the 30 biggest subsidies, awarded by Christie's EDA in the form of 10-year tax breaks, since Brown took over as chief executive on 1 October 2012. Many of the awards were given to corporate partnerships with names that did not make their ownership arrangements immediately clear.

Among the 30 were a \$106m subsidy for the property venture of another close Christie friend and campaign donor, Jon Hanson, and a \$223m award to a retail development by Prudential, a major contributor to the RGA and the biggest corporate funder of Christie's official mansion. Both of these deals were disclosed by the Guardian earlier this month.

Brown, previously Christie's appointments counsel and senior aide when he was the state's US attorney, replaced Caren Franzini, an 18-year veteran of the EDA, who had served Republican and Democratic governors. The EDA is responsible for awarding subsidies to spur investment in New Jersey and boost the state's flagging economy.

In her fourth week in the job, 12 days before the 2012 election, Brown unveiled a contest for property developers with a \$100m prize fund. She said it would reward residential ventures "stimulating economic activity and improving the quality of life" in New Jersey's biggest cities.

One of the three winners to eventually split the money was a development by Kushner Real Estate, whose chairman has given \$133,000 to Christie and the New Jersey Republican Party since 2009. The second winner was a venture by a Connecticut-based Building And Land Technology, whose CEO and president gave \$210,000 to Romney and the RNC in 2012. The third was a mainly non-profit venture whose "private partner", Citibank, has contributed \$359,950 to the RGA since 2011. None responded to requests for comment.

A track record of contributions to the RGA, a Washington-based political non-profit to which people may make unlimited donations, was a common characteristic among recipients of some of the other biggest corporate subsidies awarded by the EDA under Brown's leadership.

Between December 2012 and August last year, almost \$180m was awarded to five corporations - Caesar's Entertainment casinos group; Siemens, the electronics giant; Honeywell, the aerospace and engineering firm; NRG, the power company; and Medco, the mail-order pharmacists - that separately contributed more than \$1.1m to the RGA since 2011, when Christie became its vice-chairman. All those who responded to requests for comment said that there were no connections between the political contributions and the corporate subsidies.

Three further tax breaks, totalling more than half a billion dollars, have been awarded so far this year to major RGA contributors: Prudential and JPMorgan Chase, the bank, which between them have contributed more than \$200,000; and the Philadelphia 76ers NBA team, whose owner Josh Harris gave \$50,000. A Prudential spokesman said the firm had "never sought to influence a decision on tax credits by making political contributions." JP Morgan and the 76ers did not respond to requests for comment.

The findings raised fresh questions about Brown's leadership of the EDA, which is currently under audit by federal authorities over its use of \$23m in disaster recovery funds that were spent on a television ad campaign starring Christie following hurricane Sandy.

It emerged during Christie's 2009 campaign that he loaned Brown \$46,000 without reporting this on his tax return or financial disclosure forms. Christie insisted that he was only helping out a friend. Brown resigned, saying that she did not want to be a distraction.

State senator Raymond Lesniak, Democrat for Union County, criticised Brown at the time of her selection as "an obvious political appointee with no experience in economic development". He told the Guardian: "In retrospect, I wish I had put - and should have put - limits on campaign contributions from businesses and people employed by these businesses who get these tax incentives". Lesniak said that legislation was now needed to address this.

Lesniak said he supported a proposal also made by Good Jobs First, a watchdog group that monitors corporate subsidies by state authorities, that the awards be subject to the same state law against "pay-to-play" that bars New Jersey authorities from contracting goods and services from companies that make significant political contributions, or have major shareholders who do.

“When political donors turn economic development programs into captive corporate piggybanks, this is the definition of corrupt crony capitalism,” said Greg LaRoy, the group’s executive director. “This is where the Tea Party right and the progressive left, and a growing number of small-business owners, agree.”

Weinberg, the co-chair of the legislature’s investigation committee, said that in light of the Guardian’s findings, she would be asking the Office of Legislative Services, a nonpartisan department that provides legal counsel to the state legislature, whether the subsidy programs should in fact already be covered by the existing laws against “pay-to-play”.

Several more of the 21 biggest subsidy awards were made to companies that made substantial contributions to Romney’s 2012 campaign, or had senior executives who did. Among the nine others, some made unremarkable donations or broadly comparable contributions to both Republicans and Democrats. Some made no significant campaign contributions.

Another of the nine - the American Dream retail and entertainment mall, which received a \$390m award, the biggest made by Christie’s administration - is a client of Wolff & Samson, the law firm of David Samson, the embattled Christie ally who chaired the Port Authority of New York and New Jersey until resigning in March amid the George Washington Bridge scandal. Prosecutors are also reportedly separately investigating the Port Authority’s awarding under Samson of \$2.8bn in contracts to construction firms with ties to Wolff & Samson. A spokesman for the mall said that Wolff & Samson played no role in securing the funding.

Christie’s office has said repeatedly that it has no involvement in the awarding of corporate subsidies. It stresses that all successful projects must be judged by EDA officials to benefit the state overall with new tax revenues in the long term. All projects must also be approved by a majority vote of the EDA board. A majority of board members are Christie appointees.

Kevin Roberts, a spokesman for Christie, did not return a request for comment. He said in an earlier statement on the same subject: “Any program funding is awarded based on a strict, objective review process dictated by statute and program rules,” adding: “the Governor’s Office has no role in that process whatsoever.”

Erin Gold, a spokeswoman for the EDA, did not respond to a request for comment. She said in an earlier statement that the authority “administers these bipartisan, legislatively-created incentive programs with the highest level of due diligence and in strict compliance with the statutes.”

“This includes conducting a comprehensive net benefit analysis to ensure that projects will result in a net positive impact to New Jersey, and requiring that projects first generate new tax revenue, complete capital investments, and/or hire or retain employees to receive the approved benefits,” said Gold.

US politics

• This article is more than 9 years old

Christie agency awarded \$260m to politically connected New Jersey firm

Mayor's administration gave tax break to firm headed by Democratic rival with whom Christie signed non-aggression pact



Governor Chris Christie in Keansburg, New Jersey, on Monday. Photograph: Mel Evans/AP Photograph: Mel Evans/AP

Jon Swaine in New York

Fri 11 Jul 2014 17:27 EDT

New Jersey governor Chris Christie's administration has awarded a public subsidy worth more than a quarter of a billion dollars to a politically connected manufacturing firm.

Holtec International, which makes components for power plants, this week secured a \$260m tax break from the New Jersey Economic Development Authority (NJEDA) - the third-biggest corporate subsidy that the state has awarded.

Register: it's quick and easy

It's still free to read - this is not a paywall

We're committed to keeping our quality reporting open. By registering and providing us with insight into your preferences, you're helping us to engage with you more deeply, and that allows us to keep our journalism free for all. You'll always be able to control your own [privacy settings](#).

Register for free [I'll do it later](#)

[Have a subscription? Made a contribution? Already registered? Sign In](#)

[Why register & how does it help?](#)

[How will my information & data be used?](#)

[Get help with registering or signing in](#)

More on this story

[New Jersey law would bar donations from recipients of subsidies](#)

[New Jersey's soaring subsidy program doing](#)

[Top Chris Christie aide criticised for 'lack of](#)

Exhibit 9

CASE NO. 24-1417

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

**RICHARD ARJUN KAUL, MD
PETITIONER**

**ON APPEAL FROM
EASTERN DISTRICT OF NORTH CAROLINA**

RICHARD KAUL v. JAMES OETKEN

INFORMAL OPENING BRIEF

SUBMITTED BY:

**RICHARD ARJUN KAUL, MD
PROPRIA PERSONA PLAINTIFF
24 WASHINGTON VALLEY ROAD
MORRISTOWN, NJ 07960
drrichardkaul@gmail.com**

RELEVANT REFERENCES TO THE KAUL CASES

K11-7 - KAUL/BASCH v ICE: 21-CV-06992 (AUGUST 19, 2021, TO SEPTEMBER 12, 2022-SOUTHERN DISTRICT OF NEW YORK)

K11-14 – KAUL v GEICO: 23-CV-22325 (JUNE 22, 2023, TO AUGUST 23, 2023-SOUTHERN DISTRICT OF FLORIDA)

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

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

K11-18 – KAUL v OETKEN: 24-CV-00185 (MARCH 25, 2024, TO APRIL 8, 2024-EASTERN DISTRICT OF NORTH CAROLINA)

JURISDICTION

This appeal stems from the April 8, 2024, order of dismissal with prejudice of case: RICHARD ARJUN KAUL, MD; JANE DOE; JOHN DOE v. JAMES PAUL OETKEN; JANE DOE; JOHN DOE (5:24-CV-00185-M-KS) that was pending in the Eastern District of North Carolina.

ISSUES FOR REVIEW

Did the Court commit reversible and harmful error in interpreting Petitioner-Plaintiff's Complaint seeking declaratory and injunctive relief as a petition for a writ of mandamus?

A fundamental error of the district court's order is the framing of the Complaint as a petition seeking a writ of mandamus. It is not. The Complaint is identified as a 'Complaint', has the pleading structure and factual substance of a 'Complaint', in that specific fact is pled in support of the specific elements of specific claims that seek multiple forms of both declaratory and injunctive relief. With all due respect, the district court's 'common element' reasoning is akin to calling an apple an avocado, simply because they both have seeds.

An injunctive order prohibits a defendant in both his personal and official capacity from the commission of a specific injury causing -right violating act/s, for the purpose of preventing a threatened injury, irreparable harm and or protecting a right or enforcing a right.

Mandamus is a prerogative writ purposed to compel a public official or body to perform a statutory duty, exercise a discretionary power, or correct an abuse of discretion. In contrast to injunctions, mandamus is directed towards enforcing positive action or compelling the performance of a legal duty.

Injunctions and mandamus are two (2) distinct equitable remedies that protect and advance litigants rights through equally distinct procedural mechanisms.

Respondent-Defendant Oetken was sued in his personal and official capacity, rendering him personally and officially subject to an injunctive order.

The district court's conversion of Petitioner's Complaint seeking eleven (11) forms of declaratory and injunctive relief, into a petition for a writ of mandamus hinges on two phrases: **"to strike"** (D.E. 1 Page 30 of 31 – Point 11)) and to **"cease and desist from any further interference"** (D.E. 1 Page 30 of 31 – Point 8). The latter is an order seeking to prevent any further exacerbation of the at least twelve (12) years-worth of ongoing/"new" injury to Petitioner Kaul's life/liberty/property/reputation, and the former is excerpted from Petitioner's request that seeks to prevent any further propagation on the federal court docket of Respondent's **"illegally generated and nullified 'Fraud on the Court' March 15, 2024 'ORDER'"** (D.E. 1 Page 30 of 31 – Point 11), an order that was entered onto the K11-17 docket on March 18, 2024 and is the fraudulent product of Respondent's fraudulent September 12, 2022 purported injunction in K11-7.

However, even if these two (2) points of the eleven (11) points of declaratory/injunctive relief requested by Petitioner in K11-18 were considered a form of mandamus, which they are not, their dismissal by the district court would not nullify the admitted fraudulence of the contents of the K11-7 September 12, 2022, purported order-injunction (APPENDIX-0018 TO 0026) and the fraudulence of the contents of the K11-7 March 15, 2024 purported order (USCA4 Appeal: 24-1417 Doc: 4-8 Page 246 of 303) a copy of which was disseminated into K11-17 on March 18, 2024 (K11-17: D.E. 72). The admitted fraudulence of these documents (APPENDIX-0146 TO 0148) and their contents preclude them from having any effect on future proceedings in the Eastern District of North Carolina or any other district court in the United States. The documents and their contents are nullified nationwide.

However, even if the district court considered the relief sought by Petitioner as declaratory and injunctive, which it is, but yet still denied the relief, Respondent-Defendant is forever conflicted

and thus forever precluded from any further ministerial and or adjudicative involvement, however remote, in any cases in which Petitioner is a party to the litigation, and that includes K11-17.

Petitioner Kaul respectfully asserts that the mandamus related premise of the district court's April 8, 2024, argument in K11-18 is incorrect and therefore the ORDER is invalid ab initio.

Even assuming Petitioner's Complaint were one for mandamus, which it is not, does the Court's erroneous application of the relevant legal standards to its mandamus analysis constitute reversible and harmful error?

The Complaint seeks declaratory and injunctive relief and is not a petition for mandamus, is neither styled nor titled as a petition for mandamus and seeks only relief preventing a threatened injury, irreparable harm and or protecting a right or enforcing a right. Thus, all of the cited legal standards are irrelevant, as the relevant legal standards are those that pertain to injunctive and declaratory relief, none of which are cited.

However, even assuming the Complaint were a petition for an enforcing and or compelling mandamus, which it is not, the cited legal standards, in the context of the admitted facts of **The Kaul Cases (USCA4 Appeal: 24-1417 Doc: 4-1 to 4-9 Page 1 to 303 of 303)** do not support the district court's April 8, 2024, dismissal of the Complaint with prejudice.

Walter v Kelly, 589 F.3d 127, 139 (4th Cir. 2009)/Goines v. Valley Cmty. Servs. Bd., 822 F.3d 159, 166 (4th Cir. 2016) are cited for the proposition that the Court's consideration is restricted to facts within documents "**referenced in, or integral to, the complaint.**". **The Kaul Cases** are referenced on fifty-two (52) separate instances within the Complaint/Exhibits (D.E. 1 Page 3/5/9/18/23/24/25/26/27/28 of 31 **AND** D.E. 1-4 Page 3/5/6/7/8/9/11/12/16/17 of 17 **AND** D.E. 1-7 Page 2 of 6 **AND** D.E. 1-10 Page 6 of 9). Thus, pursuant to the **Walter/Goines** standard, the

Court was obliged to consider the facts admitted within The Kaul Cases, as identified within the May 15, 2024, PETITIONER REQUEST PURSUANT TO FEDERAL RULE OF EVIDENCE 201, FOR THE COURT TO TAKE JUDICIAL NOTICE OF FACTS ADMITTED IN PROCEEDINGS WITH A DIRECT CONNECTION TO THE ISSUES ON APPEAL (USCA APPEAL: 24-1417 DOC. 4-1 to 4-9 Page 1 to 303 of 303) the non-consideration of which renders erroneous the April 8, 2024, ORDER.

Does the Court's error and inappositely cited law constitute a reversible harmful error?

The Court's citations pertain to mandamus and not declaratory nor injunctive relief, and are thus irrelevant to the case. However, even if Petitioner had filed for mandamus, which he did not, the citations in light of the admitted facts (USCA APPEAL: 24-1417 DOC. 4-1 to 4-9 Page 1 to 303 of 303) do fail to support the Court's opinion. The Safir + Martin-Trigona + Eliahu cases were cited in K11-7 by Defendants and were nullified by Petitioner (CASE NO. 24-1417: APPENDIX-0157 TO 0169) the nullification of which was not contested/rebutted/refuted/analyzed by the K11-7 Defendants or Respondent (CASE NO. 24-1417:APPENDIX-0171 TO 0181), a fact Petitioner made known to the district court on November 20, 2023, in K11-17.

Safir v. U.S. Lines, Inc., 792 F.2d 19,23 (2nd Cir. 1986); Martin-Trigona v. Shaw, 986 F.2d 1384, 1387 (11th Cir. 1993); Eliahu v. Jewish Agency for Israel, 919 F.3d 709, 713 (2nd Cir. 2019).

Petitioner demonstrated in K11-7 that these three (3) cases fail to support and or undermine Respondent's purported injunction in K11-7, a demonstration that was not contested/refuted/rebutted nor analyzed in any manner by Respondent nor Defendants, a stark contradiction of the district court's assertion: "... Judge Oetken thoroughly analyzed why the

injunction was necessary to prevent Plaintiff from engaging in “further vexatious litigation” ...”. There was no analysis by the K11-7 Defendants or Respondent of Petitioner’s differentiation of the cited cases (CASE NO. 24-1417:APPENDIX-0171 TO 0181) and thus there could not have been, nor indeed was there, any given or legally substantiated reason for issuing the injunction, as since the 2016 filing of K1, the factual foundation of none of **The Kaul Cases**, including K11-7 had ever been either tested or denied, and thus had never been shown to be vexatious or without factual foundation, but in fact became admitted (USCA APPEAL: 24-1417 DOC. 4-1 to 4-9 Page 1 to 303 of 303). The fact of Respondent’s non-analysis of all Petitioner’s facts/law/arguments submitted in K11-7 (CASE NO. 24-1417:APPENDIX-0171 TO 0181) and of the ‘Fraud on the Court’ of the September 12, 2022, purported order-injunction in K11-7 (CASE NO. 24-1417:APPENDIX-0018 TO 0026) were placed before the district court in K11-17 on November 20, 2023 (CASE NO. 24-1417:APPENDIX-0003) and were facts on which the district court admitted the case and entered on March 13, 2024, the ORDER FOR DISCOVERY PLAN (CASE NO. 24-1417:APPENDIX-0135) but yet facts the district court not only ignored on April 8, 2024, in its dismissal with prejudice of K11-18, but facts it misrepresented in K11-17 on May 3, 2024 in its order vacating the March 13, 2024 ORDER FOR DISCOVERY PLAN (CASE NO. 24-1417:APPENDIX-0184 TO 0189). The district court’s contradiction in K11-17 and K11-18 of its prior position from November 20, 2023, to March 13, 2024, in K11-17 as to the **invalidity** of the September 12, 2022, purported injunction in K11-7 constitutes reversible harmful error.

Allied Chem. Corp. v. Daiflon, Inc., 449 U.S. 33, 34 (1980); In re First Fed. Sav. & Loan Ass’n of Durham, 860 F.2d 135, 138 (4th Cir. 1988); In re United Steelworkers of Am., AFL-CIO-CLC, 595 F.2d 958, 960 (4th Cir. 1979) are as equally unsupportive of the Court’s opinion/order, in that

not only do they fail to support its mandamus related opinion, but the Complaint explicitly seeks declaratory-injunctive relief and not mandamus. However, even if the Complaint sought mandamus, which it does not, the citations, in the context of the pled/referenced factual foundation of The Kaul Cases (USCA APPEAL: 24-1417 DOC. 4-1 to 4-9 Page 1 to 303 of 303) including K11-18, actually undermine the district court's opinion/order.

The Allied case is inapplicable and irrelevant to K11-18, as Petitioner did not seek mandamus in K11-7 as to the September 12, 2022, purported order-injunction of Respondent, in contrast to Allied, in which mandamus was sought from the 10th Circuit as to the same case pending in a district court within the 10th Circuit. Further lending towards its inapplicability is the fact that the case was tried before a jury to verdict, a fundamental human/civil/constitutional right of life/liberty/property of which the Petitioner has been willfully deprived for over eight (8) years. The Allied court, in identifying the exceptional conditions required for mandamus did identify "a **judicial usurpation of power**" as warranting mandamus. Respondents March 15, 2024, order in K11-7 ordering Petitioner to dismiss claims in K11-17 (USCA4 Appeal: 24-1417 Doc: 4-8 Page 246 of 303) was entered despite Respondent knowing that the Eastern District of North Carolina had admitted the case with full knowledge of the terms of the injunction and its admitted 'Fraud on the Court' (CASE NO. 24-1417:APPENDIX-0018 TO 0026 + 0146 to 0148).

Respondent's act constitutes an knowing and willful attempt to usurp the power of the Eastern District of North Carolina.

In the In re First Fed. case, the nature of the relief sought by Petitioner-Plaintiff-Appellant was one of enforcement, in that the petition for mandamus sought the affirmative action of the payment of outstanding taxes by Defendant-Appellee James Baker. The declaratory-injunctive relief sought by Petitioner Kaul in contrast seeks to prevent a threatened injury, irreparable harm

and or protecting a right or enforcing a right. However, even if Petitioner Kaul's March 25, 2024, Complaint were a petition for mandamus, which it is not, the In re First Fed. case still fails to support the Court's April 8, 2024, opinion-order, because in K11-18 Petitioner has a clear right to the relief sought, as his human/civil/constitutional rights were violated by Respondent's illegal March 15, 2024, order threatening to hold Petitioner in contempt if he did not dismiss K11-17 (USCA4 Appeal: 24-1417 Doc: 4-8 Page 246 of 303). Respondent's March 15, 2024, willful and knowingly illegal violation of the jurisdiction of the E.D.N.C. and Petitioner's rights did confer on Petitioner Kaul an absolutely clear right to seek emergent relief. This is the bureaucratic equivalent of physical self-defense and was warranted pursuant to Petitioner's right to a timely and proportional defense against Respondent's threatened March 29, 2024, contempt proceeding. Respondent has, since September 12, 2022, effectively sought to extinguish Petitioner's life by preventing Petitioner from procuring compensation for the twelve (12) years-worth of willful deprivation by The Kaul Cases Defendants of Petitioner's life/liberty/property/reputation and by perpetuating an ongoing violation of Petitioner's life/liberty/property/reputation. In essence, denying Petitioner remediation for past injuries while continuing to cause him new injuries. Respondents violation of Petitioner's litigation rights in the E.D.N.C. have rendered him permanently conflicted and thus Petitioner's only avenue of recourse is in the 4th Circuit in which Respondent violated Petitioner's human/civil/constitutional rights on March 15, 2024, nine hundred and fifteen (915) days after the September 12, 2022, purported injunction in K11-7 in the 2nd Circuit. Respondent violated Petitioner's rights in the 2nd Circuit (September 12, 2022) and then violated Petitioner rights in the 4th Circuit (March 15, 2024). Moreover, the fundamental flaw in the district court's April 8, 2024, opinion that Petitioner's March 25, 2024, lawsuit is a mandamus petition, is that it does the lawsuit not ask a superior court to mandamus an inferior

court, but simply seeks declaratory/injunctive relief to prevent a threatened injury, irreparable harm and or protect/enforce a right against a violating defendant, who in this case is the Respondent. These are indeed “**exceptional extraordinary ... usurping ...**” circumstances, that if Petitioner sought mandamus, which he does not, would substantiate such a plea. At some point in 2021, Respondent became ensnared in an extremely high stakes quid pro quo scheme with the K11-7 Defendants. This explains the immense risks he has taken in K11-17 under undoubtedly the threat of exposure of perpetrating such a serious scheme with seasoned professional racketeers, such as the Defendants.

In the In re United Steelworkers case, the request for mandamus was denied because there existed an adequate alternative appeal avenue for Respondent PSA to remedy its grievance and participate in the dispute with the Petitioner United Steelworkers before the National Labor Relations Board. However, even assuming Petitioner's Complaint were one for mandamus, which it is not, there exists no avenue of remediation in the 2nd Circuit, nor could there, for Respondent's March 15, 2024, violation of Petitioner's judicially authorized litigation rights in K11-17 occurred in the 4th Circuit. The 2nd Circuit would have no jurisdiction over a person, in either their official or personal capacity who committed a violation in the 4th Circuit, as did Respondent on March 15, 2024. The district court conflates the September 12, 2022 (K11-7) events in the S.D.N.Y. with the March 15, 2024 (K11-17) events in the E.D.N.C., to suggest that because Petitioner did not appeal the S.D.N.Y. September 12, 2022, purported injunction to the 2nd Circuit, that he cannot now argue that his only avenue for contesting the March 15, 2024, violation of his rights in the E.D.N.C. by Respondent is in the E.D.N.C. and or the 4th Circuit. The implication is that Petitioner's avenue of remediation for the March 15, 2024, violation in the E.D.N.C. would have been in the 2nd Circuit in 2022, but because Petitioner waived that

opportunity in 2022, he is now foreclosed from “collaterally” attacking the 2022 purported injunction in the E.D.N.C. in 2024. However, the district court knows that K11-18 is a direct attack on Respondents extra-jurisdictional and illegal attack on Petitioner’s human/civil/constitutional rights on March 15, 2024, in the 4th Circuit, which is why if mandamus were sought, which it is not, this would be the only avenue.

It is worth noting that since September 12, 2022, no evidence/facts/argument/denials have been submitted by Respondent, any Defendants or any judges to show/demonstrate/prove that the September 12, 2022, purported order/injunction is not a “Fraud on the Court’ (CASE NO. 24-1417:APPENDIX-0018 TO 0026 + 0146 to 0148), the reason being that it is a ‘Fraud on the Court’, that Defendants are now attempting to perpetrate, perpetuate and judicially incorporate into the jurisprudential ‘fabric’ of the United States Court of Appeals for the Fourth Circuit. The purpose of this perpetuation is to attempt to ‘cover-up’ the decades-long crimes of The Kaul Cases Defendants, and the criminal consequences of exposure.

Did the Court commit reversible and harmful errors of fact and law in its inconsistent and arbitrary alteration of position as to the September 12, 2022, purported injunction in K11-17?

From the filing of the Complaint in K11-17 on November 20, 2023, to the March 13, 2024, entry of an ORDER FOR DISCOVERY SCHEDULE, the Court tacitly held that the September 12, 2022, purported injunction in K11-7 was invalid and without effect in the United States District Court for the Eastern District of North Carolina. However, at some point in between the March 15, 2024, purported order of Respondent (USCA4 Appeal: 24-1417 Doc: 4-8 Page 246 of 303) and the May 3, 2024, vacating of the March 13, 2024, ORDER FOR DISCOVERY SCHEDULE

(CASE NO. 24-1417:APPENDIX-0184 TO 0189) the district court's position did arbitrarily alter absent any change in fact or law.

Does the district court's reliance on the admitted 'Fraud on the Court' of the K11-7 September 12, 2022, purported injunction and its structural error, cause that reliance to constitute an erroneous harmful substantial right violating reversible error in K11-18?

The district court's conflation and chronological silence on the events in K11-7 and K11-18, underpins its proposition-implication that Petitioner had/has an adequate remedy in the U.S.C.A for the 2nd Circuit as to Respondent's September 12, 2022, purported injunction, and that if the remedy no longer exists, it is because Petitioner chose not to utilize it, and therefore he cannot argue he has no alternative remedy to mandamus, even though Petitioner is not seeking mandamus. The abstractness of the district court's mandamus argument is akin to that of a 'straw man' argument, but Petitioner will continue to show that even though he is not seeking mandamus, it would nonetheless be afforded him in the context of the application of the district court's citations to the underlying, related and admitted facts of the case (USCA4 Appeal: 24-1417 Doc: 4-1 to 4-9 Page 1 to 303 of 303). Petitioner 'side-steps' the mandamus 'straw man' and chronologically clarifies the conflation and silence of key events in certain cases to show how Respondent's willful error and fraud in K11-7 (S.D.N.Y.-2022) has been transmitted through and into K11-10 (S.D.N.Y.-2023)/K11-14 (S.D.F.-2023)/K11-15 (S.D.F.-2023)/K11-17 (E.D.N.C.-2023) and K11-18 (E.D.N.C.-2024).

August 21, 2021 – K11-7: Petitioner filed K11-17 in the S.D.N.Y.

September 12, 2022 – K11-7: Respondent dismissed K11-7 with prejudice and entered a purported anti-filing nationwide injunction (K11-7: D.E. 168).

September 14, 2022 – K11-7: Petitioner filed request with Clerk of the Court for the S.D.N.Y. that Respondent disclose his forms AO10, his financial holdings, exparte communications and all conflicts of interest as to K11-7 by October 6, 2022, or be deemed to be conflicted and admit that the September 12, 2022, purported order/injunction constitute a ‘Fraud on the Court’ (K11-7: D.E. 170).

October 6, 2022 – K11-7: Respondent failed to provide his forms AO10, his financial holdings, exparte communications and all conflicts of interest as to K11-7 and Petitioner thus filed complaints against Respondent with state bar and Judicial Disciplinary Council. Respondent’s judicial impartiality-conflicted-ness became proven, and has remained so the present, as did the structural error and invalidity of Respondent’s September 12, 2022, purported injunction.

June 14, 2023: Petitioner was falsely arrested, jailed in New Jersey and there was an attempt on his life while incarcerated. Petitioner was released late at night on June 15, 2024, without explanation (USCA4 Appeal: 24-1417 Doc: 4-2 Page 14 to 42 of 303).

June 22, 2023 – K11-14: Petitioner filed K11-14 in the United States District Court for the Southern District of Florida.

June 27, 2023 – K11-15: Petitioner filed K11-15 in the United States District Court for the District of New Jersey.

July 5, 2023 – K11-15: Petitioner judicially noticed U.S.D.J. Bloom in the U.S.D.C.-S.D.F. as to K11-15.

July 11, 2023 - K11-15: K11-15 was docketed in the U.S.D.C.-S.D.F. before U.S.D.J. Bloom (USCA4 Appeal: 24-1417 Doc: 4-2 Page 14 to 42 of 303).

August 23, 2023 – K11-14: K11-14 was dismissed by U.S.D.J. Bloom based partly on Respondent’s purported injunction (K11-14: D.E. 39).

November 20, 2023 – K11-17: Petitioner filed K11-17 in the E.D.N.C. and referenced/included in the Complaint and Exhibit 14 all documents pertaining to the purported injunction and a copy of the purported injunction (CASE NO. 24-1417:APPENDIX-0003 TO 0133 + 0191 TO 0210).

The case was admitted and assigned to U.S.D.J. Terence Boyle.

December 21, 2023 – K11-17: The case was reassigned from U.S.D.J. Boyle to Chief Judge Meyers.

March 13, 2024 – K11-17: The E.D.N.C. entered an ORDER FOR DISCOVERY SCHEDULE (CASE NO. 24-1417:APPENDIX-0003 TO 0133 + 0191 TO 0210) that required parties confer as to the schedule. Defendants ignored order and ignored Petitioner's multiple requests to confer. No remedial action was taken against Defendants for their violation of the court's order.

March 15, 2024 – K11-7: In direct response to the ORDER FOR DISCOVERY SCHEDULE K11-7, Respondent entered a purported order in the S.D.N.Y. that sought to have Petitioner dismiss K11-17 under penalty of contempt of court (USCA4 Appeal: 24-1417 Doc: 4-8 Page 246 to 247 to 42 of 303). It should be noted that in the time period from September 12, 2022, to March 15, 2024, Respondent continued to fail to provide any evidence/fact he had **not** participated in a quid pro quo bribery scheme with Defendants, and in fact did not even submit or have submitted a statement/affidavit that he had **not** used his bench in the S.D.N.Y. to perpetrate a bribery based "**pattern of racketeering**" in K11-7 or any other cases in which he had been involved.

March 18, 2024 – K11-17: Defendants in K11-17 filed the K11-7 March 15, 2024, purported order onto the docket in K11-17 (K11-17: D.E. 72) as 'Defendant Exhibit A', turning Respondent into a witness.

March 25, 2024 – K11-18: Petitioner filed suit against Respondent in the E.D.N.C. and the case was assigned to U.S.D.J. Flannagan.

April 1, 2024 – K11-18: K11-18 was reassigned from U.S.D.J Flanagan to Chief Judge Meyers.

April 2, 2024 – K11-18: Summons was issued as to Respondent.

April 8, 2024 – K11-18: K11-18 was dismissed with prejudice by Chief Judge Meyers.

May 3, 2024 – K11-17: The magistrate judge vacated the ORDER FOR DISCOVERY SCHEDULE and stayed all other deadlines (CASE NO. 24-1417:APPENDIX-0184 TO 0189).

May 6, 2024 – K11-18: Petitioner filed a Notice of Appeal in the U.S.C.A. for the 4th Circuit.

May 15, 2024 – K11-18: Petitioner filed in the U.S.C.A. for the 4th Circuit a petition for judicial notice of facts with direct connection to the issues on appeal.

Structural error is its own class of “bad”. The Supreme Court has recognized an error as structural in multiple cases. See People v. Glasper, 234 Ill.2d 173, 917 N.E.2d 401 (June 2009), quoting Neder v. United States, 527 U.S. 1, 8, 119 S.Ct. 1827, 1833, 144 L.E.d.2d 35, 46 (1999); Johnsons v. United States, 520 U.S. 461, 468-49, 117 S.Ct. 1544, 1549-50, 137 L.E.2d 718, 728 (1997). Washington v. Recuenco, 548 U.S. 212, 218, 126 S.Ct. 2546, 2551, 165 L.Ed.2d 466, 474 (2006). A common theme of these case pertains to corrupted and non-impartial judges, a theme that has been a central one in most if not all administrative/state/bankruptcy/district courts in which Petitioner has litigated for over twelve (12) years seeking the restitution-compensation-rectification of the ongoing/”new” injuries to his illegally seized life/liberty/property/reputation. The Court’s discussion as to a mandamus related lack of available other remedies is irrelevant as Petitioner’s Complaint is not a request for mandamus, but one for declaratory/injunctive relief. This discussion ignores the structural error of the ‘Fraud on the Court’ of the K11-7 September

12, 2022 (S.D.N.Y.) purported injunction and instead references it ten (10) times without criticism, in an attempt to validate Respondent's opinion to support its dismissal of K11-18. The district court erred in neither referencing nor analyzing the evidence before it in K11-17, as to the intrinsic and extrinsic elements of the invalidity of the K11-7 September 12, 2022, purported injunction, as proven by documents filed within K11-17 on November 20, 2023 (CASE NO. 24-1417:APPENDIX-0018 TO 0026 + 0146 to 0149 + 0151 TO 0155 + 0171 TO 0182).

This evidence and other admitted facts constitute an element of the legal/factual basis on which K11-17 was admitted on November 20, 2023, and on which the Court entered on March 13, 2024, an ORDER FOR DISCOVERY PLAN (CASE NO. 24-1417:APPENDIX-0135).

However, if Petitioner had intended on filing a petition for mandamus, which he did not, he would have, as he had done before, filed it in a superior court, that being either the U.S.C.A. for the 4th Circuit or the Supreme Court of the United States, and not an equal court. In fact, it was Respondent who attempted to usurp the power of the equally powerful E.D.N.C. by threatening Petitioner with contempt if he did not dismiss K11-17.

Do the errors of fact and law within the Court's discussion and conclusion constitute harmful reversible error?

The district court's sua ponte dismissal was premised on its mischaracterization of the Complaint as being a petition for mandamus. There exists within the Complaint no elements of mandamus, and even if there did, which there do not, the correct course of action would have been to dismiss the Complaint without prejudice and with permission to amend, and not to dismiss with prejudice, knowing that a dismissal with prejudice is entirely contradictory to the Court's

November 20, 2024, admittance of K11-17 and the March 13, 2024, ORDER FOR DISCOVERY SCHEDULE in K11-17.

The Respondent has admitted to a series of felonies (CASE NO. 24-1417:APPENDIX-0146 TO 0149 + 0212 TO 0213) and the law prohibits the district court from attempting to conceal an examination of these felonies, an examination that is indisputably in the public interest. As of today, the Respondent continues to adjudicate cases in the Southern District of New York, cases that continue to be integrated into the 'fabric' of American jurisprudence.

The doctrine of 'Fraud on the Court' holds that every case that incorporates a preceding 'Fraud on the Court' does render itself a 'Fraud on the Court'. The principle of precedent is not without restraint and is principle eventually overridden by the cumulative wrongness of a persistent injustice. Petitioner Kaul has continued to be injured in his life/liberty/property/reputation since at least 2012, and continues to incur ongoing/"new" injuries that continue, under the law, to establish nationwide jurisdiction and standing to continue to bring new claims until the injuries to his life/liberty/property/reputation are remediated/rectified/compensated and new injuries are caused to cease.

Respondent's admissions of these felonies, their constituting a 'Fraud on the Court' and the filing of disciplinary complaints were submitted as exhibits with the November 20, 2023, filing of K11-17, and thus the district court knew of these facts. Respondent has never denied the facts of these felonies, nor produced any reports or findings from any disciplinary bodies negating the facts. In K11-17, each time the Defendants submitted a copy of the K11-7 September 12, 2022, purported injunction in support of their motions to dismiss, Petitioner raised these facts of felony as perpetrated by Respondent-Defendants, and neither Respondent nor Defendants denied the

facts nor submitted evidence/facts to the contrary. Respondent is guilty of charges levied in K11-18.

Further evidencing the district court's knowledge as to the fraudulence of the K11-7 September 12, 2022, purported injunction, is the fact that the district court in K11-17 entered the March 13, 2024, ORDER FOR DISCOVERY PLAN without adjudicating Defendants' motions to dismiss. The reason for this is that a denial of Defendants motions would further invalidate the K11-7 September 12, 2022, purported injunction and cause conflict between the two courts, a legitimate tension in light of the seriousness of the offenses, but a tension the district court has gone to great lengths to avoid, as evident from its April 8, 2024, opinion-order. Petitioner respectfully asserts that Respondent, a judicial officer, recognizes that Petitioner Kaul has no interest in pursuing him or further injuring his interests, but only in holding accountable those who caused and or perpetuated the twelve-years-plus (12+) injuries to Petitioner's life/liberty/property/reputation. Petitioner simply seeks Respondent cease any interference in the litigation and recognize that the extremely limited scope of his purported injunction (CASE NO. 24-1417:APPENDIX-0151 TO 0155), restrains his jurisdiction to the S.D.N.Y.

Similarly, the district court knows a grant of the motions would cause its implication in the 'Fraud on the Court' violations of the September 12, 2022, purported injunction and would not prevent Petitioner from filing new actions based on un-remediated/un-rectified/un-compensated ongoing/"new" injuries, in any one of the other ninety-three (93) district courts in the United States, as the exact injunction wording pertains to lawsuits filed "before" September 12, 2022, and cases related not the 2014 NJ revocation but to the 2019 "denial" of Petitioner's application to have his NJ license reinstated. The district court recognizes that eventually a district court will either order the case to trial or enter judgment against Defendants, as

Respondent's conflicted position permanently precludes him from any involvement in any case with any connection to Petitioner, a preclusion which permanently nullifies his K11-7 September 12, 2022, purported injunction with a res judicata-like effect, thus exposing Defendants' counsel to sanctions for the submission of the knowingly fraudulent legal instrument of Respondent's September 12, 2022 purported injunction.

The Court's characterization of the declaratory and injunctive relief sought within the Complaint as being that pursuant to an All-Writs Act, 28 U.S.C. Section 1651(a) request for mandamus seeking to cause Respondent **"to refrain from enforcing the nationwide filing injunction against him."** is not only an erroneous characterization of the relief sought, but does inadvertently, through the use of the preventative term **"refrain from enforcing"**, ally itself with the nature of declaratory/injunctive relief, that being of preventing a threatened injury, irreparable harm and or protecting a right or enforcing a right. For the term to be one of enforcement, would require that the operative verb be one of enforcement, and it is not, as it is one of prevention. However, even if the Court had made the operative verb one of enforcement, it would at most, if at all, substantiated a denial of only Point 11 of the 'DECLARATIONS AND INJUNCTIVE RELIEF' (D.E. 1 Page 30 of 31), and would not have substantiated a dismissal with prejudice of the entire case. The district court's statements and sub-conclusions of **"Plaintiff appears to seek mandamus relief under the All-Writs Act ... mandamus relief has the unfortunate consequence of making a district court judge a litigant ... "But he [Petitioner Kau] cannot plausibly demonstrate that mandamus relief is warranted ... It is well settled that mandamus may not be used as a substitute for appeal ... To be entitled to a writ of mandamus ... Plaintiff cannot plausibly demonstrate a "clear and indisputable" right to the requested mandamus relief ... that he had no other adequate remedy besides**

mandamus relief ... “ are without substantiation, as mandamus relief is not requested, as if it were, the Complaint would resemble mandamus petitions previously filed by Petitioner within the United States District Court and it does not (CASE NO. 24-1417:APPENDIX-0215 TO 0217). The district court’s repetition of the word “**mandamus**” does not convert a Complaint that plainly seeks declaratory/injunctive relief into one seeking mandamus, and moreover mandamus, by its very definition and historical origins in the British Monarchy, can only be issued from a superior to inferior authority, and not to one of equal authority, a fact of which Petitioner is aware as evidenced by his prior petitions within the United States District Court. However, the doctrine of ‘Fraud on the Court’, in permitting the filing of the same case in the same or different court, but noting however that K11-17/K11-18 are factually distinct to K11-7, does in effect cause a nullification-striking of the prior case [K11-7] which is what the district court did with the K11-17 November 20, 2023, filing and March 13, 2024, ORDER FOR DISCOVERY PLAN. The district court in K11-17 did not deem these effective nullifications-strikes as a self-imposed mandamus on either November 20, 2023, or March 13, 2024. Thus, it has precluded itself from now characterizing Petitioner’s K11-18 Complaint as a request for mandamus, as K11-18 simply seeks to have the district court remain consistent with its prior actions in K11-17, particularly in light of the fact that between the November 20, 2023, filing of K11-17 and the May 3, 2024, order vacating the March 13, 2024, ORDER FOR DISCOVERY PLAN, there have emerged no new facts or law that would substantiate the May 3, 2024, order.

Did the Court commit reversible harmful error in failing to find all the proper facts?

The district court’s recitation of fact omits the corpus of fact contained with the November 20, 2023, Complaint in K11-17 that unequivocally substantiates that the K11-7 September 12, 2022,

purported injunction was/is a 'Fraud on the Court'. In fact, it was this body of fact, contained principally within the Complaint and Exhibit 14, that caused the district court to recognize that the K11-7 September 12, 2022, purported injunction was a 'Fraud on the Court; which is why it advanced K11-17 and why on March 13, 2023, it entered an 'ORDER OF DISCOVERY PLAN'. Thus, the district court's knowingly erroneous recitation (K11-18: D.E. 7) in K11-18 of the K11-7 September 12, 2022, purported injunction as being a valid legal instrument, involves a material and erroneous omission of fact relevant to a proper analysis of the facts, which would necessarily involve citing those that formed the basis for the K11-17 March 13, 2024 'ORDER FOR DISCOVERY PLAN'. This order was a clear rejection of Respondent's September 12, 2022, purported injunction, which is why on March 15, 2024, Respondent filed a purported order in K11-7 threatening to hold Petitioner in contempt if he did not dismiss K11-17 by March 29, 2024.

The law permits a court to take judicial notice of facts from related cases in order to facilitate a proper determination of the presented issues and or questions. Within K11-17, a case pending before the United States District Court for the Eastern District of North Carolina, the Defendants brought to the attention of the district court, the existence of The Kaul Cases and the within admitted facts. On May 15, 2024, Petitioner Kaul did request the U.S.C.A. for the 4th Circuit take judicial notice of these admitted facts (USCA4 Appeal: 24-1417 Doc: 4-1 to 4-9 Page 1 to 303 of 303). These admitted facts were excluded from the district court's April 8, 2024, ORDER in K11-18, as their inclusion, even under the erroneously cited mandamus related legal standards, would cause an entry of an order substantiating a grant of the declaratory and injunctive relief sought in the March 25, 2024, Complaint in K11-18.

Does the Court's erroneous/illogical analysis within the 'DISCUSSION' section regarding fact and law constitute a harmful and reversible error?

The cases on which the district court relies were either nullified in K11-7 or are differentiated in this brief, as to render them irrelevant to the Court's April 8, 2024, opinion/order. The district court's analysis and Petitioner's response are as below:

(i) Petitioner requests the district court to order Respondent to "refrain from enforcing the nationwide filing injunction against him."

Petitioner Kaul actually requests the eleven (11) forms of declaratory/injunctive relief identified in the Complaint (D.E. 1 Page 29 to 30 of 31). Neither the word 'enforcing' not any of its derivatives or synonyms are used by Petitioner Kaul, and point 11 pertains to the proper striking from the K11-17 record of the admitted/proven 'Fraud on the Court' and structural error of the September 12, 2022, purported injunction in K11-7. Respondent is free to continue the fraud against his own docket, the S.D.N.Y., and the 2nd Circuit, but will eventually be obliged to deal with the consequences of these knowing offenses. This Court knows that the K11-7 September 12, 2022, purported injunction is a fraud, because it admitted K11-17 on November 20, 2023, and on March 13, 2023, it entered an ORDER FOR DISCOVERY PLAN with full knowledge of these facts.

(ii) the request is a "drastic one" only to be used in "extraordinary" circumstances." Allied Chem. Corp. v. Daiflon, Inc., 449 U.S. 33, 34 (1980)

Drastic is defined as "likely to have a strong or far-reaching effect" and "extraordinary" is defined as "very unusual or remarkable". The district court has not explained how any of the eleven (11) points of relief are anything but consistent with the doctrine of 'Fraud on the Court' and its remedial justice-purposed measures of nullification and re-trial. In the context of this case

“drastic” will indeed have a beneficial and lawful “far reaching effect” in that it will oppose the ongoing/”new” injuries continuing to be committed against Petitioner’s life/liberty/property/reputation by The Kaul Cases Defendants, and will prevent (injunctive) any future violations/injuries. As to the “extraordinary” standard, whether viewed through mandamus or declaratory-injunctive relief, it is indisputable that Respondent’s conversion of his bench into a “racketeering enterprise” is “extraordinary” and indeed no district judge in the S.D.N.Y. has submitted a statement/affidavit attesting that “racketeering” within the S.D.N.Y. is widespread, ordinary and or the normal course of court business. Petitioner respectfully surmises that the district court’s attempt to illogically frame Petitioner’s Complaint as a request for mandamus, particularly in light of the fact it admitted K11-17 on November 20, 2023, and advanced it into discovery on March 13, 2024, is founded on a righteous interest to see justice done and adjudicate K11-17 absent the threats/pressure/bullying Defendants illegally exerted on prior district judges.

(iii) the request would convert a district court judge into a “litigant” –

The district court’s reliance on Allied for the proposition that mandamus causes the district judge to become “litigant” is misplaced as Petitioner’s Complaint does not seek mandamus, but simply declaratory-injunctive relief consistent with the case law created by the district court, in regard to Respondent’s purported injunction, of which this district court had direct knowledge on November 20, 2023, and of which it prior actions effectively rendered null/void in the U.S.C.A. for the 4th Circuit. Petitioner’s Complaint does not, as was the case in Allied, convert the district judge in the E.D.N.C. into a “litigant” as the Complaint is directed at Respondent, who sits in the U.S.C.A. for the 2nd Circuit, and who has remained an adversary with Petitioner since October 2022, subsequent to Petitioner’s complaints to the state bar and Judicial Disciplinary

Council. However, despite Respondent's knowledge of these conflicts he did, no doubt under threats/pressure/bullying from Defendants, further violate his code of judicial conduct by entering a knowingly illegal order on March 15, 2024 (USCA4 Appeal: 24-1417 Doc: 4-8 Page 246 to 247 of 303) against the Petitioner with whom he knew he was conflicted, an order that threatened to hold Petitioner in contempt if he did not dismiss K11-17 by March 29, 2024. These acts constitute an "ongoing pattern of racketeering" within the S.D.N.Y. that deserves to be criminally investigated. The only explanation as to why Respondent would expose himself to such immense civil/criminal liability is that Defendants, in their own state of desperation, threatened to have Respondent and his relations to the third-degree criminally investigated. This is a mafia-type tactic that used frequently by Defendant Christie against his political opponents while he was the US Attorney (2001-2009) and NJ Governor (2009-2017). Petitioner respectfully asserts that his Complaint, other than seeking the stated relief, did intend to actually protect the jurisdiction of the E.D.N.C. against Respondent's illegal violation. It also seeks to prevent the setting of a precedent whereby nationwide injunctions would become tyrannical tools of immense and unconstitutional oppression used against private litigants by judges with corrupt personal agendas and or motivations, and or who find themselves entangled in highly compromised personal-professional quagmires.

(iv) the request would result in "piecemeal" post-judgment litigation –

The district court's reliance on Allied for the proposition that mandamus would cause a fragmentation of the litigation process is misplaced, in that Petitioner's Complaint does not seek mandamus, but simply relief consistent with the law of the case. But even if the Complaint did seek mandamus, which it does not nor ever could, as Respondent is not an inferior entity to the E.D.N.C., the mandamus is directed not at the E.D.N.C., but at the S.D.N.Y., and would in

actuality, cause the K11-17 litigation to efficiently advance in a manner unimpeded by Respondent's illegal scheme of interference, and would signal to recalcitrant litigants that non-cooperation with court orders would result in judgment or dismissal. For example, the district judge in the E.D.N.C. could simply have permitted Respondent to enter the case, make his case and then grant Petitioner's relief, in order that K11-17 could proceed according to the law of the case. It would also have had the effect in K11-17 of efficiently curtailing the Defendants/Counsel's blatant misconduct and illegitimate disregard for the Court's authority, a disregard not un-witnessed by state bars and disciplinary bodies.

(v) the "extraordinary" request is only warranted in "exceptional circumstances" in which there is a usurpation of judicial authority and or power

Petitioner's Complaint seeks declaratory-injunctive relief, not mandamus, and thus the district court's "extraordinary ... exceptional circumstances" proposition is inapplicable. However, if Petitioner did seek mandamus, the admitted facts of The Kaul Cases (USCA4 Appeal: 24-1417 Page 1 to 303 of 303) do exceed the "extraordinary ... exceptional circumstances" standards, as there exists not another case in the entire body of American jurisprudence that approximates the fact pattern of that in The Kaul Cases, including K11-18, and in eight (8) years The Kaul Cases Defendants have produced not one.

(vi) Petitioner claims that Respondent's attempt to enforce his purported injunction in the U.S.C.A. for the 4th Circuit constitutes "exceptional circumstances" tantamount to a "usurpation" of judicial power and that this warrants mandamus

Petitioner's Complaint seeks declaratory-injunctive relief, not mandamus, and thus the district court's "exceptional circumstances ... usurpation" proposition is inapplicable. However, even if Petitioner were seeking mandamus, which he is not, these standards are satisfied by the fact

that admitted facts of **The Kaul Cases**, including K11-18 are indeed “**exceptional**”, a word defined in the Oxford English Dictionary as being “**unusual; not typical**”. The fact pattern of **The Kaul Cases** or of any fact pattern that approximates it, is found nowhere else in the entire body of American jurisprudence, and substantiates an “**unprecedented/illegal abuse of power by Defendant, a district judge ... who seeks to enforce his judicial will on the entirety of the federal judiciary.**” (K11-18: D.E. 1 Page 8 of 31 Para. 1).

(vii) Petitioner cannot plausibly establish the factual elements necessary to warrant mandamus Petitioner’s Complaint seeks declaratory-injunctive relief, not mandamus, and thus the district court’s “**cannot plausibly demonstrate that mandamus relief is warranted**” proposition is inapplicable. However, if Petitioner were seeking mandamus, the “**exceptional ... extraordinary**” facts of the case and the lack of any other adequate remedy would substantiate mandamus, for Respondent, in illegally seeking to force Petitioner to dismiss K11-17 under threat of contempt, would deprive Petitioner of remediation through the appellate process, as voluntary dismissals, by their very nature, are unappealable. Respondent’s extortionary-like tactic was part of the “**ongoing pattern of racketeering**”. Respondent has permitted himself to become a racketeer, as did U.S.D.J. Edward Thomas Manton of the S.D.N.Y.

https://en.wikipedia.org/wiki/Martin_Thomas_Manton

(viii) Petitioner has absolutely no right to the issuance from this Court of a mandamus to Respondent compelling him not to enforce his purported injunction, because Respondent afforded Petitioner “appropriate process” and “thoroughly analyzed why the injunction was necessary to prevent Plaintiff from engaging in “further vexatious litigation” based on the denial of his medical license ...” and because it was within Respondent’s discretion to “restrict” Petitioner’s “future ability to sue”, Petitioner became deprived of any mandamus

derived “clear and indisputable” right to sue for any ongoing/”new” injuries to his life/liberty/property and or reputation

Petitioner’s Complaint seeks declaratory/injunctive relief and not mandamus, and thus the district court’ **“appropriate process”** proposition is inapplicable. However, if mandamus were sought, it would be because Respondent engaged in judicial corruption and violated Petitioner’s right to due process by failing to analyze, as the district court knows (CASE NO. 24-1417:APPENDIX-0171 to 0182), any of Petitioner’s reply arguments as to the absence of any factual or legal basis for an injunction, and because of the fact of the admitted facts of **The Kaul Cases** and because of the fact that throughout **The Kaul Cases** the Defendants corruptly interfered and illegally obstructed discovery and or trial.

The district court’s **“thoroughly analyzed”** claim is made with the knowledge that there was no analysis of the law and arguments submitted by Petitioner, which is why the district court admitted K11-17 on November 20, 2023, and did enter on March 13, 2024, an ORDER FOR DISCOVERY SCHEDULE. The district court’s inconsistency constitutes a knowing error, as there exists no change in facts or law between the March 13, 2024, ORDER FOR DISCOVERY PLAN and May 3, 2024, order vacating the ORDER that would substantiate the district court violating its own law.

(ix) Because Petitioner failed to appeal Respondent’s injunction to the U.S.C.A. for the 2nd Circuit, he is foreclosed from arguing that he has no other adequate remedy other than mandamus to contest Respondent’s violation of his judicially validated rights in the U.S.C.A. for the 4th Circuit, and is foreclosed from “collaterally” attacking the “validity of the filing injunction” through suit in the United States District Court for the Eastern District of North Carolina.

Petitioner's Complaint seeks declaratory/injunctive relief and not mandamus, and thus the district court's "no other adequate remedy" proposition is inapplicable. However, even if mandamus were sought, it would be substantiated on the basis of "no other adequate remedy". An explanation of why this is the case, requires first of all a clarification of the illogicality of the district court's April 8, 2024, opinion-order. The district court is effectively saying that because in September 2022 in K11-17 in the S.D.N.Y., the Petitioner chose not to appeal the Respondent's March 15, 2024, order of interference/violation of Petitioner's litigation rights in K11-17 in the E.D.N.C. that therefore he is foreclosed from filing suit on March 25, 2024, for Respondent's March 15, 2024, interference/violations. Or put otherwise, because Petitioner failed in 2022 to contest an unknown future event, he is foreclosed from contesting that event in 2024 when it comes into existence and becomes known to Petitioner. This strain of Kafka-esque logic has permeated The Kaul Cases with the purpose of attempting to obfuscate the guilt of The Kaul Cases Defendants, a guilt, the admitted facts of which are on plain sight ((USCA4 Appeal: 24-1417 Page 1 to 303 of 303)).

The issue in 2022 was an appeal of Respondent's September 12, 2022, purported order-injunction, while the issue in 2024 is Respondent's interference/violation of Petitioner's litigation rights in K11-17 in the E.D.N.C. Thus, Petitioner's March 25, 2024, suit against Respondent is not a collateral attack on Respondent's September 12, 2022, purported order-injunction in the S.D.N.Y., but is a direct attack on Respondent's March 15, 2024, interference/violation of Petitioner's litigation rights in K11-17 in the E.D.N.C. It is a different battle, just as the Battle of Bunker Hill (June 17, 1775-British victory-Massachusetts) was a different battle to that of the Siege of Yorktown (October 19, 1781-Franco-Patriot victory-Virginia).

As to the “**validity of the filing injunction**”, Respondent admitted to its invalidity in 2022 (CASE NO. 24-1417:APPENDIX-0212 to 0213), Petitioner further proved its invalidity in 2022 (CASE NO. 24-1417:APPENDIX-0220 to 0245) and this Court validated its invalidity on November 20, 2023, and on March 13, 2024, and thus there was nothing left for Petitioner to attack. Petitioner’s attack was on Respondent’s March 15, 2024, interference/violation of Petitioner’s litigation rights in K11-17 in the E.D.N.C. It was and is the K11-17 Defendants who have clung and clinged to the remnants of Respondent’s purported injunction. However, most conspicuous in its ongoing absence is any refutation/contestation/analysis/rebuttal by any person of the fact that Respondent’s K11-7 September 12, 2022, purported order-injunction was and is a ‘Fraud on the Court’. In fact, the district court’s silence on the fact buttresses its November 20, 2023, and March 13, 2023, actions that effectively admit the fact of the ‘Fraud on the Court’ of Respondent’s K11-7 September 12, 2022, purported order-injunction.

RELIEF REQUESTED

1. Petitioner Kaul respectfully requests the Court Issue an order to the district court as to facts within K11-17 with a direct connection to the issues on appeal, that causes the district court to vacate in K11-17 its May 3, 2024, ORDER (D.E. 107) vacating its March 13, 2024, ORDER FOR DISCOVERY PLAN.

2. Petitioner Kaul respectfully requests the Court issue an order to the district court as to facts within K11-17 with a direct connection to the issues on appeal, that causes the district court to reinstate in K11-17 its March 13, 2024, ORDER FOR DISCOVERY PLAN (D.E. 65).

3. Petitioner Kaul respectfully requests this Court hold that the restricted jurisdictional limits of the September 12, 2022, purported injunction in K11-7 is established by the exact wording set forth in the document, a fact clarified by Petitioner on April 12, 2024, as per CASE NO. 24-1417:APPENDIX-0184 TO 0187 and a fact not denied and thus admitted by K11-17 Defendants.

4. Petitioner Kaul respectfully requests this Court, in light of all the admitted facts of The Kaul Cases (USCA4 Appeal: 24-1417 Doc: 4-1 to 4-9 Page 1 to 303 of 303) provide any and all relief it believes is equitable, will serve the interests of justice and will enlighten Defendants as to future proceedings in K11-17.

PRIOR APPEALS

Petitioner has filed no prior appeals in this Court.

Petitioner certifies under penalty of perjury that the above statements are true and accurate to the best of his knowledge.

DATED: MAY 25, 2024



RICHARD ARJUN KAUL, MD

CASE NO. 24-1417

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

**RICHARD ARJUN KAUL, MD
PETITIONER**

**ON APPEAL FROM
EASTERN DISTRICT OF NORTH CAROLINA**

RICHARD KAUL v. JAMES OETKEN

CERTIFICATE OF SERVICE

I, RICHARD ARJUN KAUL, the Petitioner in the above matter do certify that on May 25, 2024, I did send a copy of the within **INFORMAL OPENING BRIEF** to Respondent **JAMES OETKEN** via FedEx.

And that on May 25, 2024, a copy of the **INFORMAL OPENING BRIEF** was sent via **FEDEX** to **PETER MOORE, JR**, the Clerk of the Court for the United States District Court for the Eastern District of North Carolina.

And that on May 25, 2024, a copy of the INFORMAL OPENING BRIEF was emailed to counsel for Defendants in the matter of RICHARD ARJUN KAUL v. CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS: 23-CV-00672-M-KS, a related case pending in the U.S.D.C. for the E.D.N.C.

DATED: MAY 25, 2024



RICHARD ARJUN KAUL, MD

Exhibit 10

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:23-cv-00672-M-KS

RICHARD ARJUN KAUL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
CENTER FOR PERSONALIZED EDUCATION)	
FOR PHYSICIANS, et al.,)	
)	
Defendants.)	
)	

ORDER

This matter comes before the court on the motions to dismiss filed by Defendants Christopher J. Christie (“Christie”) and James Howard Solomon (“Solomon”) [DE 17]; Allstate Insurance Company (“Allstate”) [DE 36]; Federation of State Medical Boards of the United States, Inc. (the “Federation”) [DE 43]; Richard F. Heary (“Heary”) [DE 48]; Center for Personalized Education for Physicians (“CPEP”) [DE 58]; and Daniel Stolz (“Stolz”) [DE 64]. Plaintiff has filed pro se responses to each of the pending motions. *See* DE 31, 51, 56, 61, 67, 84. For the following reasons, the motions are granted.

I. Factual and Procedural Background

Plaintiff alleges that, more than a decade ago, he pioneered “the first outpatient minimally invasive spinal fusion” procedure, which “revolutionized the field of spine surgery” and “immensely benefitted” the public. DE 1 ¶¶ 15, 30. He was later reported to the state licensing authority for performing his spinal fusion procedure, resulting in the revocation of his New Jersey medical license in 2014. *Id.* ¶ 135. The New Jersey State Board of Medical Examiners found that “his performance of spine surgeries on 11 patients without proper training and experience constituted gross and repeated malpractice, negligence, and incompetence.” *Kaul v. Christie*, 372

F. Supp. 3d 206, 215 (D.N.J. 2019). However, according to Plaintiff, the revocation allegedly resulted from a vast bribery and racketeering scheme involving numerous medical professionals, lawyers, government officials, and insurance companies. *Id.* ¶¶ 146–162. Since the revocation, Plaintiff has instituted approximately sixteen prior actions seeking monetary and injunctive relief, including the reinstatement of his medical license. *Id.* at 9.

Based on his filing history, on September 12, 2022, United States District Judge J. Paul Oetken enjoined Plaintiff from suing the defendants in *Kaul v. Intercontinental Exchange* (“*Kaul 2021*”) in any federal district court for claims relating to or arising from “(i) the denial of his medical license; (ii) subsequent litigation proceedings initiated by the Defendants [t]here before the date of this Order; (iii) subsequent litigation proceedings initiated by Plaintiff Kaul before the date of this Order; without first obtaining leave from this Court.” *See* No. 21-CV-6992, 2022 WL 4133427, at *9 (S.D.N.Y. Sept. 12, 2022). Judge Oetken warned that, if Plaintiff violates the order, “any request will be denied for failure to comply with this Opinion and Order, and [he] may be subject to sanctions, including monetary penalties or contempt.” *Id.*

After entry of the filing injunction, Plaintiff filed suit in this district. *See* DE 1. The complaint in this case is 132 pages and appears to allege fifteen claims arising under the Racketeer Influence Corrupt Organizations Act (“RICO”), Section 1983 of Title 42 of the United States Code, and the United Nations Declaration of Human Rights. It seeks monetary and injunctive relief, including the reinstatement of his New Jersey medical license. It also names several *Kaul 2021* defendants (the Federation; Allstate; Christie; Heary; and Stolz) as well as other defendants who were unnamed in the previous suit (CPEP and Solomon). *See id.* at 131.

On January 11, 2024, Defendants Christie and Solomon moved to dismiss the complaint. DE 17. Defendants Allstate, Federation, Heary, and CPEP have also moved for dismissal. DE 36,

43, 48, 58. On March 13, 2024, Defendant Stolz joined the pending motions. DE 64. Plaintiff filed pro se responses to each motion. DE 31, 51, 56, 61, 67, 84.

On March 15, 2024, Judge Oetken issued an order confirming that Plaintiff had not sought permission to institute this action and thus has violated the filing injunction. *See* DE 173 at 2, *Kaul* 2021, No. 1:21-cv-6992. Judge Oetken denied Plaintiff permission to file or pursue this action against the defendants named in *Kaul* 2021 and ordered Plaintiff “to withdraw the EDNC action as to those defendants within 14 days of the date of this order. If he fails to do so, he may be subject to monetary sanctions and contempt.” *Id.* To date, Plaintiff has not voluntarily withdrawn any affected claims. The motions are ripe for disposition.

II. Discussion

A. Rule 8

CPEP and Soloman argue that Plaintiff has failed to comply with Rule 8 of the Federal Rules of Civil Procedure and “leave to amend would be futile because Plaintiff has had multiple opportunities in various jurisdiction to amend his allegations and has perpetually failed to meet the Rule 8 requirements.” *See* DE 18 at 4–5; DE 59 at 4–5 (“Kaul’s recycled contentions have been repeatedly dismissed in courts across the United States because they do not plead a claim for relief.”).

Kaul responds that “Defendants have not specifically described their misunderstanding” to portions of the complaint. DE 31 at 8. He contends that they “know and understand the exact meaning of these statements pertains to the insurance industry’s over four hundred (400) year-long profit-purposed ‘pattern of racketeering’ that commenced with the trans-Atlantic slaving genocide, progressed to insuring the Nazi’s execution gas chambers/human incinerators to the current asset seizing/trafficking on masse of ethnic minority physicians into for-profit American jails to the profiting from investing/funding/financing forced mass vaccination programs.” *Id.* at 8–9

(emphasis omitted). He asserts that he does not need to amend the complaint, but if the court finds otherwise, he will correct any specific deficiencies identified for him. *Id.* at 9.

Federal Rule of Civil Procedure 8(a)(2) requires a plaintiff to set forth “a short and plain statement of the claim showing that” the plaintiff is entitled to relief. Fed. R. Civ. P. 8(a)(2). The pleading requirement is violated when a complaint is replete with “vague ramblings and nonsensical claims” that defendants must attempt to decipher the “incomprehensible” to defend themselves. *El-Bey v. North Carolina*, 2014 WL 691580, at *2 (M.D.N.C. Feb. 21, 2014). Failure to satisfy the pleading requirement after having fair notice of the specific defects in a complaint and a meaningful chance to fix them is grounds for dismissal. *Dillard v. Perry*, 2019 WL 1244701, at *5 (E.D.N.C. Mar. 18, 2019). The opportunity to amend is not required when the effort would be futile. *See Arroyo v. Zamora*, 2018 WL 1413195, at *5 (W.D.N.C. Mar. 21, 2018).

Pro se pleadings are “to be liberally construed.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (quoting *Estelle v. Gamble*, 429 U.S. 97 (1976)). “Principles requiring generous construction of pro se complaints are not, however, without limits.” *Beaudett v. City of Hampton*, 775 F.2d 1274, 1278 (4th Cir. 1985). “Every party—pro se or otherwise—must comply with the Federal Rules of Civil Procedure.” *Tagirova v. Elizabeth City State Univ.*, 2017 WL 4019516, at *4 (E.D.N.C. Sept. 11, 2017).

As CPEP and Solomon correctly point out, the complaint in this case is neither “short” nor “plain.” It is 132 pages of vague and/or conclusory allegations, accompanied by 567 pages of exhibits. The complaint, like the complaints supporting Plaintiff’s previous litigations, depends on “bizarre, far-fetched” claims “reliant on flawed premises” and “spurious comparisons between the insurance industry, on the one hand, and Nazi Germany and slavery, on the other, and difficult-to-

follow references to Mr. Kaul's other pending litigations (and related documents)." *Kaul v. Boston Partners, Inc.*, 2021 WL 3272216, at *3 (D. Mass. July 30, 2021).

Leave to amend would be futile in this case. Plaintiff maintains in essence that he will not amend his complaint to comply with Rule 8 unless specific deficiencies are identified in his complaint. *See* DE 31 at 9. "District judges have no obligation to act as counsel or paralegal to pro se litigants." *Pliler v. Ford*, 542 U.S. 225, 231 (2004). Moreover, Plaintiff has had several prior chances in his other litigations to amend his recycled allegations to state a short, plain, and plausible claim to relief, yet those other litigations "have [never] resulted in any relief for [him]." *See Kaul 2021*, 2022 WL 4133427, at *1–2. Based on the record as a whole, his filing history, and the assertions in his response, dismissal with prejudice under Fed. R. Civ. P. 8(a)(2) is appropriate.

B. Filing Injunction

The Federation, Allstate, Christie, Heary, and Stolz argue that dismissal with prejudice is also appropriate because Plaintiff has violated the filing injunction entered against him in *Kaul 2021*. *See, e.g.*, DE 18 at 2–4; DE 37 at 11–13; DE 44 at 2–5; DE 49 at 4–7. Plaintiff responds that the injunction, like all nationwide injunctions, "are heavily disfavored" and that the injunction was a product of "Fraud on the Court" and judicial corruption. *See, e.g.*, DE 31 at 4–7; DE 51 at 25–29; DE 56 at 3–6; DE 61 at 25–26.

The filing injunction enjoined Plaintiff from suing the above-named Defendants (Federation, Allstate, Christie, Heary, and Stolz) in any federal district court for claims relating to or arising from "the denial of his medical license . . . without first obtaining leave from this Court." *See Kaul 2021*, 2022 WL 4133427, at *9. Plaintiff did not appeal, and no court has invalidated, the filing injunction. Thus, the filing injunction remains in full effect. *See* DE 173 at 2, *Kaul 2021*, No. 1:21-cv-6992 (enforcing filing injunction).

There is no genuine dispute regarding whether Plaintiff has violated the injunction by filing the pending claims against the above-named Defendants. Plaintiff has again sued the above-named Defendants with allegations that they conspired “to make an example of him and cause public officials to bar him from practicing medicine in New Jersey,” in violation of federal and international law. *See, e.g., Kaul v. Intercontinental Exch.*, No. 23-cv-02016, 2023 WL 3346769, at *1 (S.D.N.Y. May 10, 2023); DE 1 ¶¶ 14, 45, 110, 135, 137, 141–144 (alleging private and public corruption stemming from the denial of his New Jersey medical license and seeking monetary and injunctive relief, including the reinstatement of his medical license). He has not sought permission to file the instant claims against the above-named Defendants. *See* DE 173 at 2, *Kaul* 2021, No. 1:21-cv-6992 (confirming violation of filing injunction). “Dismissal of a complaint with prejudice is an appropriate means to enforce violations of such injunctions.” *Kaul v. Fed’n State Med. Bds. – Fla. Bd. of Med.* (S.D. Fla. Aug. 22, 2023) (quoting *Martin-Trigona v. Shaw*, 986 F.2d 1284, 1388 (11th Cir. 1993)).

III. Conclusion

For the foregoing reasons, the court GRANTS Defendants’ motions [DE 17, 36, 43, 48, 58, 64] and DISMISSES Plaintiff’s complaint with prejudice.

The clerk of court is DIRECTED to close this case.

SO ORDERED this 14th day of June, 2024.

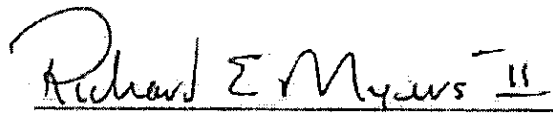

RICHARD E. MYERS II
CHIEF UNITED STATES DISTRICT JUDGE

Exhibit 11

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:23-CV-00672-M-KS

RICHARD ARJUN KAUL,

Plaintiff,

v.

CENTER FOR PERSONALIZED
EDUCATION FOR PHYSICIANS, et al.,

Defendants.

)
)
) **NOTICE OF ORDER BY THE**
) **UNITED STATES DISTRICT COURT**
) **FOR THE SOUTHERN DISTRICT OF**
) **NEW YORK REQUIRING PLAINTIFF**
) **TO WITHDRAW HIS CLAIMS**
) **AGAINST DEFENDANT CHRISTIE**
) **IN THIS ACTION**
)

NOW COME Defendants James Howard Solomon and Christopher J. Christie and respectfully submit the following Order, filed by Judge J. Paul Oetken of the Southern District of New York in *M.D. Richard Arjun Kaul, et al., v. Intercontinental Exchange, et al, 21-cv-6992* (S.D.N.Y. March 15, 2024), ruling that Plaintiff is in violation of a nationwide filing injunction imposed by that court in 2022, and specifically ordering that Plaintiff withdraw his claims against Defendant Christie in this Action within 14 days of the Order.

A copy of the Order is attached as Exhibit A.

Date: March 18, 2024.

Respectfully submitted,

ELLIS & WINTERS LLP

/s/ Leslie C. Packer
Leslie C. Packer
N.C. State Bar No. 13640
P.O. Box 33550
Raleigh, NC 27636
Telephone: 919-865-7009
Facsimile: 919-865-7010
E-mail: leslie.packer@elliswinters.com

*Counsel for Defendants James Howard
Solomon and Christopher J. Christie*

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2024, a copy of the foregoing filing was filed electronically through the ECF system. Notice and copies of this filing will be sent to the ECF registered parties through the Court's Electronic Case Filing System and has also been emailed to

Richard Arjun Kaul
24 Washington Valley Road
Morristown, NJ 07960
drrichardkaul@gmail.com

/s/ Leslie C. Packer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

M.D. RICHARD ARJUN KAUL, *et al.*
Plaintiffs,

-v-

INTERCONTINENTAL EXCHANGE, *et al.*
Defendants.

21-CV-6992 (JPO)

ORDER

J. PAUL OETKEN, District Judge:

On September 12, 2022, this Court issued an order imposing a nationwide filing injunction against Plaintiff Richard Arjun Kaul, following his filing of multiple frivolous and vexatious lawsuits against numerous defendants in this Court and other courts. *See Kaul v. Intercontinental Exchange*, No. 21-CV-6992, 2022 WL 4133427, at *8-9 (S.D.N.Y. Sept. 12, 2022). Specifically, that order barred Kaul from “filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or arises from . . . the denial of his medical license . . . without first obtaining leave from this Court.” *Id.* at *9. The order further provided that if Kaul violated the order by filing such materials without first obtaining leave of this Court, “any request will be denied for failure to comply with this Opinion and Order, and Plaintiff Kaul may be subject to sanctions . . .” *Id.*

Kaul did not file an appeal from this Court’s September 12, 2022 order.

The Court has learned that Kaul has filed suit in the United States District Court for the Eastern District of North Carolina alleging wrongdoing against several defendants in connection with the revocation of his medical license. *Kaul v. Center for Professional Education for Physicians, et al.*, No. 5:23-CV-672 (E.D.N.C.) (“the EDNC action”). That lawsuit names


**Defendant
Exhibit A**

certain individuals who were also defendants in this action, including Christopher Christie and Dr. Robert Heary. Kaul did not obtain permission from this Court prior to filing the EDNC action. He is therefore in violation of this Court's filing injunction.

Accordingly, Kaul is hereby DENIED permission to file or pursue the EDNC action as to defendants Christie, Heary, and any other defendants who were named in this action. Kaul is further ORDERED to withdraw the EDNC action as to those defendants within 14 days of the date of this order. If he fails to do so, he may be subject to monetary sanctions and contempt.

SO ORDERED.

Dated: March 15, 2024
New York, New York



J. PAUL OETKEN
United States District Judge

The Clerk of Court is directed to mail a copy of this order to:

Richard Arjun Kaul
24 Washington Valley Road
Morristown, NJ 07960

Exhibit 12

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

M.D. RICHARD ARJUN KAUL, *et al.*,
Plaintiffs,

-v-

INTERCONTINENTAL EXCHANGE, *et al.*,
Defendants.

21-CV-6992 (JPO)

OPINION AND ORDER

J. PAUL OETKEN, District Judge:

“This case is another chapter in a long saga of repetitive, frivolous lawsuits [*pro se* Plaintiff Richard Arjun] Kaul has brought against numerous defendants regarding revocation of his license to practice medicine.” *Kaul v. Fed’n of State Med. Boards*, 21-CV-57, 2021 WL 6550884, at *1 (N.D. Tex. Sept. 17, 2021), *report and recommendation adopted*, 21-CV-57, 2022 WL 171294 (N.D. Tex. Jan. 19, 2022). *Pro se* Plaintiffs Richard Arjun Kaul and David Basch sue various stock exchange holding companies (Defendant Intercontinental Exchange), banks and insurance companies (Defendants GEICO; TD Bank; Allstate Insurance Company), medical boards and medical officials (Defendants Federation State Medical Boards), New Jersey officials (Defendants Christopher J. Christie; Philip Murphy; Gurbir Grewal), health institutions and practitioners (Defendants Atlantic Health System; Robert Heary), law firms (Defendant Rivkin Radler), and lawyers (Defendants Max Gersenoﬀ; Daniel Stolz).

The amended complaint can be understood to assert claims under the Sarbanes-Oxley Act (“SOX”), the Racketeer Influence Corrupt Organizations Act (“RICO”), Section 1983, and the United Nations Declaration of Human Rights. Various defendants move to dismiss the amended complaint for failure to contain a short and plain statement of claims; for lack of personal jurisdiction; for lack of venue; and for failure to state a claim. Several defendants request that

Plaintiff Kaul be barred from filing further lawsuits against them for alleged violations arising from these facts.

For the reasons that follow, this action is dismissed for pleading failures; for lack of venue; and for failure to state a claim. Given Plaintiff Kaul's history of filing repetitive and frivolous lawsuits, the action will not be transferred. The action is dismissed with prejudice. Plaintiff Kaul is barred from filing further lawsuits against these defendants for alleged violations arising out of this set of facts.

I. Background

A. Filing History

"In March 2014, the New Jersey State Board of Medical Examiners . . . revoked [Plaintiff Richard Arjun Kaul's] medical license." *Kaul v. Christie*, 372 F. Supp. 3d 206, 215 (D.N.J. 2019). It found that "his performance of spine surgeries on 11 patients without proper training and experience constituted gross and repeated malpractice, negligence, and incompetence." *Id.* Since then, Plaintiff Kaul has filed a series of lawsuits around the country. These lawsuits generally allege that "a network of politically connected neurosurgeons wanted to make an example of him," and so "with the assistance of a cabal of lawyers, hospitals, insurance companies and media figures, they importuned public officials to banish him from the practice of medicine in New Jersey." *Id.* No lawsuits have resulted in any relief for Kaul.

Over the past decade, Plaintiff Kaul has filed four substantially similar cases in the Southern District of New York. Each has been transferred to the District of New Jersey. *See, e.g., Kaul v. Christie*, 16-CV-1346 (S.D.N.Y. Apr. 19, 2016) (Sullivan, J.) (transferring action to D.N.J.); *Kaul v. Christie*, 18-CV-3131, 2018 WL 10038784 (S.D.N.Y. Apr. 11, 2018) (McMahon, J.) (transferring action to D.N.J.); *Kaul v. Schumer*, 19-CV-3046 (S.D.N.Y. May 29, 2019) (Stanton, J.) (transferring action to D.N.J.); *Kaul v. Murphy*, 21-CV-5293 (S.D.N.Y. June

21, 2021) (Briccetti, J.) (transferring action to D.N.J.). Plaintiff has filed a case in the Northern District of Georgia alleging that New Jersey officials targeted him. That case too was transferred to the District of New Jersey. *See Patel v. Crist*, No. 19-CV-739, 2019 WL 11583344, at *1 (N.D. Ga. Apr. 2, 2019) (Brown, J.). Plaintiff has filed two cases in the District of Columbia. One was dismissed in part and otherwise transferred to the District of New Jersey. *See Kaul v. Fed'n of State Med. Boards*, No. 19-CV-3050, 2020 WL 7042821, at *1 (D.D.C. Dec. 1, 2020) (Chutkan, J.); *Kaul v. Fed'n of State Med. Boards*, No. 19-CV-3050, 2021 WL 1209211, at *1 (D.D.C. Mar. 31, 2021) (Chutkan, J.). The other was dismissed *sua sponte*. *See Kaul v. Fed'n of State Med. Boards*, No. 20-CV-1612, 2021 WL 6549978, at *1 (D.D.C. Nov. 23, 2021) (Chutkan, J.) Plaintiff has filed a case in the District of Connecticut. It too was transferred to the District of New Jersey. *See Kaul v. Murphy*, No. 21-CV-439, 2021 WL 1601149, at *2 (D. Conn. Apr. 23, 2021) (Bryant, J.). Plaintiff has filed a case in the District of Massachusetts. It was dismissed for lack of venue and transfer was refused. *See Kaul v. Bos. Partners, Inc.*, No. 21-CV-10326, 2021 WL 3272216, at *1 (D. Mass. July 30, 2021). Plaintiff has filed a case in the Northern District of Texas. It was dismissed with prejudice. *See Kaul v. Fed'n of State Med. Boards*, 21-CV-57, 2021 WL 6550884, at *1 (N.D. Tex. Sept. 17, 2021) (Ray, Jr., J.), *report and recommendation adopted*, 21-CV-57, 2022 WL 171294 (N.D. Tex. Jan. 19, 2022). Plaintiff appears to have filed a complaint in the Northern District of Illinois as well. *See Compl., Kaul v. Allstate Ins. Co.*, No. 21-CV-736 (N.D. Ill. Feb. 5, 2021), ECF No. 1.

Plaintiff Kaul has never received any relief in these cases. District courts in the District of New Jersey have dismissed some. *See, e.g., Kaul v. Christie*, 16-CV-2364, 2019 WL 920815 (D.N.J. Feb. 22, 2019) (McNulty, J.) (granting motion to dismiss); *Kaul v. Christie*, 372 F. Supp. 3d 206 (D.N.J. Feb. 25, 2019) (McNulty, J.) (granting motion to dismiss); *Kaul v. Christie*, No.

16-CV-2364, 2019 WL 13176430, at *4 (D.N.J. July 29, 2019) (Martinotti, J.) (denying motion for reconsideration); *Patel v. Crist*, No. 19-CV-9232, 2020 WL 64618, at *1 (D.N.J. Jan. 7, 2020) (Vazquez, J.) (granting motion to dismiss); *Patel v. Crist*, No. 19-CV-8946, 2020 WL 64571, at *1 (D.N.J. Jan. 7, 2020) (Vazquez, J.) (granting motion to dismiss); *Patel v. Crist*, No. 19-CV-9232, 2020 WL 6156772, at *1 (D.N.J. Oct. 20, 2020) (granting motion to dismiss); *Patel v. Crist*, No. 19-CV-8946, 2020 WL 6156751, at *1 (D.N.J. Oct. 20, 2020) (granting motion to dismiss); *Kaul v. Murphy*, No. 21-CV-13063, 2021 WL 3663873, at *1 (D.N.J. July 9, 2021) (dismissing complaint *sua sponte*). Kaul has voluntarily dismissed others. *See, e.g., Kaul v. Christie*, No. 19-1651, 2019 WL 4733531, at *1 (3d Cir. June 20, 2019) (dismissing appeal without prejudice pursuant to Fed. R. App. P. 42(b)); *Kaul v. Stein*, No. 20-3522, 2021 WL 6197149, at *1 (3d Cir. Nov. 12, 2021) (dismissing appeal pursuant to Fed. R. App. P. 42(b)); (Dkt. No. 101 at 3-4.) But Kaul continues to file lawsuits in various jurisdictions.

B. Factual Background

The amended complaint follows the pattern of Plaintiff Kaul's earlier filings. The sprawling, largely indecipherable 432-page document references a purported kidnapping; a "Slaving-Nazi-COVID-Insurance Axis"; and other conspiracies. (*See* Dkt. No. 14 ("Am. Compl.") at 9.) It identifies six specifically. First, it alleges that the New York Stock Exchange, the Securities Exchange Commission, and State of New Jersey conspired to: "(i) hav[e] Kaul's medical license revoked; (ii) eradicat[e] all debt owed to Kaul by insurance carriers (approx. \$45 million); (iii) destroy[] Kaul's reputation; (iv) eliminat[e] any future financial liability to Kaul; (v) caus[e] Kaul to enter a state of poverty/homelessness; (vi) attempt[] to cause Kaul to be jailed/deported/killed; [and] (vii) intimidat[e] other minimally invasive spine surgeons into not performing minimally invasive spine surgery, in order to divert a greater percentage of the public's insurance premiums into corporate/executive compensation." (Am. Compl. ¶ 21.)

The second is that after “Kaul’s corporations” filed for bankruptcy, Defendants Allstate and GEICO conspired with the bankruptcy trustee, Defendant Daniel Stolz, “to accept bribes from Defendants Allstate/Geico in return for not pursuing the \$45 million owed to Kaul by Defendants Allstate/Geico and others within the insurance industry.” (Am. Compl. ¶¶ 73-74.)

The third is that Defendants converted “the legislative/executive/judicial branches of the State of New Jersey and the United States District Court” to an association-in fact enterprise. (Am. Compl. ¶ 94.) The enterprise was designed “to increase . . . economic/political power within the American legal/medical/business/political sectors of the industry, at the expense of Kaul . . . an non-neurosurgical minimally invasive spine surgeons,” and “to use the United States District Court to provide cover for the Defendants’ crimes.” (Am. Compl. ¶ 94.)

The fourth is that Defendants “convert[ed] the executive/legislative/judicial branches of the State of New Jersey, United States Bankruptcy Court and the United States [D]istrict Court into an association-in-fact racketeering enterprise.” (Am. Compl. ¶ 105.) The amended complaint alleges that Defendants Allstate and GEICO conspired with Defendant Federation of State Medical Boards “to globally disseminate information regarding Kaul’s elimination, in order to prevent him exposing their crimes.” (Am. Compl. ¶ 111.) It further alleges that Defendants Allstate and GEICO participated in a “bribery-based scheme of racketeering” to “commit corruption of judges within the United States District Court.” (Am. Compl. ¶¶ 112-114.)

The fifth is that Defendant Christie “conspire[d] with Defendants Murphy/Grewal/ Allstate/Geico to have Kaul kidnapped on May 28, 2021, by nine (9) armed individuals . . . who purported to be NJ state police.” (Am. Compl. ¶ 120.) The complaint alleges that Defendants Allstate and GEICO “funnel[led] bribes to Defendants Christie/Murphy/Grewal, as part of a quid pro scheme, in which Defendants Christie/Murphy/Grewal sold, without the public’s permission,

state power to Defendants Allstate/Geico, in furtherance of their efforts to eliminate Kaul, and prevent him from further exposing their crimes.” (Am. Compl. ¶ 134.)

The sixth is that Defendants conspired to “prevent Kaul from obtaining a physician license in the State of New York.” (Am. Compl. at 35.) The State of New York too was allegedly converted into a “racketeering enterprise.” (Am. Compl. at 36-37.) In short, Plaintiffs allege that Defendants initially conspired to revoke Kaul’s medical license and that Defendants have conspired to deny Kaul relief at every relevant proceeding since then. (See Am. Compl.)

For example, the amended complaint emphasizes that Plaintiff Kaul filed suit against Defendant GEICO, among others, in the Southern District of New York. (See Am. Compl. ¶ 14.) There, Plaintiff Kaul sought “\$28,000 trillion” in monetary damages. (See Am. Compl. ¶ 14.) Plaintiff Kaul alleges that Defendants did not disclose this liability “in SEC filings, Forms 10K/13K, and in the corporations’ accounts.” (Am. Compl. ¶ 14.) Instead, they “conspired with their lawyers and accounts to file knowingly false returns/accounts.” (Am. Compl. ¶ 15.) Finally, Plaintiff Kaul summarily alleges that Defendants “violate[d] and deprive[d] Kaul of his constitutional rights pursuant to the 1st/2nd/4th/5th/6th/8th/14th amendments . . .” and deprived him of “(i) his property; (ii) his right to due process; (iii) his right to freedom to freedom of speech; (iv) his right to an impartial tribunal; (v) his prosecutorial rights; (vi) his right to equal protection; [and] (vii) his liberty and a decade of his life.” (Am. Compl. ¶ 140.) And Plaintiff alleges that Defendants “abused the power of the American State to violate Kaul’s human rights as enshrined in the Universal Declaration of Human Rights.” (Am. Compl. ¶ 140.)

As relevant to Plaintiff Basch, the amended complaint alleges only that Defendant GEICO “in collusion and conspiracy with Defendants Rivkin Radler/Gersenoff,” committed “RICO predicate acts of bribery/public corruption, in funneling bribes to judges within the

District of New Jersey in a series of quid pro quo schemes, in which corrupted judges did enter order/judgements adverse to Plaintiff Basch and other physicians, while entering order/judgments advantageous to Defendant Geico.” (Am. Compl. ¶ 148.)

C. Procedural History

Plaintiffs filed this action on August 19, 2021. (See Dkt. No. 1 (“Compl.”).) The amended complaint can be understood to assert the following claims. First, the amended complaint asserts that Defendants violated reporting requirements under the Sarbanes-Oxley Act. See 15 U.S.C. § 7241; (Am. Compl. ¶¶ 14-20.). Second, it asserts that Defendants violated the Racketeer Influence Corrupt Organizations Act (“RICO”). See 18 U.S.C. § 1962(c); (Am. Compl. ¶¶ 21-135, pp. 35-37.) Third, it identifies constitutional violations and asserts a cause of action under 42 U.S.C. § 1983. (See Am. Compl. ¶ 140.) Fourth, it asserts a cause of action under the United Nations Declaration of Human Rights. (See Am. Compl. ¶ 140.)

Defendants move to dismiss. Several defendants move to dismiss the complaint under Federal Rule of Civil Procedure 8 for failure to contain a short and plain statement of claims. (See Dkt. No. 70 (“Federation Memo”) at 6-7; Dkt. No. 83 (“ICE Memo”) at 10-11; Dkt. No. 94 (“Allstate Merits Memo”) at 1, 13; Dkt. No. 145 (“Heary Memo”) at 10.) Other defendants move to dismiss the complaint under Rule 12(b)(2) for lack of personal jurisdiction. (See Dkt. No. 128 (“Atlantic Health Memo”) at 9; Dkt. No. 145 (“Heary Memo”) at 6-7.) Other defendants move to dismiss the complaint under Rule 12(b)(3) for lack of venue. (See Dkt. No. 83 (“ICE Memo”) at 16-19; Dkt. No. 92 (“Allstate Venue Memo”) at 1-21; Dkt. No. 118 (“Christie Memo”) at 2-13; Dkt. No. 128 (“Atlantic Health Memo”) at 9.) Still others move to dismiss the complaint under Rule 12(b)(6) for failure to state a claim. (See, e.g., Dkt. No. 70 (“Federation Memo”) at 7-10; Dkt. No. 83 (“ICE Memo”) at 13-21; Dkt. No. 94 (“Allstate Merits Memo”) at 2-12; Dkt. No. 101 (“GEICO Memo”) at 10-24; Dkt. No. 97 (“TD Bank

Memo”) at 7-13; Dkt. No. 145 (“Heary Memo”) at 8-16.) Finally, several defendants have requested that an anti-filing injunction be issued against Plaintiff Kaul. (*See, e.g.*, Dkt. No. 70 (“Federation Memo”) at 10-13; Dkt. No. 97 (“TD Bank Memo”) at 13; Dkt. No. 101 (“GEICO Memo”) at 26-29; Dkt. No. 104 (“Allstate Injunction Memo”) at 1-3; Dkt. No. 118 (“Christie Memo”) at 13-17; Dkt. No. 150 (“Atlantic Health Injunction Memo”) at 1-5; Dkt. No. 145 (“Heary Memo”) at 16-19.)

II. Legal Standard

Federal Rule of Civil Procedure 8(a)(2) requires a plaintiff to make “a short and plain statement of the claim showing that the pleader is entitled to relief.” Rule 8(d)(1) further requires that “[e]ach allegation must be simple, concise, and direct.” “A complaint fails to comply with Rule 8(a)(2) if it is so confused, ambiguous, vague, or otherwise unintelligible that its true substance, if any, is well disguised.” *Strunk v. U.S. House of Representatives*, 68 F. App’x 233, 253 (2d Cir. 2003).

Rule 12(b)(2) permits a court to dismiss a defendant for “lack of personal jurisdiction.” A plaintiff “bears the burden of demonstrating personal jurisdiction over a person or entity against whom it seeks to bring suit.” *Penguin Gr. (USA) Inc. v. Am. Buddha*, 609 F.3d 30, 34 (2d Cir. 2010). The plaintiff is required to make only “a prima facie showing,” *Schultz v. Safra Nat’l Bank of New York*, 377 F. App’x 101, 102 (2d Cir. 2010), and such a showing “may be established solely by allegations” in good faith. *Aviles v. S&P Global, Inc.*, 380 F. Supp. 3d 221, 256 (S.D.N.Y. 2019). But those allegations must have “factual specificity”; conclusory statements do not suffice. *Jazini v. Nissan Motor Co.*, 148 F.3d 181, 185 (2d Cir. 1998).

Rule 12(b)(3) permits a court to dismiss a complaint for “improper venue.” Under 28 U.S.C. § 1391, a civil action may only be brought in “a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located”; “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”; or “if there is no district in which an action may otherwise be brought . . . any judicial district in which any defendant is subject to the court’s personal jurisdiction with respect to such action.” In deciding venue, the Court “must draw all reasonable inferences and resolve all factual conflicts in favor of plaintiff.” *Pablo Star Ltd. v. Welsh Gov’t*, 170 F. Supp. 3d 597, 609 (S.D.N.Y. 2016).

Rule 12(b)(6) authorizes a district court to dismiss a complaint for “failure to state a claim upon which relief can be granted.” To survive a motion to dismiss for failure to state a claim, a complainant must state “enough facts to state a claim to relief that is plausible on its face.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). A claim is plausible “when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). This means that a complaint is properly dismissed where “the allegations in a complaint, however true, could not raise a claim of entitlement to relief.” *Twombly*, 550 U.S. at 558. A complaint is also properly dismissed “where the well-pleaded facts do not permit the court to infer more than the mere possibility of misconduct.” *Iqbal*, 556 U.S. at 679.

Plaintiff is proceeding *pro se*. “It is well-established that the submissions of a *pro se* litigant must be construed liberally and interpreted to raise the strongest arguments that they suggest.” *Meadows v. United Servs., Inc.*, 963 F.3d 240, 243 (2d Cir. 2020). “Nonetheless, a *pro se* complaint must state a plausible claim for relief.” *Id.*

III. Discussion

The amended complaint is dismissed with prejudice. The pleading violates Rule 8(a)(2) because it fails to provide a plain statement of the claims at issue. The amended complaint fails to establish venue because all of the defendants are not residents of New York, and a substantial

part of the alleged violations do not arise in the Southern District of New York. In the alternative, the amended complaint fails to state a claim. Dismissal is appropriate rather than transfer. And Plaintiff Kaul is barred from filing new actions arising from these facts.

A. Rule 8(a)(2)

The pleading here totals 432 pages of single-space paragraphs and exhibits. (*See Am. Compl.*) As in Plaintiff Kaul’s previous cases, the amended complaint “contains rambling quotes and excerpts from various sources, . . . spurious comparisons between the insurance industry, on the one hand, and Nazi Germany and slavery, on the other, . . . and difficult-to-follow references to Mr. Kaul’s other pending litigation (and related documents.” *Bos. Partners, Inc.*, 2021 WL 3272216, at *3. Such a pleading amounts to “a prolix and unintelligible ‘conspiracy theory novel.’” *O’Neil v. Ponzi*, 394 Fed. App’x 795, 796 (2d Cir. 2010). It fails “to provide fair notice of the claims and enable the adverse party to answer the complaint and prepare for trial.” *Strunk*, 68 Fed. App’x at 235. Accordingly, the amended complaint is dismissed on the ground that it fails to provide a short and plain statement of the claim under Rule 8.

B. Personal Jurisdiction and Venue

This action is also dismissed for lack of venue. Defendants Atlantic Health Systems and Robert Heary move to dismiss for lack of personal jurisdiction. (*See* Dkt. No. 128 (“Atlantic Health Memo”) at 9; Dkt. No. 145 (“Heary Memo”) at 6-7.) Defendants Intercontinental Exchange, Allstate, Chris Christie, and Atlantic Health Systems also move to dismiss for lack of venue. (*See* Dkt. No. 83 (“ICE Memo”) at 16-19; Dkt. No. 92 (“Allstate Venue Memo”) at 1-21; Dkt. No. 118 (“Christie Memo”) at 2-13; Dkt. No. 128 (“Atlantic Health Memo”) at 9. “[A] federal court has leeway to choose among threshold grounds for denying audience to a case on

the merits.” *Sinochem Int’l Co. v. Malaysia Int’l Shipping Corp.*, 549 U.S. 422, 431 (2007) (marks omitted). A dismissal for lack of venue is more appropriate here.

Plaintiffs have not met their burden to allege venue. To assess venue, a court “must determine whether the case falls within one of the three categories set out in [28 U.S.C.] § 1391(b).” *Atl. Marine Constr. Co. v. U.S. Dist. Court for W. Dist., of Tex.*, 571 U.S. 49, 56 (2013). Venue does not lie in the Southern District of New York under Section 1391(b)(1) because, as alleged, nearly all defendants reside outside of New York. (*See Am. Compl.* at 3.)

Venue does not lie in the Southern District of New York under Section 1391(b)(2) because “a substantial part of the events or omissions giving rise to the claim” did not occur in this district. 28 U.S.C. § 1391(b)(2). To apply this provision a district court must “(1) identify the nature of the claims and the acts or omissions that the plaintiff alleges give rise to those claims, and (2) determine whether a substantial part of those acts or omissions occurred in the district where the suit was filed.” *Fisher v. Int’l Student Exch., Inc.*, 38 F. Supp. 3d 276, 284-85 (E.D.N.Y 2014) (quoting *Daniel v. Am. Bd. of Emergency Med.*, 428 F.3d 408, 432 (2d Cir. 2005)) (internal quotation marks omitted). The nature of the claims here, liberally construed, concern the revocation of Plaintiff Kaul’s license, his alleged targeting during subsequent proceedings, and Defendants’ alleged efforts to evade accountability. To support those allegations, the pleading identifies various proceedings; financial disclosures; bribery schemes; judicial orders; attempts to kidnap; and denials of license applications. (*See Am. Compl.*)

Almost all of those allegations concern events and omissions in New Jersey. The initial alleged conspiracy, for example, arises from the revocation of Plaintiff Kaul’s license. (*See Am. Compl.* ¶ 21.) Plaintiff Kaul was licensed to practice in New Jersey. (*See Am. Compl. Ex. 1.*) He performed his spine surgeries in New Jersey; his license was revoked by the New Jersey State

Board of Medical Examiners; and the administrative disciplinary proceedings were initiated by the Attorney General of New Jersey. *See Kaul v. Christie*, No. 16-CV-2364, 2019 WL 920815, at *5 (D.N.J. Feb. 22, 2019). The alleged kidnapping, for another, concerns actions undertaken by New Jersey officials such as Defendants Christie, Murphy, and Grewal. (*See Am. Compl.* ¶ 120.) The other counts follow the same pattern. Indeed, Plaintiffs list “The State of New Jersey” and “The District of New Jersey-Newark.” as alleged co-conspirators. (*See id.*)

Plaintiffs identify several potential contacts in New York City. All are conclusory. None are substantial. “Substantiality for venue purposes is a more qualitative than quantitative inquiry, determined by assessing the overall nature of the plaintiff’s claims and the nature of the specific events or omissions in the forum, and not by simply adding up the number of contacts.” *Daniel v. American Bd. of Emergency Medicine*, 428 F.3d 408, 432-33 (2d Cir. 2005). “[F]or venue to be proper, *significant* events or omissions *material* to the plaintiff’s claim must have occurred in the district in question, even if other material events occurred elsewhere. *AEI Life, LLC v. Lincoln Ben. Life Co.*, 305 F.R.D. 37, 43 (E.D.N.Y. 2015) (quotation omitted). Even had Plaintiffs alleged any factual basis to support his allegations concerning New York City, those contacts would be insubstantial in light of the nature of Plaintiffs’ claims — primarily, a series of RICO claims — and the reality that the allegations place those schemes primarily in New Jersey.

Further, any alleged contacts are insubstantial in light of Plaintiffs’ gamesmanship. “Mr. Kaul appears to be engaged in forum shopping.” *Bos. Partners, Inc.*, 2021 WL 3272216, at *2. “Apparently dissatisfied with the judges in the District of New Jersey, . . . he has initiated lawsuits, based on the same underlying factual contentions, against many of the defendants in this case (and others), in various federal district courts around the country.” *Id.* He “seems

prepared to file essentially the same suit in any federal district court other than in New Jersey until he succeeds.” *Id.* Such manufactured contacts are not a substantial part of the claims here.

If venue is not proper, “the case must be dismissed or transferred under [28 U.S.C.] § 1406(a).” *Atl. Marine Constr. Co.*, 571 U.S. at 56. Section 1406(a) provides that an improper district court “shall dismiss, or if it be in the interest of justice, transfer such case to any district or division in which it could have been brought.” Dismissal is appropriate here. Transfer would not be in the interests of justice. First, as already explained, Plaintiff Kaul appears to be forum-shopping. Second, “based on Mr. Kaul’s prior conduct, if the Court were to transfer the case to the District of New Jersey, Mr. Kaul would likely voluntarily dismiss the case (or abandon his prosecution of it) and then re-file elsewhere.” *Bos. Partners, Inc.*, 2021 WL 3272216, at *3. Third, as explained below, Plaintiffs “is unlikely to state a viable claim against any of the defendants even if the case were transferred.” *Id.* Fourth, “whatever impediment there may be to an adjudication on the merits is the result of Mr. Kaul’s own conduct.” *Id.* Accordingly, the action is dismissed. Plaintiff Kaul’s conduct warrants a dismissal with prejudice.

C. Merits

In the alternative, even if venue is proper, the amended complaint is dismissed for failure to state a claim. Each asserted claim is meritless.

1. Sarbanes-Oxley

Plaintiffs’ claim under the Sarbanes-Oxley Act is meritless. Plaintiffs allege that some Defendants violated various reporting requirements, *see, e.g.*, 15 U.S.C. § 7241, because they did not report Plaintiff Kaul’s claim for \$28,000 trillion in monetary damages in a prior case. (*See* Am. Compl. ¶ 14.) But Sarbanes-Oxley does not supply a private cause of action for Plaintiffs’ claim. Sarbanes-Oxley contains two express rights of action. One relates to insider trading, *see* 15 U.S.C. § 7244(a)(2)(B), and the other relates to whistleblowing, *see* 18 U.S.C. § 1514A(b).

Those rights of action “have nothing to do with the facts pleaded by [Plaintiffs,]” *Li v. Ali Baba Grp. Holding Ltd.*, No. 19-CV-11629, 2021 WL 4084574, at *4, and there is no basis to infer a private right to enforce the provisions identified by Plaintiffs, *see Cohen v. Viray*, 622 F.3d 188, 194 (2d Cir. 2010). Accordingly, Plaintiff’s Sarbanes-Oxley Act claim does not state a claim.

2. RICO

Plaintiffs’ RICO allegations are also meritless. To state a valid civil RICO claim, a plaintiff must plausibly allege that defendants “engaged in (1) conduct (2) of an enterprise (3) through a pattern (4) of racketeering activity.” *Cruz v. FXDirectDealer, LLC*, 720 F.3d 115, 120 (2d Cir. 2013). Plaintiffs do not adequately allege the existence of a RICO enterprise. “[A] RICO enterprise is a group of persons associated together for a common purpose of engaging in a course of conduct, the existence of which is proven by evidence of an ongoing organization, formal or informal, and by evidence that the various associates function as a continuing unit.” *First Capital Asset Mgmt. v. Satinwood, Inc.*, 385 F.3d 159, 173 (2d Cir. 2004). It requires “a purpose, relationships among those associated with the enterprise, and longevity sufficient to permit these associates to purpose the enterprise’s purpose.” *Boyle v. United States*, 556 U.S. 938 (2009). Accordingly, to allege an enterprise, a plaintiff must at least plead with specificity both “the nature of the defendants’ common interests and the mechanics of the alleged ongoing working relationship.” *Cont’l Petroleum Corp. v. Corp. Funding Partners, LLC*, No. 11-CV-7801, 2012 WL 1231775, at *6 (S.D.N.Y. Apr. 11, 2012). Plaintiffs have not done so. There is no explanation, for example, of the alleged “hierarchy, organization, and activities of the alleged association.” *BWP Media USA Inc. v. Hollywood Fan Sites, LLC*, 69 F. Supp. 3d 342, 360 (S.D.N.Y. 2014). Instead, Plaintiffs simply identify entities and alleged crimes. Such a “conclusory naming of a string of entities” does not suffice. *Id.*

Further, Plaintiffs at most identify predicate acts; they do not plausibly allege a “course of fraudulent or illegal conduct separate and distinct from the alleged predicate racketeering acts themselves—a requirement in this Circuit.” *First Capital*, 385 F.3d at 174. Accordingly, Plaintiffs’ RICO allegations do not state a claim.

3. Section 1983

Plaintiffs’ Section 1983 allegations are meritless as well. “To state a claim under § 1983, a plaintiff must allege that defendants violated plaintiff’s federal rights while acting under color of state law.” *McGugan v. Aldana-Bernier*, 752 F.3d 224, 229 (2d Cir. 2014). Most of the defendants here are not state actors. *See, e.g., Desiderio v. Nat’l Ass’n of Sec. Dealer, Inc.*, 191 F.3d 198, 206 (2d Cir. 1999) (finding the New York Stock Exchange not to be state actor); *Ponticelli v. Zurich Am. Ins. Grp.*, 16 F. Supp. 2d 414, 426 (S.D.N.Y. 1998) (finding private insurer not to be state actor). And, in any event, although Plaintiffs list various constitutional amendments and constitutional rights, they do not allege any factual basis from which to infer that these constitutional provisions have been violated. *See Iqbal*, 556 U.S. at 678.

4. UN Declaration of Human Rights

Lastly, Plaintiffs’ claim under the United Nation’s Declaration of Human Rights is meritless. Plaintiff alleges that Defendants “abused the power of the American State to violate Kaul’s human rights as enshrined in the Universal Declaration of Human Rights.” (Am. Comp. ¶ 140.) But “the Universal Declaration of Human Rights . . . provides no private rights of action.” *United States v. Chatman*, 351 F. App’x 740, 741 (3d Cir. 2009). Because any amendment would be futile, there is no reason to give Plaintiffs leave to amend.

D. Filing Injunction

Finally, the Court concludes that an anti-filing injunction for Plaintiff Kaul is appropriate. “That [a] district court possess[e]s the authority to enjoin [parties] from further vexatious

litigation is beyond peradventure.” *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 23 (2d Cir. 1986). To determine whether an anti-filing injunction is appropriate, a district court must consider: “(1) the litigant’s history of litigation and in particular whether it entailed vexatious, harassing or duplicative lawsuits; (2) the litigant’s motive in pursuing the litigation, e.g., does the litigant have an objective good faith expectation of prevailing?; (3) whether the litigant is represented by counsel; (4) whether the litigant has caused needless expense to other parties or has posed an unnecessary burden on the courts and their personnel; and (5) whether other sanctions would be adequate to protect the courts and other parties.” *Eliahu v. Jewish Agency for Israel*, 919 F.3d 709, 714 (2d Cir. 2019).

These factors favor issuing an anti-filing injunction. First, Plaintiff Kaul has an extensive history of duplicative lawsuits. Over the past decade, Plaintiff Kaul has filed at least twelve lawsuits outside the District of New Jersey. (*See, supra*, pp. 2-3.) Those lawsuits all concern the denial of his medical license in New Jersey as well as subsequent related proceedings. Courts have dismissed claims on preclusion grounds. *See, e.g., Kaul v. Fed’n of State Med. Boards*, 21-CV-57, 2021 WL 6550884, at *3 (N.D. Tex. Sept. 17, 2021) (Ray, Jr., J.), *report and recommendation adopted*, 21-CV-57, 2022 WL 171294 (N.D. Tex. Jan. 19, 2022). In those cases, Plaintiff Kaul has a history of being a vexatious and harassing litigant. *Cf. Kaul v. Murphy*, No. 21-CV-13063, 2021 WL 3663873, at *1 (D.N.J. July 9, 2021) (“Plaintiff has been a frequent, vexatious litigant before this Court.”). Plaintiff Kaul harasses officials to manufacture litigation. *See, e.g., Bos. Partners, Inc.*, 2021 WL 3272216, at *3 n.13 (“It appears that one of Mr. Kaul’s tactics is to send a letter to someone alerting them to the alleged conspiracy (or asking them to disclaim involvement) and then, if the recipient does not respond, concluding that they are a participant in the conspiracy.”); (Dkt. No. 71, Ex. 3.) (letter addressed to New

Hampshire licensing officials warning that their potential “misconduct would constitute a conspiracy involving the State of New Hampshire and would expose the state to legal liability”). Plaintiff Kaul harasses opposing parties during litigation. For example, in *Kaul v. Murphy*, 21-CV-9788, the district court ultimately ordered Kaul not to “communicat[e], or attempt[] to directly communicate, with any represented Defendants or their relatives, and from entering the property where any represented Defendant resides.” (Dkt. No. 71, Ex. B., 186.) And the Court has serious doubts about Plaintiff Kaul’s candor with the Court. For example, Plaintiff Kaul alleges that certain Defendants have “admitted to the RICO and Section 1983 claims,” citing an Exhibit 5 (*See Am. Compl. pp. 225-28*), but this document appears to be fabricated. (*See Dkt. No. 97 at 2-3, 14.*) These facts weigh heavily in favor of an injunction.

Second, Plaintiff Kaul has no objective expectation of prevailing. He has not prevailed in any of the twelve duplicative cases he has filed with the district courts around the United States. As explained above, and as other courts have found, the filings in these cases are “bizarre, far-fetched, and reliant on flawed premises.” *Bos. Partners, Inc.*, 2021 WL 3663873, at *3.

Third, although Plaintiff Kaul proceeds *pro se*, he is a sophisticated litigant. *Kaul v. Fed’n of State Med. Boards*, No. 19-CV-3050, 2020 WL 7042821, at *17 (D.D.C. Dec. 1, 2020) (“Although they are proceeding *pro se*, Plaintiffs are highly educated and experienced in utilizing the court system.”) Regardless, given the other factors, an injunction is appropriate for Plaintiff Kaul even though he proceeds *pro se*. *See, e.g., Schuster v. Charter Communs., Inc.*, No. 18-CV-1826, 2021 WL 1317370 (S.D.N.Y. Apr. 8, 2021) (issuing anti-filing injunction for *pro se* litigant); *Edwards v. Barclays Servs. Corp.*, 19-CV-9326, 2020 WL 2087749 (S.D.N.Y. May 1, 2020), *report and recommendation adopted*, No. 19-CV-9326, 2020 WL 3446870

(S.D.N.Y. June 24, 2020) (same); *see also Lipko v. Christie*, 94 F. App'x 12, 14 (2d Cir. 2004) (enjoining *pro se* litigant from filing appeals).

Fourth, Plaintiff Kaul has caused needless expense to other parties and needlessly burdened court personnel. For example, he regularly files documents that must be stricken. *See, e.g., Kaul v. Schumer*, 19-CV-13477, ECF No. 13 (filing purported “Request[s] for admission or denial of statements” directed to sitting United States District Court Judges”).

Fifth, lesser sanctions would not be adequate. For years, Plaintiff Kaul has filed cases in improper venues and then voluntarily dismissed them once they reach the District of New Jersey. *See Bos. Partners, Inc.*, 2021 WL 3272216, at *3. There is no reason to think that practice will abate. Further, Plaintiff has already ignored an anti-filing injunction that covers a defendant in this case. (*See* Dkt. No. 129-1 (“Stolz Declaration”) ¶ 5.) “Ultimately, the question the court must answer is whether a litigant who has a history of vexatious litigation is likely to continue to abuse the judicial process and harass other parties.” *Safir*, 792 F.2d at 24. Absent an injunction, it is likely that Kaul would continue here.

The filing injunction here must be “appropriately narrow.” *Bd. of Managers of 2900 Ocean Ave. Condo. v. Bronkovic*, 83 F.3d 44, 45 (2d Cir. 1996). Given Plaintiff Kaul’s history, he should be enjoined from filing lawsuits arising from the allegations here. Given Plaintiff Kaul’s litigation practices, he is enjoined from filing those lawsuits in any federal court. When a litigant has demonstrated “a pattern of abusing different district courts around the country, an injunction which applies to all federal district courts is warranted.” *Sassower*, 833 F. Supp. 253, 270 (S.D.N.Y. 1993) (citing *In re Martin-Trigona*, 737 F.2d 1254, 1262 (2d Cir. 1984)).

From the date of this Opinion and Order, Plaintiff Kaul is barred from filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or arises from (i) the denial of his medical license; (ii) subsequent litigation proceedings initiated by the Defendants here before the date of this Order; (iii) subsequent litigation proceedings initiated by Plaintiff Kaul before the date of this Order; without first obtaining leave from this Court. Any motion for leave must include the caption “Request for Permission to File under Filing Injunction” and must be submitted to the Pro Se Intake Unit of this Court along with Plaintiff Kaul’s proposed filings.

If Plaintiff Kaul violates this Opinion and Order and files any materials without first obtaining leave to file, any request will be denied for failure to comply with this Opinion and Order, and Plaintiff Kaul may be subject to sanctions, including monetary penalties or contempt. *See Schuster*, 2021 WL 1317370, at *11. The Court clarifies that this filing injunction does not prevent Kaul from filing an appeal from this Opinion and Order.

IV. Conclusion

For the foregoing reasons, Defendants’ motions to dismiss the complaint are GRANTED. The complaint is hereby dismissed for pleading failures under Rule 8(a)(2); for lack of venue; and for failure to state a claim.

Defendants’ motions for an anti-filing injunction are also GRANTED as set forth above.

The Clerk of Court is directed to:

- (1) close the motions at Docket Numbers 69, 82, 91, 93, 95, 100, 103, 117, 126, 140, 144, and 149;
- (2) enter final judgment in favor of Defendants dismissing the complaint with prejudice;
- (3) mail a copy of this opinion and order to the *pro se* parties in this matter; and
- (4) close this case.

SO ORDERED.

Dated: September 12, 2022
New York, New York



J. PAUL OETKEN
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

M.D. RICHARD ARJUN KAUL, *et al.*
Plaintiffs,

-v-

INTERCONTINENTAL EXCHANGE, *et al.*
Defendants.

21-CV-6992 (JPO)

ORDER

J. PAUL OETKEN, District Judge:

On September 12, 2022, this Court issued an order imposing a nationwide filing injunction against Plaintiff Richard Arjun Kaul, following his filing of multiple frivolous and vexatious lawsuits against numerous defendants in this Court and other courts. *See Kaul v. Intercontinental Exchange*, No. 21-CV-6992, 2022 WL 4133427, at *8-9 (S.D.N.Y. Sept. 12, 2022). Specifically, that order barred Kaul from “filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or arises from . . . the denial of his medical license . . . without first obtaining leave from this Court.” *Id.* at *9. The order further provided that if Kaul violated the order by filing such materials without first obtaining leave of this Court, “any request will be denied for failure to comply with this Opinion and Order, and Plaintiff Kaul may be subject to sanctions . . .” *Id.*

Kaul did not file an appeal from this Court’s September 12, 2022 order.

The Court has learned that Kaul has filed suit in the United States District Court for the Eastern District of North Carolina alleging wrongdoing against several defendants in connection with the revocation of his medical license. *Kaul v. Center for Professional Education for Physicians, et al.*, No. 5:23-CV-672 (E.D.N.C.) (“the EDNC action”). That lawsuit names

certain individuals who were also defendants in this action, including Christopher Christie and Dr. Robert Heary. Kaul did not obtain permission from this Court prior to filing the EDNC action. He is therefore in violation of this Court's filing injunction.

Accordingly, Kaul is hereby DENIED permission to file or pursue the EDNC action as to defendants Christie, Heary, and any other defendants who were named in this action. Kaul is further ORDERED to withdraw the EDNC action as to those defendants within 14 days of the date of this order. If he fails to do so, he may be subject to monetary sanctions and contempt.

SO ORDERED.

Dated: March 15, 2024
New York, New York



J. PAUL OETKEN
United States District Judge

The Clerk of Court is directed to mail a copy of this order to:

Richard Arjun Kaul
24 Washington Valley Road
Morristown, NJ 07960

Exhibit 13

NEUROSURGEON

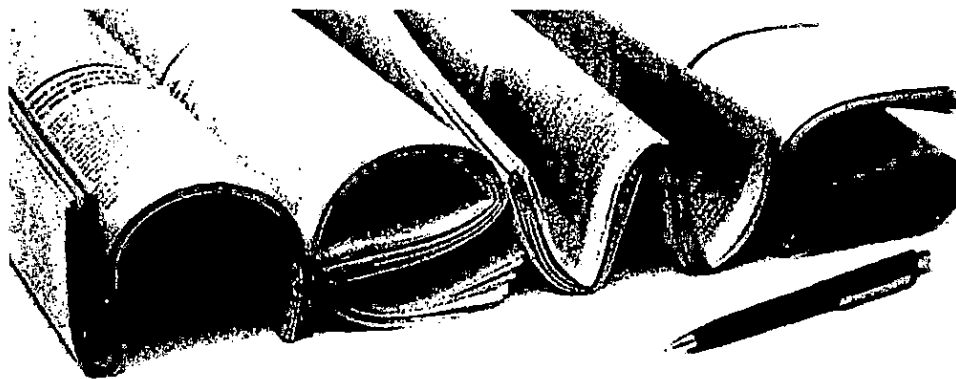
AANS Neurosurgeon | Volume 27, Number 1, 2018

Search



ADVERTISEMENT

MORE DATA. MORE PATIENTS.
IMPROVED OUTCOMES.



Notice of Disciplinary Action

AANS Neurosurgeon | Inside Neurosurgeon | AANS News
AANS Neurosurgeon: Volume 26, Number 3, 2017

At its meeting on April 21, 2017, the American Association of Neurological Surgeons

SHARES

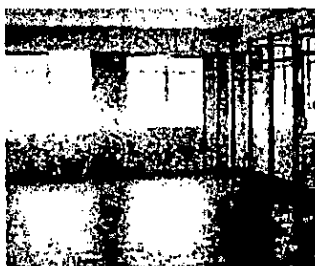
witnesses in medical malpractice lawsuit. The disciplinary action is as follows:

- **Gregory J. Przybylski, MD, FAANS – Censure.** The Board of Directors concluded that Dr. Przybylski of Edison, NJ., violated Section A.1 of the AANS Rules for Neurosurgical Medical/Legal Expert Opinion Services by demonstrating improper advocacy when he testified, among other things, that the patient had osteomyelitis, and that no other diagnosis was a more likely cause for the fusion construction failure, based on ESR, CRP, MRI and Staphylococcus epidermidis wound culture in the revision surgery; that longer and different antibiotic treatment and longer wound drainage would have avoided need for revision surgery; and that the unrecognized osteomyelitis burned out without antibiotic therapy. The Board of Directors also concluded that Dr. Przybylski violated Section A.4 by misrepresenting the standard of care when he testified that antibiotic treatment for six weeks after an esophageal tear closure, monitoring ESR and CRP and personal review of esophageal swallow studies are all required during treatment of a pharyngeal tear.

FEATURES



DEPARTMENTS



CALENDAR/COURSES

2018 Advanced Endoscopic Skull Base and Pituitary Surgery
June 1-2, 2018; New York

2018 Annual Meeting of the Michigan Association of Neurological Surgeons
June 8-10, 2018; Thompsonville, MI

2018 American Society for Stereotactic and Functional Neurosurgery Biennial Meeting
June 2-5, 2018; Denver

CARS 2018 Computer Assisted Radiology and Surgery
June 20-23, 2018; Berlin, Germany

Complex Endoscopic Endonasal Surgery of the Skull Base
June 7-9, 2018; Pittsburgh, PA

Interactive Calendar

LEAVE A REPLY

SHARES

www.drrichardkaul.com

February 6, 2018

American Association of Neurological Surgeons
5550 Meadowbrook Drive
Rolling Meadows, IL 60008-3852

Re: Gregory Przybylski, MD

Dear Sir/Madam

I wish to file a complaint against Dr. Gregory Przybylski, for violating the following sections of the AANS Rules for Neurological Medical/Legal Expert Opinion Services:

A. Impartial Testimony

1. The neurosurgical expert witness shall be an impartial educator for attorneys, jurors and the court on the subject of neurosurgical practice – Dr. Przybylski, as is detailed in the enclosed documents, was not an impartial witness, but in fact had conspired with both the New Jersey Attorney General, and other neurosurgeons to have my medical license revoked. This misconduct, which spanned at least five (5) years, included acts of political corruption, racketeering and most relevantly for the purposes of this complaint, the commission of thirty (30) separate instances of witness perjury. The substance of these malfeasant acts is detailed in 'The Solomon Critique' + Kaul v Christie.
2. The neurosurgical expert witness shall represent and testify as to the practice behavior of a prudent neurological surgeon giving different viewpoints if such there are – Dr. Przybylski knew that there are many different methods for the diagnosis and surgical management of degenerative spinal pathology. However, he willfully, and whilst under oath, repeatedly misrepresented this information in multiple legal proceedings, over a period of two years, until May 6, 2013, when he admitted this position under cross-examination. The specific testimony is contained within 'The Solomon Critique' + Kaul v Christie.

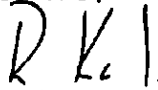
3. The neurosurgical expert witness shall recognize and correctly represent the full standard of neurosurgical care and shall with reasonable accuracy state whether a particular action was clearly outside of, or close to the margins of the standard of neurosurgical care – Dr. Przybylski, an individual with almost two decades of expert witness experience, knew that the standards from which he accused me of having deviated, were not standards at all. He knew that the standard of care was not determined by factors associated with education, training, hospital privileges or local administrative regulations pertaining to healthcare. He willfully ignored the law; knowingly misrepresented the facts and found conclusions that he understood were false. He was cognizant of the fact that his accusations of my purported “gross deviations” were devoid of truth.

I understand that the current bylaws of your organization seek to restrict the filing of complaints to its members. However, I believe that the evidence of Dr. Przybylski's misconduct is so incriminating, that to not open an investigation, would condone his malfeasance, and would neither reflect the true purpose nor the spirit of the Rules. I hope this matter is administered with a transparency and fairness that accurately communicates your organization's ethical framework.

Copies of 'The Solomon Critique' + Kaul v Christie are contained within the enclosed flash drive.

I look forward to your response.

Yours sincerely



Richard Arjun Kaul, MD

Exhibit 14

www.drrichardkaul.com

June 6, 2023

Alexis Angell, JD
Shareholder
Polsinelli
CPEP Board
720 S. Colorado Blvd., Suite 1100-N
Denver, CO 80246

Re: Resolution of Conflict of Interest

Dear Mr. Angell,

I write this letter as a follow-up and to memorialize the conversation I had on June 5, 2023, from approximately 12:30 pm to 1pm EST, with Amanda Besmanoff and Alisa Johnson regarding the fact that the three individuals (Anthony/Harned/Brown) who conducted evaluations of my skills/knowledge on February 22/23, 2023, were knowingly conflicted and ought to have recused themselves, the willful non-recusal of which however, invalidates their evaluations/reports and moreover has caused me further injury.

I emailed Ms. Besmanoff as soon as I became aware of these conflicts. The conflicts arise from the fact I have on multiple occasions, sued Defendant American Society of Interventional Pain Physicians (ASIPP) in the United States District Court, and that two individuals (Harned/Brown) were/are politically active directors of the Kentucky/Colorado ASIPP chapters and the third (Antony) is an active lecture providing, fee-paying, politically contributing member. A copy of one of these suits (K1) was emailed to Ms. Besmanoff, and establishes the conflicted nature of all members of Defendant ASIPP.

Another point raised during the conversation pertained to CPEP's relationship with the Federation State Medical Boards, an entity with which I have engaged in litigation. I would suggest you view www.pacer.org and search my name with RICHARD ARJUN KAUL, as this will provide further context as to the conflict with the FSMB.

Options:

I believe there are two (2) options:

1. The physician assessments are re-conducted by physicians with no professional, commercial connections/relations/associations, and as stated in my May 30, 2023, email to Ms. Besmanoff (copy attached), these individuals will likely be found in academic/research settings.

2. CPEP issue a report containing the contents of all the tests and the reports of Antony/Harned/Brown's with a statement/paragraph as to the conflicted nature of the reports and how/why the situation was permitted to come into existence, and cause further costly delay.

If option 1 is chosen, and the individuals are conflict-free, then I would not request the reimbursement of my approximately fourteen thousands dollars (\$14,000) enrollment fee, but I would still require I be provided a complete copy of my entire file.

If option 2 is chosen, I would request reimbursement of my enrollment fee and of course production of my entire file.

As I explained during the conversation, if it becomes impossible for me, through this particular avenue, to vindicate my rights and rectify/mitigate the illegal/ongoing eleven (11) year plus injury to my livelihood/life/liberty/reputation/economic standing, I will place the issue before the Pennsylvania Medical Board/ Pennsylvania Courts, to seek an alternate resolution, in which politics/business/professional rivalries are not permitted to obstruct/interfere with my fundamental human/constitutional rights.

I hope that CPEP advances this matter in a manner that is fair, professional and one ultimately, I believe, could reflect well on the organization within the medical profession.

Yours sincerely

RICHARD ARJUN KAUL, MD



Richard Kaul <drrichardkaul@gmail.com>

CPEP Assessment + Supporting Documents

1 message

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Tue, May 30, 2023 at 9:01 AM

Amanda,

I left a message last week on your VM enquiring as to CPEP's course of action in light of the conflicted nature of the three individuals retained by CPEP to evaluate my knowledge/skills. At your earliest convenience, could you please call me on this point.

Could you please also email me a complete copy of my CPEP file, and ensure that no changes are made to the file in the interim.

There are interventional pain physicians who have no association with Defendant ASIPP, and who quite frankly view the organization as lacking academic gravitas and an organization that is nothing more than a vehicle through which to funnel bribes to corrupt politicians. These individuals exist primarily within academic/research institutions and amongst practitioners who have no commercial interest in the spine market.

I hope we can rectify this situation.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com





Richard Kaul <drrichardkaul@gmail.com>

CPEP Assessment - Dr. Michael Harned

8 messages

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Tue, May 16, 2023 at 7:04 PM

Amanda,

I was recently informed that Dr. Michael Harned is a Director At Large of the Kentucky chapter of the American Society of Interventional Pain Physicians, and has been for a number of years:

<https://asipp.org/kentucky-society-of-interventional-pain-physicians/>

In 2017 I filed suit against ASIPP in the United States District Court for the District of New Jersey (copy attached) a fact known to Dr. Harnad when he conducted his interview on February 23, 2023, and unfortunately this represents a conflict of interest, of which Dr. Harnard should have informed CPEP.

Could you please bring this issue to the attention of the CPEP Board.

Thank you in advance.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



171027-Kaul v Christle-K1-D.E. 214.pdf
2464K

Amanda Besmanoff <abesmanoff@cpepdoc.org>
To: Richard Kaul <drrichardkaul@gmail.com>

Wed, May 17, 2023 at 12:54 PM

Hi Dr. Kaul,

I received your message and will discuss with my team. I'll follow-up with you either later today or tomorrow morning.

Thanks,

Amanda

[Quoted text hidden]

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Wed, May 17, 2023 at 1:15 PM

Thanks Amanda.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



[Quoted text hidden]

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Fri, May 19, 2023 at 6:37 PM

Amanda,

Could you please also present the attached information to the CPEP Board regarding Dr. Ajay Antony (page 5/10):

<https://asipp.org/wp-content/uploads/ASIPP23rdAnnualMeetingAgenda.pdf>

In deciding what course of action to take, and in light of the conflicts of interest, I would like to suggest for the purpose of fairness and expediency, that I respond to the substance of Drs. Harned/Antony's reports, bearing in mind that regardless of CPEP's final report, I cannot practice without a monitor.

I think it would have been prudent of these physicians to have recused themselves from the matter, and not subject both CPEP and I to an avoidable and costly delay.

Thank you for your attention to this matter.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



[Quoted text hidden]

Amanda Besmanoff <abesmanoff@cpepdoc.org>
To: Richard Kaul <drrichardkaul@gmail.com>

Mon, May 22, 2023 at 12:28 PM

Hi Dr. Kaul,

Can you please clarify what the conflict of interest specifically is with Dr. Antony so I can discuss this further with my team?

[Quoted text hidden]

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Mon, May 22, 2023 at 3:11 PM

Amanda,

For physicians to present lectures at ASIPP meetings, they must be fee-paying members.

Dr. Antony is an active fee-paying member of ASIPP and its Florida Chapter, and is involved in the political fundraising element of ASIPP identified in the lawsuit ([Kaul v Christie:16-CV-02364](#)) (K1) that was the conduit through which bribes were funnelled to Defendant Christie, as party of the quid pro quo for having the board revoke (illegally) my license.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



[Quoted text hidden]

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Tue, May 23, 2023 at 3:18 PM

Amanda,

Could you please bring to the attention of the CPEP board, Dr. Robert Brown's directorship with ASIPP.

<https://asipp.org/colorado-society-of-interventional-pain-physicians/>

Did any of these three physicians (Antony/Harned/Brown) disclose their conflicts of interest to CPEP?

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



[Quoted text hidden]

Amanda Besmanoff <abesmanoff@cpepdoc.org>
To: Richard Kaul <drrichardkaul@gmail.com>

Tue, May 23, 2023 at 4:12 PM

Hi Dr. Kaul,

I'm acknowledging receipt of your email and the previous one.

[Quoted text hidden]



June 9, 2023

Via Email and U.S. Mail

Dr. Richard A. Kaul
24 Washington Valley Road
Morristown, NJ 07960
dr-richardkaul@gmail.com

Re: CPEP Assessment Services

Dear Dr. Kaul:

We have reviewed in detail your concerns submitted via email on May 16, 2023, May 19, 2023, May 22, 2023, and May 23, 2023, and as discussed with Alisa Johnson, CPEP Program Director, on June 5, 2023, as well as your letter dated June 6, 2023, concerning the clinical consultants who participated in your CPEP Clinical Competence Assessment which took place on February 22, 2023.

On January 16, 2023, you entered an Assessment Services Participation Agreement with CPEP. Pursuant to the Agreement, CPEP engaged clinical consultants to participate in your Assessment. You were provided with the identity of these consultants prior to your Assessment in February 2023 and these consultants conducted clinical interviews with you during your Assessment. In the emails listed above and in further conversation you have contended that the consultants have conflicts of interest because of their affiliation with the American Society of Interventional Pain Physicians (ASIPP) and objected to their involvement based on pending litigation you have filed against ASIPP and others. In your June 6, 2023 correspondence you outlined two options including "re-conducting the Assessment with physicians with no professional, commercial connections/relations/associations..." or "issuing a report containing the contents of all the tests and the reports of Antony/Hamed/Brown's with a statement/paragraph as to the conflicted nature of the reports and how/why the situation was permitted to come into existence, and cause further costly delay." You also requested a copy of your complete file with both options and reimbursement of your enrollment fee.

CPEP is unable to agree to either option. § 6.2 of the Participation Agreement grants CPEP sole discretion to determine if you are a suitable candidate for participation. CPEP has determined you are not and Pursuant to § 6.2, CPEP terminates the Participation Agreement for cause. CPEP will not re-conduct the Assessment nor issue an Assessment Report with the existing consultants and data.

§ 2.5 of the Participation Agreement states that you are not entitled to review the contents of any file. Therefore, CPEP will not be providing this information to you.

While it is not required to do so, CPEP will refund the \$14,500 assessment fee you paid via your original payment methods.

Please note the Dispute Resolution provisions in Article VII of the Participation Agreement.

Thank you for your attention to these matters.

Sincerely,

Elizabeth J. Korinek
Chief Executive Officer

CPEP – The Center for Personalized Education for Professionals
720 South Colorado Boulevard, 1100-N, Denver, CO 80246

This document and its contents are confidential. Use or disclosure without written authorization from CPEP is strictly prohibited.

www.drrichardkaul.com

June 21, 2023

Elizabeth J. Korinek
CEO
CPEP
720 South Colorado Boulevard, 1100-N
Denver, CO 80246

Re: NOTICE OF LITIGATION

Dear Ms. Korinek,

Thank you for your letter of June 9, 2023 (copy enclosed). Please find below my response and further statement:

1. Conflict of Interest re: ASIPP:

You state: **“On January 16, 2023, ... provided with the identity of these consultants ... conflicts of interest ... affiliation ... ASIPP ... Antony/Harned/Brown ... copy of your complete file ... fee”**, seemingly in support of your argument that because you provided the consultants names and I signed an agreement, that therefore the law indemnifies CPEP/members/consultants against the liability pursuant to the knowing perpetration of fraud. Not only were the referenced conflicts known to CPEP/members/consultants, they were intentional, and it was indeed the purpose of the participants/co-conspirators to conceal this wrongdoing and have issued highly defamatory and knowingly false reports.

2. Conflict of Interest re: Federation State Medical Boards:

In my June 6, 2023, letter to CPEP’s lawyer, Alexis Angell (copy enclosed) I state: **“Another point raised during the conversation pertained to CPEP’s relationship with the Federation State Medical Boards, an entity with which I have engaged in litigation.”** CPEP is a commercially subjugate component of The Kaul Cases Defendant FSMB and was cognizant of this conflict of interest when it contracted with me on January 16, 2023. However, it concealed the conflict for the purpose of furthering its own economic agenda with The Kaul Cases Defendant FSMB, in the knowledge that it would issue a defamatory report purposed to prevent the issuance of my Pennsylvania medical license, which CPEP/FSMB believed would impede my prosecution of The Kaul Cases Defendant FSMB in the United States District Court.

Your failure, in your June 9, 2023, letter, to address/deny/contest/rebut these facts, constitute their tacit admission for the purpose of pending/future litigation.

3. Mail Fraud:

CPEP and its agents, did with fraudulent intent, instruct the United States Postal Service to use its apparatus to illegally/without legitimate cause, obstruct the delivery of documents from me. Specifically, on June 6, 2023, I sent the letter to Alexis Angell via certified mail, with a scheduled delivery date of June 8, 2023. As a consequence of CPEP's obstruction the letter remains at the postal facility in Denver. On June 9, 2023, I emailed the letter to Ms. Besmanoff.

CPEP/members/consultants fraudulent misconduct constitutes an **“ongoing pattern of racketeering”** and violation of my civil/constitutional rights, for which neither the agreement nor your disclosure of the consultants names provide any defense.

Please also be advised that as a consequence of CPEP/members/consultants and **The Kaul Cases** Defendant FSMB, being competitors of mine in the healthcare market, the within detailed misconduct constitutes a knowing violation of antitrust law.

Please be advised accordingly.

Yours sincerely

RICHARD ARJUN KAUL, MD

cc: Ajay Antony
Michael Harned
Robert Brown
ASIPP



June 9, 2023

Via Email and U.S. Mail

Dr. Richard A. Kaul
24 Washington Valley Road
Morristown, NJ 07960
drrichardkaul@gmail.com

Re: CPEP Assessment Services

Dear Dr. Kaul:

We have reviewed in detail your concerns submitted via email on May 16, 2023, May 19, 2023, May 22, 2023, and May 23, 2023, and as discussed with Alisa Johnson, CPEP Program Director, on June 5, 2023, as well as your letter dated June 6, 2023, concerning the clinical consultants who participated in your CPEP Clinical Competence Assessment which took place on February 22, 2023.

On January 16, 2023, you entered an Assessment Services Participation Agreement with CPEP. Pursuant to the Agreement, CPEP engaged clinical consultants to participate in your Assessment. You were provided with the identity of these consultants prior to your Assessment in February 2023 and these consultants conducted clinical interviews with you during your Assessment. In the emails listed above and in further conversation you have contended that the consultants have conflicts of interest because of their affiliation with the American Society of Interventional Pain Physicians (ASIPP) and objected to their involvement based on pending litigation you have filed against ASIPP and others. In your June 6, 2023 correspondence you outlined two options including "re-conducting the Assessment with physicians with no professional, commercial connections/relations/associations..." or "issuing a report containing the contents of all the tests and the reports of Antony/Harned/Brown's with a statement/paragraph as to the conflicted nature of the reports and how/why the situation was permitted to come into existence, and cause further costly delay." You also requested a copy of your complete file with both options and reimbursement of your enrollment fee.

CPEP is unable to agree to either option. § 6.2 of the Participation Agreement grants CPEP sole discretion to determine if you are a suitable candidate for participation. CPEP has determined you are not and Pursuant to § 6.2, CPEP terminates the Participation Agreement for cause. CPEP will not re-conduct the Assessment nor issue an Assessment Report with the existing consultants and data.

§ 2.5 of the Participation Agreement states that you are not entitled to review the contents of any file. Therefore, CPEP will not be providing this information to you.

While it is not required to do so, CPEP will refund the \$14,500 assessment fee you paid via your original payment methods.

Please note the Dispute Resolution provisions in Article VII of the Participation Agreement.

Thank you for your attention to these matters.

Sincerely,

Elizabeth J. Korinek
Chief Executive Officer

www.drrichardkaul.com

June 6, 2023

Alexis Angell, JD
Shareholder
Polsinelli
CPEP Board
720 S. Colorado Blvd., Suite 1100-N
Denver, CO 80246

Re: Resolution of Conflict of Interest

Dear Mr. Angell,

I write this letter as a follow-up and to memorialize the conversation I had on June 5, 2023, from approximately 12:30 pm to 1pm EST, with Amanda Besmanoff and Alisa Johnson regarding the fact that the three individuals (Anthony/Harned/Brown) who conducted evaluations of my skills/knowledge on February 22/23, 2023, were knowingly conflicted and ought to have recused themselves, the willful non-recusal of which however, invalidates their evaluations/reports and moreover has caused me further injury.

I emailed Ms. Besmanoff as soon as I became aware of these conflicts. The conflicts arise from the fact I have on multiple occasions, sued Defendant American Society of Interventional Pain Physicians (ASIPP) in the United States District Court, and that two individuals (Harned/Brown) were/are politically active directors of the Kentucky/Colorado ASIPP chapters and the third (Antony) is an active lecture providing, fee-paying, politically contributing member. A copy of one of these suits (K1) was emailed to Ms. Besmanoff, and establishes the conflicted nature of all members of Defendant ASIPP.

Another point raised during the conversation pertained to CPEP's relationship with the Federation State Medical Boards, an entity with which I have engaged in litigation. I would suggest you view www.pacer.org and search my name with RICHARD ARJUN KAUL, as this will provide further context as to the conflict with the FSMB.

Options:

I believe there are two (2) options:

1. The physician assessments are re-conducted by physicians with no professional, commercial connections/relations/associations, and as stated in my May 30, 2023, email to Ms. Besmanoff (copy attached), these individuals will likely be found in academic/research settings.

2. CPEP issue a report containing the contents of all the tests and the reports of Antony/Harned/Brown's with a statement/paragraph as to the conflicted nature of the reports and how/why the situation was permitted to come into existence, and cause further costly delay.

If option 1 is chosen, and the individuals are conflict-free, then I would not request the reimbursement of my approximately fourteen thousands dollars (\$14,000) enrollment fee, but I would still require I be provided a complete copy of my entire file.

If option 2 is chosen, I would request reimbursement of my enrollment fee and of course production of my entire file.

As I explained during the conversation, if it becomes impossible for me, through this particular avenue, to vindicate my rights and rectify/mitigate the illegal/ongoing eleven (11) year plus injury to my livelihood/life/liberty/reputation/economic standing, I will place the issue before the Pennsylvania Medical Board/ Pennsylvania Courts, to seek an alternate resolution, in which politics/business/professional rivalries are not permitted to obstruct/interfere with my fundamental human/constitutional rights.

I hope that CPEP advances this matter in a manner that is fair, professional and one ultimately, I believe, could reflect well on the organization within the medical profession.

Yours sincerely

RICHARD ARJUN KAUL, MD



Richard Kaul <drrichardkaul@gmail.com>

CPEP Assessment + Supporting Documents

1 message

Richard Kaul <drrichardkaul@gmail.com>
To: Amanda Besmanoff <abesmanoff@cpepdoc.org>

Tue, May 30, 2023 at 9:01 AM

Amanda,

I left a message last week on your VM enquiring as to CPEP's course of action in light of the conflicted nature of the three individuals retained by CPEP to evaluate my knowledge/skills. At your earliest convenience, could you please call me on this point.

Could you please also email me a complete copy of my CPEP file, and ensure that no changes are made to the file in the interim.

There are interventional pain physicians who have no association with Defendant ASIPP, and who quite frankly view the organization as lacking academic gravitas and an organization that is nothing more than a vehicle through which to funnel bribes to corrupt politicians. These individuals exist primarily within academic/research institutions and amongst practitioners who have no commercial interest in the spine market.

I hope we can rectify this situation.

Regards,

Richard Arjun Kaul, MD

www.drrichardkaul.com



Exhibit 15

Frances R. Oleen, #17433
Deputy Attorney General
Kaley Schrader, #27700
Assistant Attorney General
Office of the Attorney General
Public Protection Division
120 SW 10th Ave., 2nd Floor
Topeka, Kansas 66612-1597
Tel: 785-296-3751
Fax: 785-291-3699
kaley.schrader@ag.ks.gov

IN THE DISTRICT COURT OF THOMAS COUNTY, KANSAS

STATE OF KANSAS, *ex rel.*)
KRIS W. KOBACH, Attorney General,)
)
Plaintiff,)
)
v.)
)
PFIZER INC.,)
)
Defendant.)
_____)

Pursuant to K.S.A. Chapter 60

PETITION

COMES NOW the Plaintiff, State of Kansas, *ex rel.* Kris W. Kobach, Attorney General, by and through Assistant Attorney General Kaley Schrader, and for its cause of action against Defendant, alleges and states as follows:

NATURE OF THE ACTION

1. Pfizer misled the public that it had a “safe and effective” COVID-19 vaccine.
2. Pfizer said its COVID-19 vaccine was safe even though it knew its COVID-19 vaccine was connected to serious adverse events, including myocarditis and pericarditis, failed pregnancies, and deaths. Pfizer concealed this critical safety information from the public.

3. Pfizer said its COVID-19 vaccine was effective even though it knew its COVID-19 vaccine waned over time and did not protect against COVID-19 variants. Pfizer concealed this critical effectiveness information from the public.

4. Pfizer said its COVID-19 vaccine would prevent transmission of COVID-19 even though it knew it never studied the effect of its vaccine on transmission of COVID-19.

5. To keep the public from learning the truth, Pfizer worked to censor speech on social media that questioned Pfizer's claims about its COVID-19 vaccine.

6. Pfizer's misrepresentations of a "safe and effective" vaccine resulted in record company revenue of approximately \$75 billion from COVID-19 vaccine sales in just two years.

7. Pfizer's actions and statements relating to its COVID-19 vaccine violated previous consent judgments with the State of Kansas.

8. Pfizer's actions and statements relating to its COVID-19 vaccine violated the Kansas Consumer Protection Act, K.S.A. 50-623 *et seq.*, regardless of whether any individual consumer ultimately received Pfizer's COVID-19 vaccine.

9. Pfizer must be held accountable for falsely representing the benefits of its COVID-19 vaccine while concealing and suppressing the truth about its vaccine's safety risks, waning effectiveness, and inability to prevent transmission.

PARTIES

10. Plaintiff Kris W. Kobach is the duly elected, qualified, and acting Attorney General for the State of Kansas.

11. The Attorney General has standing to bring this action in the name of the State of Kansas by statute. K.S.A. 50-628(a)(1), 50-632(a); *see also* K.S.A. 75-702(a).

12. The Attorney General has standing to bring this action under the common law of this State on behalf of all Kansans.

13. The Attorney General has standing to bring this action under consent judgments between the State of Kansas and Pfizer.

14. Defendant Pfizer Inc. (“Pfizer”) is a publicly traded corporation organized in the State of Delaware and with a principal place of business in New York, New York. Pfizer has been registered to do business in Kansas since June 8, 1993.

15. Defendant Pfizer may be served through its resident agent CT Corporation System, 112 SW 7th Street, Suite 3C, Topeka, Kansas, 66603.

16. Pfizer’s acts include acts by Pfizer and acts by Pfizer’s officers, directors, agents, or employees on Pfizer’s behalf and under its authority.

17. Actions or statements by Pfizer Chairman and CEO Dr. Albert Bourla and Pfizer Board Member Dr. Scott Gottlieb are attributable to Pfizer.

JURISDICTION AND VENUE

18. This Court has jurisdiction over this case pursuant to K.S.A. 20-301 and K.S.A. 50-638(a).

19. Pfizer is registered to do business in Kansas as a foreign corporation, and the cause of action arose in Kansas from Pfizer conducting business in Kansas. Therefore, Pfizer is subject to personal jurisdiction in Kansas pursuant to K.S.A. 17-7307(c).

20. Pfizer is also subject to personal jurisdiction in Kansas pursuant to K.S.A. 60-308(b)(1)(A) because Pfizer transacts business in Kansas.

21. Venue is proper in this county under K.S.A. 50-638(b). Pfizer’s actions and practices that violated the Kansas Consumer Protection Act reached consumers in Thomas County.

ALLEGATIONS COMMON TO ALL COUNTS

22. Plaintiff incorporates all preceding paragraphs by reference.

23. At all times relevant hereto, and in the ordinary course of business, Pfizer acted as a “supplier,” as that term is defined by K.S.A. 50-624(l).

24. At all times relevant hereto, and in the ordinary course of business, Pfizer made, caused to be made, or solicited, “consumer transactions,” as that term is defined by K.S.A. 50-624(c).

25. Upon information and belief, because of the high public interest in Pfizer’s COVID-19 vaccine, Pfizer’s actions and statements circulated widely throughout Kansas.

26. Statements on Pfizer’s website and social media have made misrepresentations to Kansans from the day they were posted continuing to the present.

27. Pfizer’s misrepresentations about its COVID-19 vaccine violated the Kansas Consumer Protection Act and Pfizer’s consent judgments with Kansas each time Pfizer made them to a Kansas consumer, regardless of whether an individual consumer decided to receive or forgo Pfizer’s COVID-19 vaccine.

28. Millions of Kansans heard Pfizer’s misrepresentations about its COVID-19 vaccine. For example, Pfizer administered 3,355,518 Pfizer vaccine doses in Kansas as of February 7, 2024. This accounted for more than 60% of all vaccine doses in Kansas. Kansas Department of Health and Environment, *Data*.¹

29. In May 2021, Pfizer advertised to Kansans on Facebook about its “life-saving vaccines” and its “cures.” Upon information and belief, Pfizer intended for Kansans to think of

¹ Available at <https://www.coronavirus.kdheks.gov/317/Data>. Since this data was collected, the Kansas Department of Health and Environment no longer publicly reports vaccine doses by manufacturer.

its COVID-19 vaccine when it discussed “life-saving vaccines” and “cures.” Pfizer ran three different ads between May 4, 2021 and June 1, 2021 that received 165,000 to 190,000 impressions [views] in Kansas. Meta Ad Library, Summary Data for Ads 2974674432763576,² 1144557279322749,³ and 468595664399043.⁴

30. Pfizer took advantage of Kansans’ fear of COVID-19 and desire for safety by offering a “safe and effective” COVID-19 vaccine, while concealing, suppressing, and omitting material information that undermined its safety and effectiveness claims.

I. Pfizer’s Big Bet on Its COVID-19 Vaccine

31. COVID-19 is caused by the virus SARS-CoV-2 and originated in Wuhan, China.

32. In 2020, Pfizer raced to develop a COVID-19 vaccine.

33. Unlike the other companies involved in the race for a vaccine, Pfizer did not join Operation Warp Speed and declined its vaccine development funding. *Transcript, Pfizer CEO Dr. Albert Bourla on ‘Face the Nation,’* CBS News, Sept. 13, 2020;⁵ Carolyn Y. Johnson, *Pfizer’s coronavirus vaccine is more than 90 percent effective in first analysis, company reports*, THE WASHINGTON POST (Nov. 9, 2020).⁶

34. Pfizer distanced itself from Operation Warp Speed when it announced the results of its COVID-19 vaccine trials: “We were never part of the Warp Speed,” proclaimed Pfizer’s senior vice president and head of vaccine research and development. Philip Bump, *No, Pfizer’s*

² Available at <https://www.facebook.com/ads/library/?id=2974674432763576>.

³ Available at <https://www.facebook.com/ads/library/?id=1144557279322749>.

⁴ Available at <https://www.facebook.com/ads/library/?id=468595664399043>.

⁵ Available at <https://www.cbsnews.com/news/transcript-pfizer-ceo-dr-albert-bourla-on-face-the-nation-september-13-2020/>.

⁶ Available at <https://www.washingtonpost.com/health/2020/11/09/pfizer-coronavirus-vaccine-effective/>.

apparent vaccine success is not a function of Trump's 'Operation Warp Speed,' THE WASHINGTON POST (Nov. 9, 2020).⁷

35. Pfizer's Chairman and CEO Dr. Bourla, a veterinarian by training, reported that Pfizer declined government funding in order to "liberate" Pfizer's scientists from government oversight of its vaccine development: "But the reason why I did it was because I wanted to liberate our scientists from any bureaucracy. **When you get money from someone that always comes with strings. They want to see how we are going to progress, what type of moves you are going to do. They want reports. I didn't want to have any of that.**" *Transcript, Pfizer CEO Dr. Albert Bourla on 'Face the Nation,'* CBS NEWS, Sept. 13, 2020 (emphasis added).⁸

36. Because Pfizer did not accept government funding, "[t]he government had limited visibility into what was happening at Pfizer, ..." Sydney Lupkin, *The U.S. Paid Billions To Get Enough COVID Vaccines Last Fall. What Went Wrong?* NPR (Aug. 25, 2021).⁹

37. "Pfizer worked 'at arm's length' compared with the other companies in Operation Warp Speed," the scientific lead of Operation Warp Speed recounted. *Id.*

38. Pfizer's independence from Operation Warp Speed allowed it to demand a "tailor-made contract" that let Pfizer "retain almost all of its intellectual property rights and forgo the taxpayer protection clauses found in most government contracts that fund inventions." *Id.*; see also Statement of Work for COVID-19 Pandemic-Large Scale Vaccine Manufacturing Demonstration, July 21, 2020 ("Pfizer Statement of Work"), ¶¶ 7.1, 7.2 (PDF pp. 19-20).¹⁰

⁷ Available at <https://www.washingtonpost.com/politics/2020/11/09/no-pfizers-apparent-vaccine-success-is-not-function-trumps-operation-warp-speed/>.

⁸ Available at <https://www.cbsnews.com/news/transcript-pfizer-ceo-dr-albert-bourla-on-face-the-nation-september-13-2020/>.

⁹ Available at <https://www.npr.org/sections/health-shots/2021/08/25/1029715721/pfizer-vaccine-operation-warp-speed-delay>.

¹⁰ Available at <https://www.hhs.gov/sites/default/files/pfizer-inc-covid-19-vaccine-contract.pdf>.

39. By self-funding, Pfizer was betting big that its vaccine development would succeed. “[I]f it fails, it goes to our pocket,” warned Pfizer Chairman and CEO Dr. Bourla. *Transcript, Pfizer CEO Dr. Albert Bourla on ‘Face the Nation,’*” CBS NEWS, Sept. 13, 2020.¹¹

40. By September 2020, Pfizer had invested at least \$1.5 billion for COVID vaccine development. Losing this money by failing to develop an approved vaccine would be “painful,” admitted Pfizer Chairman and CEO Dr. Bourla. *Id.*

41. Based on Pfizer’s public statements, Pfizer would lose \$1.5 billion to \$2 billion if government regulators did not approve its COVID-19 vaccine. *See id.*; Pfizer 2021 Annual Report, *Expanding COVID-19 Manufacturing Efforts to Increase Global Vaccine Access.*¹²

42. Pfizer’s contract with the federal government—in which Pfizer would deliver 100 million doses in exchange for \$1.95 billion—required Pfizer to obtain approval of its COVID-19 vaccine. *Pfizer and BioNTech Announce an Agreement with U.S. Government for up to 600 Million Doses of mRNA-based Vaccine Candidate Against SARS-CoV-2*, July 22, 2020.¹³

43. Pfizer doubled down on its bet that its vaccine would receive federal government approval by producing a “few million” vaccine doses before it received the efficacy or safety data from its vaccine trial or government approval. *Pfizer CEO says he would’ve released vaccine data before election if possible*, AXIOS, Nov. 9, 2020.¹⁴

44. Pfizer’s CEO had a personal financial interest in Pfizer succeeding.

¹¹ Available at <https://www.cbsnews.com/news/transcript-pfizer-ceo-dr-albert-bourla-on-face-the-nation-september-13-2020/>.

¹² Available at https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2021/story/expanding-covid-manufacturing-efforts/.

¹³ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-announce-agreement-us-government-600>.

¹⁴ Available at <https://www.axios.com/2020/11/09/pfizer-ceo-says-he-wouldve-released-vaccine-data-before-election-if-possible>.

45. In August 2020, Pfizer Chairman and CEO Dr. Bourla implemented a plan to sell some of his Pfizer stock if it reached a pre-determined price just one day before Pfizer issued a press release “featuring ‘additional Phase 1 safety and immunogenicity data’ and confirming that Pfizer and its German partner, BioNTech, were ‘on track to seek regulatory review’ for its vaccine candidate by October. The financial news channels Fox Business, CNBC, and Bloomberg all covered the August news, with CNBC noting that [Pfizer’s] stock appeared to be ‘moving sharply higher today on an optimistic vaccine timeline.’” Tom Dreisbach, *Pfizer CEO Sold Millions In Stock After Coronavirus Vaccine News, Raising Questions*, NPR, Nov. 11, 2020.¹⁵

46. Pfizer Chairman and CEO Dr. Bourla’s stock reached the pre-determined price and sold on November 9, 2020, “the same day Pfizer announced that its experimental coronavirus vaccine candidate was found to be more than 90% effective. The company’s stock soared on the news.” *Id.*

47. Pfizer Chairman and CEO Dr. Bourla made \$5.6 million from his November 9, 2020 Pfizer stock sale. *Id.*

48. An insider-trading expert called the sequence of events involving Pfizer Chairman and CEO Dr. Bourla’s stock sale “very suspicious,” “wholly inappropriate,” and “troubling.” *Id.*

49. Pfizer had billions of incentives to do whatever it took to ensure that its COVID-19 vaccine received the necessary government approval.

50. Pfizer received emergency use authorization for its COVID-19 vaccine in individuals 16 years of age and older on December 11, 2020. FDA, *FDA Takes Key Action in Fight Against COVID-19 By Issuing Emergency Use Authorization for First COVID-19 Vaccine*,

¹⁵ Available at <https://www.npr.org/2020/11/11/933957580/pfizer-ceo-sold-millions-in-stock-after-coronavirus-vaccine-news-raising-questio>.

Dec. 11, 2020.¹⁶ Emergency Use Authorizations “can be used by the FDA during public health emergencies to provide access to medical products that may be effective in preventing, diagnosing, or treating a disease, provided that the FDA determines that the known and potential benefits of a product, when used to prevent, diagnose, or treat the disease, outweigh the known and potential risks of the product.” FDA, *FDA Approves First COVID-19 Vaccine*, Aug. 23, 2021.¹⁷

51. Pfizer received FDA approval for its COVID-19 vaccine in individuals 16 years of age and older on August 23, 2021. *Id.*

52. From 2021 to 2023, Pfizer received emergency use authorizations for its COVID-19 vaccine in children from six months to 15 years of age, as well as for booster doses. *See, e.g.,* U.S. Dep’t of Health and Human Servs., *COVID-19 Vaccine Milestones*.¹⁸

II. Pfizer’s COVID-19 Vaccine and Transparency

A. Pfizer’s representations about transparency

53. Pfizer repeatedly assured Kansans that it provided transparency on its data.

54. On December 14, 2020, the day Americans began receiving Pfizer’s COVID-19 vaccine, Pfizer Chairman and CEO Dr. Bourla said, “This is a vaccine that was developed without cutting corners from a company with 171 years of credentials. This is a vaccine that was developed in the spotlight in the daylight, with all the data being put in servers.” *CNBC Transcript: Pfizer Chairman and CEO Albert Bourla Speaks with CNBC’s ‘Squawk Box’ Today*, CNBC (Dec. 14, 2020).¹⁹

¹⁶ Available at <https://www.fda.gov/news-events/press-announcements/fda-takes-key-action-fight-against-covid-19-issuing-emergency-use-authorization-first-covid-19>.

¹⁷ Available at <https://www.fda.gov/news-events/press-announcements/fda-approves-first-covid-19-vaccine>.

¹⁸ Available at <https://www.hhs.gov/coronavirus/covid-19-vaccines/index.html>.

¹⁹ Available at <https://www.cnbc.com/2020/12/14/cnbc-transcript-pfizer-chairman-and-ceo-albert-bourla-speaks-with-cnbc-squawk-box-today.html>.

55. On September 16, 2021, Pfizer Chairman and CEO Dr. Bourla said, “Since the start of this pandemic, Pfizer and BioNTech have pledged to follow the science and keep people informed about our progress to help bring an end to this global health crisis. We have stayed true to our commitment of full transparency without selectively cherry-picking data.” *Continuing to Follow the Science: An Open Letter from Pfizer Chairman and CEO Dr. Albert Bourla*, Pfizer, Sept. 16, 2021.²⁰

56. Contrary to its representations, Pfizer has willfully concealed, suppressed, and omitted safety and efficacy data relating to its COVID-19 vaccine.

B. Pfizer used confidentiality agreements to conceal critical data relating to the safety and effectiveness of its COVID-19 vaccine.

57. Pfizer has kept data hidden through confidentiality agreements with governments around the world.

58. Pfizer’s contract required the United States government to keep Pfizer’s confidential information secret for 10 years. Higher protections applied to Pfizer’s trade secret information, which the government promised to keep “in confidence in perpetuity.” Pfizer Statement of Work, ¶ 11.10 (PDF p. 25).²¹

59. Pfizer effectively had a veto over the federal government’s communications because the parties agreed that they would not make any public announcement relating to the COVID-19 vaccine contract or “the transactions contemplated by it” without the prior written consent of the other. *Id.* at ¶ 11.11 (PDF p. 25).

²⁰ Available at <https://www.pfizer.com/news/announcements/continuing-follow-science-open-letter-pfizer-chairman-and-ceo-dr-albert-bourla>.

²¹ Available at <https://www.hhs.gov/sites/default/files/pfizer-inc-covid-19-vaccine-contract.pdf>.

60. Conversely, Pfizer had exclusive control over its own communications through “the right, but not the obligation, to prepare and submit scientific publications and release information to the public about its COVID-19 development program, without the Government’s consent or involvement.” *Id.*

61. Upon information and belief, Pfizer used its confidentiality agreements with the United States government and others to conceal, suppress, and omit material facts relating to Pfizer’s COVID-19 vaccine, including the safety and efficacy of the vaccine.

C. Pfizer used an extended study timeline to conceal critical data relating to the safety and effectiveness of its COVID-19 vaccine.

62. Pfizer also kept data hidden through a study timeline that Pfizer repeatedly delayed.

63. Pfizer planned to provide researchers with access to patient-level data and full clinical study reports 24 months after study completion. Protocol C4591001, “A Phase 1/2, Placebo-Controlled, Randomized, Observer-Blind, Dose-Finding Study to Describe the Safety, Tolerability, Immunogenicity, and Potential Efficacy of SARS-CoV-2 RNA Vaccine Candidates Against COVID-19 in Healthy Adults,” (“Apr. 2020 Protocol”), Pfizer, Apr. 15, 2020, 104 (PDF p. 106), ¶ 10.1.4.²²

64. Pfizer initially estimated that it would complete the study by January 27, 2023, but that estimated date fell back to February 2024 because of a late vaccination of a single study participant (out of 44,000 participants). Jennifer Block, *COVID-19: Researchers face wait for patient level data from Pfizer and Moderna vaccine trials*, BRITISH MEDICAL JOURNAL, July 12, 2022,²³ *see also* Pfizer’s Clinical Study Records.²⁴

²² Available at https://www.nejm.org/doi/suppl/10.1056/NEJMoa2027906/suppl_file/nejmoa2027906_protocol.pdf.

²³ Available at <https://www.bmj.com/content/378/bmj.o1731>.

²⁴ Available at <https://www.clinicaltrials.gov/study/NCT04368728?term=C4591001&rank=2&tab=history&a=>.

65. Scientists were outraged that they still could not review Pfizer’s COVID-19 study data. “Pfizer’s pivotal COVID vaccine trial was funded by the company and designed, run, analysed, and authored by Pfizer employees. The company and the contract research organisations that carried out the trial hold all the data.” *COVID-19 vaccines and treatments: we must have raw data, now*, British Medical Journal, 2022:376 (Jan. 19, 2022).²⁵

66. Pfizer’s control of the data allowed the company to selectively publish results for which the underlying data could not be independently evaluated. *See id.*

67. As the British Medical Journal editorialized in January 2022:

Pharmaceutical companies are reaping vast profits without adequate independent scrutiny of their scientific claims. The purpose of regulators is not to dance to the tune of rich global corporations and enrich them further; it is to protect the health of their populations. We need complete data transparency for all studies, we need it in the public interest, and we need it now.

Id.

68. Perhaps due to a production ruling in a Freedom of Information Act (“FOIA”) lawsuit against the FDA, *see infra*, and the increased frustration expressed by scientists, Pfizer finally completed its study on February 10, 2023.

69. Pfizer today says it will make data from vaccine trials approved in the United States available 18 months after the primary study completion date. Pfizer, *Data Access Requests*.²⁶

70. Upon information and belief, Pfizer has still not made its complete study data available to researchers.

D. Pfizer used FOIA denial and delay to conceal critical data relating to the safety and effectiveness of its COVID-19 vaccine.

²⁵ Available at <https://www.bmj.com/content/376/bmj.o102>.

²⁶ Available at <https://www.pfizer.com/science/clinical-trials/trial-data-and-results/data-requests>.

71. The Food and Drug Administration's refusal to immediately produce safety and effectiveness data for Pfizer's COVID-19 vaccine kept Pfizer's data hidden from the public.

72. The Food and Drug Administration granted full approval for Pfizer's COVID-19 vaccine in adults on August 23, 2021. *Pfizer-BioNTech COVID-19 Vaccine COMIRNATY® Receives Full U.S. FDA Approval for Individuals 16 Years and Older*, Aug. 23, 2021.²⁷

73. Full approval of Pfizer's COVID-19 vaccine should have made Pfizer's "safety and effectiveness data and information, ... adverse reaction reports, product experience reports, [and] consumer complaints ... immediately available for public disclosure." *See* 21 C.F.R. 601.51(e).

74. Safety and effectiveness data includes all studies and tests on animals and humans. 21 C.F.R. § 601.51(g).

75. But the FDA did not make the safety and effectiveness data for Pfizer's COVID-19 vaccine immediately available.

76. Because full data was not available, Public Health and Medical Professionals for Transparency in America ("PHMPTA") submitted a FOIA request to the FDA for all data and information for Pfizer's COVID-19 vaccine. *Pub. Health & Med. Pros. for Transparency v. Food & Drug Admin.*, No. 4:21-CV-1058-P, Doc. 1-1 (Aug. 27, 2021 request).

77. Pfizer's contract with the federal government granted Pfizer at least 30 days to review any records the government planned to release and the power to identify documents and information "legally withholdable from release under FOIA." Pfizer Statement of Work, ¶ 7.2 (PDF p. 20).²⁸

²⁷ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-biontech-covid-19-vaccine-comirnatyr-receives-full>.

²⁸ Available at <https://www.hhs.gov/sites/default/files/pfizer-inc-covid-19-vaccine-contract.pdf>.

78. FOIA does not provide a third-party like Pfizer with rights to review documents before their release or to identify withholdable documents. Pfizer's COVID-19 vaccine contract thus provided Pfizer with rights over government documents not typically possessed by private businesses.

79. The FDA denied expedited processing of PHMPTA's FOIA request and claimed in litigation that it would take 55 years—until 2076—to produce all of the responsive documents. Jenna Greene, *Wait what? FDA wants 55 years to process FOIA request over vaccine data*, REUTERS, Nov. 18, 2021.²⁹

80. Upon information and belief, Pfizer and its contractual rights to review documents before their release and to identify withholdable documents influenced the FDA's decision to deny expedited processing of PHMPTA's FOIA request and propose a 55-year production timeline.

81. Upon information and belief, Pfizer thus had a role in keeping its safety and effectiveness data possessed by the FDA hidden from the public.

82. In January 2022, a federal judge rejected the FDA's proposed production of 500 pages per month and ordered the FDA to instead produce 55,000 pages per month. *Pub. Health & Med. Pros. for Transparency v. Food & Drug Admin.*, No. 4:21-CV-1058-P, 2022 WL 90237, at *2 (N.D. Tex. Jan. 6, 2022).

E. Pfizer destroyed the vaccine control group, which will conceal critical data relating to the safety and effectiveness of its COVID-19 vaccine.

83. Finally, Pfizer kept its COVID-19 vaccine's true effects hidden by destroying the control group participating in its vaccine trial.

²⁹ Available at <https://www.reuters.com/legal/government/wait-what-fda-wants-55-years-process-foia-request-over-vaccine-data-2021-11-18/>.

84. A double-blind study, in which both the study subjects and study investigators do not know which group received the treatment or the placebo, is “the gold standard in modern clinical trials” and is “designed to test a treatment’s safety and efficacy.” Pfizer, *How the Placebo Effect Can Cloud Clinical Trial Results*.³⁰

85. Pfizer promoted that it was conducting a double-blind study on its COVID-19 vaccine “to obtain safety, immune response, and efficacy data needed for regulatory review.” Pfizer, *Pfizer and BioNTech Choose Lead mRNA Vaccine Candidate Against COVID-19 and Commence Pivotal Phase 2/3 Global Study*, July 27, 2020;³¹ see also Apr. 2020 Protocol, *supra*, 30 (PDF p. 32).

86. Pfizer planned to follow COVID-19 vaccine study participants, both vaccine and placebo recipients, for 24 months to monitor the safety and effectiveness of its vaccine. Apr. 2020 Protocol, *supra*, 94-95 (PDF p. 96-97).

87. Once the FDA approved Pfizer’s COVID-19 vaccine through an emergency use authorization in December 2020, Pfizer unblinded the study participants and offered vaccine placebo recipients the option to receive the Pfizer COVID-19 vaccine. Stephen J. Thomas et al., *Safety and Efficacy of the BNT162b2 mRNA COVID-19 Vaccine through 6 months*, N. Eng. J. Med., Sept. 15, 2021.³²

88. Of the 21,921 vaccine trial participants who received the placebo, more than 20,000 placebo participants decided to receive the Pfizer COVID-19 vaccine as of March 13, 2021. BLA Clinical Review Memorandum, Aug. 23, 2021, at 32.³³

³⁰ Available at https://www.pfizer.com/news/articles/how_the_placebo_effect_can_cloud_clinical_trial_results.

³¹ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-choose-lead-mrna-vaccine-candidate>.

³² Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8461570/>.

³³ Available at <https://www.fda.gov/media/152256/download>.

89. Taken together, only 1,544 placebo participants had not received the Pfizer COVID-19 vaccine as of March 13, 2021, just 7% of the original placebo group. *See id.*

90. Because Pfizer unblinded the original control group and allowed them to receive Pfizer's COVID-19 vaccine, Pfizer, government regulators, and independent scientists cannot fully compare the safety and efficacy of Pfizer's COVID-19 vaccine against unvaccinated individuals.

91. Pfizer's extensive and aggressive efforts to keep its COVID-19 vaccine information hidden conflict with its public transparency pledges and raise serious questions about what Pfizer is hiding and why it is hiding it.

III. Pfizer's COVID-19 Vaccine and Safety

A. Pfizer's representations about its COVID-19 vaccine and safety

92. In an open letter to the public, Pfizer Chairman and CEO Dr. Bourla dedicated his company to producing a safe vaccine: "The second requirement is to prove that the vaccine is safe. Our internal standards for vaccine safety and those required by regulators are set high. . . . **Safety is, and will remain, our number one priority**, and we will continue monitoring and reporting safety data for all trial participants for two years." *An Open Letter from Pfizer Chairman and CEO Albert Bourla*, Pfizer, Oct. 15, 2020 (emphasis added).³⁴

93. After committing to Kansans that safety was Pfizer's number one priority with its COVID-19 vaccine, Pfizer and its employees, directors, and agents repeatedly misrepresented to Kansans that Pfizer's COVID-19 vaccine was safe.

94. On November 9, 2020, Pfizer Chairman and CEO Dr. Bourla said, "We feel very good about the safety" of Pfizer's COVID-19 vaccine and that there were "no safety concerns"

³⁴ Available at <https://www.pfizer.com/news/announcements/open-letter-pfizer-chairman-and-ceo-albert-bourla>.

reported to Pfizer by a review committee. Tommy Brooksbank, *Pfizer CEO on coronavirus vaccine: 'We feel very good about the safety,'* GOOD MORNING AMERICA, Nov. 9, 2020.³⁵

95. On April 1, 2021, Pfizer issued a press release confirming “no serious safety concerns through up to six months following second dose” of the Pfizer COVID-19 vaccine. *Pfizer and BioNTech Confirm High Efficacy and No Serious Safety Concerns Through Up to Six Months Following Second Dose in Updated Topline Analysis of Landmark COVID-19 Vaccine Study*, Pfizer, Apr. 1, 2021.³⁶

96. On August 23, 2021, Pfizer Chairman and CEO Dr. Bourla said that the Pfizer vaccine “is effective and safe.” Antonio Planas, *'Effective and safe': Pfizer CEO says FDA's full approval should result in more vaccinations*, NBC NEWS, Aug. 23, 2021.³⁷

97. On September 16, 2021, Pfizer Chairman and CEO Dr. Bourla said, “We have been very successful in developing an effective and safe vaccine.” *Continuing to Follow the Science: An Open Letter from Pfizer Chairman and CEO Dr. Albert Bourla*, Pfizer, Sept. 16, 2021.³⁸

98. On September 20, 2021, Pfizer announced in a press release that “[i]n participants 5 to 11 years of age, the vaccine was safe, well tolerated and showed robust neutralizing antibody responses.” *Pfizer and BioNTech Announce Positive Topline Results From Pivotal Trial of COVID-19 Vaccine in Children 5 to 11 Years*, Pfizer, Sept. 20, 2021.³⁹

³⁵ Available at <https://www.goodmorningamerica.com/news/story/pfizer-ceo-coronavirus-vaccine-feel-good-safety-74105879>.

³⁶ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-confirm-high-efficacy-and-no-serious>.

³⁷ Available at <https://www.nbcnews.com/news/us-news/effective-safe-pfizer-ceo-says-fda-s-full-approval-should-n1277478>.

³⁸ Available at <https://www.pfizer.com/news/announcements/continuing-follow-science-open-letter-pfizer-chairman-and-ceo-dr-albert-bourla>.

³⁹ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-announce-positive-topline-results>.

99. On November 22, 2021, Pfizer announced that its COVID-19 vaccine “demonstrated 100% efficacy against COVID-19 in longer-term analysis, with no serious safety concerns identified” in children 12 through 15 years of age. *Follow-Up Data From Phase 3 Trial of Pfizer-BioNTech COVID-19 Vaccine Support Safety and High Efficacy in Adolescents 12 Through 15 Years of Age*, Pfizer, Nov. 22, 2021.⁴⁰

B. Pfizer made unsupported representations and concealed material facts relating to safety of its COVID-19 vaccine.

100. What Pfizer knew about its COVID-19 vaccine demonstrates that Pfizer made unsupported representations and concealed material facts relating to its COVID-19 vaccine.

1. Pfizer’s vaccine trials provided limited safety information because Pfizer tested only healthy individuals.

101. Vaccine development normally includes testing on “people with typically varying health statuses and from different demographic groups.” FDA, *Vaccine Development – 101* (Dec. 14, 2020) (discussing Phase 2).⁴¹ Indeed, vaccine development includes “trial participants who have characteristics (such as age and physical health) similar to the intended recipients for the vaccine.” CDC, *How Vaccines are Developed and Approved for Use* (Mar. 30, 2023).

102. Pfizer only tested its COVID-19 vaccine on healthy individuals. Protocol C4591001, “A Phase 1/2/3, Placebo-Controlled, Randomized, Observer-Blind, Dose-Finding Study to Evaluate the Safety, Tolerability, Immunogenicity, and Efficacy of SARS-CoV-2 RNA Vaccine Candidates Against COVID-19 in Healthy Individuals” (“Sept. 2020 Protocol”), Pfizer, Sept. 8, 2020, 36 (PDF p. 164), ¶ 5.1.2.⁴²

⁴⁰ Available at <https://www.pfizer.com/news/press-release/press-release-detail/follow-data-phase-3-trial-pfizer-biontech-covid-19-vaccine>.

⁴¹ Available at <https://www.fda.gov/vaccines-blood-biologics/development-approval-process-cber/vaccine-development-101>.

⁴² Available at https://www.nejm.org/doi/suppl/10.1056/NEJMoa2027906/suppl_file/nejmoa2027906_protocol.pdf.

103. Pfizer excluded unhealthy individuals from its COVID-19 vaccine trials. *Id.* at 37-38 (PDF pp. 165-66), ¶ 5.2.

104. For example, Pfizer excluded from its COVID-19 vaccine trials any individual who had been diagnosed with COVID-19. *Id.* at 37 (PDF p. 165), ¶ 5.2.5.

105. Pfizer excluded from its COVID-19 vaccine trials any immunocompromised individual. *Id.* at 38 (PDF p. 166), ¶ 5.2.8.

106. Pfizer excluded from its COVID-19 vaccine trials any woman who was pregnant or breastfeeding. *Id.* at 38 (PDF p. 166), ¶ 5.2.11.

107. Pfizer excluded individuals who health officials opined were vulnerable to COVID-19, and who accordingly were likely to be interested in a vaccine for COVID-19.

108. Pfizer's representations that its COVID-19 vaccine did not have any safety concerns failed to disclose the material facts that it had only been tested on healthy individuals.

109. Pfizer did not have data to support representations that its vaccine was safe for the general population, such as in individuals who had been diagnosed with COVID-19, who were immunocompromised, or who were pregnant or breastfeeding.

2. Pfizer failed to disclose limitations of its COVID-19 vaccine trials.

110. When Pfizer announced that the FDA had authorized Pfizer's COVID-19 vaccine for emergency use, Pfizer did not disclose that its trial included only healthy individuals and excluded unhealthy individuals. *See Pfizer and BioNTech Celebrate Historic First Authorization in the U.S. of Vaccine to Prevent COVID-19*, Dec. 11, 2020.⁴³

⁴³ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-celebrate-historic-first-authorization>.

111. In its press release announcing emergency use authorization of its COVID-19 vaccine, Pfizer claimed that a “primary endpoint” of the trial of its COVID-19 vaccine was “prevention of COVID-19 regardless of whether participants have previously been infected by SARS-CoV-2.” *Id.*

112. Pfizer’s statement was misleading since it had excluded any individual who had been diagnosed with COVID-19 from its vaccine trial.

113. In its press release announcing emergency use authorization of its COVID-19 vaccine, Pfizer did not disclose that it had excluded immunocompromised individuals from its COVID-19 vaccine trials. *See id.*

114. Instead, in “Important Safety Information” in its press release, Pfizer noted that “[i]mmunocompromised persons, including individuals receiving immunosuppressant therapy, may have a diminished immune response to the Pfizer BioNTech COVID-19 Vaccine.” *Id.*

115. Because it excluded immunocompromised individuals from its COVID-19 vaccine trials, Pfizer did not have a reasonable basis to make representations about the possible effect its COVID-19 vaccine would have on immunocompromised individuals.

116. In its press release announcing emergency use authorization of its COVID-19 vaccine, Pfizer did not disclose that it had excluded pregnant or breastfeeding women from its COVID-19 vaccine trials. *See id.*

117. Instead, Pfizer reported that it planned additional studies to evaluate its COVID-19 vaccine in pregnant women. *Id.*

118. In addition, in “Important Safety Information” in its press release, Pfizer reported, “[a]vailable data on Pfizer BioNTech COVID-19 Vaccine administered to pregnant women are insufficient to inform vaccine-associated risks in pregnancy.” *Id.*

119. Pfizer also reported, “[d]ata are not available to assess the effects of Pfizer BioNTech COVID-19 Vaccine on the breastfed infant or on milk production/excretion.” *Id.*

120. Pfizer did not disclose that data was insufficient and unavailable to assess the effects of Pfizer’s COVID-19 vaccine on pregnant and breastfeeding women because Pfizer excluded all pregnant and breastfeeding women from its COVID-19 vaccine trials.

121. Six months after vaccinating individuals in its COVID-19 vaccine trial, Pfizer issued another press release that again failed to disclose that Pfizer excluded all unhealthy individuals, immunocompromised individuals, and women who are pregnant or breastfeeding from its COVID-19 vaccine trial. *Pfizer and BioNTech Confirm High Efficacy and No Serious Safety Concerns Through Up to Six Months Following Second Dose in Updated Topline Analysis of Landmark COVID-19 Vaccine Study*, Apr. 1, 2021.⁴⁴

122. Pfizer’s April 1, 2021 press release contains the same statements about immunocompromised individuals and women who are pregnant or breastfeeding as its December 11, 2020 press release.

123. Pfizer made representations about its COVID-19 vaccine’s safety knowingly or with reason to know that it did not possess a reasonable basis to represent that it was safe for individuals who had been diagnosed with COVID-19, who were immunocompromised, or who were pregnant or breastfeeding.

124. Pfizer made representations knowingly or with reason to know that the safety of its COVID-19 vaccine had not been proven or otherwise substantiated in individuals who had been diagnosed with COVID-19, who were immunocompromised, or who were pregnant or

⁴⁴ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-confirm-high-efficacy-and-no-serious>.

breastfeeding. Pfizer did not rely upon or possess the type and amount of proof or substantiation it represented to exist.

125. Pfizer's decision to exclude individuals who had been diagnosed with COVID-19, who were immunocompromised, or who were pregnant or breastfeeding from its vaccine trials were material facts to Kansans making decisions about COVID-19 vaccination.

126. On multiple occasions, Pfizer willfully concealed, suppressed, or omitted material facts about who it had excluded from its COVID-19 vaccine trials, and how those exclusions might affect Pfizer's safety representations.

C. Pfizer's knowledge of COVID-19 vaccine safety issues

127. Pfizer possessed data presenting significant safety concerns associated with its COVID-19 vaccine when Pfizer made public statements in 2021 that its COVID-19 vaccine was safe. See *Worldwide Safety and Pfizer, 5.3.6 Cumulative Analysis of Post-Authorization Adverse Event Reports of PF-07302048 (BNT162B2) Received Through 28-Feb-2021*, approved Apr. 30, 2021 ("Pfizer Feb. 28, 2021 Adverse Event Data").⁴⁵

128. The FDA defines an adverse event as "any undesirable experience associated with the use of a medical product in a patient." FDA, *What is a Serious Adverse Event?*, content current as of May 18, 2023.⁴⁶

129. The FDA and CDC co-manage the Vaccine Adverse Event Reporting System (VAERS), "a national early warning system to detect possible safety problems in U.S.-licensed vaccines." U.S. Dept. of Health & Human Servs., *About VAERS*.⁴⁷

⁴⁵ Available at https://phmp.org/wp-content/uploads/2022/04/reissue_5.3.6-postmarketing-experience.pdf.

⁴⁶ Available at <https://www.fda.gov/safety/reporting-serious-problems-fda/what-serious-adverse-event>.

⁴⁷ Available at <https://vaers.hhs.gov/about.html>.

130. VAERS is a passive reporting system that relies on reports submitted by patients and health care providers, “a system that is believed to miss many potential side effects.” JoNel Aleccia, *COVID vaccine safety system has gaps that may miss unexpected side effects, experts say*, NBC NEWS (May 2, 2021).⁴⁸

131. Separate from VAERS, Pfizer maintained its own adverse events database that “contain[ed] cases of [adverse events (AEs)] reported spontaneously to Pfizer, cases reported by the health authorities, cases published in the medical literature, cases from Pfizer-sponsored marketing programs, non-interventional studies, and cases of serious AEs reported from clinical studies regardless of causality assessment.” Pfizer Feb. 28, 2021 Adverse Event Data, at 5.

132. Upon information and belief, Pfizer’s adverse events database contained more adverse event data than VAERS because it included both information in VAERS and information not in VAERS.

133. Pfizer did not publicly release adverse events data from its database.

134. The Pfizer Feb. 28, 2021 Adverse Event Data document was only obtained through the Public Health and Medical Professionals for Transparency in America FOIA litigation.

135. As of February 28, 2021, Pfizer’s adverse events database contained 158,893 adverse events (from 42,086 case reports) from its COVID-19 vaccine. *Id.* at 6.

136. As of February 28, 2021, Pfizer’s database contained 1,223 fatalities after taking Pfizer’s COVID-19 vaccine, although Pfizer did not make causality findings. *Id.* at 7.

137. Pfizer was receiving so many adverse event reports that it had to hire 600 additional full-time staff and expected to hire more than 1,800 additional resources by June 2021. *Id.* at 6.

⁴⁸ Available at <https://www.nbcnews.com/health/health-news/covid-vaccine-safety-system-has-gaps-may-miss-unexpected-side-n1265986>.

138. Pfizer had such a backlog of adverse events that it might take 90 days to code “non-serious cases.” *Id.*

139. Pfizer did not know “the magnitude of underreporting” *id.* at 5, but significant underreporting was likely. *See* Hazell L, Shakir SA. Under-reporting of adverse drug reactions: a systematic review. *Drug Saf.* 2006;29(5):385-96. doi: 10.2165/00002018-200629050-00003. PMID: 16689555 (systematic review of 37 studies concluding that the median under-reporting of adverse drug reactions to spontaneous reporting systems was 94%).

140. Pfizer’s representations that its COVID-19 vaccine did not have any safety concerns was inconsistent with the adverse events data it possessed.

141. Pfizer concealed, suppressed, or omitted material facts it possessed showing significant safety concerns associated with Pfizer’s COVID-19 vaccine.

D. Pfizer’s knowledge of the safety of its COVID-19 vaccine on pregnant women

1. The concerning findings in Pfizer’s secret animal study.

142. While Pfizer tested its COVID-19 vaccine on healthy individuals in 2020, Pfizer and its partner BioNTech also quietly tested its COVID-19 vaccine on pregnant rats from June 29, 2020 to October 12, 2020. Charles River, “A Combined Fertility and Development Study (Including Teratogenicity and Postnatal Investigations) of BNT162b1, BNT162b2 and BNT162b3 by Intramuscular Administration in the Wistar Rat,” approved Dec. 22, 2020 (“Pfizer Rat Fertility Study”), at 13.⁴⁹

⁴⁹ Available at https://pdata0916.s3.us-east-2.amazonaws.com/pdocs/110122/125742_S1_M4_20256434.pdf.

143. According to the lab that performed the research, “[t]he rat genome is comparable to the human genome, which makes rats desirable models for the study of diseases that affect humans.” Charles River, *Laboratory Rats*.⁵⁰

144. The rat fertility study contained a positive conclusion: “Intramuscular administration of BNT162b1, BNT162b2 and BNT162b3 before and during gestation to female Wistar (CRL:WI[Han]) rats was associated with non-adverse effects (body weight, food consumption and effects localized to the injection site) after each dose administration. There were no effects of any of the 3 vaccine candidates on mating performance or fertility in F0 female rats or on embryo-fetal or postnatal survival, growth, or development of the F1 offspring.” Pfizer Rat Fertility Study, at 38.

145. The rat fertility study’s details tell a much more concerning story.

146. Rats that received BNT162b2, Pfizer’s COVID-19 vaccine:

- a. Had multiple fetuses with severe soft tissue and skeletal malformations, *id.* at 34;
- b. Did not become pregnant, *id.* at 22 Text Table 5, n. b;
- c. Failed to implant embryos at more than double (9.77%) the rate of the control group (4.09%), *id.* at 33;
- d. Lost body weight, *id.* at 31; and
- e. Consumed less food, *id.*

147. Rats that received other variations of Pfizer’s COVID-19 vaccine experienced these issues and others, such as losing their entire litters and delivering stillborn offspring. *Id.* at 30.

148. Pfizer did not issue a press release announcing the rat fertility study’s findings.

⁵⁰ Available at <https://www.criver.com/products-services/research-models-services/animal-models/rats?region=3616>.

149. Pfizer did not publish a study relating to the rat fertility study's findings.

150. Pfizer issued press releases and published studies for other animal study findings relating to its COVID-19 vaccine. *See, e.g., Pfizer and BioNTech Public Preclinical Data from Investigational COVID-19 Vaccine Program in Nature*, Feb. 1, 2021.⁵¹

151. Pfizer's rat study was not publicly released until November 2022 in the Public Health and Medical Professionals for Transparency in America FOIA lawsuit.

2. Pfizer announces study on pregnant women but omits material facts already in its possession.

152. On February 18, 2021, Pfizer announced "that the first participants have been dosed in a global Phase 2/3 study to further evaluate the safety, tolerability, and immunogenicity of the Pfizer-BioNTech COVID-19 vaccine (BNT162b2) in preventing COVID-19 in healthy pregnant women 18 years of age and older." *Pfizer and BioNTech Commence Global Clinical Trial to Evaluate COVID-19 Vaccine in Pregnant Women*, Feb. 18, 2021.⁵²

153. In its February 18, 2021 press release, Pfizer did not disclose material facts relating to pregnancy in its possession. *See Pfizer, Pregnancy and Lactation Cumulative Review*, approved Apr. 20, 2021 ("Pfizer Feb. 28, 2021 Pregnancy Data");⁵³ *see also* Pfizer Feb. 28, 2021 Adverse Event Data, *supra*, at 12; Pfizer Rat Fertility Study; *supra*.

154. As of February 28, 2021, Pfizer possessed reports for 458 pregnant women exposed to its COVID-19 vaccine during pregnancy. Pfizer Feb. 28, 2021 Pregnancy Data, at 2.

⁵¹ Available at https://cdn.pfizer.com/pfizercom/2021-02/BNT162_Nature_Preclinical_Data_Publication_Statement_to_Upload_VF.pdf.

⁵² Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-commence-global-clinical-trial-evaluate>.

⁵³ Available at https://www.phmpt.org/wp-content/uploads/2023/04/125742_S2_M1_pllr-cumulative-review.pdf.

155. More than half of the pregnant women (248 cases, or 54%) reported an adverse event from Pfizer's COVID-19 vaccine, while fewer than half (210 cases, or 46%) did not report an adverse event. *Id.* at 2-3.

156. More than 1-in-10 women (52) who received Pfizer's COVID-19 vaccine during their pregnancy reported a miscarriage, many within days of vaccination. *Id.* at 3-4.

157. Six women who received Pfizer's COVID-19 vaccine during their pregnancy reported premature deliveries; several babies died. *Id.* at 3.

158. Pfizer's February 18, 2021 press release also did not disclose other adverse effects on the reproductive systems of women who received Pfizer's COVID-19 vaccine.

159. For example, by April 2022, Pfizer knew of tens of thousands of adverse events connected to its COVID-19 vaccine including heavy menstrual bleeding (27,685); menstrual disorders (22,145); irregular periods (15,083); delayed periods (13,989); absence of periods (11,363); and other reproductive system effects. Pfizer, *Appendix 2.1 Cumulative Number of Case Reports (Serious and Non-Serious, Medically Confirmed and Non Medically-Confirmed) from Post-Marketing Data Sources, Overall, by Sex, Country, Age Groups and in Special Populations and Summary Tabulation by Preferred Term and MedDRA System Organ Class*, approved May 6, 2022, at 333-340 (PDF pp. 6-13).⁵⁴

160. Upon information and belief, Pfizer possessed many reports on these adverse events relating to women's reproductive systems at the time of its February 18, 2021 press release.

3. Pfizer's study on pregnant women failed and the results are secret.

⁵⁴ Available at <https://www.tga.gov.au/sites/default/files/2022-08/foi-3727-01.pdf>.

161. According to Pfizer's February 18, 2021 press release, Pfizer sought to study approximately 4,000 healthy pregnant women. *Pfizer and BioNTech Commence Global Clinical Trial to Evaluate COVID-19 Vaccine in Pregnant Women*, Feb. 18, 2021.⁵⁵

162. However, Pfizer only enrolled a fraction of this amount (683) in its study. National Library of Medicine, *To Evaluate the Safety, Tolerability, and Immunogenicity of BNT162b2 Against COVID-19 in Healthy Pregnant Women 18 Years of Age and Older*, ID NCT04754594, last update posted July 13, 2023.⁵⁶

163. Upon information and belief, Pfizer destroyed the placebo control group during the study, preventing Pfizer from evaluating differences in safety and efficacy between vaccinated pregnant women and unvaccinated pregnant women.

164. Although Pfizer completed its study of its COVID-19 vaccine on pregnant women on July 15, 2022, it still has not completed the quality control review process for the study. *Id.* at Results Submitted.⁵⁷

E. Pfizer's misrepresentations about its COVID-19 vaccine and safety signals

165. On January 18, 2023, when asked whether the Pfizer COVID-19 vaccine caused strokes or myocarditis, Pfizer Chairman and CEO Dr. Bourla said, "We constantly review and analyze the data. We've seen not a single [safety] signal although we have distributed billions of doses." *Pfizer CEO Albert Bourla discusses new vaccines in the pipeline*, CNBC, Jan. 18, 2023, 3:18.⁵⁸

⁵⁵ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-commence-global-clinical-trial-evaluate>.

⁵⁶ Available at <https://clinicaltrials.gov/study/NCT04754594>.

⁵⁷ Available at <https://clinicaltrials.gov/study/NCT04754594?tab=results>.

⁵⁸ Available at <https://www.cnbc.com/video/2023/01/18/pfizer-ceo-albert-bourla-discusses-new-vaccines-to-be-released.html>.

166. The FDA has defined “safety signal” as “a concern about an excess of adverse events compared to what would be expected to be associated with a product’s use.” A “single well-documented case report can be viewed as a signal, ...” U.S. Department of Health and Human Services et al., *Guidance for Industry: Good Pharmacovigilance Practices and Pharmacoepidemiologic Assessment*, Mar. 2005, at 4 (PDF p. 7).⁵⁹

167. Upon information and belief, contrary to Pfizer Chairman and CEO Dr. Bourla’s representations, Pfizer has been aware of numerous safety signals relating to its COVID-19 vaccine.

1. Pfizer’s knowledge of a safety signal for myocarditis and pericarditis

168. Upon information and belief, at the time Pfizer Chairman and CEO Dr. Bourla represented that Pfizer had not seen a single safety signal, Pfizer was aware of a safety signal for myocarditis and pericarditis caused by its COVID-19 vaccine.

169. “Myocarditis is inflammation of the heart muscle, and pericarditis is inflammation of the outer lining of the heart.” CDC, *Myocarditis and Pericarditis After mRNA COVID-19 Vaccination*, Nov. 3, 2023.⁶⁰

170. From the start, a clear connection existed between Pfizer’s COVID-19 vaccine and cases of myocarditis and pericarditis.

i. The United States military detected a safety signal for myocarditis.

171. In early 2021, the U.S. military noticed cases of myocarditis in male military members occurring within four days of administration of Pfizer’s COVID-19 vaccine. Report to the Committee on Armed Services of the House of Representatives, *Department of Defense Report*

⁵⁹ Available at <https://www.fda.gov/media/71546/download>.

⁶⁰ Available at <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/myocarditis.html>.

on Cardiac and Kidney Issues in Service Members Prior to and Following the COVID Vaccine Requirement, Sept. 2023 (“DOD COVID Vaccine Report”), 3;⁶¹ Patricia Kime, *Pentagon Tracking 14 Cases of Heart Inflammation in Troops After COVID-19 Shots*, MILITARY.COM (Apr. 26, 2021).⁶²

172. By June 2021, military doctors found an association between the COVID-19 vaccine and myocarditis in at least 23 military patients who had no known cardiac issues until 12 to 96 hours following a mRNA COVID-19 vaccination, after which they developed myocarditis. Jay Montgomery *et al.*, *Myocarditis Following Immunization With mRNA COVID-19 Vaccines in Members of the US Military*, *JAMA Cardiol.* 2021;6(10):1202-1206. doi:10.1001/jamacardio.2021.2833.⁶³

173. When the Department of Defense reviewed its health system data for 2021, it found that “[t]hose who were recently vaccinated had a rate ratio that showed their incidences of myocarditis and pericarditis were 2.6 and 2.0 times higher compared to those who were never vaccinated.” DOD COVID Vaccine Report, *supra*, 10.

ii. The United States government detected a safety signal for myocarditis.

174. On March 3, 2021, Israel’s Ministry of Health contacted the CDC about myocarditis and pericarditis connected to Pfizer’s COVID-19 vaccine: “We are seeing a large number of myocarditis and pericarditis cases in young individuals soon after Pfizer COVID-19 vaccine. We would like to discuss the issue with a relevant expert at CDC.”

⁶¹ Available at <https://www.health.mil/Reference-Center/Reports/2023/09/29/DOD-Report-on-Cardiac-and-Kidney-Issues-in-Service-Members-Prior-to-and-Following-the-COVID-Vaccine-Requirement>.

⁶² Available at <https://www.military.com/daily-news/2021/04/26/pentagon-tracking-14-cases-of-heart-inflammation-troops-after-covid-19-shots.html>.

⁶³ Available at <https://jamanetwork.com/journals/jamacardiology/fullarticle/2781601>.

175. Israel had been tracking myocarditis cases arising shortly after receipt of Pfizer's COVID-19 vaccine. Maayan Jaffe-Hoffman, *19-year-old hospitalized in ICU days after receiving second Pfizer vaccine*, THE JERUSALEM POST (Feb. 1, 2021).⁶⁴

176. Upon information and belief, Pfizer had knowledge of the medical reports in Israel related to its vaccine and myocarditis and pericarditis because Israel agreed to share medical data with Pfizer. Daniel Estrin, *Vaccines for Data: Israel's Pfizer Deal Drives Quick Rollout – And Privacy Worries*, NPR (Jan. 31, 2021);⁶⁵ Real-World Epidemiological Evidence Collaboration Agreement, Jan. 6, 2021, §§ 1.8, 2.3, 3, Ex. A.⁶⁶

177. On June 1, 2021, a CDC Advisory Committee on Immunization Practices work group issued a notice stating “that within 30 days of receiving the second dose of either Pfizer or Moderna vaccines, ‘there was a higher number of observed than expected myocarditis/pericarditis cases in 16-24-year-olds.’” Elizabeth Cohen, *A link between COVID-19 vaccination and a cardiac illness may be getting closer*, CNN (June 10, 2021).⁶⁷

178. A Pfizer spokesperson provided a statement that said “the company is aware of the myocarditis reports, and that ‘a causal link to the vaccine has not been established.’” *Id.*

179. Also on June 1, 2021, Israel's Ministry of Health reported that “it had found the small number of heart inflammation cases observed mainly in young men who received Pfizer's

⁶⁴ Available at <https://www.jpost.com/health-science/19-year-old-hospitalized-with-heart-inflammation-after-pfizer-vaccination-657428>.

⁶⁵ Available at <https://www.npr.org/2021/01/31/960819083/vaccines-for-data-israels-pfizer-deal-drives-quick-rollout-and-privacy-worries>.

⁶⁶ Available at https://www.gov.il/BlobFolder/news/17012021-02/he/files_publications_corona_pfizer_agreement.pdf.

⁶⁷ Available at <https://www.cnn.com/2021/06/09/health/myocarditis-covid-vaccination-link-clearer/index.html>.

COVID-19 vaccine in Israel were likely linked to their vaccination.” Jeffrey Heller, *Israel sees probable link between Pfizer vaccine and myocarditis cases*, Reuters (June 2, 2021).⁶⁸

180. After the CDC had received 1,200 reports of heart inflammation relating to the COVID-19 vaccine, in late June 2021, the FDA added a warning about the risk of myocarditis and pericarditis to the Pfizer (and Moderna) COVID-19 vaccine fact sheet. Lauren Mascarenhas, *FDA adds a warning to COVID-19 vaccines about risk of heart inflammation*, CNN, June 26, 2021.⁶⁹

181. According to a September 2021 FDA briefing document, “[p]ost-EUA safety surveillance reports received by FDA and CDC identified serious risks for myocarditis and pericarditis following administration of the primary series (Dose 1 and Dose 2)” of Pfizer’s COVID-19 vaccine. *Vaccines and Related Biological Products Advisory Committee Meeting, Sept. 17, 2021, FDA Briefing Document, Application for licensure of a booster dose for COMIRNATY (COVID-19 Vaccine, mRNA)*, 7.⁷⁰

182. According to a presentation to the CDC’s Advisory Committee in Immunization Practices, analysis through May 2022 found a safety signal for myocarditis and pericarditis (as well as acute myocardial infarction and venous thromboembolism). Nicola Klein, *COVID-19 Vaccine Safety Surveillance: Summary from VSD RCA*, CDC Advisory Committee in Immunization Practices (Sept. 12, 2023), at 42.⁷¹

183. At the time of Pfizer Chairman and CEO Dr. Bourla’s January 18, 2023 denial of any safety signals, the CDC’s website reported that “[d]ata from multiple studies show a rare risk for myocarditis and/or pericarditis following receipt of mRNA COVID-19 vaccines. These rare

⁶⁸ Available at <https://www.reuters.com/world/middle-east/israel-sees-probable-link-between-pfizer-vaccine-small-number-myocarditis-cases-2021-06-01/>.

⁶⁹ Available at <https://www.cnn.com/2021/06/25/health/fda-covid-vaccine-heart-warning/index.html>.

⁷⁰ Available at <https://www.fda.gov/media/152176/download>.

⁷¹ Available at <https://www.cdc.gov/vaccines/acip/meetings/downloads/slides-2023-09-12/07-covid-klein-508.pdf>.

cases of myocarditis or pericarditis have occurred most frequently in adolescent and young adult males, ages 16 years and older, within 7 days after receiving the second dose of an mRNA COVID-19 vaccine (Pfizer-BioNTech and Moderna).” CDC, *Clinical Considerations: Myocarditis and Pericarditis after Receipt of mRNA COVID-19 Vaccines Among Adolescents and Young Adults* (captured Jan. 17, 2023).⁷²

184. The CDC currently reports “a causal association between mRNA COVID-19 vaccines (i.e., Moderna or Pfizer-BioNTech) and myocarditis and pericarditis.” CDC, *Clinical Considerations: Myocarditis and Pericarditis after Receipt of COVID-19 Vaccines Among Adolescents and Young Adults* (last reviewed Oct. 10, 2023).⁷³

iii. Pfizer detected a safety signal for myocarditis.

185. According to a leaked confidential February 2022 Pfizer document, “[s]ince April 2021, increased cases of myocarditis and pericarditis have been reported in the United States after mRNA COVID-19 vaccination (Pfizer-BioNTech and Moderna), particularly in adolescents and young adults (CDC 2021).” Pfizer, *Myocarditis/Pericarditis After mRNA COVID-19 Vaccine Administration: Potential Mechanisms and Recommended Future Actions*, Feb. 11, 2022, at 18.⁷⁴

186. After Pfizer obtained FDA approval through emergency use authorization to provide its COVID-19 vaccine to 12-15-year-olds in August 2021, Pfizer decided to study “how often” its vaccine may cause myocarditis or pericarditis in children by testing 5-16-year-olds for troponin I. *CT05-GSOP-RF05 7.0 Phase 1/2/3/4 Informed Consent Pediatric Study Template*,

⁷² Available at <https://web.archive.org/web/20230117155359/https://www.cdc.gov/vaccines/covid-19/clinical-considerations/myocarditis.html>.

⁷³ Available at <https://www.cdc.gov/vaccines/covid-19/clinical-considerations/myocarditis.html>.

⁷⁴ Available at

https://downloads.ctfassets.net/syq3snmxclc9/7AqXvmHTBMFOxeGxwMBxxS/7d21477d2697da8adf980ccce52b983f/3-16-23_-_Pfizer_Docs_Watermarked.pdf.

*Phase 2/3 Obtaining Serum Samples for Potential Troponin I Testing (all age groups, Pfizer (Sept. 13, 2021), 2.*⁷⁵

187. Troponin I, an enzyme in the heart muscle, “could be an early sign of two conditions that affect the heart called myocarditis or pericarditis.” *Id.*

188. Pfizer warned children participants that after receiving Pfizer’s COVID-19 vaccine, “[y]ou might get chest pain, shortness of breath, or feelings of having a fast-beating, fluttering or pounding heart. You may need to come in to see the study doctor for further assessments if you have these symptoms.” *Id.* at 8.

189. Pfizer press releases did not disclose an increased risk of myocarditis from Pfizer’s COVID-19 vaccine until November 2021. *Posts falsely claim Pfizer ‘officially admits’ heart inflammation is COVID jab side effect in 2023*, AFP FRANCE (Dec. 11, 2023).⁷⁶

190. Upon information and belief, at the time of Pfizer Chairman and CEO Dr. Bourla’s January 2023 representation that Pfizer had not observed a single safety signal related to Pfizer’s COVID-19 vaccine, Pfizer was aware of a safety signal relating to myocarditis and pericarditis.

2. Pfizer’s knowledge of a safety signal for strokes

191. Upon information and belief, Pfizer also detected a safety signal relating to strokes.

192. Days before Pfizer Chairman and CEO Dr. Bourla denied any safety signal, the CDC’s and FDA’s “surveillance system flagged a possible link between the new Pfizer-BioNTech bivalent COVID-19 vaccine and strokes in people aged 65 and over, . . .” Ben Leonard and Lauren

⁷⁵ Available at https://www.phmpt.org/wp-content/uploads/2023/10/019736_S488_M5_c4591007-p2-3-older-children-assent-troponin-icd.pdf.

⁷⁶ Available at <https://factcheck.afp.com/doc.afp.com.346Z3GD>.

Gardner, *CDC, FDA see possible link between Pfizer’s bivalent shot and strokes*, POLITICO, Jan. 13, 2023.⁷⁷

193. Although CDC later suggested a link was “very unlikely,” a FDA study found that individuals 85 years or older who received both a flu vaccine and Pfizer’s COVID-19 vaccine “saw a 20 percent increase in the risk of ischemic stroke.” Apoorva Mandavilli, *COVID Shots May Slightly Raise Stroke Risk in the Oldest Recipients*, THE NEW YORK TIMES (Oct. 24, 2023).⁷⁸

194. Pfizer inadequately studied its vaccine’s effects on the elderly.

195. When Pfizer sought approval for a third shot—a “booster”—for its COVID-19 vaccine, it requested approval to vaccinate individuals 16 years of age and older, including the elderly. However, Pfizer only tested the booster shot on 12 trial participants who were in the 65- to 85-year-old age range. Vaccines and Related Biological Products Advisory Committee Meeting, Sept. 17, 2021, FDA Briefing Document, Application for licensure of a booster dose for COMIRNATY (COVID-19 Vaccine, mRNA), 22 (“While evaluated in only 12 participants in the age cohort of 65 through 85 years, . . .”).⁷⁹

196. Pfizer should not have represented that the booster was “safe” for 65- to 85-year-olds after only testing 12 trial participants in that age range.

197. Pfizer did not test the booster on any participant older than 85 years old. *Id.*

198. Pfizer should not have represented that the booster was “safe” for individuals 85 years old and older when it had not tested any trial participants in that age range.

⁷⁷ Available at <https://www.politico.com/news/2023/01/13/cdc-fda-pfizer-bivalent-vaccine-possible-strokes-00077933>.

⁷⁸ Available at <https://www.nytimes.com/2023/10/24/health/covid-flu-vaccine-stroke.html>.

⁷⁹ Available at <https://www.fda.gov/media/152176/download>.

199. Upon information and belief, at the time of Pfizer Chairman and CEO Dr. Bourla's representation in January 2023, that Pfizer had not observed a single safety signal related to Pfizer's COVID-19 vaccine, Pfizer was aware of a safety signal relating to strokes.

3. Pfizer's knowledge of a safety signal for increased fatalities

200. Upon information and belief, Pfizer also detected a safety signal relating to deaths.

201. As of February 28, 2021, Pfizer's adverse events database contained 1,223 fatalities after taking Pfizer's COVID-19 vaccine. Pfizer Feb. 28, 2021 Adverse Event Data, *supra*, at 7, table 1.

202. An expert review by the Norwegian Medicines Agency published on May 19, 2021 determined that "[a]mong 100 reported deaths, a causal link to the [Pfizer COVID-19] vaccine was considered probable in 10 cases, possible in 26 and unlikely in 59. Five were unclassifiable." Wyller TB, Kittang BR, Ranhoff AH, Harg P, Myrstad M. Nursing home deaths after COVID-19 vaccination. *Tidsskr Nor Legeforen* 2021;141. doi:10.4045/tidsskr.21.0383.⁸⁰

203. By December 2021, New Zealand's health authorities had linked multiple deaths to Pfizer's COVID-19 vaccine. *New Zealand links 26-year-old man's death to Pfizer COVID-19 vaccine*, REUTERS (Dec. 19, 2021).⁸¹

204. Upon information and belief, Pfizer was aware of other reports of death related to its COVID-19 vaccine.

205. Upon information and belief, at the time of Pfizer Chairman and CEO Dr. Bourla's representation in January 2023 that Pfizer had not observed a single safety signal related to Pfizer's COVID-19 vaccine, Pfizer was aware of a safety signal relating to deaths.

⁸⁰ Available at <https://tidsskriftet.no/en/2021/05/originalartikkel/nursing-home-deaths-after-covid-19-vaccination>.

⁸¹ Available at <https://www.reuters.com/world/asia-pacific/new-zealand-links-26-year-old-mans-death-pfizer-covid-19-vaccine-2021-12-20/>.

IV. Pfizer Made Unsupported Representations and Concealed Material Facts Relating to Efficacy of its COVID-19 Vaccine.

A. Pfizer misrepresented and concealed material facts relating to the durability of protection provided by its COVID-19 vaccine.

206. In November 2020, Pfizer announced, “[p]rimary efficacy analysis demonstrates BNT162b2 to be 95% effective against COVID-19 beginning 28 days after the first dose.” *Pfizer and BioNTech Conclude Phase 3 Study of COVID-19 Vaccine Candidate, Meeting All Primary Efficacy Endpoints*, Pfizer, Nov. 18, 2020.⁸²

207. Pfizer did not report the absolute risk reduction of its COVID-19 vaccine, which was just 0.84%. Piero Olliaro *et al.*, *COVID-19 vaccine efficacy and effectiveness—the elephant (not) in the room*, 2 LANCET e279, 279 (July 2021).⁸³ Absolute risk reduction “measures the precise magnitude and strength of the reduced risk,” compared to relative risk reduction that “is a proportion of risk outcomes in separate groups.” Brown RB. *Relative risk reduction: Misinformative measure in clinical trials and COVID-19 vaccine efficacy*, at 3. *Dialogues Health*. 2022 Dec;1:100074. doi: 10.1016/j.dialog.2022.100074. Epub 2022 Nov 10. PMID: 36785641; PMCID: PMC9647013.

208. On February 25, 2021, when asked in an interview how long Pfizer’s COVID-19 two-dose vaccine provided protection, Pfizer Chairman and CEO Dr. Bourla stated, “at six months, the protection is robust.” *Exclusive interview with Pfizer CEO Albert Bourla*, NBC News (Feb. 25, 2021), at 3:55.⁸⁴

⁸² Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-conclude-phase-3-study-covid-19-vaccine>.

⁸³ Available at [https://doi.org/10.1016/S2666-5247\(21\)00069-0](https://doi.org/10.1016/S2666-5247(21)00069-0).

⁸⁴ Available at <https://www.nbcnews.com/nightly-news/video/exclusive-interview-with-pfizer-ceo-albert-bourla-101605957789>.

209. “Robust” is defined as “exhibiting strength” and “capable of performing without failure under a wide range of conditions.” Merriam-Webster, *Robust*.⁸⁵

210. Upon information and belief, Pfizer had insufficient data on February 25, 2021 to conclude that protection at six months was robust.

211. On April 1, 2021, Pfizer issued a press release that celebrated “high efficacy” in Pfizer’s COVID-19 vaccine through up to six months after the second dose. *Pfizer and BioNTech Confirm High Efficacy and No Serious Safety Concerns Through Up to Six Months Following Second Dose in Updated Topline Analysis of Landmark COVID-19 Vaccine Study*, Pfizer, Apr. 1, 2021.⁸⁶

212. Pfizer represented that “[a]nalysis of 927 confirmed symptomatic cases of COVID-19 demonstrates BNT162b2 is highly effective with 91.3% vaccine efficacy observed against COVID-19, measured seven days through up to six months after the second dose.” *Id.*

213. Pfizer cited data in its press release that also appears in a Pfizer efficacy summary document. *2.7.3 Summary of Clinical Efficacy*, approved on Apr. 30, 2021, at 55.⁸⁷

214. Upon information and belief, Pfizer possessed the data contained in the efficacy summary document at the time it published the April 1, 2021 press release.

215. In its efficacy summary document, Pfizer reported an 83.7% efficacy rate four months after the second dose of its COVID-19 vaccine. *Id.* at 68.

216. In its efficacy summary document, Pfizer reported blood sample data showing effectiveness continued to wane at six months. *Id.* at 169, 171.

⁸⁵ Available at <https://www.merriam-webster.com/dictionary/robust>.

⁸⁶ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-confirm-high-efficacy-and-no-serious>.

⁸⁷ Available at <https://clinical-information.canada.ca/ci-rc-vu.pdf?file=m2/27-clin-sum/summary-clin-efficacy-covid19-1.pdf&id=252736>.

217. Waning effectiveness of Pfizer's COVID-19 vaccine was a material fact for Kansans considering the vaccine.

218. Pfizer did not disclose the material fact of measurable waning effectiveness of its COVID-19 vaccine in its April 1, 2021 press release.

219. Pfizer did not publicly disclose that effectiveness waned to 83.7% until July 28, 2021, in a Pfizer preprint study. Alexa Lardieri, *Pfizer Vaccine Protection Declines After Six Months, Boosters Protect Against Delta Variant*, U.S. News & World Report, July 28, 2021.⁸⁸

220. Pfizer issued a press release on July 28, 2021 that promoted positive results from a booster study, but it did not mention the pre-print study or the waning effectiveness of its COVID-19 vaccine. *Pfizer Reports Second-Quarter 2021 Results*, July 28, 2021, 11.⁸⁹

221. "It's clear from the documents that these analyses were almost four months old by the time they became public," said Peter Doshi, an associate professor at the University of Maryland School of Pharmacy. "It's disappointing that neither Pfizer, nor regulators, disclosed these data until it was too obvious to ignore new outbreaks in Israel and Massachusetts, which made it clear that vaccine performance was not holding up." Maryanne Demasi, *Pfizer Hid Data on Waning Immunity*, Brownstone Institute, Apr. 7, 2023.⁹⁰

222. Pfizer's concealment, suppression, and omission of the waning effectiveness of its COVID-19 vaccine allowed Pfizer to profit from vaccinations of Kansans who may have been deterred from Pfizer's COVID-19 vaccine had they known about its waning effectiveness.

⁸⁸ Available at <https://www.usnews.com/news/health-news/articles/2021-07-28/pfizer-vaccine-protection-declines-after-six-months-boosters-protect-against-delta-variant>.

⁸⁹ Available at https://s21.q4cdn.com/317678438/files/doc_financials/2021/q2/Q2-2021-PFE-Earnings-Release.pdf.

⁹⁰ Available at <https://brownstone.org/articles/pfizer-hid-data-on-waning-immunity/>.

223. Pfizer collected \$7.8 billion in direct sales and alliance revenues from its COVID-19 vaccine in the second quarter of 2021, or the time between its April 1, 2021 press release failing to disclose the waning effectiveness of its COVID-19 vaccine and June 30, 2021, more than one month before its belated disclosure on waning effectiveness of its COVID-19 vaccine. *Pfizer Reports Second-Quarter 2021 Results*, July 28, 2021, 5.⁹¹

B. Pfizer misrepresented and concealed material facts relating to the effectiveness against variants provided by its COVID-19 vaccine.

224. On February 25, 2021, Pfizer Chairman and CEO Dr. Bourla said data suggested that individuals fully vaccinated with Pfizer's COVID-19 vaccine were protected against any variant currently known, including the South African, Brazilian, and UK variants. *Exclusive interview with Pfizer CEO Albert Bourla*, NBC NEWS (Feb. 25, 2021), at 0:15.⁹²

225. On June 15, 2021, Pfizer Chairman and CEO Dr. Bourla reiterated his belief that his company's COVID-19 vaccine would protect against variants: "I feel quite comfortable that we cover it. . . . We will not need a special vaccine for it. The current vaccine should cover it." *CEO 'comfortable' Pfizer COVID-19 vaccine protects against more severe Delta variant*, CBS NEWS (June 15, 2021).⁹³

226. On June 24, 2021, Pfizer's medical director in Israel reported that Pfizer's COVID-19 vaccine was "very effective, around 90%" against the Delta variant. Maayan Lubell, *Pfizer says COVID vaccine is highly effective against Delta variant*, REUTERS (June 24, 2021).⁹⁴

⁹¹ Available at https://s21.q4cdn.com/317678438/files/doc_financials/2021/q2/Q2-2021-PFE-Earnings-Release.pdf.

⁹² Available at <https://www.nbcnews.com/nightly-news/video/exclusive-interview-with-pfizer-ceo-albert-bourla-101605957789>.

⁹³ Available at <https://www.cbsnews.com/news/pfizer-vaccine-delta-variant/>.

⁹⁴ Available at <https://www.reuters.com/business/healthcare-pharmaceuticals/pfizer-says-covid-vaccine-highly-effective-against-delta-variant-2021-06-24/>.

227. But on July 6, 2021, Israel's Health Ministry announced that Pfizer's COVID-19 vaccine effectiveness was just 64%. *Israel sees drop in Pfizer COVID vaccine protection, still strong in severe illness*, REUTERS (July 6, 2021).⁹⁵

228. On July 8, 2021, Pfizer publicly admitted the declining effectiveness of its COVID-19 vaccine after six months post-vaccination and against the Delta variant. *Pfizer and BioNTech Provide Update on Booster Program in Light of the Delta Variant*, Pfizer (July 8, 2021).⁹⁶

229. Pfizer announced it was conducting an "ongoing booster trial of a third dose" of its COVID-19 vaccine and "developing an updated version of the Pfizer-BioNTech COVID-19 vaccine that targets the full spike protein of the Delta variant." *Id.*

230. Upon information and belief, Pfizer already was conducting a booster trial and developing an updated version of its COVID-19 vaccine because, despite its public statements to the contrary, it knew its COVID-19 vaccine was not effective against the Delta variant.

231. Just two weeks later, on July 23, 2021, Israel reported Pfizer's COVID-19 vaccine was only 39% effective. Berkeley Lovelace, *Israel says Pfizer COVID vaccine is just 39% effective as delta spreads, but still prevents severe illness*, CNBC (July 23, 2021).⁹⁷

232. But when contacted for the report about its COVID-19 vaccine's 39% effectiveness, Pfizer continued to misrepresent effectiveness of its COVID-19 vaccine: "In a statement to CNBC, Pfizer said it remains confident its two-dose regimen is protective against the coronavirus and its variants." *Id.*

⁹⁵ Available at <https://www.reuters.com/world/middle-east/israel-sees-drop-pfizer-vaccine-protection-against-infections-still-strong-2021-07-05/>.

⁹⁶ Available at https://cdn.pfizer.com/pfizercom/2021-07/Delta_Variant_Study_Press_Statement_Final_7.8.21.pdf?IPpR1xZj1wvaUMQ9sRn2FkePcBiRPGqw.

⁹⁷ Available at <https://www.cnbc.com/2021/07/23/delta-variant-pfizer-covid-vaccine-39percent-effective-in-israel-prevents-severe-illness.html>.

233. In August 2021, a study “found the Pfizer vaccine was only 42% effective against infection in July, when the Delta variant was dominant.” Caitlin Owens, *New data on coronavirus vaccine effectiveness may be ‘a wakeup call,’* AXIOS (Aug. 11, 2021).⁹⁸

234. Despite data showing its COVID-19 vaccine was not effective, Pfizer’s chief medical officer said in October 2021, “[o]ur variant-specific analysis clearly shows that the BNT162b2 vaccine is effective against all current variants of concern, including delta.” Berkeley Lovelace Jr., *Pfizer COVID shot protects people from hospitalization even as effectiveness against infection falls, Lancet study confirms,* CNBC (Oct. 4, 2021).⁹⁹

235. Finally, by December 2021, Pfizer acknowledged potential effectiveness issues with its COVID-19 vaccine and the Omicron variant. “Sera from individuals who received two doses of the current COVID-19 vaccine did exhibit, on average, more than a 25-fold reduction in neutralization titers against the Omicron variant compared to wild-type, indicating that two doses of BNT162b2 may not be sufficient to protect against infection with the Omicron variant.” *Pfizer and BioNTech Provide Update on Omicron Variant,* Pfizer (Dec. 8, 2021).¹⁰⁰

236. Pfizer attempted to soften this news by claiming that two doses still protected against “severe forms of the disease.” *Id.*

237. But in January 2022, Pfizer Chairman and CEO Dr. Bourla admitted that the vaccine lost effectiveness at both preventing infections and hospitalizations: “We have seen with a second dose very clearly that the first thing that we lost was the protection against infections. . . . But then two months later, what used to be very strong in hospitalization also went down. And

⁹⁸ Available at <https://www.axios.com/2021/08/11/coronavirus-vaccines-pfizer-moderna-delta-biden>.

⁹⁹ Available at <https://www.cnbc.com/2021/10/04/pfizer-covid-vaccine-protection-against-infection-tumbles-to-47percent-study-confirms.html>.

¹⁰⁰ Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-provide-update-omicron-variant>.

I think this is what everybody's worried about." Spencer Kimball, *Pfizer CEO says two COVID vaccine doses aren't 'enough for omicron,'* CNBC (Jan. 10, 2022).¹⁰¹

238. Pfizer Chairman and CEO Dr. Bourla acknowledged that "two doses, they're not enough for omicron." *Id.*

239. Indeed, United Kingdom data reported that two doses of Pfizer's COVID-19 vaccine "are only about 10% effective at preventing infection from omicron 20 weeks after the second dose." *Id.*

240. Upon information and belief, Pfizer was aware that its COVID-19 vaccine was not effective at preventing infection or hospitalization from variants, such as Delta and Omicron, at the time it was publicly representing the opposite information.

241. The ineffectiveness of Pfizer's COVID-19 vaccine against variants was a material fact.

V. Pfizer Made Unsupported Representations Relating to Transmission of its COVID-19 Vaccine.

A. Pfizer's statements and knowledge about the effect of its COVID-19 vaccine on transmission of COVID-19

242. When the FDA issued the Emergency Use Authorization for Pfizer's COVID-19 vaccine in December 2020, the FDA reported that there was no "evidence that the vaccine prevents transmission of SARS-CoV-2 from person to person." *FDA Takes Key Action in Fight Against COVID-19 By Issuing Emergency Use Authorization for First COVID-19 Vaccine*, Dec. 11, 2020.¹⁰²

¹⁰¹ Available at <https://www.cnn.com/2022/01/10/pfizer-ceo-says-two-covid-vaccine-doses-arent-enough-for-omicron.html>.

¹⁰² Available at <https://wayback.archive-it.org/7993/20201217195048/https://www.fda.gov/news-events/press-announcements/fda-takes-key-action-fight-against-covid-19-issuing-emergency-use-authorization-first-covid-19>.

243. According to Pfizer's trial protocol, evaluating transmission was not an objective of the trial. Apr. 2020 Protocol, *supra*, 11-12 (PDF pp. 13-14);¹⁰³ Sept. 2020 Protocol, *supra*, 10-13 (PDF p. 138-141).¹⁰⁴

244. Pfizer has publicly confirmed that it did not test its COVID-19 vaccine on stopping transmission. When asked, "Was the Pfizer COVID vaccine tested on stopping the transmission of the virus before it entered the market?" Pfizer's Director of International Developed Markets Janine Small responded, "No." Frank Chung, *Pfizer did not know whether COVID vaccine stopped transmission before rollout, executive admits*, NEWS.COM.AU, Oct. 13, 2022.¹⁰⁵

245. In November 2020, Pfizer Board Member Dr. Scott Gottlieb reported that more research was needed on transmission after receiving a Pfizer COVID-19 vaccination. "I think initially it's probably going to be given on a general schedule until we learn more about the real-world benefits of the vaccine and how much it cuts down on transmission of the virus. You know, does it just prevent you from getting COVID symptoms or does it actually prevent you from getting the infection and spreading the infection? That's one of the things we're going to need to determine about the vaccine and how long the immunity is." *Full transcript of 'Face the Nation' on November 22, 2020*, CBS NEWS, Nov. 22, 2020.¹⁰⁶

246. Pfizer Chairman and CEO Dr. Bourla also wanted more transmission research in December 2020. "Even though I've had the protection, am I still able to transmit [COVID-19] to other people?" Bourla told NBC News' Lester Holt. "I think this is something that needs to be examined. We are not certain about that right now with what we know." Joseph Choi, *Pfizer*

¹⁰³ Available at https://www.nejm.org/doi/suppl/10.1056/NEJMoa2027906/suppl_file/nejmoa2027906_protocol.pdf.

¹⁰⁴ Available at https://www.nejm.org/doi/suppl/10.1056/NEJMoa2027906/suppl_file/nejmoa2027906_protocol.pdf.

¹⁰⁵ Available at <https://www.news.com.au/technology/science/human-body/pfizer-did-not-know-whether-covid-vaccine-stopped-transmission-before-rollout-executive-admits/news-story/f307f28f794e173ac017a62784fec414>.

¹⁰⁶ Available at <https://www.cbsnews.com/news/full-transcript-of-face-the-nation-on-november-22-2020/>.

chairman: We're not sure if someone can transmit virus after vaccination, THE HILL, Dec. 3, 2020.¹⁰⁷

B. Pfizer's representations that its COVID-19 vaccine would prevent transmission.

247. Despite admissions by Pfizer Chairman and CEO Dr. Bourla and Board Member Dr. Scott Gottlieb that Pfizer did not know if its vaccine prevented transmission, Pfizer Chairman and CEO Dr. Bourla warned Kansans on multiple occasions that not receiving a COVID-19 vaccine would affect the lives of those around them, thus implying that Pfizer's COVID-19 vaccine prevented transmission.

- a. December 2020: "I repeat once more, that this choice not to vaccinate will not affect only your health or your life. Unfortunately, it will affect the lives of others and likely the lives of the people you love the most, who are the people that usually you are in contact with." *CNBC Transcript: Pfizer Chairman and CEO Albert Bourla Speaks with CNBC's 'Squawk Box' Today*, CNBC (Dec. 14, 2020).¹⁰⁸
- b. January 2021: "What I would say to people who fear the vaccine is that they need to recognize that the decision to take it or not will not affect only their own lives. It will affect the lives of others. And most likely it will affect the lives of people that they love the most, who are the people that they socialize the most with." John Micklethwait, *Pfizer CEO Says Science Will Prevail with COVID-19 Here to Stay*, BLOOMBERG, Jan. 28, 2021.¹⁰⁹

¹⁰⁷ Available at <https://thehill.com/news-by-subject/healthcare/528619-pfizer-chairman-were-not-sure-if-someone-can-transmit-virus-after/>.

¹⁰⁸ Available at <https://www.cnn.com/2020/12/14/cnn-transcript-pfizer-chairman-and-ceo-albert-bourla-speaks-with-cnbc-squawk-box-today.html>.

¹⁰⁹ Available at <https://www.bloomberg.com/news/features/2021-01-28/covid-is-here-to-stay-pfizer-ceo-albert-bourla>.

- c. June 2021: “I try to explain to them that the decision to vaccinate or not is not only going to affect only your life. . . . But unfortunately will affect the health of others and likely will affect the health of people you like and you love the most. . . . When you try to explain that their fear could stand in the way of protecting their loved ones, I think this is the argument that mostly works.” *CEO ‘comfortable’ Pfizer COVID-19 vaccine protects against more severe Delta variant*, CBS NEWS (June 15, 2021).¹¹⁰
- d. November 2021: “The only thing that stands between the new way of life and the current way of life, frankly, is the hesitancy to get vaccinated, the people that are afraid to get the vaccines, and they create issues not only for them. Unfortunately, they are going to affect the lives of others and, frankly, the lives of the people that they love the most because they are putting at risk the people that they hug, they kiss, [and] they socialize with.” *Pfizer’s Albert Bourla on how the pandemic ends*, ATLANTIC COUNCIL, Nov. 9, 2021.¹¹¹

248. In other words, on multiple occasions, Pfizer Chairman and CEO Dr. Bourla represented to Kansans that Pfizer’s COVID-19 vaccine prevented transmission since not getting vaccinated threatened the lives of loved ones with whom a person closely interacted.

249. In December 2021, a Pfizer press release quoted Chairman and CEO Dr. Bourla in a manner that again suggested that Pfizer’s COVID-19 vaccine prevented transmission: “Ensuring as many people as possible are fully vaccinated with the first two dose series and a booster remains

¹¹⁰ Available at <https://www.cbsnews.com/news/pfizer-vaccine-delta-variant/>.

¹¹¹ Available at <https://www.atlanticcouncil.org/blogs/new-atlanticist/pfizers-albert-bourla-on-how-the-pandemic-ends/>.

the best course of action to prevent the spread of COVID-19.” *Pfizer and BioNTech Provide Update on Omicron Variant*, Pfizer (Dec. 8, 2021) (emphasis added).¹¹²

250. Pfizer Board Member Dr. Scott Gottlieb also represented to Kansans that Pfizer’s COVID-19 prevented transmission: “And final point, I mean, some of the optimism is also being driven by growing science, suggesting that these vaccines, all the vaccines not only prevent COVID disease, prevent symptoms, but also prevent transmission. So they could have a dramatic effect on reducing the overall tenor of the epidemic.” *Full transcript of ‘Face the Nation’ on March 7, 2021*, CBS News, Mar. 7, 2021.¹¹³

251. Pfizer even used comic books to suggest that the vaccine prevented transmission. In 2022, Pfizer partnered with Marvel to produce an “Avengers”-themed comic book that called individuals waiting for a Pfizer COVID-19 vaccine “Everyday Heroes.” *See Avengers: Everyday Heroes*, 2022.¹¹⁴

252. According to one of the characters in the Pfizer comic book, “it’s also important for entire communities to come together and help fight the threat.” “And that’s exactly what we’re doing today!” says another character. As the group heads to the examination room to get their Pfizer COVID-19 vaccinations, the first character announces, “The Avengers are doing their part to help keep us safe. Now it’s time for us to do ours.” *Id.* at 13.

253. One of the final pages reinforces the need for individuals to get a Pfizer COVID-19 vaccine in order to protect the community. “Everyday heroes don’t wear capes! But they do wear a small bandage on their upper arm after they get their latest COVID-19 vaccination—

¹¹² Available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-provide-update-omicron-variant>.

¹¹³ Available at <https://www.cbsnews.com/news/full-transcript-of-face-the-nation-on-march-7-2021/>.

¹¹⁴ Available at https://www.marvel.com/pfizereverydayheroes#open_text-5/.

because everyday heroes are concerned about their health. **And they're people who choose to unite with their communities and do their part to help protect against COVID-19.**" *Id.* at 15 (emphasis added).

254. Pfizer released the "Everyday Heroes" comic book as a digital comic and provided print editions at some offices and retail locations around the country. *Avengers Assemble! Teaming Up with Marvel to Illustrate the Importance of COVID-19 Vaccination*, PFIZER.¹¹⁵

255. Pfizer represented that its COVID-19 vaccine could prevent transmission of COVID-19, even though it had no basis for the representation since Pfizer never tested its COVID-19 vaccine to determine whether it could prevent transmission of COVID-19.

256. Pfizer misled Kansans about the effect of the COVID-19 vaccine on transmission of COVID-19.

VI. Pfizer's Efforts to Censor and Suppress Material Facts related to its COVID-19 Vaccines

257. When Pfizer's efforts to hide material facts from public scrutiny failed, Pfizer took action to conceal and suppress material facts related to its COVID-19 vaccines.

A. Pfizer's view that "misinformation spreaders" are "criminals" who have "literally cost millions of lives"

258. A Pfizer website page on "Fighting Misinformation" states: "The spread of rumors and falsehoods can be dangerous. It is a threat to truth that misleads and manipulates people's perceptions. We are dedicated to helping people find accurate, science-based information as they make healthcare decisions that impact their lives." Pfizer, *Fighting Misinformation*.¹¹⁶

¹¹⁵ Available at https://www.pfizer.com/news/articles/avengers_assemble_teaming_up_with_marvel_to_illustrate_the_importance_of_covid_19_vaccination.

¹¹⁶ Available at <https://www.pfizer.com/about/responsibility/misinformation>.

259. On July 19, 2021, Pfizer Board Member Dr. Scott Gottlieb claimed social media companies had an “obligation” and an “affirmative responsibility” to prevent the spread of COVID-19 vaccine misinformation on their platforms. Pia Singh, *Dr. Scott Gottlieb urges social media platforms to curb COVID vaccine misinformation*, CNBC, July 19, 2021.¹¹⁷

260. Pfizer Chairman and CEO Dr. Bourla called people who spread misinformation on COVID-19 vaccines “criminals” who have “literally cost millions of lives.” *Pfizer’s Albert Bourla on how the pandemic ends*, ATLANTIC COUNCIL, Nov. 9, 2021.¹¹⁸

B. Pfizer worked to conceal and suppress material facts.

261. Pfizer worked to conceal and suppress material facts on social media platforms.

262. Pfizer Board Member Dr. Scott Gottlieb pressed Twitter on multiple occasions to censor speech critical of COVID-19 vaccines and the response to the pandemic.

263. On August 24, 2021, Pfizer Board Member Dr. Scott Gottlieb contacted Twitter to complain about a column written by Alex Berenson that criticized Dr. Anthony Fauci. “This is whats [sic] promoted on Twitter. This is why Tony needs a security detail,” Gottlieb wrote. Charles Creitz, *Alex Berenson says Pfizer-linked former FDA official got him banned from Twitter in ‘months-long conspiracy,’* FOX NEWS (Oct. 13, 2022).¹¹⁹

264. On August 27, 2021, Pfizer Board Member Dr. Scott Gottlieb had a conference call with Twitter employees to discuss Mr. Berenson. Twitter banned Mr. Berenson the next day.

¹¹⁷ Available at <https://www.cnn.com/2021/07/19/scott-gottlieb-social-media-must-act-to-curb-covid-vaccine-misinformation.html>.

¹¹⁸ Available at <https://www.atlanticcouncil.org/blogs/new-atlanticist/pfizers-albert-bourla-on-how-the-pandemic-ends/>.

¹¹⁹ Available at <https://www.foxnews.com/media/alex-berenson-pfizer-linked-former-fda-official-banned-twitter-months-long-conspiracy>.

265. On Friday, August 27, 2021, Dr. Brett P. Giroir, who served as the assistant secretary for health from 2018 to 2021 and approximately one month as the acting FDA Commissioner in late 2019, posted to Twitter that natural immunity was superior to vaccine immunity. Joseph A. Wulfsohn, *Twitter Files: Pfizer board member Dr. Scott Gottlieb flagged tweets questioning COVID vaccine*, FOX NEWS (Jan. 9, 2023).¹²⁰

266. In response, Pfizer Board Member Dr. Scott Gottlieb reached out to Twitter's top lobbyist in Washington, D.C., to complain that the post was "corrosive," "draws a sweeping conclusion," and "will end up going viral and driving news coverage." *Id.*

267. The Twitter lobbyist forwarded Pfizer Board Member Dr. Scott Gottlieb's email to the Twitter "Strategic Response" team, which "later slapped [Girori's tweet] with a 'misleading' label and blocked any ability to like or share the tweet." *Id.*

268. Upon information and belief, Pfizer Board Member Dr. Scott Gottlieb contacted social media platforms to request censorship of other COVID-19-related posts.

269. Upon information and belief, Pfizer coordinated with and through others to conceal and suppress other material facts about its COVID-19 vaccine.

270. On December 11, 2020, the same day that Pfizer's COVID-19 vaccine received emergency use authorization from the FDA, a Zoom calendar appointment entitled "Vaccine Disinformation Response" invited personnel at the Department of Health and Human Services, Pfizer and other pharmaceutical companies, and Stanford University to discuss "a coalition to

¹²⁰ Available at <https://www.foxnews.com/media/twitter-files-pfizer-board-member-dr-scott-gottlieb-flagged-tweets-questioning-covid-vaccine>.

respond to COVID-19 vaccine disinformation.” Letter from U.S. House Judiciary Chairman Jim Jordan to Pfizer’s Dr. Albert Bourla, July 18, 2023, at 1-2.¹²¹

271. Upon information and belief, at or around this December 11, 2020 meeting, Pfizer, the Department of Health and Human Services, and Stanford University agreed to work together to conceal and suppress material facts about Pfizer’s COVID-19 vaccine, including concealing and suppressing posts about the safety and efficacy of Pfizer’s COVID-19 vaccine.

272. The CDC is within the Department of Health and Human Services. U.S. Dep’t of Health and Human Servs., *HHS Organizational Charts Office of Secretary and Divisions*.¹²²

273. In 2021, the CDC actively worked to censor speech critical of COVID-19 vaccines. Robby Soave, *Inside the Facebook Files: Emails Reveal the CDC’s Role in Silencing COVID-19 Dissent*, REASON (Jan. 19, 2023).¹²³

274. Shortly after the December 11, 2020 meeting, Stanford University co-launched the Virality Project.

275. For at least the next year, Stanford and members of the Virality Project pressured social media companies to conceal and suppress information about Pfizer’s COVID-19 vaccine, including information about safety and efficacy. *See general Memes, Magnets, and Microchips: Narrative dynamics around COVID-19 vaccines*, THE VIRALITY PROJECT, Apr. 26, 2022, at 39 (PDF p. 46); 46 (PDF p. 53); 56 (PDF p. 63); 84 (PDF p. 91).¹²⁴

¹²¹ Available at <https://judiciary.house.gov/sites/evo-subsites/republicans-judiciary.house.gov/files/evo-media-document/2023-07-18-jdj-to-bourla-pfizer.pdf>.

¹²² Available at <https://www.hhs.gov/about/agencies/orgchart/index.html>.

¹²³ Available at <https://reason.com/2023/01/19/facebook-files-emails-cdc-covid-vaccines-censorship/>.

¹²⁴ Available at https://stacks.stanford.edu/file/druid:mx395xj8490/Virality_project_final_report.pdf.

276. Upon information and belief, the Virality Project flagged supposed “misinformation” to platforms on a massive scale, with a high degree of success in inducing the platforms to censor it.

277. The Virality Project admits that six social-media platforms “engaged with VP tickets,” “acknowledge[ed] content flagged for review” by the VP, “and act[ed] on it in accordance with their policies”—in other words, censored it. *Id.* at 18 (PDF p. 25).

278. The Virality Project was not the only organization pressuring social media companies to conceal and suppress speech about Pfizer’s COVID-19 vaccine on behalf of Pfizer.

279. The Virality Project partnered with a campaign called “Stronger.” Stronger, *About*.¹²⁵ Stronger described itself as “a first-of-its-kind national advocacy campaign against misinformation and for vaccines.” *National Public Health Campaign Designed to Mobilize Support of Vaccines*, July 15, 2020.¹²⁶

280. Pfizer was a top funder and served as a board member for the group, Biotechnology Innovation Organization, that paid for the Stronger campaign. Lee Fang (@lhfang), Twitter, Jan. 16, 2023 at 11:13 a.m.,¹²⁷ Biotechnology Innovation Organization “Helix Sponsor;”¹²⁸ John D. Young.¹²⁹

¹²⁵ Available at <https://stronger.org/about>.

¹²⁶ Available at https://www.pnewswire.com/news-releases/national-public-health-campaign-designed-to-mobilize-support-of-vaccines-301093876.html?tc=eml_cleartime&fbclid=IwAR0y3GEys3DsmxdPz3WDpkvN7iJyA4PsmNh2tWWL7K6d7MdshMSicIvQukc.

¹²⁷ Available at <https://twitter.com/lhfang/status/1615019469516197891>.

¹²⁸ Available at <https://www.bio.org/>.

¹²⁹ Available at <https://www.novartis.com/about/board-directors/john-d-young>

281. According to Stronger, “Our mission is to dispel vaccine misinformation so that more adults get vaccinated, kids receive their routine immunizations, and everybody who can get a COVID-19 vaccine does.” Stronger.¹³⁰

282. Stronger “regularly communicated with Twitter on regulating content related to the pandemic. The firm worked closely with the San Francisco social media giant to help develop bots to censor vaccine misinformation and, at times, sent direct requests to Twitter with lists of accounts to censor and verify.” Lee Fang, *COVID-19 Drugmakers Pressured Twitter to Censor Activists Pushing for Generic Vaccine*, THE INTERCEPT, Jan. 16, 2023.¹³¹

283. Upon information and belief, Pfizer worked to conceal and suppress material facts relating to its COVID-19 vaccine.

VII. Pfizer’s Record-Breaking COVID-19 Vaccine Profits

284. Pfizer’s misrepresentations and suppression, concealment, and omission of material facts paid off handsomely for Pfizer because they allowed Pfizer to acquire and keep market share for its COVID-19 vaccine.

285. In 2020, Pfizer reported more than \$9.1 billion in profit. Ryan King, *Pfizer reports nearly \$37 billion in COVID-19 vaccine sales in 2021*, WASHINGTON EXAMINER, Feb. 8, 2022.¹³²

286. In 2021, Pfizer reported approximately \$37 billion in global direct sales and alliance revenue from its COVID-19 vaccine. *Id.*

287. Thanks to Pfizer’s COVID-19 vaccine, Pfizer more than doubled its profits from 2020 to 2021, reporting \$22 billion in total profits in 2021. *Id.*

¹³⁰ Available at <https://stronger.org/>.

¹³¹ Available at <https://theintercept.com/2023/01/16/twitter-covid-vaccine-pharma/>.

¹³² Available at <https://www.washingtonexaminer.com/policy/healthcare/pfizer-reports-nearly-37-billion-in-covid-19-vaccine-sales-in-2021>.

288. In 2022, Pfizer reported approximately \$38 billion in global direct sales and alliance revenue from its COVID-19 vaccine. Spencer Kimball, *The COVID pandemic drives Pfizer's 2022 revenue to a record \$100 billion*, CNBC, Jan. 31, 2023.¹³³

289. Overall, Pfizer reported a record \$100 billion in revenue in 2022. *Id.* Pfizer's COVID-19 vaccine made up approximately 40% of Pfizer's total revenue.

290. Pfizer made record-breaking profits because it misrepresented, suppressed, concealed, and omitted material facts relating to its COVID-19 vaccine.

291. Pfizer's profit would have been lower if Pfizer had not misrepresented, suppressed, concealed, and omitted material facts relating to its COVID-19 vaccine.

VIII. Pfizer's Violation of Past Consent Judgments with the State of Kansas

292. Pfizer entered consent judgments with the State of Kansas to resolve consumer protection claims that govern Pfizer's future conduct, including relating to its COVID-19 vaccine.

A. The 2008 Consent Judgment

293. In 2008, Pfizer paid \$60 million to resolve claims by a group of states, including Kansas, relating to Pfizer's promotional and marketing practices regarding the prescription drugs Celebrex® and Bextra®. Final Consent Judgment, *State of Kansas, ex rel. Steve Six v. Pfizer Inc.*, No. 08CV1576 (Oct. 23, 2008), attached as Exhibit A.

294. According to the 2008 Consent Judgment, "Pfizer shall not make any written or oral claim that is false, misleading or deceptive regarding any FDA-approved Pfizer Product." *Id.* at ¶ 4.

¹³³ Available at <https://www.cnn.com/2023/01/31/the-covid-pandemic-drives-pfizers-2022-revenue-to-a-record-100-billion.html>.

295. The 2008 Consent Judgment defined “Product” to mean “any prescription drug or biological product manufactured, distributed, sold, marketed or promoted in the United States in any way.” *Id.* at § 2, ¶ 5(1).

296. While the 2008 Consent Judgment does not define “biological product,” the FDA defines “biological product” to include vaccines. FDA, *What Are “Biologics” Questions and Answers*, content current as of Feb. 6, 2018;¹³⁴ *see also* 42 U.S.C. § 262.

297. Under the 2008 Consent Judgment, Pfizer’s COVID-19 vaccine is a biological product manufactured, distributed, sold, marketed or promoted in the United States in any way.

298. Pfizer received FDA approval for its COVID-19 vaccine, including but not limited to through an emergency use authorization on December 11, 2020 for individuals 16 years old and older; through an amended emergency use authorization on May 10, 2021 for children 12 years old to 15 years old; through full approval on August 23, 2021 for individuals 16 years old and older; through emergency use authorization on October 29, 2021 for children five years old to 11 years old; through emergency use authorization on June 17, 2022 for children 6 months through four years; and through full approval on July 8, 2022 for children 12 through 15 years of age.

299. The 2008 Consent Judgment also governs communications about clinical studies of Pfizer’s COVID-19 vaccine.

300. According to the 2008 Consent Judgment:

When presenting information in detailing pieces, brochures, booklets, mailing pieces, published journals, magazines, other periodicals and newspapers, and broadcast through media such as radio, television, the Internet, and telephone communications systems, about a Clinical Study that relates to an FDA-approved Pfizer Product, Pfizer shall: (a) accurately reflect the methodology

¹³⁴ Available at <https://www.fda.gov/about-fda/center-biologics-evaluation-and-research-cber/what-are-biologics-questions-and-answers>.

used to conduct the Clinical Study; (b) not present favorable information or conclusions from a study that is inadequate in design, scope, or conduct to furnish significant support for such information or conclusions; and (c) not use statistical analyses and techniques on a retrospective basis to discover and cite findings not soundly supported by the study, or to suggest scientific validity and rigor for data from studies the design or protocol of which are not amenable to formal statistical evaluation.

Id. at ¶ 10; *see also* ¶ 12.

301. Similarly, according to the next paragraph in the 2008 Consent Judgment:

When presenting information in detailing pieces, brochures, booklets, mailing pieces, published journals, magazines, other periodicals and newspapers, and broadcast through media such as radio, television, the Internet, and telephone communications systems, about a Clinical Study or analysis of Clinical Studies as evidence of an FDA-approved Pfizer Product's safety, Pfizer shall not: (a) present information from a study in a way that implies that the study represents larger or more general experience with the drug than it actually does; or (b) use statistics on numbers of patients, or counts of favorable results or side effects derived from pooling data from various insignificant or dissimilar studies in a way that suggests either that such statistics are valid if they are not or that they are derived from large or significant studies supporting favorable conclusions when such is not the case.

Id. at ¶ 11.

302. As set forth in the 2008 Consent Judgment, *id.* at ¶ 35, the Kansas Attorney General provided Pfizer notice of his reasonable belief that Pfizer has engaged in practices that violate the 2008 Consent Judgment. Letter from Kansas Attorney General's Office to Pfizer Inc., Apr. 22, 2024, attached as Exhibit B.

303. In response to the notice from Plaintiff Kansas Attorney General, Pfizer did not address all of the issues identified by Plaintiff, did not respond to evidence cited by Plaintiff, and did not produce documents requested by Plaintiff. Letter from Pfizer's Counsel to Kansas Attorney General's Office, May 22, 2024, attached as Exhibit C.

304. The 2008 Consent Judgment empowers the Kansas Attorney General to assert any claim that Pfizer has violated this Judgment in a separate civil action and to enforce compliance with the Consent Judgment and to seek any other relief afforded by law, pursuant to K.S.A. 50-636(b). Ex. A, at ¶ 36.

B. The 2012 Consent Judgment

305. In 2012, Pfizer paid \$42.9 million to resolve claims by a group of states, including Kansas, relating to Pfizer’s promotional and marketing practices regarding the prescription drugs Zyvox® and Lyrica®. Final Consent Judgment, *State of Kansas, ex rel. Derek Schmidt v. Pfizer Inc.*, No. 12CV1339 (Dec. 13, 2012), attached as Exhibit D.

306. According to the 2012 Consent Judgment, “Pfizer shall not make, or cause to be made, any written or oral claim that is false, misleading, or deceptive regarding any FDA-approved Pfizer Product, . . .” *Id.* at ¶ 3.1.

307. The 2012 Consent Judgment defined “Pfizer Product” to mean “any FDA-approved prescription drug or biological product manufactured, distributed, sold, marketed or Promoted by Pfizer in the United States.” *Id.* at ¶ 2.18.

308. While the 2012 Consent Judgment does not define “biological product,” the FDA defines “biological product” to include vaccines. FDA, *What Are “Biologics” Questions and Answers*, content current as of Feb. 6, 2018,¹³⁵ *see also* 42 U.S.C. § 262.

309. Under the 2012 Consent Judgment, Pfizer’s COVID-19 vaccine is a biological product manufactured, distributed, sold, marketed or Promoted in the United States.

¹³⁵ Available at <https://www.fda.gov/about-fda/center-biologics-evaluation-and-research-cber/what-are-biologics-questions-and-answers>.

310. Pfizer's COVID-19 vaccine received FDA approval beginning on December 11, 2020.

311. As set forth in the 2012 Consent Judgment, *id.* at ¶ 6.1, the Kansas Attorney General provided Pfizer notice of his reasonable belief that Pfizer has engaged in practices that violate the 2012 Consent Judgment. *See Ex. B.*

312. In response to the notice from Plaintiff Kansas Attorney General, Pfizer did not address all of the issues identified by Plaintiff, did not respond to evidence cited by Plaintiff, and did not produce documents requested by Plaintiff. *See Ex. C.*

313. The 2012 Consent Judgment empowers the Kansas Attorney General to assert any claim that Pfizer has violated this Judgment in a separate civil action and to enforce compliance with the Consent Judgment and to seek any other relief afforded by law pursuant to K.S.A. 50-636(b). *Ex. D, at ¶ 6.3.*

C. The 2014 Consent Judgment

314. In 2014, Pfizer paid \$35 million to resolve claims by a group of states, including Kansas, relating to Wyeth Pharmaceuticals Inc.'s ("Wyeth") promotional and marketing practices regarding the prescription drug Rapamune®. Pfizer acquired Wyeth five years before the Consent Judgment. Pfizer signed the Consent Judgment on behalf of itself and Wyeth. Final Consent Judgment, *State of Kansas, ex rel. Derek Schmidt. v. Wyeth Pharmaceuticals Inc.*, No. 2014CV777 (Aug. 6, 2014), attached as Exhibit E.

315. According to the 2014 Consent Judgment, "Pfizer shall not make, or cause to be made, any written or oral claim that is false, misleading, or deceptive regarding any Pfizer Product." *Id.* at ¶ 3.1.

316. The 2014 Consent Judgment defined “Pfizer Product” to mean “any FDA-approved prescription drug or biological product manufactured, distributed, sold, marketed or Promoted by Pfizer in the United States.” *Id.* at ¶ 2.17.

317. While the 2014 Consent Judgment does not define “biological product,” the FDA defines “biological product” to include vaccines. FDA, *What Are “Biologics” Questions and Answers*, content current as of Feb. 6, 2018;¹³⁶ *see also* 42 U.S.C. § 262.

318. Under the 2014 Consent Judgment, Pfizer’s COVID-19 vaccine is a biological product manufactured, distributed, sold, marketed or Promoted in the United States.

319. Pfizer’s COVID-19 vaccine received FDA approval beginning on December 11, 2020.

320. As set forth in the 2014 Consent Judgment, *id.* at ¶ 6.1, the Kansas Attorney General provided Pfizer notice of his reasonable belief that Pfizer has engaged in practices that violate the 2014 Consent Judgment. *See* Ex. B.

321. In response to the notice from Plaintiff Kansas Attorney General, Pfizer did not address all of the issues identified by Plaintiff, did not respond to evidence cited by Plaintiff, and did not produce documents requested by Plaintiff. *See* Ex. C.

322. The 2014 Consent Judgment empowers the Kansas Attorney General to assert any claim that Pfizer has violated this Judgment in a separate civil action and to enforce compliance with the Consent Judgment and to seek any other relief afforded by law, pursuant to K.S.A. 50-636(b). Ex. E, at ¶ 6.3.

¹³⁶ Available at <https://www.fda.gov/about-fda/center-biologics-evaluation-and-research-cber/what-are-biologics-questions-and-answers>.

COUNT I
KANSAS CONSUMER PROTECTION ACT
Violation of the 2008 Consent Judgment, K.S.A. 50-636(b)
(False, misleading, and deceptive claims)

323. All preceding paragraphs are incorporated by reference herein.

324. Pfizer made written and oral claims that were false, misleading and deceptive regarding its COVID-19 vaccine, including but not limited to: Pfizer's COVID-19 vaccine was safe, effective, and prevented transmission of the virus.

325. Pfizer's false, misleading and deceptive claims regarding its COVID-19 vaccine violated the 2008 Consent Judgment, for which the Court should assess an enhanced civil penalty of not more than twenty thousand dollars (\$20,000.00) per violation, pursuant to K.S.A. 50-636(b).

326. The State of Kansas has been harmed by Pfizer's breach of provisions in the 2008 Consent Judgment.

COUNT II
KANSAS CONSUMER PROTECTION ACT
Violation of the 2008 Consent Judgment, K.S.A. 50-636(b)
(Clinical studies communications)

327. All preceding paragraphs are incorporated by reference herein.

328. Pfizer made public statements that were published and broadcast through media relating to its COVID-19 vaccine that did not accurately reflect the methodology used to conduct the clinical study, presented favorable information or conclusions from a study that was inadequate in design, scope, or conduct to furnish significant support for such information or conclusions, and/or used statistical analyses and techniques on a retrospective basis to discover and cite findings not soundly supported by the study, or to suggest scientific validity and rigor for data from studies

the design or protocol of which are not amenable to formal statistical evaluation, including but not limited to:

- a. Statements about Pfizer's original COVID-19 clinical trial on healthy individuals;
- b. Statements about Pfizer's COVID-19 trial on pregnant women; and
- c. Statements about Pfizer's COVID-19 vaccine booster trial on individuals 65 years old and older.

329. Pfizer also made public statements that were published and broadcast through media relating to its COVID-19 vaccine that presented information from a study in a way that implied that the study represents larger or more general experience with the drug than it actually did, and/or used statistics on numbers of patients, or counts of favorable results or side effects derived from pooling data from various insignificant or dissimilar studies in a way that suggests either that such statistics are valid if they are not or that they are derived from large or significant studies supporting favorable conclusions when such is not the case, including but not limited to:

- a. Statements about Pfizer's original COVID-19 clinical trial on healthy individuals;
- b. Statements about Pfizer's COVID-19 trial on pregnant women; and
- c. Statements about Pfizer's COVID-19 vaccine booster trial on individuals 65 years old and older.

330. Pfizer's public statements about its COVID-19 vaccine that referenced or relied on clinical studies violated the 2008 Consent Judgment, for which the Court should assess an enhanced civil penalty of not more than twenty thousand dollars (\$20,000.00) per violation, pursuant to K.S.A. 50-636(b).

331. The State of Kansas has been harmed by Pfizer's breach of provisions in the 2008 Consent Judgment.

COUNT III
KANSAS CONSUMER PROTECTION ACT
Violation of the 2012 Consent Judgment, K.S.A. 50-636(b)
(False, misleading, and deceptive claims)

332. All preceding paragraphs are incorporated by reference herein.

333. Pfizer made, or caused to be made, written and oral claims that were false, misleading, and deceptive regarding its COVID-19 vaccine, including but not limited to: Pfizer's COVID-19 vaccine was safe, effective, and prevented transmission of the virus.

334. Pfizer's false, misleading, and deceptive claims regarding its COVID-19 vaccine violated the 2012 Consent Judgment, for which the Court should assess an enhanced civil penalty of not more than twenty thousand dollars (\$20,000.00) per violation, pursuant to K.S.A. 50-636(b).

335. The State of Kansas has been harmed by Pfizer's breach of provisions in the 2012 Consent Judgment.

COUNT IV
KANSAS CONSUMER PROTECTION ACT
Violation of the 2014 Consent Judgment, K.S.A. 50-636(b)
(False, misleading, and deceptive claims)

336. All preceding paragraphs are incorporated by reference herein.

337. Pfizer made, or caused to be made, written and oral claims that were false, misleading, and deceptive regarding its COVID-19 vaccine, including but not limited to: Pfizer's COVID-19 vaccine was safe, effective, and prevented transmission of the virus.

338. Pfizer's false, misleading, and deceptive claims regarding its COVID-19 vaccine violated the 2014 Consent Judgment, for which the Court should assess an enhanced civil penalty of not more than twenty thousand dollars (\$20,000.00) per violation, pursuant to K.S.A. 50-636(b).

339. The State of Kansas has been harmed by Pfizer's breach of provisions in the 2014 Consent Judgment.

COUNT V
KANSAS CONSUMER PROTECTION ACT
Deceptive Acts or Practices, K.S.A. 50-626(b)(1)(F)

340. All preceding paragraphs are incorporated by reference herein.

341. Beginning in 2020, Pfizer made representations to Kansas consumers knowingly or with reason to know that its COVID-19 vaccine had uses, benefits or characteristics that Pfizer could not rely upon and did not possess a reasonable basis for making such representation, in violation of K.S.A. 50-626(b)(1)(F), including but not limited to: Pfizer's COVID-19 vaccine was safe, effective, and prevented transmission of the virus.

342. Pfizer's representations to consumers are continuing deceptive acts and practices and each day it exists is a separate violation of the KCPA. Civil penalties of not more than ten thousand dollars (\$10,000.00) per violation may be imposed, pursuant to K.S.A. 50-636(d).

343. Consumers have been damaged by Pfizer's violation of the Kansas Consumer Protection Act.

COUNT VI
KANSAS CONSUMER PROTECTION ACT
Deceptive Acts or Practices, K.S.A. 50-626(b)(1)(G)

344. All preceding paragraphs are incorporated by reference herein.

345. Beginning in 2020, Pfizer made representations knowingly or with reason to know that the use, benefit or characteristic of its COVID-19 vaccine had not been proven or otherwise substantiated and Pfizer did not rely upon and possess the type and amount of proof or substantiation represented to exist, in violation of K.S.A. 50-626(1)(G), including but not limited to: Pfizer's COVID-19 vaccine was safe, effective, and prevented transmission.

346. Pfizer's representations to consumers are continuing deceptive acts and practices and each day it exists is a separate violation of the KCPA. Civil penalties of not more than ten thousand dollars (\$10,000.00) per violation may be imposed, pursuant to K.S.A. 50-636(d).

347. Consumers have been damaged by Pfizer's violation of the Kansas Consumer Protection Act.

COUNT VII
KANSAS CONSUMER PROTECTION ACT
Deceptive Acts or Practices, K.S.A. 50-626(b)(2)

348. All preceding paragraphs are incorporated by reference herein.

349. Beginning in 2020, Pfizer willfully used, in any oral or written representation, of exaggerations, falsehoods, innuendo, or ambiguity as to a material fact, in violation of K.S.A. 50-626(b)(2), including but not limited to: Pfizer's COVID-19 vaccine was safe, effective, and prevented transmission.

350. Pfizer's deceptive acts and practices are continuing and each day it exists is a separate violation of the KCPA. Civil penalties of not more than ten thousand dollars (\$10,000.00) per violation may be imposed, pursuant to K.S.A. 50-636(d).

351. Consumers have been damaged by Pfizer's violation of the Kansas Consumer Protection Act.

COUNT VIII
KANSAS CONSUMER PROTECTION ACT
Deceptive Acts or Practices, K.S.A. 50-626(b)(3)

352. All preceding paragraphs are incorporated by reference herein.

353. Beginning in 2020, Pfizer willfully failed to state a material fact or willfully concealed, suppressed, or omitted a material fact in violation of K.S.A. 50-626(b)(3), including but not limited to:

- a. Pfizer's COVID-19 vaccine safety data, including from its clinical trials and confidential internal company documents on adverse events, pregnant animals and pregnant women, and safety signals;
- b. Pfizer's COVID-19 vaccine's efficacy, including waning effectiveness; and
- c. Pfizer's direct efforts to censor truthful information on social media about Pfizer's COVID-19 vaccine.

354. Pfizer's deceptive acts and practices are continuing and each day it exists is a separate violation of the KCPA. Civil penalties of not more than ten thousand dollars (\$10,000.00) per violation may be imposed, pursuant to K.S.A. 50-636(d).

355. Consumers have been damaged by Pfizer's violation of the Kansas Consumer Protection Act.

COUNT IX
KANSAS CONSUMER PROTECTION ACT
Unconscionable Acts or Practices, K.S.A. 50-627(b)(6)

356. All preceding paragraphs are incorporated by reference herein.

357. Beginning in 2020, Pfizer knew or had reason to know that it made a misleading statement of opinion on which the consumer was likely to rely to the consumer's detriment in

violation of K.S.A. 50-627(b)(6), including but not limited to: Pfizer's vaccine was safe, effective, and prevented transmission.

358. Pfizer's unconscionable acts or practices are continuing and each day it exists is a separate violation of the KCPA. Civil penalties of not more than ten thousand dollars (\$10,000.00) per violation may be imposed, pursuant to K.S.A. 50-636(d).

359. Consumers have been damaged by Pfizer's violation of the Kansas Consumer Protection Act.

**COUNT X
Civil Conspiracy**

360. All preceding paragraphs are incorporated by reference herein.

361. Upon information and belief, Pfizer conspired with two or more persons from the federal government and third-party businesses and organizations to willfully conceal, suppress, or omit material facts relating to Pfizer's COVID-19 vaccine.

362. Upon information and belief, Pfizer, the Department of Health and Human Services, and members of the Virality Project, including Stanford, had a meeting of the minds no later than December 2020 to willfully conceal, suppress, or omit material facts relating to Pfizer's COVID-19 vaccine.

363. Upon information and belief, Pfizer, the Biotechnology Innovation Organization, and the Public Goods Project had a meeting of the minds no later than July 2020 to willfully conceal, suppress, or omit material facts relating to Pfizer's COVID-19 vaccine.

364. Pfizer and its co-conspirators took actions to willfully conceal, suppress, or omit material facts relating to Pfizer's COVID-19 vaccine in violation of the Kansas Consumer Protection Act, including K.S.A. 50-626(b)(3).

365. Kansans have been damaged as a proximate result of Pfizer's conspiracy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff State of Kansas respectfully prays that this Court grant them the following relief:

- A. Declare that Pfizer's written and oral claims violate the 2008 Consent Judgment;
- B. Order Pfizer to pay the State of Kansas enhanced civil penalties of twenty thousand dollars (\$20,000.00) for each violation of the 2008 Consent Judgment pursuant to K.S.A. 50-636(b);
- C. Declare that Pfizer's written and oral claims violate the 2012 Consent Judgment;
- D. Order Pfizer to pay the State of Kansas enhanced civil penalties of twenty thousand dollars (\$20,000.00) for each violation of the 2012 Consent Judgment pursuant to K.S.A. 50-636(b);
- E. Declare that Pfizer's written and oral claims violate the 2014 Consent Judgment pursuant to K.S.A. 50-636(b);
- F. Order Pfizer to pay the State of Kansas enhanced civil penalties of twenty thousand dollars (\$20,000.00) for each violation of the 2014 Consent Judgment;
- G. Declare, pursuant to K.S.A. 50-632(a)(1), that Pfizer's deceptive or unconscionable acts or practices violate the Kansas Consumer Protection Act, K.S.A. 50-623, *et seq.*;
- H. Order Pfizer to pay a civil penalty of ten thousand dollars (\$10,000.00) for each violation of the Kansas Consumer Protection Act pursuant to K.S.A. 50-636;
- I. Order Pfizer to pay a civil penalty of ten thousand dollars (\$10,000.00) for each day Pfizer's act or practice exists pursuant to K.S.A. 50-636(d);

J. Award Plaintiff State of Kansas damages for Pfizer's violations of the Kansas Consumer Protection Act, K.S.A. 50-636(a);

K. Award Plaintiff State of Kansas reasonable expenses and investigation fees pursuant to K.S.A. 50-636(c);

L. Award Plaintiff State of Kansas damages caused by Pfizer's civil conspiracy; and

M. Grant such other and further relief as the Court deems just and proper.

Dated: June 17, 2024

Respectfully submitted,

KRIS W. KOBACH
ATTORNEY GENERAL

/s/ Kaley Schrader

Frances R. Oleen, #17433
Deputy Attorney General
Kaley Schrader, #27700
Assistant Attorney General
Office of the Attorney General
Public Protection Division
120 SW 10th Ave., 2nd Floor
Topeka, Kansas 66612-1597
Tel: 785-296-3751
Fax: 785-291-3699
kaley.schrader@ag.ks.gov

JAMES OTIS LAW GROUP, LLC

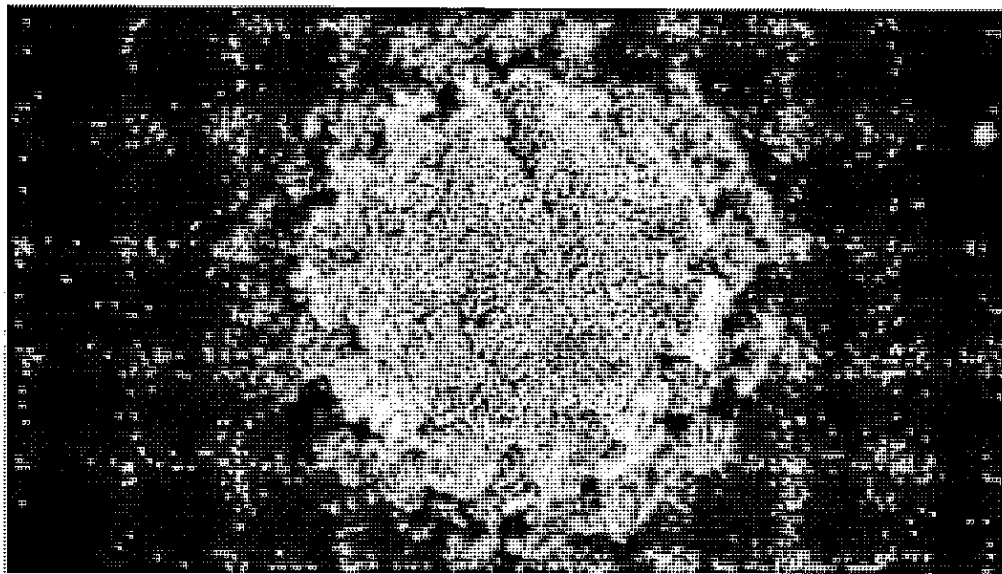
/s/ Justin D. Smith

Justin D. Smith, Mo. Bar No. 63253*
William O. Scharf, Mo. Bar No. 66676*
Michael C. Martinich-Sauter, Mo. Bar. No. 66065*
13321 North Outer Forty Road, Suite 300
St. Louis, Missouri 63017
(816) 678-2103
Justin.Smith@james-otis.com

* *pro hac vice* forthcoming

Exhibit 16

Trump: COVID-19 + Crimes Against Humanity + Medical Board Corruption.



On May 11, 2020, minimally invasive spine pioneer, Richard Arjun Kaul, MD, filed a lawsuit in the United States District Court for the District of Columbia, in which racketeering and gross negligence claims are asserted against, amongst others, Defendants New Jersey Board of Medical Examiners and Allstate Insurance Company. The thrust of the case is that Defendant Allstate has, since at least 1999, engaged in massive schemes of bribery that have corrupted state medical boards. The Complaint alleges that this corruption is directly responsible, as of May 11, 2020, for over eighty thousand (80,000) deaths and one point three million (1,300,000) cases caused by COVID-19 infections.

Contemporaneously with the Complaint, Kaul submitted a letter to President Trump, in which he seeks to have the Criminal Division of the United States Department of Justice commence an investigation against state medical boards, regarding the commission of gross negligence and crimes against humanity.

On March 24, 2020, Kaul sent a letter to New Jersey Governor, Philip Murphy, that sought his assistance in having Kaul's New Jersey license reinstated. The illegal revocation on March 12, 2014 is the subject matter of a lawsuit Kaul filed on October 1, 2019. Kaul indicated to Murphy that a reinstatement would permit him to use his clinical expertise to save lives. Murphy failed to respond to the letter, but has continued to publicize his plan to stem the pandemic.

The plague of medical board corruption constitutes a central theme in Kaul's recently published audio book: "An Impossible Victory: Kaul v. Christie", a book whose publication the Defendants attempted to suppress. A series of documentaries about the book are in production, the first of which will be released in June, 2020.

www.drrichardkaul.com
201-989 2299

Share on social



www.drrichardkaul.com 

**COVID-19 DEATHS + MEDICAL BOARD
RACKETEERING + THE SUPREME COURT OF THE
UNITED STATES**



A lawsuit filed on June 18, 2020 by Richard Arjun Kaul, MD, has exposed how schemes of rampant corruption/bribery of American state medical boards by, amongst others, Allstate Insurance Company, are responsible for COVID-19 related mortalities. Kaul's legal/public relations campaign to alert the public to the 'cancer of corruption' within the American healthcare sector officially began on February 22, 2016, when he filed the first in a series of 9 lawsuits ("The Kaul Cases") in United States federal courts. The overarching goal of his prosecution of the Defendants, of which Allstate, the New Jersey Medical Board and the Federation of State Medical Boards are but three, is to cause a "Reformation of American Medical Boards". Had this change occurred earlier, the American public would not now be experiencing the highest COVID-19 related mortality rate in the western world.

On November 3, 2020, Kaul filed an emergency petition in the Supreme Court of the United States, in which he advances six arguments, two of which are:

"Kaul respectfully asserts that the grant of a writ will reduce COVID-19 related morbidity/mortality and will be in aid of the Court's appellate jurisdiction."

"Kaul respectfully asserts that a grant of the writ will mitigate future threats of COVID-19 like microbial pandemics ..."

"The Kaul Cases" and the associated liability to the Defendants of in excess of \$9 billion, have negatively impacted the market capitalization of Defendants Allstate, TD Bank and Geico/Berkshire Hathaway, a fact that Kaul raises in the writ:

"Kaul respectfully asserts that the grant of a writ will mitigate any further decrease in market capitalization of Defendants Allstate + TD Bank + Berkshire Hathaway/Geico ... "

Racketeering and other criminal activity within American state medical boards were discussed on October 28, 2020 by Kaul and Oregon based physician, Dr. Eric Dover. The conversation highlighted the epidemic in American medicine of physician suicides/incarceration, and the role of the insurance industry and corporate greed in this human tragedy (time segment 20:30).

Kaul and Dover identified the solution, part of which calls for POLITICAL CAMPAIGN FINANCE REFORM. Multi-national corporations have corrupted government and control the political process. State

have corrupted government and control the political process. State medical boards are governmental agencies. The longer a politician has been in politics the more beholden he is to these forces. Trump entered politics in 2016, Biden, a lawyer, entered in 1970; but whoever wins would be well advised to support a "**Reformation of American Medical Boards**". In doing so he will save the lives of future Americans from another COVID-19 like pandemic. Political corruption kills.

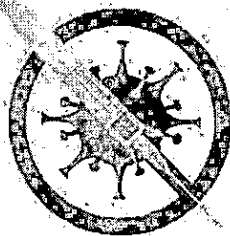
www.drrichardkaul.com
201-989 2299

Share on social



www.drrichardkaul.com 

**COVID-19:
A MUTATION DEFEATS A VACCINE**



On December 15, 2020 the New York Post published a story entitled:

“UK finds new mutation of COVID-19 behind rapid spread across London”

Scientists from the COVID-19 Genomics UK Consortium related the rapid rise in transmission to a mutation in the so called **“spike protein”**, that part of the virus that locks on to human cells. The mutated genetic code has effectively ‘super-charged’ the virus and increased its genetic ‘stickiness’, rendering it far more infective and pathologically aggressive. The COVID-19 virus is an ‘intelligent’ microbial form that has mutated in response to the recently released vaccine from Pfizer and Moderna.

On November 21, 2020, Kaul sent a letter to the General Medical Council of the UK, in which he states:

“Additionally, the RNA virus has a marked propensity for mutation, which effectively means that whatever vaccine is developed, it will be rapidly ‘outmaneuvered’ by a COVID-19 genetic ‘two-step’, always staying one step ahead, until global herd immunity achieves a critical mass and COVID-19 appears in the rearview mirror of humanity. Until then, whenever that may be, the catastrophe will continue unabated, by which point medical board corruption or indeed medical boards will have been eradicated.”

On December 7, 2020, a release was issued from Kaul Healthcare Consultants entitled:

"PFIZER + COVID-19 VACCINE: “FROM THE FRYING PAN INTO THE FIRE” – A DEADLY PROPOSITION?"

It exposes the lack of evidence regarding the safety and efficacy of the vaccine, and references a case in the UK in which a vaccinated woman developed a severe neurological injury.

The vaccine has caused the mutation and will provide no protection to the mutant virus now coursing through the planet’s circulatory system.

Of course those corporations/executives raking in billions of dollars from having corrupt governments/politicians mandating vaccination programs, have insulated themselves and their families from harm. Two of these corporations are Berkshire Hathaway/Geico and Allstate Insurance Company.

All vaccination programs should cease and until proper clinical trials are

All vaccination programs should cease and until proper clinical trials are conducted every human on this planet should reject the vaccine, a poison that places profit over people.

It is not the **"FIRE"** but the **"INFERNO"** into which the so called **"vaccine"** has cast humanity. This tale of greed, corporate tyranny and mutation has all the makings of a revolution:

"Coercion camouflaged as care, cares not for humanity" – Anon.
Circa. 1939: Germany.

www.drrichardkaul.com
201-989 2299

Share on social



www.drrichardkaul.com 

Exhibit 17

first time in its history, and unquestionably in a public relations 'damage-mitigation' effort, publicly admit to these crimes against humanity: <https://www.lloyds.com/about-lloyds/history/the-trans-atlantic-slave-trade/lloyds-marine-insurance-and-slavery>. The insurance industry, which includes the Defendants, has replaced shipping slaves with the human trafficking of Indian/African American physicians into the modern-day plantation equivalent, that of the American jails.)

19. The forced/coerced mass vaccination programs/passports are the chains and whips of the COVID enslavement program, the strings of which are being pulled by the British controlled insurance industry. The COVID vaccine, as Kaul predicted, has now been found to be highly toxic/ineffective: <https://www.dr-richard-kaul.com/so/24NPf5Q65> This fact was known by the government/corporate entities that forced it on the world's population: <https://theswisstimes.ch/swiss-banker-files-criminal-charges-over-false-covid-vaccine-statements/> In K11-7, the Defendants attempted to frame the Plaintiffs' assertion of these facts as evidence of the implausibility of their complaint, with terms such as "vast conspiracy" and "nutcase". These facts are now proven, and this country, like Switzerland, should have the courage to bring criminal charges against those who perpetrated these crimes against humanity.

20. In K11-2, the Defendants and the Court devoted inordinate page space to Kaul's exposition of the insurance industry's four hundred (400) year-long genocide, and in doing so, did betray their conviction of the absolute truth of the matter.

21. In K11-7, Kaul identifies how, in 2021, the "pattern", like the COVID-19 virus, has mutated into a purported mission to save humanity, the calling card of which is a supposed "vaccine". The vaccine is more than useless, as it was the cause of the viral mutation, as Kaul in 2020, explained it would be.

Case: 20-3522 Document: 17 Page: 37 Date Filed: 12/22/2020

CHARIE GRASSLEY, IOWA, CHAIRMAN
ALICE CRAPPO, IOWA
PAT ROBERTS, KANSAS
MICHAEL B. LEE, ILLINOIS
JOHN CORNYN, TEXAS
JONI FINN, SOUTH DAKOTA
RICHARD BLUMENTHAL, CONNECTICUT
ROB PORTMAN, OHIO
PATRICK S. TOOMEY, PENNSYLVANIA
TIM SCOTT, SOUTH CAROLINA
TED CROZZO, LOUISIANA
JAMES LAMARCA, OREGON
STEVE DAINES, MONTANA
TED CRUZ, TEXAS
SEN. GREGG, NEW HAMPSHIRE

RON WYDEN, OREGON
OSCAR STEVENSON, MICHIGAN
MARK CANTWELL, WASHINGTON
ROBERT AGARONIS, NEW JERSEY
THOMAS R. CARPER, DELAWARE
BENJAMIN L. CARDIN, MARYLAND
THERO WOODRUFF, MISSISSIPPI
MICHAEL F. FENNELL, COLORADO
ROBERT F. CASPER, WYOMING
MARK R. WARREN, VIRGINIA
HELENE WYETH HOLTJE, RHODE ISLAND
MAGGIE HASSAN, NEW HAMPSHIRE
CATHERINE CORTEZ MARTO, NEVADA

United States Senate
COMMITTEE ON FINANCE
WASHINGTON, DC 20510-0200

EDDIE DAVIS, STAFF DIRECTOR AND CHIEF COUNSEL
JESSICA BRIDENMAN, LEGISLATIVE STAFF DIRECTOR

To: Members of the Senate Finance Committee
From: Senator Chuck Grassley, Chairman of the Senate Finance Committee
Senator Ron Wyden, Ranking Member of the Senate Finance Committee
Date: December 16, 2020
Re: Findings from the Investigation of Opioid Manufacturers' Financial Relationships with Patient Advocacy Groups and other Tax-Exempt Entities

Dear Colleagues:

As the nation continues to respond to the COVID-19 pandemic, we want to bring your attention back to another concerning public health matter: our nation's opioid epidemic. Opioid overdoses claimed more than 450,000 lives in the United States from 1999 to 2019, and preliminary data from the Centers for Disease Control and Prevention (CDC) suggests drug overdoses deaths, including those attributed to opioids, have accelerated since the pandemic began.¹ Indeed, COVID-19 has increased risk factors associated with substance-use disorders (SUDs) and opioid-use disorders (OUDs) like feelings of anxiety, depression, loneliness, and an ongoing sense of uncertainty.² For individuals suffering from these diseases, COVID-19 has even presented additional barriers to treatment and social support services as people are urged to stay-at-home and social distance.³ We are concerned that this will only worsen as our country continues to battle COVID-19 and its social isolation and lack of access to SUD and OUD treatment persists.

As the opioid epidemic and its impact on programs within the Finance Committee's jurisdiction shows no signs of abating, we write to provide you with an update on the

¹ *Opioid Overdose, Data Analysis and Resources*, CTRS. FOR DISEASE CONTROL AND PREVENTION, <https://www.cdc.gov/drugoverdose/data/analysis.html> (last viewed Dec. 10, 2020).
² Alex Edelman, *Overdose deaths appear to rise amid coronavirus pandemic in U.S.*, NBC NEWS (Oct. 20, 2020), <https://www.nbcnews.com/health/health-news/overdose-deaths-appear-rise-amid-coronavirus-pandemic-ar-1244924>; Jon Kamp and Ariann Campo-Flores, *The Opioid Crisis, Already Serious, Has Intensified During Coronavirus Pandemic*, WALL ST. J. (Sept. 8, 2020), <https://www.wsj.com/articles/the-opioid-crisis-already-serious-has-intensified-during-coronavirus-pandemic-11599557401>.
³ Jon Kamp and Ariann Campo-Flores, *The Opioid Crisis, Already Serious, Has Intensified During Coronavirus Pandemic*, WALL ST. J. (Sept. 8, 2020), <https://www.wsj.com/articles/the-opioid-crisis-already-serious-has-intensified-during-coronavirus-pandemic-11599557401>. See also DEP'T OF HEALTH AND HUMAN SERVS., OFF. OF INSPECTOR GEN., OPIOID TREATMENT PROGRAMS REPORTED CHALLENGES ENCOUNTERED DURING THE COVID-19 PANDEMIC AND ACTIONS TAKEN TO ADDRESS THEM (Nov. 2020), https://oig.hhs.gov/osr/reports/res/09/2001001.asp?main_source=web&utm_medium=web&utm_campaign=covid-A-09-20-01001.

Case: 20-3522 Document: 17 Page: 38 Date Filed: 12/22/2020

Committee's ongoing investigation into the financial relationships between opioid manufacturers and tax-exempt organizations. To date, the Committee has identified approximately \$65 million in payments that opioid manufacturers and related companies have made to tax-exempt entities, which suggest that manufacturers view these organizations as helpful extensions of their sales and marketing efforts.

The Committee's Long-Standing Interest in the Opioid Epidemic

The opioid epidemic has directly impacted Federal health care programs under the Committee's jurisdiction, and has been a long-standing interest of its members.⁴ The increased use of opioid drugs for long-term chronic non-cancer pain in the 1990's dramatically increased the number of Medicare and Medicaid patients admitted to hospitals for "opioid overdose."⁵ By 2017, Medicare and Medicaid covered approximately 73% of 974,000 opioid-related inpatient hospital stays.⁶ Furthermore, earlier this year, and before the COVID-19 pandemic, the Office of Inspector General at the Department of Health and Human Services (HHS OIG) reported that 267,000 Medicare Part D beneficiaries received high amounts of opioids in 2019, and 209,000 beneficiaries received medically assisted treatment.⁷ And, while the HHS OIG found that opioid use in Medicare Part D had decreased in 2019 (when compared to the past 3 years) due to the efforts of the Department of Health and Human Services (HHS) and others, it stressed the critical need to remain diligent, especially during the COVID-19 pandemic.⁸

Over the past eight years, we have used our leadership positions to seek greater transparency into the financial relationships between opioid manufacturers and tax-exempt organizations. Our work reveals that opioid manufacturers have maintained extensive financial relationships with tax-exempt organizations, including pain advocacy groups, professional provider groups, and medical associations. In turn, these groups have sought to influence opioid prescribing practices and related Federal policy connected to opioid use and pain care that directly affects Medicare and Medicaid. Given these ongoing concerns, on June 28, 2019, we sent letters to 10 tax-exempt organizations and requested information about their financial relationships with opioid manufacturers.⁹ These groups included:

⁴ Senator Grassley, in his capacity as Ranking Member of the health subcommittee, co-chaired the Committee's first hearing on the opioid epidemic in 2012. *Prescription Drug Abuse: How are Medicare and Medicaid Adapting to the Challenge?*, Hearing Before Subcomm. On Health of the S. Fin. Comm., 112th Cong. (2012), <https://www.finance.senate.gov/recordings/prescription-drug-abuse-how-are-medicare-and-medicaid-adapting-to-the-challenge/>.

⁵ The number of combined hospital inpatient stays among Medicare and Medicaid beneficiaries increased from 126,500 in 1993 to 437,800 in 2012. See *Hospital Inpatient Utilization Related to Opioids Overuse Among Adults 1993-2012*, AHRQ Table 2 (Aug. 2014), <http://www.hcup-us.ahrq.gov/reports/states/171/hospitalizations-for-opioid-overuse.pdf>.

⁶ *HCUP Fast Stats - Opioid-Related Hospital Use*, AHRQ, <https://www.hcup-us.ahrq.gov/faststats/OpioidUse.jsp> (last viewed Nov. 25, 2020).

⁷ DEP'T OF HEALTH AND HUMAN SERVS., OFF. OF INSPECTOR GEN., OPIOID USE IN MEDICARE PART D CONTINUED TO DECLINE IN 2019, BUT VIGILANCE IS NEEDED AS COVID-19 RAISES NEW CONCERNS (Aug. 13, 2020), <https://oig.hhs.gov/oig/reports/OIG-02-20-00229.asp>.

⁸ *Id.*

⁹ Press Release, Grassley, Wyden Press for Answers on Financial Relationships Between Opioids Manufacturers and Tax-Exempt Organizations (July 1, 2019), <https://www.grassley.senate.gov/newsroom/record/press-release-wyden-press-answers-financial-relationships-between-opioid-manufacturers>.

Case: 20-3522 Document: 17 Page: 39 Date Filed: 12/22/2020

1. American Chronic Pain Association
2. American Pain Society
3. American Society for Pain Management Nursing
4. American Society of Pain Educators
5. Center for Practical Bioethics
6. Federation of State Medical Boards
7. The Joint Commission
8. American Academy of Physical Medicine and Rehabilitation
9. Alliance for Patient Access
10. International Association for the Study of Pain

We requested complete Internal Revenue Service (IRS) Form 990s filed for each year between 2012 and 2019, as well as a detailed accounting of all payments and transfers including, but not limited to, contributions, grants, advertising, program scholarship, and other revenue and remuneration.¹⁰ In a separate, but related inquiry, Senator Wyden also requested information from the U.S. Pain Foundation and the American Academy of Pain Medicine.¹¹

The goal of our requests was to identify these groups' largest pharmaceutical donors and to ascertain whether these payments influenced the organizations' activities in any way, especially as they pertain to opioids and opioid prescribing practices. This investigation also built on work the Committee began in 2012, when then-Chairman Max Baucus of the Senate Finance Committee and then-Ranking Member Chuck Grassley of the Senate Judiciary Committee examined Purdue Pharma, Endo Pharmaceuticals, and Johnson & Johnson's financial relationship with tax-exempt medical groups, and included questions about payments made to physicians who specialize in pain management.¹² Ranking Member Wyden subsequently sent letters to Secretary Burwell,¹³ Secretary Price,¹⁴ Secretary Azar¹⁵ and the National Academy of Medicine,¹⁶ raising concerns about conflicts of interest of various members of Federal advisory

¹⁰ *Id.*

¹¹ Letter from Senator Ron Wyden to Dr. Jinguo Cheng, President, American Academy of Pain Medicine (Mar. 12, 2019), <https://www.finance.senate.gov/imo/media/doc/2019031219%20Wyden%20letter%20to%20AAPM.pdf>; Letter from Senator Ron Wyden to Nicole Hemmenway, Interim CEO, U.S. Pain Foundation (Dec. 18, 2018), <https://www.finance.senate.gov/imo/media/doc/121818%20Senator%20Wyden%20to%20U.S.%20Pain%20Foundation.pdf>.

¹² Press Release, Baucus, Grassley Seek Answers About Opioid Manufacturers' Ties to Medical Groups (May 8, 2012), <https://www.finance.senate.gov/cha/mans-news/baucus-grassley-seek-answers-about-opioid-manufacturers-ties-to-medical-groups>.

¹³ Letter from Senator Ron Wyden to Sylvia Burwell, Secretary, Department of Health and Human Services (Feb. 5, 2016), https://www.finance.senate.gov/imo/media/doc/Wyden%20letter%20to%20HHS_Opioid%20Conflicts.pdf.

¹⁴ Press Release, Wyden Asks Price to Delay Federal Opioid Workshop Until Industry Conflicts are Examined (May 8, 2017), <https://www.finance.senate.gov/ranking-members-news/wyden-asks-price-to-delay-federal-opioid-workshop-until-industry-conflicts-are-examined>.

¹⁵ Press Release, Wyden Reveals Opioid Industry Ties on HHS Task Force, Probes Advocacy Group's Finances (Dec. 19, 2018), <https://www.finance.senate.gov/ranking-members-news/wyden-reveals-opioid-industry-ties-on-hhs-task-force-probes-advocacy-groups-finances>.

¹⁶ Press Release, Wyden Concerned by National Academy Ties to Opioid Manufacturers (July 5, 2016), <https://www.finance.senate.gov/ranking-members-news/wyden-concerned-by-national-academy-ties-to-opioid-manufacturers>.

Case: 20-3522 Document: 17 Page: 54 Date Filed: 12/22/2020

officers that sit on Federal advisory boards.¹³² This is why the Committee is releasing the financial information collected during the 2012 investigation, in addition to data collected over the past two years, because we remain concerned that the opioid epidemic was driven, in part, by misinformation and dubious marketing practices used by pharmaceutical companies and the tax-exempt groups they fund.

Congress must continue to shed light on pharmaceutical and medical device manufacturers' financial dealings with tax-exempt organizations. While such financial entanglements are of particular concern in regards to opioids, given their danger and addictive potential, such funding and influence is not limited to this therapeutic class.¹³³ This investigation clearly shows that such payments are viewed as key marketing and policy influencing tools, which, in the case of opioids, contributed to addiction, sickness, and death for millions of Americans. Therefore, Congress must continue to advocate for stronger safeguards within tax-exempt organizations and within the Federal government. Steps we recommend taking:

1. Expand CMS's Open Payments database to require pharmaceutical manufacturers and device manufacturers to report payments made to tax-exempt organizations.
2. Require the Secretary of HHS to develop guidelines and procedures to increase transparency among members of Federal task forces, as well as research groups and panels convened or contracted by HHS.

In the next Congress, we plan to continue our work on these important issues and we encourage my colleagues to do the same.



Charles Grassley
Chairman
Senate Finance Committee



Ron Wyden
Ranking Member
Senate Finance Committee

¹³² e.g., the FDA's advisory committee on analgesics, which evaluate the safety of opioids includes Kevin Zacharoff who sat on the ASPE board, and Lonnie Zeltzer who was the APS and API boards. See *Anesthetic and Analgesic Drug Products Advisory Committee Roster*, FDA, <https://www.fda.gov/advisory-committees/analgesic-and-analgesic-drug-products-advisory-committee-roster> (last viewed Dec. 10, 2020).

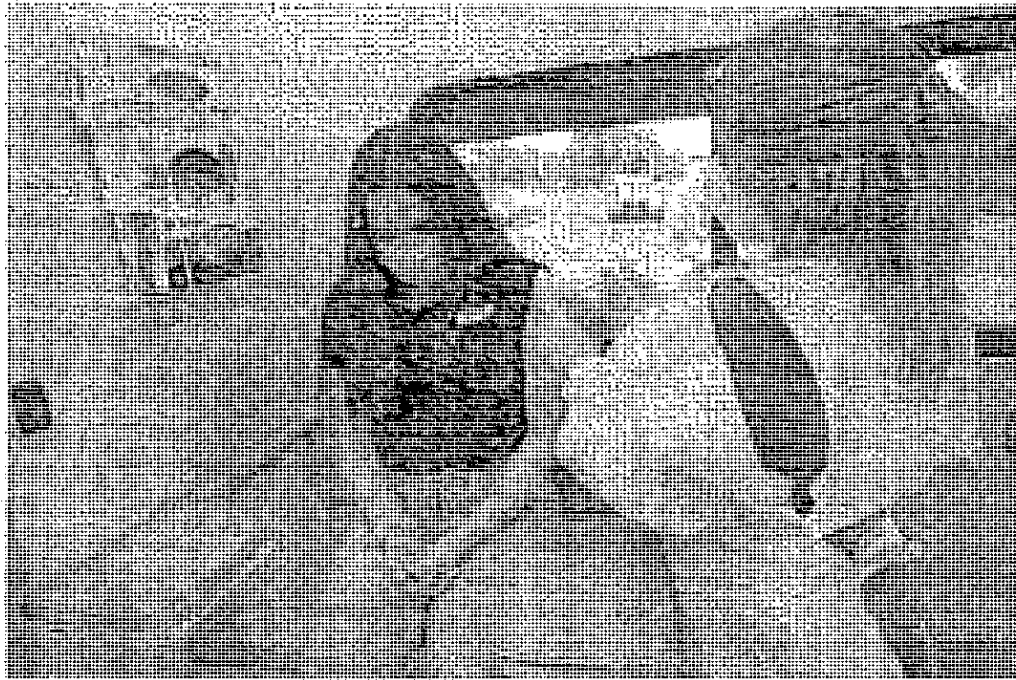
¹³³ See *Drug Pricing in America: A Prescription for Change, Part II: Hearing Before S. Comm. Fin 116th Cong.* at 70, 147, 477, 529, 716 (2019), <https://www.finance.senate.gov/imo/media/doc/71113.pdf>. See also Alex Ruoff, *AbbVie, Bristol-Myers Among Patient Advocacy Groups' Big Backers*, BLOOMBERG, <https://about.bgov.com/news/abbvie-bristol-myers-among-patient-advocacy-groups-big-backers/>.



HEALTH CARE

Medical boards get pushback as they try to punish doctors for Covid misinformation

Medical boards have sanctioned eight physicians since January 2021 for spreading coronavirus-related misinformation, according to the Federation of State Medical Boards.



A medical professional gives a patient a Covid vaccine. | Joe Raedle/Getty Images

By **DARIUS TAHIR**
02/01/2022 04:30 AM EST



Medical boards and other regulators across the country are scrambling to penalize doctors who spread misinformation about vaccines or promote unproven cures for Covid-19. But they are unsure whether they'll prevail over actions by state lawmakers who believe the boards are overreaching.

In Maui, the state medical board filed complaints against the state's chief health officer and another physician after they supported Covid-19 treatments federal health officials warned against. In Florida, the nominee for state

surgeon general refused to directly answer on the effectiveness and safety of the coronavirus vaccine — and that’s after a local doctor filed a complaint to the state’s medical boards. In Idaho, local GOP officials appointed a pathologist who promoted unproven virus treatments to a local public health board, despite complaints from his peers to state regulators.

Advertisement

In all, medical boards have sanctioned eight physicians since January 2021 for spreading coronavirus-related misinformation, according to the Federation of State Medical Boards, which has recommended that health officials consider action against medical professionals who dispense false medical claims in public forums. The eight penalized doctors, who’ve been hit with discipline from suspension to revocation of licenses, represent a surprising figure, considering the time it takes for state boards to mete out punishment. The targets of investigations have cited their own scientific expertise in recommending alternative courses of treatment.



TECHNOLOGY

Biden’s vaccine misinformation road not taken

BY ALEXANDRA S. LEVINE

“When that white coat is weaponized to spread misinformation, it does public harm,” Brian Castrucci, the CEO of the public health non-profit the de Beaumont Foundation in Bethesda, Md., who supports the action taken by health regulators.

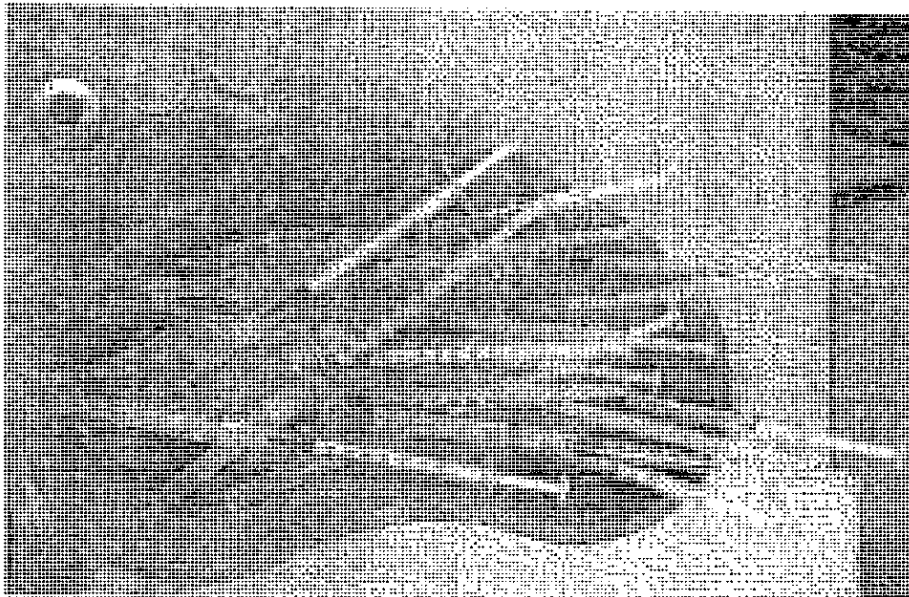
The federation expects its members will conduct more investigations that would lead to disciplinary actions. But in some cases the responses from some medical boards and state officials have been stymied by political backlash. States like Tennessee and North Dakota, for example, have restricted state medical boards’ powers. And now legislators in 10 other states — including Florida and South Carolina — have introduced similar measures.

Some state boards also lack the legal tools to discipline doctors for sharing unreliable information via social media. They believe the precedents in their

states for unprofessional or unethical behavior more narrowly apply to actions or speech made directly to patients under their care.

“We need the medical boards to stand up and evolve,” said Castrucci, who cited the need to preserve the public’s trust in medicine. “With the click of a mouse button, two million people can get information that’s incorrect.”

Pressing public health problem



Medical personnel reach for pre-loaded syringes as they vaccinate students at KIPP Believe Charter School in New Orleans, Tuesday, Jan. 25, 2022. | Ted Jackson/AP Photo

Misinformation hasn’t just distorted the public debate over vaccines, Castrucci and his peers warn. It also has helped create a market for unproven drugs and treatment against Covid-19, sometimes with harmful side effects. Poison centers have recorded increased numbers of calls related to ivermectin and oleandrin, with some patients requiring hospitalizations. And a recent study in *The New England Journal of Medicine* projected nearly \$2.5 million in wasteful insurance spending on ivermectin in a single week.

Both substances have been the beneficiaries of considerable hype from commentators online and elsewhere outside the mainstream of the medical profession — even after negative clinical evidence came in — for their alleged anti-coronavirus properties.

Facing a flood of misinformation, plus the anti-establishment mood in many red states, the regulatory structure upholding professional standards is “unraveling,” said Richard Baron, the leader of the American Board of Internal Medicine, one of the private-sector bodies that certifies doctors. “We’re trying to figure out what the most effective way to act,” Baron said, conceding that he was uncertain about the most effective way to confront the problem. “There are

AD

Legal structures developed for the 20th century are, in many states, not suited to discipline doctors who broadcast misinformation on social media because the physicians are not directly treating patients, Federation of State Medical Boards CEO Humayun Chaudhry said. So, some boards — and other regulators that license providers and the non-profits that certify physicians for their expertise — feel uncertain about disciplining such doctors, even though they might be contributing to lagging vaccination rates.

“Doctors who are out in the public domain, making broad statements about discredited treatments, our processes weren’t designed for that,” acknowledged Kristina Lawson, the head of the Medical Board of California. “We’re actively thinking about that.”

When Lawson’s board started to crack down last year on doctors spreading misinformation about the coronavirus vaccines, she began getting threats. Anti-vaccination protesters accosted her at a parking lot and flew a drone over her house, she has said.

“I’ve had to have private security,” she told POLITICO. “I’ve had to have regular conversations with the California Highway Patrol,” an agency that protects high-level politicians in the state.

Now and then



Medical personnel from Riley County Health Department conduct a drive-thru vaccination using the new Moderna vaccine in Manhattan, Kansas.

Despite those constraints, continue to crack down on some of their own.

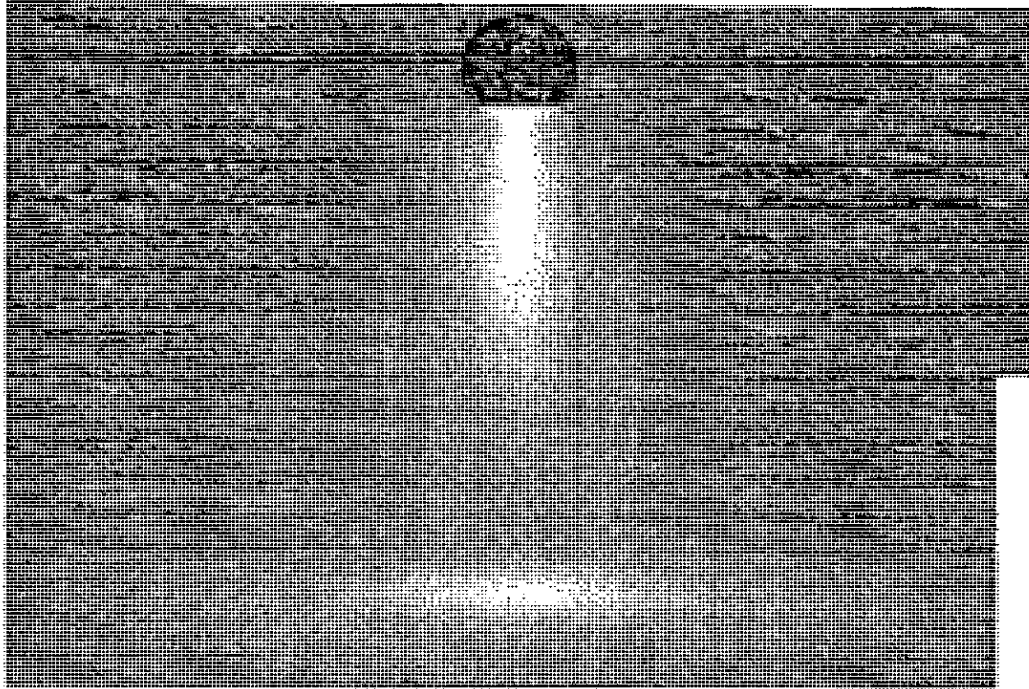
The federation said that two-thirds of their members had seen an increased number of complaints related to disinformation in a December 2021 survey. “There might be right now, dozens or hundreds of investigations going on [into misinformation],” Chaudhry said.

But it’s unclear whether the activity will make a difference. Many inside the profession are pessimistic.

Some of the medical professions’ trade groups have been called to act. In November, the American Medical Association’s House of Delegates asked the organization to develop a strategy to address misinformation. The association’s president, Gerald Harmon, told POLITICO around that time he had “the goal ahead of me,” but the “devil is in the details.” The association has no new updates.

Anti-vaccine sentiment and vaccine skepticism has drawn backlash. When Houston Methodist Hospital suspended a doctor’s privileges November after she allegedly spread misinformation over social media about vaccine policies, the doctor hit right back. She broadcast on Facebook that she was suing hospital for financial information, alleging the hospital had profited from its administration of the vaccines. She also touted her cocktail of a high-dosage steroids, ivermectin, vitamin C, among other medications. (Some steroids have had success in treating Covid.)

The targets of misinformation investigations typically claim they’re better scientists than the scientists bringing the disciplinary actions. “It’s not



Dark Truth Revealed: Medical Censorship, Dubious Networks and the Medical Council of New Zealand

Censorship & Politics



I have never met a doctor, when I bring up the Federation of State Medical Boards, who knows what I'm talking about ... The medical councils of the world have been captured by the Federation. We should not be allowing a private corporation to be influencing medical councils like this. If we stand by and we let the Medical Council of New Zealand incorporate this into their policies and procedures, that will be the final gag on anything that a doctor says counter to the mainstream narrative. ~ Dr Bruce Dooley

Dr Dooley is an American trained private medical doctor who has been practicing in New Zealand for some years. After receiving a Master's degree in immunology and virology he attended medical school, where he learned

very early on, of the grooming that the pharmaceutical industry engage in with doctors and medical students. He gave an explosive interview with Liz Gunn at FreeNZ Media on 24 September 2022.

A Tale in History: Corruption of the Medical Council of New Zealand?

In the early 1900s most treatment processes were "natural medicine", involving interventions aimed at maintaining a healthy terrain. Described well by Robert F Kennedy Jr in The Real Anthony Fauci, America had around 2,000 medical schools at that time, teaching a range of interventions. Oil magnate John D Rockefeller eliminated the majority of them, reducing the number to around 150, all of whom focused on allopathic medicine, which follows the pharmaceutical model using petroleum based medicine. This became known as "mainstream" whilst all other interventions were marginalised as "quack medicine".

The Federation of State Medical Boards (FSMB) is a private organisation founded in 1913, now based near Dallas in Texas and with a branch in Washington, DC. It is not known if Rockefeller was involved in its formation but the timing makes it seem plausible. An international arm based at the same Texas address, the International Association of Medical Regulatory Authorities (IAMRA), was established in 1994, of which the Medical Council of NZ is a member organisation.

These organisations operate with a cloak of secrecy such that most doctors are unaware of their existence despite the inordinate power that they wield over medical practitioner regulatory authorities. Our concerns about this privatised, Machiavellian global monopolisation encroaching on the regulation of New Zealand medical practitioners were recently raised by Dr Emanuel García. Dr Dooley outlines the ways in which the intrusion plays out. He refers to the aim of medical councils being to "reduce harm to patients". The primary purpose of the MCNZ is to 'protect patients and the public'.

As our own Dr Matt Shelton learned, having a medical opinion which he is adequately qualified to have, but which is not consistent with the pharmaceutical industry business model, is now enough to be considered as causing "potential harm". Dr Dooley uses Dr Shelton as an example in his description of this public health crisis. He asks why the Medical Council of New Zealand's letter of suspension to Dr Shelton was copied to the FSMB?

Dr Dooley learned about the FSMB whilst living in Florida, USA in the mid-1990s. He was practicing EDTA chelation therapy, an extremely safe and effective intervention for patients with heart disease and other chronic conditions. A politically connected cardiologist appointed to the local medical council tried to have chelation therapy made illegal, as successful patient outcomes were reducing his patient load.

Dr Dooley found himself before a disciplinary board on the matter, where he overheard mention of the FSMB. Curious to know who they were, he found out and attended the annual FSMB meeting in order to understand who they were, what they were doing and how. He describes FSMB as a private organisation of unknown funding offering luxurious "wine and dine" experiences including an awards ceremony, a library with free books and other gifts, to members of the medical councils.

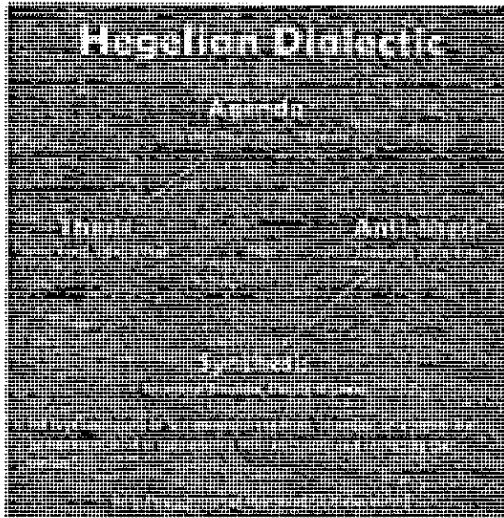
Ways to suspend the licenses of so-called "quack" or "fringe" doctors were openly discussed at the event. At the time doctors and patients were pushing for medical freedom, and a movement was growing. FSMB encouraged medical council delegates to lobby lawmakers to restrict this movement, using the argument of needing medical council control for protection of public health. Medical council delegates (government employees) voted on policy written by the FSMB (a private organisation), which they had not seen until it was presented to them at the voting event during the annual conference.

The end result was the creation of new laws further crushing the rights of doctors to practice autonomously. It appears this has been happening for decades, and has since spread across the world via IAMRA.

Dr Dooley then testified at the White House Commission on Complementary and Alternative Medicine Policy, under President Clinton. This two year project produced great outcomes around how complementary medicines could impact population health but no action was taken. In his testimony he told the commission what he knew of the FSMB and declared that private organisations should not have the right to influence medical councils in this way.

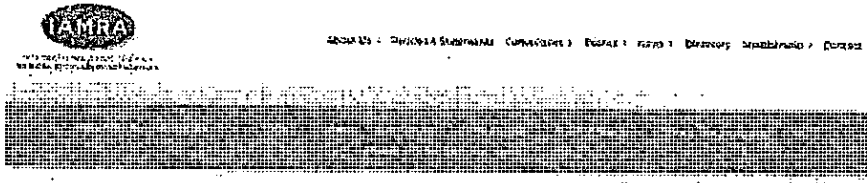
In 2021 the FSMB made this public statement, which Dr Dooley describes as a "battle cry to the medical councils". Interestingly it coincides with a meteoric rise in "dissident" doctors being disciplined and de-licensed by medical councils across the globe.

A few months after this notice was published, the FSMB conducted a survey of the medical councils and found a 56% increase in complaints about misinformation and disinformation from physicians. They concluded that they would therefore formulate policy relating to physician mis- and disinformation, to be voted on at the next annual conference. The vote took place in April 2022, and policy has been voted in confirming the right to delicense medical doctors spreading mis- and disinformation. This action is an incredible display of Hegelian Dialectic.



With no medical qualifications, Joan Simeon is currently the CEO of the Medical Council of New Zealand, where she has worked for 19 years following ten years as a practice manager at a medical imaging company. Demonstrating the intensely globalist networks between FSMB, IAMRA and their member organisations, Ms Simeon is the Incoming Chair Elect of IAMRA. Dr Dooley reveals that IAMRA secretary and FSMB President/CEO, Dr Chaudhry, earns a salary of US\$700,000. No doubt Ms Simeon anticipates her own bonanza. Where does all this money come from? Both IAMRA and

FSMB are run as registered charities, meaning their donors can remain opaque.



Board of Directors

The Board of Directors is responsible for the overall management of the organization and for the strategic direction of the organization. The Board of Directors is also responsible for the financial management of the organization and for the appointment and removal of the Executive Director.

The Board of Directors is composed of the following members:

OFFICERS



Dr. Meli Oster
 President
 Director
 College of Physicians and Surgeons
 (Medical Council of New Zealand)



Joan Simeon
 President
 Director
 Medical Council of New Zealand



Dr. Tolaga Kiockioa Solomon
 Director
 Health Practitioners Complaints
 Tribunal



Dr. Harshjiv Chaudhry
 Director
 President and CEO
 The Faculty of Health Sciences
 University of the West of Scotland

Dr Dooley describes the heartache he feels, watching the profession he loves so much, crumble. Public trust in the medical profession has been devastated. Nurses have confided in Dr Dooley, that to vent their horrors at what they are seeing today, they leave their phones behind and congregate in the hospital car park to speak in confidence as they know their careers could be jeopardised if they are heard “wrong speaking”.

Ms Simeon has already written to every licensed New Zealand doctor, saying that (her untrained definition of) misinformation and disinformation is being spread by “a few doctors”. On this, we agree with Ontario Supreme Court Judge Pazaratz, who asked if “misinformation’ is even a real word ... Or has it become a crass, self-serving tool to pre-empt scrutiny and discredit your opponent?”.

The Medical Council of New Zealand have requested the input of doctors on a policy resembling, if not identical to, that passed in April by the FSMB, prior to voting on it. Dr Dooley warns: this will be the final gag on the right of doctors to speak on matters relevant to their clinical expertise, that are not in keeping with the mainstream narrative. NZDSOS disagrees slightly with him here; MCNZ came charging out of the gates at the start of the rollout,

having sat back quietly while early covid treatments were fraudulently suppressed, enforcing the One Source of Truth's narrative using a very large stick approach. It has ensured most of the profession has already given up its autonomy and independent thinking out of fear.

We know of dead and injured doctor casualties from the Jab's enforcement, and we will not rest until all the enablers are held to account. Based on the increasing body of evidence showing lies and deception, it really should not be long now.

Dr Dooley concludes correctly that we need to disentangle our health care regulatory bodies totally from these powerful and malign influences. The Medical Council of New Zealand must disengage from the international bodies and the government must allow open debate on issues of public health.

Watch: Dr Dooley Outlines Concerns Regarding Dubious Networks At The Medical Council of New Zealand

Dr Dooley's story belongs to every New Zealander, and particularly every New Zealand doctor and licensed health care practitioner. Big Money must not be allowed to beat integrity and experience.

Liz Gunn has put a call out to Joan Simeon, for an interview to discuss the issues raised by Dr Dooley.

Please share this story far and wide.

View at [FreeNZ](#); [Rumble](#); [Odysee](#); [Bitchute](#); [Brighteon](#); or below.

COVID-19 and Medical Board Tyranny

Steven LaTulippe, M.D.

The COVID-19 pandemic may someday be the subject of countless volumes of literature describing it as a sinister man-made global plague. In today's America, it has introduced a dark age of medical science. Nowhere has this fact been demonstrated more clearly than by the actions of state medical licensing boards, most of whom take their cues from the Federation of State Medical Boards (FSMB). Their drive to control medical practice has been gaining momentum for decades, but their current stance and methodology is an all-out assault on the once noble and legitimate medical profession.

Having received the infamous honor of being the first medical doctor in the U.S. to have my medical license first suspended, then fully revoked, because of COVID malevolence, I've learned many lessons about exactly how state medical boards have honed the process of destroying good physicians.

Now, to be sure, there are no perfect physicians, just as there are no perfect people. But a serious problem must exist when the Oregon Medical Board (OMB) is able to take down a physician who has done no harm and who actually had no patient complaints concerning the board's allegations against him.

In this story of my experience, I am just an example. It exposes the corruption and dirty secrets of an agency that is out of control, without accountability, and devoid of any regard for the best science and sound medical practice. State medical licensing boards have evolved into monsters that devour any medical practitioners in their path who do not comply with the government narrative. When government goes rogue, the medical system becomes an unholy alliance that ultimately wreaks havoc on patients. When the physician-patient kinship is compromised, the healing arts suffer greatly. Any collaboration between government and medicine spells disaster.

When Nothing Makes Sense, Think in Terms of Evil

In late October 2019, I treated my first patient who presented with a full-blown influenza-like illness that typified what in several months would be attributed to SARS-CoV-2. I wasn't particularly disturbed by the illness, having seen similarly severe cases over the past decade.

When the COVID-19 pandemic was declared on Mar 11, 2020, I had treated only about 75 patients with the syndrome. They varied in age, but all severe cases were adults, many with comorbidities. They all recovered in about a week's time and all resumed their normal lifestyles. My treatment for severe viral illnesses had worked successfully for decades. It included a pulse dosing of high-dose prednisone, a high-dose topical steroid inhaler, azithromycin or doxycycline, a beta-agonist inhaler, and a generic oral hydrating solution. Simple as that.

What caught my attention about this virus was not so much the virus itself, but the seemingly nonsensical approach to this mysterious pandemic. All the best studies regarding masking concluded that masking was worthless, yet overnight Dr.

Anthony Fauci, director of the National Institute of Allergy and Infectious Diseases and the President's chief medical adviser, suddenly claimed that masking could help, and maybe two masks were better than one. Really?

That message opposed the then-current standard of care. Then, doctors were advised to close their clinics for two weeks. But isn't it the duty of physicians to treat the sick? Why close a clinic when clinicians are most needed? To the best of my knowledge, I was the only doctor in Polk County to keep my clinic doors open throughout the pandemic, staying faithful to my duty to put the patient first—always.

In the early days of the pandemic, my patients who became ill over the weekend were calling for treatment appointments on Monday. They all told stories of being turned away at emergency departments and urgent care clinics. They received no treatment and were advised to quarantine at home for two weeks, and if their lips turned blue to go to the hospital. I had never heard of such advice before. This was not medicine. As people were being told to cover their faces, social distance, close their businesses, and then to take an untested new type of mRNA "vaccine," I began to feel that I was living in Alice's Wonderland where nothing made sense.

My office staff and I had never masked, and all the patients I treated recovered swiftly. My standard cold and flu season protocol worked very well. We had no problems with disease spread, and no cases were traced to my office. Neither my staff nor I ever got sick. And I had even treated a couple patients who were in overt heart failure and had been refused treatment in the emergency department or by their specialists.

Absolutely nothing made sense, until I started putting the pieces of the puzzle together. People were living in fear and confusion. I soon concluded that this was intentional. As the accumulating evidence revealed that the SARS-CoV-2 virus was patented, as was also the reported "cure-all" vaccine, I suspected foul play. Whatever this pandemic was, it appeared to be planned, and it was evil. That would explain an otherwise inexplicable pattern.

The Cost of Truth-Telling

In December 2019, I opened my first-ever social media account on Twitter, at the behest of my publisher, who suggested it to promote a book that I had just launched: *Unity Without Compromise: a Biblical Basis for Christian Union*. The comments popping up on Twitter at that time were disturbing. People seemed so confused and distressed about this virus. Maybe it was my Ph.D. training in microbiology that induced my reaction, but I couldn't resist responding with comments of common sense and what our best scientific studies had taught us. In no time, more than 30,000 Twitter followers revealed how desperate they were to hear the truth. But "Twitter Jack" Dorsey, Twitter's co-founder and now former CEO, didn't like what I had to say, and I was often censored. By then I knew why.

Unfortunately, I never did get to market my book. The COVID-19 panic consumed my time.

On Aug 13, 2020, I received a notice from the Oregon Medical Board (OMB) that it had "received a complaint regarding unprofessional conduct and has opened an investigation."

It alleged three things: 1) Licensee is not following social-distancing guidelines in his practice and care of patients; 2) licensee is advising patients and the public that masks required under the current guidelines do not work and should not be worn; and 3) licensee has been posting to social media statements discouraging citizens from adhering to distancing guidelines specific to COVID-19.

I responded to the allegations, stating that I had no immediate recall of specifically addressing social-distancing guidelines, but I affirmed my position that masks are not an effective viral barrier, and I gave my patients informed consent regarding scientific mask data and allowed them to choose for themselves to mask or not in my clinic. My patients were most grateful for the honest information. I heard nothing further from OMB after submitting my response.

Almost 4 months later, I attended a political rally at the capitol in Salem. By that time, I had concluded that some serious chicanery was involved in the pandemic response. It was too coordinated, and it defied all the best current science. Unexpectedly, on Nov 7, 2020, I spoke to a large crowd about masking, my highly successful early treatment of COVID, and the fact that the government was trying to shut us down and control us.

The Multnomah County (Portland) Republican National Committee had recorded my speech and made a YouTube video of it that went viral globally. Apparently, the next day the video reached the eyes of OMB, and on Nov 9 the OMB medical director sent me a threatening letter advising me that I "may be in direct and active violation of current Governor Executive Orders" specifying that "elective and non-urgent procedures across all care settings that utilize PPE are allowed, but only to the extent they comply with guidance or administrative rules issued by the Oregon Health Authority."

The letter further stated that these "legal mandates" require all people to wear "properly fitted facemasks" when indoors in any care setting, this because "immasking has been shown to significantly reduce the spread of the novel coronavirus responsible for the current worldwide pandemic." Of course, that statement was contradicted by the scientific evidence. But according to OMB's medical director, my care "may be found to be negligent and may also constitute unprofessional or dishonorable conduct" and therefore "may be subject to administrative sanctions." He concluded, "Thank you for your prompt attention to these matters."

My prompt attention apparently necessitated a surprise visit from a board investigator, who requested five minutes of my time. I spent more than an hour explaining to him my disease prevention protocol, my 100 percent success in treating COVID-19 patients, and all the best science on masking—to no avail. His "investigation" got about nearly everything about my case wrong, except that my staff and I were not masking. He lied, fabricated, and misrepresented data, and his bias was clearly to support the government party line. His investigation was shoddy at best; he acted more as a prosecutor than an investigator.

The next morning, after the entire world had been notified, the investigator advised me that OMB suspended my license

by "emergency" order. No explanation. No due process. No free speech protection. Guilty as charged, allegedly for not practicing medicine according to Governor Kate Brown's "legal mandates." I was unaware that an unlicensed governor could practice medicine in Oregon. Nothing was legal with these decisions, and I quickly sought counsel and filed a federal lawsuit against OMB.

The board does all its damage in administrative courts, and is highly skilled in staying out of a real courtroom. OMB immediately petitioned to dismiss my case on the grounds of it having "judicial immunity." It took a year for the judge to respond, but my federal lawsuit was dismissed—after OMB blindsided me with a new "Complaint and Notice of Proposed Disciplinary Action" on Jul 16, 2021. To all the previous "findings" related to COVID guidelines, this complaint added conclusions from two fraudulent pain medicine investigations that had been opened in 2019 and never closed.

Medical Boards' Tyranny in Pain Medicine

OMB has been on the warpath against all doctors practicing pain medicine at least since the Centers for Disease Control and Prevention (CDC) chronic opioid prescribing guidelines surfaced in 2016. When a pain patient of mine repeatedly refused to abide by one of those guidelines, and then verbally abused my staff, I terminated his care. The patient's partner's friend filed a complaint against me, unbeknownst to the patient himself (so the accuser stated in a personal letter to me). Though my action was clearly justified, OMB opened an investigation.

Less than a month later, on Dec 10, 2019, I received another notice from OMB, this time stating, "The Oregon Medical Board has received a complaint regarding your care and treatment of [seven additional] patients...and have [sic] opened an investigation." The vague charge was that "Licensee is not following the guidelines for the treatment of chronic pain." Once again, "guidelines" were cited, but not a mention was made of what guidelines I was being accused of not following. Five of these seven patients actually wrote affidavits on my behalf after OMB suspended my medical license.

At the ensuing Investigative Committee meeting, several specialists took turns at setting traps for me. I focused on exposing their ignorance about pain medicine. They called for the meeting to end, but I challenged them, stating that according to their policy, I could now ask them questions. Although the chairman insisted they were out of time, I continued. "Why did you open an investigation on a patient who was rightfully terminated for not following the 'guidelines' and violating his opioid agreement?" No answer. Second question: "Was there a complaint filed against me by seven patients regarding my treatment of their chronic pain?" They responded that they could not give out the names or discuss anything about anyone who files a complaint." That wasn't my question. I repeated, "Was a complaint actually filed against me about these seven patients?" Thirty seconds elapsed. No answer. My attorney then spoke up for the first time and stated, "You didn't answer Dr. LaTullippe's question." He repeated the question. Again, no answer. Just silence.

I immediately sent OMB medical literature to support my position against the erroneous claims regarding pain management. Then I heard nothing further for some time. The investigation was left open.

Medical Board Retaliation

The proposed disciplinary action dated Jul 16, 2021, included fully revoking my license and fining me \$10,000. The day before this complaint was filed, my wife and I left the state to visit our daughters in Arizona, and we put our mail on hold. Our intent was to be gone four weeks, but we extended our stay for seven weeks. Upon our return, we found a letter from the OMB sent by regular-service mail; the certified letter had been returned unopened after two weeks. The letter announced their proposed action and gave me three weeks to respond. Not having received the notice, I responded four weeks late. I mailed the letter certified, and at the same time received a notice that a default order for revoking my medical license and the \$10,000 fine were acted upon because I had not responded. Again, no due process. OMB made no attempt to contact me, despite having my email address and cell phone number.

After receiving my response, OMB refused to reconsider. And since my license was revoked because of additional pain "findings," the board's petition to dismiss my federal lawsuit was granted. I appealed the case for judicial review, but at the time I had no legal representation. Now that I have an attorney, I am a slightly less vulnerable victim. But delay after delay has greatly drawn out the legal process.

How Medical Boards Destroy Doctors

State medical boards can destroy highly qualified, conscientious, caring, and competent physicians for no other reason than that the doctors didn't follow the current political narrative. Although their stated purpose is to protect the public from rogue doctors who do terrible things to patients, the actual purpose of state medical licensing boards now includes policing dissenters who abide by their Oath of Hippocrates and actually base medical decisions on the best scientific evidence. How many good doctors have been removed? How could we find out? How do licensing boards get away with it, and why is the public unaware of their sordid tactics? The answers are compelling—and frightening.

The process of weakening and wearing down good physicians by state medical boards is systematic and can be described by what I call the six D's:

- Demoralize you,
- Divest you of your income,
- Destroy your reputation publicly,
- Divert attention from the real issue,
- Delay the litigation process for as long as possible, and
- Deprive you of licensure in another state.

A colleague encouraged me to apply for a Florida medical license because legislators there vowed to not deny a medical license to anyone persecuted by medical boards because of COVID. Such was my case. But after I filed a federal lawsuit against OMB for constitutional violations, it suddenly found cause to open new bogus investigations against me, citing ludicrous things that allegedly happened to patients that I hadn't seen for as long as five years.

I'm uncertain whether any of these fabricated cases are still open despite OMB's having revoked my license. The Florida Medical Board informed me that any open case would nullify my opportunity to apply for a Florida license to practice medicine. Since my case against OMB is now pending in Oregon Appellate Court, I was denied the state license, but all OMB had to do was

keep open a single bogus investigation—something they do all the time—to prevent me from ever again practicing medicine in any state.

Medical boards ruthlessly break the law with no fear of consequences, have zero accountability, and know full well that the rigged judicial system will always guarantee their victory against medical doctors. State medical boards can do whatever they want; and they know it. Their methodology is based on five factors: Judicial Immunity, avoiding real courtrooms, capitalizing on the physician's weaknesses, ignoring the best science, and discarding all ethics.

Judicial Immunity

The ever-abused disclaimer of medical boards charged with any foul play is "judicial immunity." They assert that their actions were implemented under the protective canopy of serving as a judge. As judge, they declare themselves exempt from all charges such as character defamation, malicious prosecution, fraud, and even glaring constitutional violations that involve the First, Fifth, and Fourteenth Amendments.

Medical board members are selected by the state governor, and consist of a potpourri of medical and non-medical personnel. They have no legal expertise, but when it comes to taking down physicians, they are self-declared "experts." The legal system has rules that must be followed, but medical board accusers have their own unique set of rules. They would be quickly destroyed in a real courtroom, but they are able to work in a system that fully enables their methods: administrative law.

Administrative Court—the Quintessential Kangaroo Court

Unlike in civil and criminal courts, the composite medical board is assigned the role of judge, although the members have no training in jurisprudence. Their assuming full judicial authority is akin to practicing medicine without a license. Also, no due process of the law applies to these courts. There are no rules of evidence, and hearsay is fully admissible as "evidence" of wrongdoing.

Hearsay might involve a stranger far away who read an article or somehow heard about a doctor and decides he wants to file a complaint with the state board against the doctor. If such a "witness" makes any blind accusation against the doctor—whom he may not know in the least—then that surreptitious charge would be considered as evidence. If the accusation favors the bias of the medical board team, then it becomes very useful fodder in a board proceeding.

When a medical board takes action against a medical professional, such hearsay is memorialized in the widely publicized, unscrupulous mainstream media that adds its own twist, giving the public the false impression that this rumor or personal statement is a proven fact. In this way, even the most absurd and false claims (lies) are tied to the "villain," and his character is quickly destroyed. Of course, the board knows the claims are fallacious, but they will serve to incite the recruited vigilantes to attack their prey. Threats and insults and new accusations are sure to follow. And that rationalizes the board's deviant scheme.

All such accusers are given full protection by the board. That means the indicted medical doctor isn't allowed to know the identity of his accuser(s). It means no cross-examination is permitted. This allows the board to build a case against a doctor without any evidence of patient harm or actual wrongdoing.

An administrative law judge (ALJ) is assigned to these

hearings, but acts only in an advisory capacity. Since medical board members are clueless about judicial procedure, the ALJ facilitates medical board "judges" and makes recommendations that favor the board's actions and decisions. The bias of ALJs is readily obvious, as expected, since a huge conflict of interest compromises them: they receive their income from government agencies that they represent. In other words, the entire administrative court system is rigged. Judgment is already decided before the hearings begin. It is rare for a defendant to win in administrative courts. They are the quintessential kangaroo court.

Disarming the Victims of Medical Board Abuse

One of the most devastating actions committed by state medical boards against accused doctors is rendering them weak and unfit to ward off their vicious attacker. The moment a physician's license is suspended, his income is abruptly halted. Yet he must still pay out many expenses in the process of closing his clinic. How can he afford to hire an attorney? That's easy, just dip into life savings for retirement, or deplete the children's college funds. Then hire an expensive attorney who already knows the case is futile, but will go through the motions of defending you in the mock court. After all, it does provide the lawyer income. By that time, your funds are sufficiently depleted that you are extremely hesitant to appeal your case in civil court. What will that cost?

After all the libel and slander, abrupt loss of income, notifications that all medical affiliations, board certifications, insurance contracts, and hospital privileges have been canceled, the pending sense of doom begins to engulf you.

'The Science' Substitutes for Best Science

Throughout the fake court hearings, you realize that all the best evidence you presented to defend your actions and your honor meant nothing. The board accused you of not complying with a standard of care or best practices, when in fact, such standards were based on the weakest and most biased medical studies available, or simply on the whim of the state's "woke" health agencies. The best science was neither cited nor acknowledged. Good science was ignored. When I declared this elephant in the room, the board simply did not respond. All logic and strong evidence were overruled by some means or another by the ALJ.

Ethics and Morality Discarded

Exposing all the subtle discrepancies of justice that occur in a medical board action is a formidable challenge. State medical boards abide by no code of ethics, and they make their own definitions of good and evil. How else can one explain the fact that state medical boards have no problem with surgeons who mutilate, and render forever infertile, perfectly healthy young bodies under the guise of "gender-affirming care," while they will gladly crush a physician who actually heals the sick and first does no harm?

When ethics and morality are discarded, people will do whatever evil they wish, and justify it to themselves. Never will they consider the collateral damage they do. When OMB suspended my license, thousands of patients suddenly had no physician. One-half of my practice involved pain and addiction medicine. This population was doing very well under my care. Some of them now have suffered greatly, and in diverse

ways. One committed suicide. Several applied for disability compensation. Others returned to heroin and other street drugs. Some are depressed and anxious due to lack of quality care. A few have given up and slowly wilt away.

My receptionist derived much support from our "clinic family." She had been suffering from severe personal and family issues, but she thrived in my office. After my clinic closed, she moved and sought other employment. In a few months, she died from a substance overdose.

The Consequences of Such a System

I practiced medicine without blemish for more than 22 years before OMB took me down for telling the world that early medical treatment for COVID-19 was extremely effective. What if a small-town doctor showed the world that there is an effective COVID-19 treatment when Emergency Use Authorization for an experimental vaccine requires that no treatment be available? The loss to the pharmaceutical industry would be enormous. Thus, independent doctors must be sacrificed.

State medical boards are so powerful that almost all physicians are terrorized into silence and submission. I broke the rules, and I paid the price. I lost my license, my clinic, my home, my career, my reputation, and my means of supporting my family.

The evidence that OMB conveniently ignores is that no actual complaint was ever filed against me by any of my patients, and that I never caused any harm to even a single patient. I only did my job. OMB lied about a complaint being filed against me—a gross injustice. Will I ever be vindicated? In the world's eyes, it likely doesn't matter.

Restoring Medical Freedom

Some say that we need a parallel medical system in America, free from the pirated third-party system. Such a system would be incredibly effective at restoring quality medical care. But that would likely be the system's downfall. Independent doctors would still be a small minority. They would yet be attacked and threatened for doing their job faithfully. Thwarted by corrupt pharma, judges, lawyers, hospital CEOs, and many other colleagues, could they survive?

Medical freedom demands that we dissolve the Federation of State Medical Boards, which now advises every state's medical licensing board to punish doctors for speaking truth in medicine and insisting on informed consent. State medical boards must be dethroned. Litigation and legislative changes are vital.

Now is the time to act, as the evidence of the death and disease caused by malefactors in the disastrous COVID-19 response mounts. International and U.S. government agencies, and their officials, knew the truth. The truth will be told in history, but many lives will be saved if we boldly and loudly proclaim the truth now.

As individuals, we must all do what we can to better our world, and recognize that whatever the price of freedom, no cost is too great.

Freedom is only vanquished when the people forfeit their liberty. Once lost, this pearl of great price may never be restored.

Steven LaTulippo, M.D., is a family physician. Contact: salatulippe@gmail.com.

As a library, NLM provides access to scientific literature. Inclusion in an NLM database does not imply endorsement of, or agreement with, the contents by NLM or the National Institutes of Health. [Learn more about our disclaimer.](#)



J Public Health Manag Pract. 2022 Nov; 28(6): 595-598.
Published online 2022 Aug 31. doi: [10.1097/PHH.0000000000001616](https://doi.org/10.1097/PHH.0000000000001616)

PMCID: PMC9555612
PMID: 36070583

Disciplining Physicians Who Spread Medical Misinformation

Y. Tony Yang, ScD, LL.M, MPH^M and Sarah Scheffler DeRoo, MD, MA

The combination of the rapidly evolving COVID-19 landscape and the widespread use of social media has created the perfect storm for viral dissemination of misinformation, leaving the health community struggling to communicate evidence-based guidance in a broad and timely fashion. Exacerbating this problem is a minority of health care professionals who promote falsehoods about COVID-19 and have thereby brought renewed focus to concerns about medical misinformation and the rights and responsibilities of health care professionals to communicate accurate, evidence-based information. Recently, there have been increasing calls in the medical community, including from the Federation of State Medical Boards (FSMB),¹ and professional certification boards such as the American Boards of Family Medicine (ABFM), Internal Medicine (ABIM), and Pediatrics (ABP),² to revoke the licenses and board certifications of physicians who promulgate medical misinformation, whose harmful claims tend to receive disproportionate attention based on their professional status. There have been reports of physicians refuting now widely accepted preventive measures, such as masking and vaccines, contrary to ample evidence supporting their efficacy.³ In addition, a small but vocal number of physicians continue to tout the benefits of now discredited treatments, such as ivermectin, which not only fail to successfully treat COVID-19 infection but may also put patients at risk.^{4,5}

Lessons learned from vaccine hesitancy research can help inform the dangers of physician spread misinformation, as vaccination is now the most important COVID-19 preventive measure available. Decades of research have consistently demonstrated that a strong physician recommendation is among the most important drivers of vaccine acceptance and uptake,⁶ and early surveys suggest that the same is true for COVID-19 vaccination.^{7,8}

Medical Boards and Disciplinary Proceedings

Physicians generally enjoy the privileges and responsibilities of self-regulation, but state medical boards provide oversight to ensure that rules are followed. The structure and authority of medical boards vary from state to state. Most boards are independent and maintain all licensing and disciplinary powers, while some are part of a larger umbrella agency such as a state department of health. For example, discipline against physicians accused of misconduct in New York is housed within the state Health Department's Office of Professional Medical Conduct.⁹ Each state's Medical Practice Act prohibits physicians from engaging in "unprofessional conduct." While states define unprofessional conduct differently, it is the most common reason for physician disciplinary action related to professionalism.¹⁰

Some state laws authorize disciplinary action against physicians who make false, deceptive, or misleading statements to the public. Generally, these laws apply only to statements made in connection with advertising, but some are worded broadly enough to apply in additional contexts.¹¹ Among the cases pursued by medical boards, none have imposed serious penalties against physicians thought to be spreading misinformation (Table).¹²

Feedback

TABLE 1

Examples of Actions by State Medical Boards Against Physician Spreading Misinformation

State/Year	Case	Result
Illinois/2004	A complaint filed against a physician based on an online publication of "false and potentially harmful medical advice."	Voluntarily dismissed after the physician modified his Web site and stopped treating patients.
Arizona/2015	Investigation into a physician for anti-vaccine messages.	Investigation closed because none of the individuals who filed complaints against the physician had alleged problems with his "actual medical care."
Oregon/2020	Action against an "anti-mask" physician.	License suspension based on the physician's failure to comply with masking requirements in the treatment of patients, not statements made in public settings.
Georgia/2020	A complaint accusing a physician of publicly spreading false COVID-19 information.	No violation determined.
Texas/2021	A complaint of a physician spreading misinformation about hydroxychloroquine as COVID-19 treatment	The physician was fined \$500 for failing to explain harmful side effects to the patient upon prescription of hydroxychloroquine.

Disciplinary proceedings can be lengthy and challenging in nature. It is also not clear whether physicians—who are not government officials—have any legal obligation to promote public health, despite ethical and professional obligations.

Disciplining a physician who spreads misinformation is a judgment on the physician's competency. Professional governing bodies—including state medical boards—promulgate rules and standards by which members must abide. The right to practice medicine is a privilege granted by the state. If a physician intentionally spreads misinformation that puts the public at risk, the medical board has a duty to act.

Constitutionality and Concerns

Physicians have the right to free speech that prohibits government restriction, even if the content is false. But freedom of speech is not absolute. The Supreme Court has determined that there are 3 types of speech restrictions: *content-based*, *commercial*, and *professional*.¹³ Depending on the speech's nature, courts will apply varying levels of scrutiny when considering a ruling.

State medical board disciplinary proceedings against physicians disseminating misinformation can be considered *content-based* restrictions. A content-based restriction "discriminates against speech based on the substance of what it communicates."¹⁴ Content-based restrictions are presumptively unconstitutional and are only valid if the state shows that they are the least restrictive means of achieving a compelling state interest.

The arguments for disciplinary proceedings generally emphasize the potential harms to public health. But this is likely not enough to achieve constitutionality, because the state can mitigate the harm by disseminating factually accurate messages.

Many of the physicians implicated in the dissemination of misinformation have done so without offering anything for sale. In these cases, the commercial speech doctrine and its lower scrutiny do not apply.¹¹ But even if the speech contemplates a transaction, "courts have demonstrated increasing reluctance to regulate commercial speech, emphasizing the rights of speakers rather than the state's interests in the health and welfare of community members."¹³

The *professional speech* doctrine has been applied by several federal appellate courts to limit the free speech rights of physicians or therapists. Some circuit courts have decided that when dispensing professional advice, physicians are entitled to less stringent First Amendment protections. According to the Ninth Circuit, while medical treatments require speech, a physician's speech in that context concerns treatment less than speech about public issues.¹⁵ In 2018, the Supreme Court upheld a California statute requiring licensed "crisis pregnancy centers" (which discourage women from seeking abortions) to notify women that California provided free and low-cost services including abortions.¹¹ While the case may support the notion of the professional speech doctrine, it likely is not broad enough to cover speech entirely unrelated to practicing medicine, which is generally defined as providing a diagnosis or treatment to individual patients. When physicians make public statements about medical matters, they are not speaking to an individual patient.

Another important consideration is the concern about punishing physicians who stray from medically accepted standards when they believe the standard of care is misguided. Those physicians might be leery of expressing their thoughts if a state medical board could discipline against their opposing statements. This is especially concerning when guidance from public health officials change along the course of an evolving public health scenario. One notable example was Dr Anthony Fauci's opinion early in the COVID-19 pandemic that masking was not required. Since then, as evidence of COVID-19's transmissibility was augmented, masking became a clear emphasis.

However, formal professional channels exist for refuting widely accepted medical information—namely, through peer-reviewed publications. The peer-review process helps ensure the scientific rigor of the information presented and attempts to prevent low-quality information from reaching the scientific community.¹⁶ By subjecting their studies to the scrutiny of peer revisions, physicians who disagree with current medical standards have an avenue not only for expressing their dissent but also for sharing the evidence to support it, as well as a platform for public dissemination if accepted.

There is ample evidence of the so-called "medical reversals"¹⁷ that exemplify the power of the peer-review process. In the late 1980s, a group of drugs once widely considered essential for the prevention of sudden cardiac arrest following myocardial infarction was found to increase patients' mortality risk when compared with placebo.¹⁸ More recent examples include rejecting the practice of prescribing hormone replacement therapy for postmenopausal women and allergen avoidance for children at high risk of peanut allergy.

Potential Solution

Despite constitutional limitations, one solution draws on established disciplinary guidelines against lawyers who spread knowing or reckless falsehoods. Under this standard, a state medical board could discipline a physician who *knowingly* spreads medical misinformation (i.e. spreads disinformation) or spreads misinformation despite having serious doubts that the information is true (i.e. spreads information *recklessly*). In the legal profession, knowingly or recklessly spreading falsehoods is evidence of the lawyer's "fitness to practice" and as such warrants disciplinary action against the lawyer.

Within this framework, a state medical board would have to prove 2 things. First, the information spread was false. Second, the physician acted knowingly or recklessly. While medical knowledge is ever-evolving, some positions in the medical community have been accepted as factual cornerstones, such as the widely and roundly refuted suggestion that vaccines contribute to autism. Proving the physician's knowing or reckless mental state would require proving that the defendant acted with "actual malice"—that is "with knowledge that it was false or with reckless disregard of the statement's validity."

Proving malice does not require direct evidence of intent to deceive; rather, it can be established by evidence that statements were "fabricated," "the product of imagination," or "so inherently improbable that only a reckless man would have put them into circulation." A state medical board could prove a physician's actual malice by showing that his or her statements contradicted a settled medical consensus *and* were based on unverifiable sources or no evidence at all. This combination would allow the board to determine that a physician could not—in good faith—believe the unsupported statements when all responsible medical authorities have rejected those same statements.

Conclusion

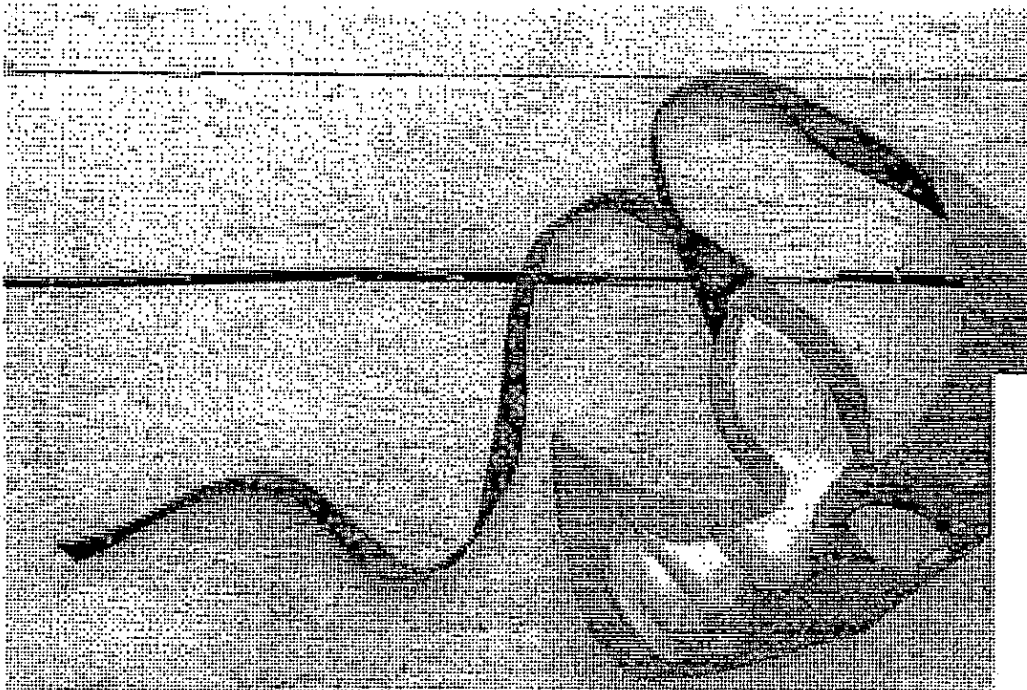
Disseminating health misinformation has only become easier in today's world of social media. Many have taken the position that state medical boards should act against physicians spreading misinformation regarding COVID-19 vaccines and other mitigation strategies. However, disseminating misinformation via social media is not the same as treating an individual patient. As such, physicians disseminating harmful misinformation are afforded constitutional protections. And while this may be harmful to society in the context of COVID-19, allowing physicians to challenge medically accepted standards has resulted in "medical reversals" of these standards throughout history. So, any limitations on physicians' speech must be narrowly tailored. Requiring state medical boards to prove that physicians are knowingly or recklessly spreading misinformation strikes the right balance.

Footnotes

The authors declare no conflicts of interest.

References

1. Federation of State Medical Boards. Spreading COVID-19 vaccine misinformation may put medical license at risk. <https://www.fsb.org/advocacy/news-releases/fsmb-spreading-covid-19-vaccine-misinformation-may-put-medical-license-at-risk>. Published July 29, 2021. Accessed June 15, 2022.
2. Newton W, Baron RJ, Nichols DG. Statement about dissemination of COVID-19 misinformation. <https://www.ahp.org/news/press-releases/statement-about-dissemination-covid-19-misinformation>. Published September 9, 2021. Accessed June 15, 2022.
3. Rubin R. When physicians spread unscientific information about COVID-19. *JAMA*. 2022;327(10):904–906. [PubMed] [Google Scholar]
4. Szalinski C. Fringe doctors' groups promote ivermectin for COVID despite a lack of evidence. *Scientific American*. September 29, 2021. <https://www.scientificamerican.com/article/fringe-doctors-groups-promote-ivermectin-for-covid-despite-a-lack-of-evidence>. Accessed June 15, 2022.
5. Popp M, Stegemann M, Metzendorf MI, et al. Ivermectin for preventing and treating COVID-19. *Cochrane Database Syst Rev*. 2021;7(7):CD015017. [PMC free article] [PubMed] [Google Scholar]
6. Olson O, Berry C, Kumar N. Addressing parental vaccine hesitancy towards childhood vaccines in the United States: a systematic literature review of communication interventions and strategies. *Vaccines (Basel)*. 2020;8(4):590. [PMC free article] [PubMed] [Google Scholar]
7. Szilagyi PG, Shah MD, Delgado JR, et al. Parents' intentions and perceptions about COVID-19 vaccination for their children: results from a national survey. *Pediatrics*. 2021;148(4):e2021052335. [PMC free article] [PubMed] [Google Scholar]
8. Clark SJ, Schultz SL, Gebremariam A, Singer DC, Freed GL. More parent-provider communication about COVID vaccine needed. C.S. Mott Children's Hospital National Poll on Children's Health. University of Michigan. *Mott Poll Rep*. 2021;39(1). <https://poll.mott.org/reports/more-parent-provider-communication-covid-vaccine-needed>. Accessed June 15, 2022. [Google Scholar]
9. New York State Department of Health. Physician and physician assistants disciplinary and other actions. <https://www.health.ny.gov/professionals/physicians/conduct/>. Accessed June 22, 2022.
10. Richmond L. Most common reasons doctors get disciplined by state medical boards. *MDLinx*. April. 23, 2021. <https://www.mdlinx.com/article/most-common-reasons-doctors-get-disciplined-by-state-medical-boards/3y2yNICFzZbUjBA4yQzAU6K>. Accessed June 15, 2022.
11. Coleman CH. Physicians who disseminate medical misinformation: testing the constitutional limits of professional disciplinary action. SSRN. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3925250. Accessed June 15, 2022.
12. Furmer B. Medical boards pressured to let it slide when doctors spread COVID misinformation. *Kaiser Health News*. February 15, 2022. <https://khn.org/news/article/medical-boards-pressured-to-let-it-slide-when-doctors-spread-covid-misinformation>. Accessed June 15, 2022.
13. Wu JT, McCormick JB. Why health professionals should speak out against false beliefs on the Internet. *AMA J Ethics*. 2018;20(11):1052–1058. [PubMed] [Google Scholar]
14. Hudson D. Content based. In: *The First Amendment Encyclopedia*. Murfreesboro, TN: Free Speech Center, Middle Tennessee State University; 2009. <https://www.mtsu.edu/first-amendment/article/935/content-based>. Accessed June 15, 2022. [Google Scholar]



Unmasking the Mystery of the Federation of State Medical Boards : Dr Emanuel Garcia in Discussion With Maajid Nawaz

[Censorship & Politics, What is Going On?](#)

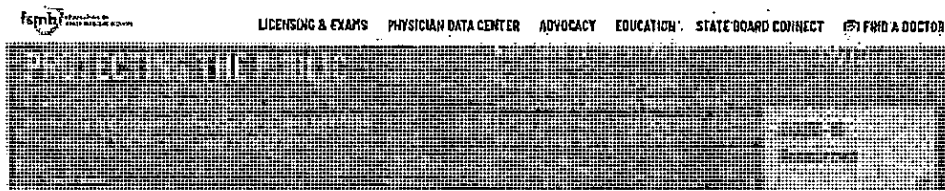
Who Are the Federation of State Medical Boards?

Most doctors have never heard of the Federation of State Medical Boards (FSMB) despite the fact that they impose the rules and regulations that doctors are increasingly required to abide by. Dr Bruce Dooley brought them to [international attention](#) in his September 2022 interview with Liz Gunn at [FreeNZ Media](#). However our own NZDSOS founding member Dr Emanuel Garcia first wrote about them at [Global Research in August 2022](#) and he has remained [forefront in the exposé](#).

Hot on the tails of Dr Matt Shelton's [recent interview](#) with Maajid Nawaz, Dr Garcia has now spoken on the podcast [Radical](#). Their conversation focuses on the Federation of State Medical Boards and its influence on medical and health professional licensing authorities across the globe.

The Federation of State Medical Boards is a private entity connected to a charitable foundation whose donors are shrouded in secrecy but very likely to be primarily from the pharmaceutical industry. Founded in 1912, a year before the US Federal Reserve Bank, whose name also dishonestly implies governmental authority, the only connection between government and the Federation of State Medical Boards is the lobbying they undertake for political influence.

They are otherwise a corporate-funded organisation claiming a mission to safeguard patients by "*licensing, disciplining and regulating physicians and other healthcare professionals*". As has been revealed during the Covid-19 crisis, they do this by engaging in Mafia style strategies to silence opposition, serving to increase and fortify their own profits and control. They were instrumental in suppressing the integrative medicine movement in the 1990s and also appear to be implicated in America's opioid crisis.



In conversation with Maajid Nawaz, Dr Garcia discusses how he came to learn about the Federation of State Medical Boards and how their influence impacted his own professional career as a psychiatrist working in New Zealand. Founded in 1994, the International Association of Medical Regulatory Authorities (IAMRA) is an expansion of the Federation of State Medical Boards, also claiming a goal of public protection by ensuring doctors are "*safe and competent*".



As a partnership both entities now influence medical and health professional regulatory authorities across disciplines, states and nations, including the Medical Council of New Zealand (MCNZ). Two New Zealand examples of the obvious conflicts of interest involved are:

- Joan Simeon is both CEO of MCNZ and Chair-Elect of IAMRA;
- Curtis Walker is Chair of MCNZ and member of the Federation of State Medical Board's Task Force on Health Equity and Medical Regulation.

insurance industry and public-private partnerships being encouraged by nefarious entities such as World Economic Forum.

A Call For Support From Our Colleagues: It Is Not Too Late

Dr Garcia argues that if 5% of doctors with critical faculties – acting like real doctors – had spoken up against the narrative, then the damage and destruction New Zealanders have experienced would have been prevented. The mafia tactics of the Federation of State Medical Boards, filtered down to individual health professionals, has been highly effective in suffocating dissent, stigmatising critical thinking and helping to establish a Stasi-style culture.

New Zealand's emergency covid legislation remains in place, and Dr Garcia suggests it can be used against the populace again at anytime. Doctors are in a prime position to oppose this harmful legislation ever being imposed upon New Zealand again.

Listen to Dr Garcia's story, acquire an understanding of events playing out and determine the role you wish to play at this critical time. Lend your expertise to NZDSOS, to protect medical freedoms and democracy against psychopathic entities such as the Federation of State Medical Boards.

Watch: Dr Garcia and Dr Gill Revealing the Harms of Public-Private Partnerships Corrupting Health Care Systems Globally

We highly recommend an hour with Dr Emanuel Garcia of NZDSOS followed by half an hour with Dr Bob Gill, for anyone trying to make sense of what is going wrong in health systems across the western world.

Radical: Episode 32 – On Destroying Our Health System and Big Pharma Capture.

Exhibit 18

www.drrichardkaul.com

JUNE 12, 2024

JORGE DOPICO
CHIEF ATTORNEY
ATTORNEY GRIEVANCE COMMITTEE
STATE OF NEW YORK
SUPREME COURT APPELLATE DIVISION
180 MAIDEN LANE – 17TH FLOOR
NEW YORK, NEW YORK 10038

RE: MATTER OF JAMES PAUL OETKEN, ESQ
DOCKET NO. 2024.1398

Dear Mr. Dopico,

Thank you for your letter, dated June 12, 2024, in which you conclude there exists no basis for disciplinary action against Respondent James Paul Oetken.

However, the letter is conclusory, without any analysis of the facts of bribery/judicial corruption to which Respondent admitted in 2022, the supporting documents of which were submitted with the November 30, 2022, Complaint (copy attached). With all due respect, your review is a 'whitewash', purposed to mitigate the publicization of Respondent's "**pattern of racketeering**" on the federal bench, as detailed in the June 5, 2024, release from www.drrichardkaul.com (copy attached). The release reached a global audience of over two million (2,000,000), but on June 11, 2024, the function was deactivated by wix.com. Please see attached copy/email and please note my 2022 Complaint was docketed in 2024.

Respondent's 2022 admission of facts as to bribery/public corruption does invalidate your review, as these violations are felonies under New York law, and could never substantiate an ethics committee investigation of no cause, and you have not shown otherwise. It would appear that the committee has permitted itself to become part of Respondent/Defendant Oetken's violations of law, subject to liability pursuant to RICO.

Defendant Oetken and his multiple felonies on the bench are the subject of an appeal in the United States District Court for the 4th Circuit, a case, the facts of which he failed to deny and thus caused to be admitted. Please find attached a copy of this Complaint. These admitted facts warrant further investigation by federal prosecutors in a district outside of the S.D.N.Y.

Defendant Oetken's perversion of the process of your committee constitutes a further basis for claims against him in the United States District Court, and I would request in the interests of justice, that you ask the Department of Justice to investigate Defendant Oetken and the validity of your review.

There must occur an independent and transparent investigation of Defendant Oetken's long history of bribery-related judicial misconduct, as he will continue to incur liability until such an investigation is conducted. This individual has used/continues to use the federal bench in furtherance of a "**pattern of racketeering**" and unless the Committee properly investigates the matter, it too will become subject to suit.

Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of the initials 'R.K.' followed by a vertical line.

RICHARD ARJUN KAUL, MD

cc: JAMES PAUL OETKEN



Richard Kaul <drrichardkaul@gmail.com>

TEST

RICHARD ARJUN KAUL <no-reply@usmailtest.com>
Reply-To: drrichardkaul@gmail.com
To: drrichardkaul@gmail.com

Sun, Jun 9, 2024 at 11:25 PM

Can't see this message? [View in a browser](#)

**PRESIDENT TRUMP +
CORRUPTION IN THE NEW
YORK COURTS**



Corruption

Corrupt Judges – Threat to the Constitutional State

Franziska Rinke / Marie-Christine Fuchs / Gisela Elsner / Aishwarya Natarajan /
Arne Wulff / Nils Seidel / Hartmut Rank / Mahir Muharemović /
Anja Schoeller-Schletter

On March 25, 2024, Plaintiff, RICHARD ARJUN KAUL, filed a lawsuit (KAUL v OETKEN: 24-CV-00185) in the United States District Court against New York Judge, James Paul Oetken, a judge appointed by the Democrats. The central thrust of the Complaint pertains to judicial corruption and within the Complaint, KAUL alleges, amongst other things:

“Defendant James Paul Oetken is a district judge in the Southern District of New York, who, prior to being appointed to the bench was private counsel to multiple financial corporations, a number of whom he defended in the 2008 financial fiasco. Subsequent to his defense of corporations that had caused massive homelessness/poverty on the American people, he was proposed by Senator Charles Schumer to the bench. Plaintiff Kaul sued Schumer on April 4, 2019, in K3 (KAUL v SCHUMER: 19-CV-13477), on charges of racketeering/bribery/public corruption/civil rights violations (Exhibit 1). The case was voluntarily dismissed on January 3, 2022 (K3: D.E. 53), but not before Defendant Schumer extracted money from the public purse to fund his legal defense (Exhibit 2).”

“Defendant Oetken, recognizing his conflict of interest, and in fact exploiting it, did adjudicate K11-7 from August 19, 2021, to September 12, 2022, without disclosing his conflict to the court record or Plaintiff Kaul. This “pattern” of K3 Defendant Schumer related conflicted-ness was evident in K1, in which the first presiding judge was Defendant Schumer’s brother-in-law, Kevin McNulty, a judge who became disqualified on May 22, 2019 (K1: D.E. 340). Defendant Schumer, a NY State Senator, has for many decades received enormous bribes from the insurance/banking industry on Wall Street, NY, and within K1 were Defendants TD Bank and Allstate/Geico Insurance Companies. The McNulty-Schumer-Oetken-TD-Allstate-Geico nexus was able to directly corrupt the judicial process until K11-17, but still, in an increasingly ‘thuggish’ manner, attempts to interfere indirectly with threats against Plaintiff Kaul.”

“Defendant Oetken believes he can, and on March 15, 2024, entered an order (Exhibit 3) in K11-7, a case closed on October 6, 2022, in which he threatens Plaintiff Kaul, that if by March 29, 2024, he fails to dismiss K11-17, he will be fined, will be held in contempt, and will likely be arrested/jailed. In his March 15, 2024 ‘ORDER’ Defendant Oetken provides no law to corroborate nor could he that he has any legitimate or legal

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA

FILED

APR 12 2024

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY mmc DEP CLK

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

v.

CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS;
JAMES HOWARD SOLOMON;
FEDERATION STATE MEDICAL BOARDS;
ALLSTATE INSURANCE COMPANY;
CHRISTOPHER J. CHRISTIE; ROBERT FRANCIS HEARY
DANIEL STOLZ; JANE DOE; JOHN DOE.

CIVIL ACTION: NO.: 23-CV-00672
(M-KS)

**PLAINTIFF KAUL'S SUR-REPLY TO DEFENDANTS MOTION TO VACATE
DISCOVERY ORDER AND DEADLINES**

Respectfully Submitted



RICHARD ARJUN KAUL, MD

DATED: APRIL 11, 2024

RELEVANT REFERENCE TO THE KAUL CASES

K11-7: KAUL v ICE: 21-CV-06992

K11-10: KAUL v ICE: 23-CV-2016

K11-14: KAUL v GEICO: 23-CV-22325

K11-15: KAUL v CHRISTIE: 23-CV-22582

K11-17: KAUL v CPEP: 23-CV-00672

K11-18: KAUL v OETKEN: 24-CV-00185

REPLY

1. Plaintiff Kaul respectfully asserts that Defendants March 19, 2024, plea to 'Stay the Rule 26(f) Conference, the Discovery Plan/Report, Disclosures, and all other Discovery Deadlines, Pending a Resolution on his Motion to Dismiss' is without factual or legal foundation and should therefore be rejected, on the basis of the following facts/law:

2. Defendants, as with every other Defendant, has submitted a defense that relies almost exclusively on the September 12, 2022, injunction issued by U.S.D.J. James Paul Oetken (K11-7: D.E. 168), and that injunction related defense is re-stated as the sole basis for his current plea.

3. On April 8, 2024, the United States District Court for the Eastern District of North Carolina, in dismissing K11-18 with prejudice, did reference the operative section of the September 12, 2022, injunction of U.S.D.J. Oetken, which is verbatim:

"From the date of this Opinion and Order, Plaintiff Kaul is barred from filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or arises from (i) the denial of his

medical license; (ii) subsequent litigation proceedings initiated by the Defendants here before the date of this Order; (iii) subsequent litigation proceedings initiated by Plaintiff Kaul before the date of this Order; without first obtaining leave from this Court.” (K11-7: D.E. 168 Page 19 of 20).

4. These six (6) lines contain the actionable terms of the injunction, and are the lines that define the limits and power of the injunction. These six (6) lines have rendered and do indeed continue to render the injunction null and void in K11-10/K11-14/K11-15/K11-7. The injunction-based dismissals in K11-10/K11-14 were thus erroneous, and the injunction would have no effect on any future litigation that might be necessary if The Kaul Cases Defendants continue to fail to remediate/rectify/recompensate/cease the ongoing/”new” injuries to Plaintiff Kaul’s life/liberty/property/reputation.

5. Specifically, the injunction states:

“From the date of this Opinion [September 12, 2022, ... (i) the denial of his medical license ...”

This phrase pertains NOT to the 2014 revocation, but to the 2019 denial of Plaintiff Kaul’s application for a New Jersey medical license (singular) and not licenses (plural). The fact of the singular 2019 denial of the New Jersey license is not an element of the factual foundation of K11-17. The revocation process is coercive and involves no process of denial, in contrast to the application process, which can and did in Plaintiff Kaul’s 2019 application cause a denial. The phrase does not state, nor could it, as the injunction, as stated by Chief Judge Myers, was “narrowly tailored” (K11-18: D.E. 7 Page 4 of 6) to refer to the 2019 NJ application and any events that relate or arise from the 2019 denial of that application. The factual foundation of K11-17 neither references the 2019 denial, nor pleads any events that “relate or arise” from that 2019 denial.

For example, the phrase does not state, nor could it: **“against any of the Defendants named in this litigation that relates to or arises from (i) the 2014 revocation of Plaintiff Kaul’s New Jersey license and or the denial of any future applications (plural) to any and all medical boards within the United States...”**

The exact wording of the injunction is clearly inapplicable to the factual underpinning of K11-17, which includes, amongst other things, the denial of Plaintiff Kaul’s licensure application in North Carolina, a denial that in 2024 continues to cause **“new”** injury to Plaintiff Kaul’s life/liberty/property/reputation.

“From the date of this Opinion and Order, Plaintiff Kaul is barred from filing in any United States district court any action, motion, petition, complaint, or request for relief against any of the Defendants named in this litigation that relates to or arises from ... (iii) subsequent litigation proceedings initiated by Plaintiff Kaul before the date of this Order; without first obtaining leave from this Court.”

The injunction was entered on September 12, 2022, and specifically states that the litigation restriction is restricted to litigation that commenced **“before the date of this Order”**. K11-17 commenced on December 12, 2023. K11-15 commenced on July 4, 2023. K11-14 commenced on June 22, 2023. K11-10 commenced on March 9, 2023. None of these cases commenced **“before the date of this Order”** and thus the injunction was erroneously applied in K11-10/K11-14/K11-15.

6. Defendants citations as to the Court’s exercise of its discretionary power are irrelevant to his argument, as the limits of the September 12, 2022, injunction do not reach the Court in K11-17, and thus the question of judicial discretion is moot.

These facts further substantiate the March 13, 2024, ORDER FOR DISCOVERY PLAN (D.E. 65).

CONCLUSION

For the above stated reasons, Plaintiff Kaul respectfully requests Defendants plea be denied.

DATED: APRIL 11, 2024



RICHARD ARJUN KAUL, MD

Exhibit 19

www.drrichardkaul.com

September 13, 2022

Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Kaul/Basch v ICE et al
21-CV-06992
K11-7
Financial disclosures/conflicts of interest/ex parte communications

RECEIVED
SONY PRO SE OFFICE
2022 SEP 14 PM 2:12

Dear Judge Oetken,

We write this letter with the utmost respect for you and the federal judiciary, and in recognition of the immense pressures that the above case must have brought to bear on your judgment. However, it is our position, one that is authorized by law and by our rights, that the opinion and order entered on September 12, 2022, will remain invalid until the following information has been disclosed to the record:

1. Forms AO 10 since 2020.
2. Information required pursuant to the Courthouse and Transparency Act.
3. A list of all ex parte communications between yourself and any agents acting on your behalf, and the Defendants or any agents acting on their behalf, that pertains/relates/refers/references or are in any way associated with the aspect of any of K11-7 or any of The Kaul Cases, including but not limited to: (i) the delivery and or receipt of any favor/gift/benefit/advantage/interest to you and or any member of your family to the third-degree, by the Defendants and or their agents in return for granting their motions; (ii) the promise of any future delivery and or receipt of any favor/gift/benefit/advantage/interest to you and or any member of your family to the third-degree, by the Defendants and or their agents in return for granting their motions. The pertinent time period is August 19, 2021, to the present.

As you are aware, the issue of judicial corruption has unfortunately appeared prominently within The Kaul Cases, and was featured in a series of Wall Street Journal articles in September

2021 (K11-7: D.E. 25 Page 1 – 46 of 50). Consequent to this publicity, and in or around May 2022, the Courthouse Ethics and Transparency Act was passed in response to public pressure against judicial corruption (Exhibit 1). Senator Ted Cruz was one of the co-sponsors, a person to whose attention, in January 2021, I brought the issue of judicial corruption (Exhibit 2). The ~~misconduct of Senator Charles Schumer regarding his~~ **“Political interference in judicial process”** is highlighted in the letter to Senator Cruz. I understand your appointment to the bench was sponsored by Senator Schumer.

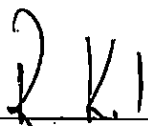
Our request for the public disclosure of the above financial information relates to the fact that your opinion/order are so thoroughly divorced from the evidence/facts/arguments/law of this case, that one cannot but conclude that you, like U.S.D.J. Kevin McNulty (U.S.D.C.-DNJ), Senator Schumer’s brother-in-law, have been corrupted. U.S.D.J. McNulty engaged in the same opinion falsifying activity in K1 (D.E. 313-1), as now appears in K11-7 (D.E. 168).

Our request for the public disclosure of all ex parte communications pertains, in part, to the dissemination of notices of preservation to various ex-members of the political/legal/judicial establishment, including Jose Linares, the ex-Chief Judge of the District of New Jersey, who, in mid-late May 2019, suddenly retired from the bench, and took partner status at the law firm of English & McCarter in Newark, New Jersey, after having received a letter from me, requesting his financial disclosure/conflicts of interest (Exhibit 3). On May 5, 2022, Mr. Linares was served with a NOTICE OF PRESERVATION in K11-7 (Exhibit 4).

We respectfully assert that the principles underpinning Rules 144/455, and those of the due process clauses of the Constitution, are authoritative in this matter, and do render your opinion/order void until your impartiality/lack of bias has been evidentially established.

We thank you for your attention to this matter.

Yours sincerely



RICHARD ARJUN KAUL, MD



DAVID BASCH, MD

cc: All Counsel of Record
All parties with a legal or other interest

Exhibit 1

0

Cornyn, Coons Bill to Apply STOCK Act Requirements to Federal Judges Signed Into Law

In: All News (/newsroom) Posted 05/13/2022

Share:  ([https://www.facebook.com/sharer/sharer.php?](https://www.facebook.com/sharer/sharer.php?u=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law)

[u=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law](https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law))  ([https://twitter.com/intent/tweet?](https://twitter.com/intent/tweet?text=Cornyn%2C+Coons+Bill+to+Apply+STOCK+Act+Requirements+to+Federal+Judges+Signed+Into+Law&url=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law)

[text=Cornyn%2C+Coons+Bill+to+Apply+STOCK+Act+Requirements+to+Federal+Judges+Signed+Into+Law&url=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law](https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law))  ([mailto:?subject=Cornyn, Coons Bill to Apply STOCK Act Requirements to Federal Judges Signed Into](mailto:?subject=Cornyn, Coons Bill to Apply STOCK Act Requirements to Federal Judges Signed Into Law&body=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law)

[Law&body=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law](https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law))

"Bill Followed Wall Street Journal Report on Judges Neglecting Financial Disclosure Requirements, Avoiding Potential Conflicts of Interest"

WASHINGTON – U.S. Senators John Cornyn (R-TX) and Chris Coons (D-DE) released the following statements after their *Courthouse Ethics and Transparency Act*, which would require online publication of financial disclosure reports for federal judges and mandate they submit periodic transaction reports for certain securities transactions, was signed into law:

"Excluding federal judges from the same disclosure requirements as other federal officials under the STOCK Act was a mistake, and I'm glad we could right this wrong," said Sen. Cornyn. *"Thank you to my colleagues in Congress and the Biden Administration for acting quickly to make this the law of the land so we can prevent conflicts of interest and reassure litigants that they will receive a fair trial."*

"Every American who has their day in court deserves to know they'll be treated fairly by their judge, and now that the Courthouse Ethics and Transparency Act is law, they can be more confident than ever that they're getting equal and unbiased treatment. By signing this bipartisan measure into law, President Biden has brought badly needed transparency to federal judges' finances by signing this bipartisan measure into law," said Sen. Coons.

The legislation is cosponsored by Senate Judiciary Committee Chairman Dick Durbin (D-IL) and Ranking Member Chuck Grassley (R-IA) and Senators John Kennedy (R-LA), Sheldon Whitehouse (D-RI), Ted Cruz (R-TX), and Jon Ossoff (D-GA).

Background:

The *Courthouse Ethics and Transparency Act* will require that federal judges' financial disclosure reports be made publicly available online and require federal judges to submit periodic transaction reports of securities transactions in line with other federal officials under the *STOCK Act*. The bill will amend the *Ethics in Government Act of 1978* to:

- Require the Administrative Office of the U.S. Courts to create a searchable online database of judicial financial disclosure forms and post those forms within 90 days of being filed, and
- Subject federal judges to the *STOCK Act's* requirement of filing periodic transaction reports within 45 days of securities transactions over \$1,000.

Importantly, the bill also preserves the existing ability of judges to request redactions of personal information on financial disclosure reports due to a security concern.

Under ethics guidelines and federal law prior to the *Courthouse Ethics and Transparency Act*, federal judges were prohibited from hearing cases that involve a party in which they, their spouse, or their minor children have a financial interest. Federal judges were instead supposed to disqualify themselves in any proceeding in which their impartiality may be questioned. Despite this, a recent report from the *Wall Street Journal* found that between 2010 and 2018, more than 130 federal judges failed to recuse themselves in nearly 700 cases in which they or an immediate family member held stock in a company involved in the case.

While federal judges were required to submit financial disclosure reports, the law did not provide sufficient transparency or certainty for litigants to discern if the judge has a conflict of interest. The process for obtaining judicial financial disclosure forms was often cumbersome and took months or even years. By contrast, financial disclosure reports for the President, Members of Congress, and Presidential-appointed and Senate-confirmed officials are readily available online.

Litigants need real-time access to judges' financial disclosures and securities transactions in order to preserve the integrity of the proceedings and ensure a recusal when there's a potential conflict of interest in their case. The *Courthouse Ethics and Transparency Act* will enact necessary updates to disclosure rules and provide litigants and the public with greater confidence in the judicial system.

Contact Senator Cornyn [↗ \(/contact\)](#)

Keep Informed

First Name

Last Name

E-mail

Sign Up

Washington, DC

Central Texas

FILED

MAR 25 2024

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY mas DEP CLK

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA**

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

Plaintiff

v.

JAMES PAUL OETKEN
(PERSONAL AND OFFICIAL CAPACITY)
JANE DOE; JOHN DOE.

Defendant

CIVIL ACTION NO.:

5:21-CV-00158-FC

COMPLAINT

K11-18
KAUL v OETKEN

CONTENTS

PARTIES – Page 4

RELEVANT/REFERENCED CASES OF 'THE KAUL CASES' – Page 5

JURISDICTION + VENUE – Page 6

PRELIMINARY STATEMENT – Page 8

DEPRIVATION OF ANY/ALL IMMUNITIES – Page 11

STATEMENT OF FACT – Page 13

LEGAL CLAIMS – Page 18

Violation of Civil Rights: Section 1983 claim

UN Human Rights Violation: The United Nations Universal Declaration of Human Rights

DECLARATIONS AND RELIEF SOUGHT – Page 29

PARTIES

PLAINTIFF

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

DEFENDANT

**JAMES PAUL OETKEN, ESQ – ROOM 706, 40 FOLEY SQUARE, NY, NY 10007 (“DEFENDANT
OETKEN”)**

RELEVANT/REFERENCED CASES OF 'THE KAUL CASES'

K1: KAUL v CHRISTIE: 16-CV-02364

K3: KAUL v SCHUMER: 10-CV-13477

K11-3: KAUL v ALLSTATE: 21-CV-00736

K11-7: KAUL v. ICE ET AL: 21-CV-6992

K11-10: KAUL v. ICE ET AL: 23-CV-2016

K11-11: KAUL v BCBS: 23-CV-00518

K11-14: KAUL v. FEDERATION ET AL: 23-CV-22325

K11-15: KAUL v. CHRISTIE/MURPHY: 23-CV-22582

K11-17: KAUL v CPEP: 23-CV-00672

JURISDICTION + VENUE

General:

Plaintiff Kaul claims federal jurisdiction pursuant to:

(i) Article III § 2; (ii) 28 U.S.C. § 1331 – Plaintiff’s allegations arise pursuant to Section 1983 claims of violations of Plaintiff Kaul’s Rights Under The United States Constitution; (iii) 28 U.S.C. § 1332(d)(2)(A) – Plaintiff Kaul is a citizen of a different state to Defendant Oetken

Personal:

The Court has personal jurisdiction over all Defendant Oetken, as he has transacted business, maintained substantial contacts through the Federal Judges Association, 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 Defendant Oetken pursuant to Fed. R. Civ. P. 4(k)(1)(A) because he 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.

Defendant Oetken’s K11-7 September 12, 2022 purported ‘injunction’ and his K11-7 March 15, 2024, threat to hold Plaintiff Kaul in contempt if by March 29, 2024, Plaintiff Kaul does not dismiss K11-17, AND the K11-17 Defendants filing on March 18, 2024 of Defendant Oetken’s March 15, 2024 threatening ‘ORDER’ do constitute a substantial and ongoing injury and violation of Plaintiff Kaul’s human/civil/constitutional right to vindicate and or secure his right

to his life/liberty/property/reputation WITHIN the jurisdiction of the United States District Court for the Eastern District of North Carolina, that confers on Plaintiff Kaul the right to sue Defendant Oetken in this district.

PRELIMINARY STATEMENT

1. This case stems from K11-17, and at the core of this case exists an unprecedented/illegal abuse of power by the Defendant, a district judge, one (1) of six hundred and seventy-seven (677) within the United States District Court, who seeks to enforce his judicial will on the entirety of the federal judiciary.

2. Defendant James Paul Oetken is a district judge in the Southern District of New York, who, prior to being appointed to the bench was private counsel to multiple financial corporations, a number of whom he defended in the 2008 financial fiasco. Subsequent to his defense of corporations that had caused massive homelessness/poverty on the American people, he was proposed by Senator Charles Schumer to the bench. Plaintiff Kaul sued Schumer on April 4, 2019, in K3 (KAUL v SCHUMER: 19-CV-13477), on charges of racketeering/bribery/public corruption/civil rights violations (Exhibit 1). The case was voluntarily dismissed on January 3, 2022 (K3: D.E. 53), but not before Defendant Schumer extracted money from the public purse to fund his legal defense (Exhibit 2).

3. Defendant Oetken, recognizing his conflict of interest, and in fact exploiting it, did adjudicate K11-7 from August 19, 2021, to September 12, 2022, without disclosing his conflict to the court record or Plaintiff Kaul. This “pattern” of K3 Defendant Schumer related conflicted-ness was evident in K1, in which the first presiding judge was Defendant Schumer’s brother-in-law, Kevin McNulty, a judge who became disqualified on May 22, 2019 (K1: D.E. 340). Defendant Schumer, a NY State Senator, has for many decades received enormous bribes from the insurance/banking industry on Wall Street, NY, and within K1 were Defendants TD Bank and Allstate/Geico Insurance Companies. The McNulty-Schumer-Oetken-TD-Allstate-Geico nexus was able to directly corrupt the judicial process until K11-17, but still, in an increasingly ‘thuggish’ manner, attempts to interfere indirectly with threats against Plaintiff Kaul.

4. The principal question/issue presented by this case pertains to the demarcation limits of the jurisdiction/authority/power of the orders and decisions of district judges/courts within the United States District Court, or put otherwise, does an opinion/order of a district judge depriving a person of his/her litigation rights, then deprive every other district judge of their right of discretion to permit that person to prosecute his/her claims in their courts.

5. Can one district judge assume power over all other district judges?

6. Defendant Oetken believes he can, and on March 15, 2024, entered an order (Exhibit 3) in K11-7, a case closed on October 6, 2022, in which he threatens Plaintiff Kaul, that if by March 29, 2024, he fails to dismiss K11-17, he will be fined, will be held in contempt, and will likely be arrested/jailed. In his March 15, 2024 'ORDER' Defendant Oetken provides no law to corroborate, nor could he, that he has any legitimate or legal right to coerce Plaintiff Kaul into dismissing K11-17 under threat of imprisonment. Defendant Oetken's illegal actions are a consequence of his scheme, in conjunction with the K11-17 Defendants, to prevent Plaintiff Kaul from further exposing his crimes and those of The Kaul Cases Defendants, including Defendant Schumer.

7. Plaintiff Kaul respectfully asserts that the answer to the question is no. No district judge has the authority, power or right to prohibit another district judge from deciding whether to permit a litigant to prosecute claims in his/her court, regardless of whether that litigant's claims have complete or partial identity with prior claims. The decision is at the sole discretion of the permitting judge, and not the restricting judge, and the principle underpinning this aspect of jurisprudence pertains to the fact that legal precedent has proven that matters of truth, initially either suppressed or not made evident, do, through repeated legal examination become evident.

8. Within the American judicial system, there are hundreds of thousands of cases of exoneration, that only came into being because "vexatious ... harassing ... frivolous ...

scandalous ...” litigants refused to cease their search of the truth. The Innocence Project is but one example.

9. Defendant Oetken’s highly unusual and highly improper interference in the legal process of K11-17 in the United States District Court for the Eastern District of North Carolina, does simply confirm his co-conspirator guilt of the levied charges, and the guilt of the K11-17 Defendants.

DEPRIVATION OF ANY/ALL IMMUNITIES

10. Defendant Oetken became deprived of any immunity the moment he commenced conspiring with the K11-7 Defendants in the conception, development, and perpetration of the quid pro quo schemes, as detailed in K11-17 (Exhibit 4).

11. Defendant Oetken has knowledge of the facts of K11-17. This is evidenced in Defendants Christie/Solomon/Heary's private letter to him (Exhibit 5) and by his own admission in his March 15, 2024 'ORDER': "The Court has learned ..." although Defendants Christie/Solomon/Heary's January 19, 2024, letter was privately addressed to Defendant Oetken, and not the Clerk of the Court nor any other judges within the "Court". Defendant Christie/Solomon/Heary's letter is not published to the SDNY docket, and neither their names nor the letter is referenced on the docket nor in Defendant Oetken's March 15, 2024 'ORDER', as just further evidence of Defendant Oetken's "pattern" of illegal exparte violations. Defendant Oetken's March 15, 2024 'ORDER' is arguably without the authority of the Court and constitutes a violation of U.S.C. Section 1018 and the Judiciary Act of 1789.

12. Defendant Oetken, with knowledge of the K11-17 facts of his crimes at a time no later than January 19, 2024, has continued to fail to submit an affidavit into K11-17 denying the facts of the quid pro quo schemes/evidential falsification/perjury and other acts of public corruption. His non-denial caused the admission of these facts, facts of felonies and felonies that deprive him of any immunity.

13. Defendant Oetken's guilt accounts for both his admission of fact and the failure of the K11-17 Defendants to cause the submission of affidavits from the New York State Ethics Committee, the Judicial Disciplinary Council, and any other judge within the SDNY, as to Defendant Oetken's refuting that Defendant Oetken engaged in criminal schemes with the K11-7 Defendants.

14. Defendant Oetken's guilt and his recognition of his guilt account for his March 15, 2024, effort to attempt to coerce Plaintiff Kaul under threat of contempt into dismissing K11-17, in order to attempt to suppress the inevitable March 13, 2024, related K11-17 DISCOVERY ORDER emergence of further evidence of his guilt, that would place him at risk of criminal indictment. As with Defendant Christie, Defendant Oetken's scheme in attempting to hatch plots to jail/kill/silence does nothing but further evidence his crimes, crimes for which, like Edward Manton (Exhibit 5), he lacks immunity.

STATEMENT OF FACT

The following facts are extracted from the K11-7 September 13, 2022, letter from Plaintiffs Kaul/Basch to Defendant Oetken (Exhibit 6):

15. Commencing in approximately September 2021 to September 2022, Defendant Oetken/agents conspired with the K11-17 Defendants/agents in the manufacturing of a quid pro quo scheme, in which Defendant Oetken received bribes/other tangible favors in return for obstructing Plaintiff Kaul's prosecution of K11-7, by denying all motions for discovery/default/summary judgment.

16. Through their nexus with K3 Defendant Charles Schumer and K11-3 Defendant Kevin McNulty, counsel for the K11-7 Defendants knew that Defendant Oetken was a well-known "racketeer" within the SDNY, with a reputation for 'selling' his opinion to the 'highest bidder'.

17. The scheme, having commenced in approximately September 2021, was perpetrated by Defendant Oetken and the K11-7 Defendants up until the September 12, 2022, dismissal with prejudice of K11-7 and the issuing of the purported 'injunction'.

18. Defendant Oetken and the K11-7 Defendants used the US wires to communicate what bribes/benefits/favors would be paid for what specific judicial acts.

19. Defendant Oetken and the K11-7 Defendants used the US wires to communicate to where the bribes/benefits/favors would be paid or deposited.

20. Defendant Oetken and the K11-7 Defendants used the US wires to communicate when the bribes/benefits/favors would be paid or deposited and how the bribes would be apportioned to specific judicial acts.

21. Defendant Oetken and the K11-7 Defendants used the US wires to communicate when the bribes/benefits/favors would be paid or deposited.

22. Defendant Oetken, in recognizing his conversion of the federal bench into a “racketeering enterprise” did endeavor to conduct the knowingly illegal quid pro quo scheme with deceptive secrecy by deceiving Plaintiffs Kaul/Basch, the SDNY Court and the federal record into believing he was conducting himself within the law and in accordance with his juridical/ethical code of conduct.

23. On September 12, 2022, Defendant Oetken, having entered an order dismissing K11-7 with prejudice and having entered a ‘injunction’ purporting to permanently bar Plaintiff Kaul from pursuing any claims within the United States District Court, did believe that the scheme had succeeded and Plaintiff Kaul, a non-lawyer would neither expose his corrupt tactics or that if Plaintiff Kaul did, he would have no knowledge or experience as to the appropriate course of action.

24. Plaintiff Kaul did expose the facts of Defendant Oetken’s quid pro quo scheme, exparte communications and the illegal dismissal and ‘Fraud on the Court’ purported ‘injunction’, facts to which Defendant Oetken did cause to become admitted.

25. However, Defendant Oetken, despite knowing that he had ‘been caught’ in a crime, did not believe that Plaintiff Kaul would continue to expose his criminal “patterns” and would pursue the prosecution of his claims within the United States District Court.

26. Defendant Oetken became subject to state/federal disciplinary complaints filed against him by Plaintiff Kaul.

27. From March 2023 to December 2023, Plaintiff Kaul filed K11-10/K11-11/K11-14/K11-15/K11-17 and within the filing of each claim were highly incriminating/admitted facts of Defendant Oetken's criminal conversion of the SDNY into a "racketeering enterprise".

28. Defendant Oetken, recognizing the civil/criminal consequences to him of the immense public exposure of his crimes that would occur if the cases advanced into discovery, did, in conjunction with the K11-10/K11-14 Defendants cause the corrupt dismissal of these cases, based on his purported 'injunction'.

29. However, when K11-17 was filed, Plaintiff Kaul submitted as exhibits with his December 12, 2023, Complaint, a copy of the September 12, 2022, purported 'injunction/dismissal opinion, a copy of Plaintiff Kaul's unrefuted/admitted analysis of the September 12, 2022, purported 'injunction/dismissal opinion, THE OETKEN ANALYSIS' and copies of all disciplinary complaints filed against Defendant Oetken.

30. However, by happenstance in approximately late 2022, Plaintiff Kaul spoke with a female person who had appeared before Defendant Oetken several years earlier in a mortgage dispute with JP Morgan, in which JP Morgan was seeking to have her/her family evicted from their thirty-five year-long residence. Defendant Oetken had, whilst a corporate lawyer, represented JP Morgan in the 2008 dispute with the US Government, in which no executives were prosecuted for the nation-wide devastation of their financial crimes. JP Morgan have 'donated' millions of bribes to K3 Defendant Schumer, the person who sponsored Defendant Oetken's appointment to the federal bench.

31. Defendant Oetken concealed his conflict of interest from the female person, and ordered that she/her family be evicted. On the day of this hearing, the female person, upon hearing Defendant Oetken's order or eviction became physically ill and rushed to the bathroom, followed by several female court employees. While in the bathroom, these employees advised the female person that "you must do something He does this all the time". The female

person provided a sworn affidavit to Plaintiff Kaul of these harrowing events (Exhibit 7), an affidavit that further evidences a “**pattern**” in which Defendant Oetken abuses the power of the court to further the political/economic agendas of himself and those corporations/politicians with whom he conducts his “**pattern of racketeering**” within the United States District Court.

32. With the filing of K11-17, the Defendant Oetken became aware of the nullity of his purported ‘injunction’ as the Defendants voluminous filings resulted not in the case being dismissed, but in the Court issuing a DISCOVERY ORDER on March 13, 2024 (K11-17: D.E. 65).

33. Defendant Oetken recognized that because the K11-17 Defendants had submitted the purported ‘injunction’ as their principal defense, the DISCOVERY OFFER would permit Plaintiff Kaul to depose Defendant Oetken about not just the facts surrounding the corrupt procurement of the purported ‘injunction’ but about many other cases in which Defendant Oetken was conflicted, but nonetheless rendered decisions/judgments in favor of those from whom he received bribes, in both civil/criminal cases.

34. Defendant Oetken, in recognizing the crime exposing effect of the DISCOVERY ORDER, and the nullity of the purported ‘injunction’ within the United States District Court for the Eastern District of North Carolina, did, in conjunction with the K11-17 Defendants scheme to attempt to coerce Plaintiff Kaul into dismissing K11-17 under threat of contempt of court if he did not.

35. On March 15, 2024, Defendant Oetken, without informing any other Judges within the SDNY, did illegally publish to the court docket a knowingly illegal document, that he self-designated as an ‘ORDER’ (Exhibit 3), the true purpose of which is an attempt to prevent further exposure of highly incriminating facts of the criminal conduct of himself and the K11-7/K11-17 Defendants and others.

36. On March 19, 2024, the K11-17 Defendants filed motions seeking to have the Court vacate the DISCOVERY ORDER and stay all deadlines (Exhibit 8).

37. On March 19/20, 2024, Plaintiff Kaul filed replies to Defendant Oetken's March 15, 2024, K11-7 'ORDER' and K11-17 Defendants March 19, 2024, motions (Exhibit 9).

LEGAL CLAIMS

38. In 2005, Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive spinal fusion, a case/technique that revolutionized the field of spine surgery and has been for many years the standard of care. This event and the consequent success caused Plaintiff Kaul's physician/hospitals/insurance competitors in the minimally invasive spine surgery market to view him, his outpatient surgical center, his technique, and his technique invention as a threat to their market share, and not being able to compete fairly/legally, did resort to committing judicial corruption/political corruption/public corruption/ bribery/perjury/evidential falsification/witness tampering/obstruction of justice/kickbacks/wire fraud/mail fraud/false indictments/false arrests/false imprisonment/kidnapping/attempted drugging-killing. These events occurred over a time period from 2005 to 2023, in conjunction with ongoing/accruing and daily recurring and "new" violations of Plaintiff Kaul's human/civil/constitutional rights. In causing the 2012/2014 illegal suspension/revocation of Plaintiff Kaul's NJ license, The Kaul Cases Defendants committed a theft of Plaintiff Kaul's intellectual property, from which have been generated/continue to be generated hundreds of millions, if not billions of dollars.

39. The above facts, in conjunction with those contained within the factual corpus of The Kaul Cases substantiate ongoing violations to a criminal standard of Plaintiff Kaul's fundamental right to life/liberty/property, his right to his hard-earned reputation and specifically, violations of the following rights:

Violation of Civil Rights

Section 1983 claim

40. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing violation and deprivation of Plaintiff Kaul's First Amendment Right of the United States

Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

41. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing violation and deprivation of Plaintiff Kaul's **Second Amendment Right** of the United States Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

42. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing violation and deprivation of Plaintiff Kaul's **Fourth Amendment Right** of the United States Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

43. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing violation and deprivation of Plaintiff Kaul's **Fifth Amendment Right** of the United States Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

44. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing violation and deprivation of Plaintiff Kaul's **Sixth Amendment Right** of the United States Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

45. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing

violation and deprivation of Plaintiff Kaul's Eighth Amendment Right of the United States Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

46. In a period from September 12, 2022, to the present, Defendant Oetken did abuse state power in attempting to and in fact achieving in K11-10/K11-14 a knowing/willful/continuing violation and deprivation of Plaintiff Kaul's Fourteenth Amendment Right of the United States Constitution, **CONSEQUENT TO** the illegal purported 'injunction' violating Plaintiff Kaul's right to litigate his claims/vindicate his rights in the United States District Court.

47. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of his livelihood by preventing its rectification through the judicial process.

48. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his business real estate by preventing its rectification through the judicial process.

49. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his personal real estate by preventing its rectification through the judicial process.

50. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his life earnings by preventing its rectification through the judicial process.

51. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his pensions by preventing its rectification through the judicial process.

52. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his financial investments by preventing its rectification through the judicial process.

53. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his professional licenses by preventing its rectification through the judicial process.

54. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of the property of all his accounts receivable BY preventing its rectification through the judicial process.

55. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of his right to due process BY preventing his access to discovery and substantive litigation process.

56. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/continue to deprive Plaintiff Kaul of his right to free speech BY preventing his access to discovery and substantive litigation process.

57. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/attempt to continue to deprive Plaintiff Kaul of his right to impartial tribunals/judges/courts BY continuing to perpetrate through certain courts within the United States District Court the corruptly procured K11-17 'Fraud on the Court' 'injunction', which has prevented Plaintiff Kaul's access to discovery and substantive litigation process.

58. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/attempt to continue to deprive Plaintiff Kaul of his right to substantively prosecute his claims BY continuing to perpetrate through certain courts within the United States District

Court the corruptly procured K11-17 'Fraud on the Court' 'injunction', which has prevented Plaintiff Kaul's access to discovery and substantive litigation process.

59. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/attempt to continue to deprive Plaintiff Kaul of his right to equal protection under the law **BY** continuing to perpetrate through certain courts within the United States District Court the corruptly procured K11-17 'Fraud on the Court' 'injunction', which has prevented Plaintiff Kaul's access to discovery and substantive litigation process.

6. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/attempt to continue to deprive Plaintiff Kaul of his right to liberty **BY** continuing to perpetrate through certain courts within the United States District Court the corruptly procured K11-17 'Fraud on the Court' 'injunction', which has prevented Plaintiff Kaul's access to discovery and substantive litigation process.

61. These deprivations/violations willfully/maliciously caused by Defendant Oetken did illegally deprive/attempt to continue to deprive Plaintiff Kaul of his right to be compensated for the illegal deprivation of the property of eleven (11) years of his life **BY** continuing to perpetrate through certain courts within the United States District Court the corruptly procured K11-17 'Fraud on the Court' 'injunction', which has prevented Plaintiff Kaul's access to discovery and substantive litigation process.

62. These deprivations/violations/injuries were willfully/maliciously perpetrated by Defendant Oetken within/through/with the assistance of the executive/judicial apparatus of the American State.

63. These deprivations/violations/injuries were willfully/maliciously perpetrated by Defendant Oetken within/through/with the assistance of the United States District Court.

64. These deprivations/violations/injuries were willfully/maliciously perpetrated by Defendant Oetken in collusion/conspiracy with private actors associated with the New York Stock Exchange.

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

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

67. Defendant Oetken and The Kaul Cases Defendants were and are motivated to commit and continue to commit these deprivations/violations/injuries to Plaintiff Kaul's human/civil/constitutional/property rights.

68. The motivation is based on Defendant Oetken and The Kaul Cases Defendants scheme to prevent Plaintiff Kaul from exposing their crimes, including those of defrauding the global equities market.

UN Human Rights Violation

The United Nations Universal Declaration of Human Rights

69. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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.”

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

71. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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, color, 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.”

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

73. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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.”

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

75. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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.”

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

77. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

79. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

81. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

83. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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.”

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

85. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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.”

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

87. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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.”

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

89. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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 honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.”

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

91. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

93. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

95. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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 favorable conditions of work and to protection against unemployment."

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

97. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

99. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

101. Defendant Oetken and The Kaul Cases Defendants-Co-Conspirators 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."

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

DECLARATIONS AND INJUNCTIVE RELIEF

- 1. The legal record in K11-17 has established by a preponderance of the evidence that the September 22, 2022, purported 'injunction' issued by U.S.D.J. Oetken in K11-7 is an admitted 'Fraud on the Court'.**
- 2. The United States District Court for the Eastern District of North Carolina did nullify the purported 'injunction' within its jurisdiction, when it admitted the case on November 20, 2023**
- 3. The United States District Court for the Eastern District of North Carolina did nullify the purported 'injunction' within its jurisdiction when it issued its March 13, 2024, ORDER FOR DISCOVERY PLAN.**
- 3. The nullification of the purported 'injunction' within the jurisdiction of the United States District Court for the Eastern District of North Carolina, has rendered the purported 'injunction' a legal nullity within the Eastern District of North Carolina without legal effect or existence.**
- 4. Therefore, the nullity and legal non-existence of the purported 'injunction' quite logically means that Plaintiff Kaul could not have violated any purported 'injunction within the jurisdiction of the United States District Court for the Eastern District of North Carolina.**
- 5. Therefore, the nullity and legal non-existence of the purported 'injunction' quite logically means that Plaintiff Kaul's continued prosecution of K11-17 within the United States District Court for the Eastern District of North Carolina does not, nor could not, violate any injunction.**
- 6. Plaintiff Kaul's human/civil/constitutional rights and the controlling doctrinal law of 'Fraud on the Court' strictly prohibit Defendant Oetken from using the instrumentality of his purported 'injunction' in any manner to infringe on Plaintiff Kaul's human, civil and or constitutional rights to vindicate and or secure his right to his life/liberty/property/reputation.**

7. Defendant Oetken is prohibited from attempting to use the purported 'injunction', an admitted 'Fraud on the Court, to cause injury or infringe on Plaintiff Kaul's person and or violate his human/civil/constitutional rights within the jurisdiction of the United States.

8. Defendant Oetken is ordered to immediately cease and desist from any further interference in the judicial process of the United States District Court for the Eastern District of North Carolina.

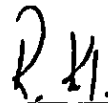
9. Defendant Oetken's March 15, 2024 'ORDER' in K11-17, a product of the K11-7 September 12, 2022 'Fraud on the Court' purported injunction is itself a 'Fraud on the Court', and is thus null/void for all intents/purposes.

10. Defendant Oetken's nullified 'Fraud on the Court' March 15, 2024 'ORDER' that was generated and filed in K11-7 by Defendant Oetken, and then filed in K11-17 by the K11-17 Defendants on March 18, 2024, constitutes a flagrant violation of Plaintiff Kaul's human/civil/constitutional rights to vindicate and or secure his right to his life/liberty/property/reputation.

11. Defendant Oetken is ordered to strike from the K11-7 docket the illegally generated and nullified 'Fraud on the Court' March 15, 2024 'ORDER'.

Plaintiff Kaul swears under penalty of perjury that the above statements are true and accurate to the best of my knowledge and that if it is proved that I willfully and knowingly misrepresented the facts, then I will be subject to punishment.

DATED: MARCH 22, 2024

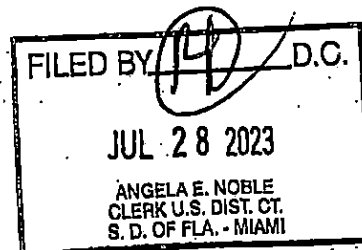


RICHARD ARJUN KAUL, MD

cc: Clerk of the Court for the SDNY
Chief Judge for the SDNY

Exhibit 20

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA



RICHARD ARJUN KAUL, MD;
JANE DOE, JOHN DOE

v.

CHRISTOPHER J. CHRISTIE; KENNETH MURPHY
JANE DOE; JOHN DOE (1-11)

CIVIL ACTION: NO.: 23-CV-22582-BB

FIRST AMENDED COMPLAINT

Contents

Preliminary Statement – Page 4

Jurisdiction + Venue – Page 5

Parties – Page 6

Facts – Page 7

Legal Claims – Page 23

42 U.S.C. § 1983 – CIVIL ACTION FOR DEPRIVATION OF RIGHTS – Page 23

COUNT ONE

AGAINST DEFENDANTS CHRISTIE/MURPHY

**VIOLATION OF PLAINTIFF KAUL'S DUE PROCESS RIGHTS PURSUANT TO THE FIFTH, EIGHT AND
FOURTEENTH AMENDMENTS OF THE UNITED STATES CONSTITUTION – Page 23**

COUNT TWO

AGAINST DEFENDANTS CHRISTIE/MURPHY

**VIOLATION OF PLAINTIFF KAUL'S RIGHT PURSUANT TO THE FOURTH AMENDMENT OF THE
UNITED STATES CONSTITUTION – Page 26**

COUNT THREE

AGAINST DEFENDANTS CHRISTIE/MURPHY

42 U.S.C. § 1985 (3) – CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS – Page 28

Relief – Page 30

Conclusion – Page 31

Preliminary Statement

1. This case, K11-15 of The Kaul Cases, details the ever-expanding and continually unsuccessful conspiracy to eliminate Plaintiff Kaul (jail-suicide/murder), in order to cause him to cease his prosecution of The Kaul Cases Defendants, a prosecution that will further expose their crimes and those of their co-conspirators.
2. Continuing to be a central cog in the conspiracy is Defendant Christie, whose profound concerns about the decimating effect that Plaintiff Kaul has had, and continues to have on his political path to the White House, have destabilized his mental fitness/political judgment, such that his schemes to eliminate Plaintiff Kaul have devolved into the conversion of unwitting rookie/other police officers into nothing but 'Nazi-esque' thugs.
3. K11-15 details a scheme of ongoing human/constitutional/civil rights violations, that constitute further conclusive evidence of The Kaul Cases claims, and specifically those of K11-14, claims that Plaintiff Kaul has been consistently asserting in the United States District Court since February 22, 2016.
4. The relief sought in K11-15 is of the same nature and form as that sought in K1, and involves not only relief specific to Plaintiff Kaul, but, and arguably as important, if not more, changes to the political and healthcare regulatory systems, including a "Reformation of American Medical Boards" ("RAMBO").
5. Plaintiff Kaul, a citizen of India, respectfully advises this Court that the Indian Government and specifically the Office of PM Modi, have been made aware of the within pled facts/surrounding issues, and a copy of this Complaint has been transmitted to the relevant persons/consulates.

Jurisdiction + Venue

6. 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(a) – The aggregate amount in controversy exceeds seventy-five thousand dollars (\$75,000).

7. Personal:

The Court has personal jurisdiction over all K11-15 Defendants, as there remains pending a case (K11-14) in this Court, in which there exists commonality of litigants, subject matter, evidence, facts, argument and law, that substantiate in the interest of judicial efficiency and consistency, that K11-14/K11-15 be tried concurrently and under a consistent set of rules, in order to avoid inconsistent decisions and an inefficient utilization of the Court’s resources.

Personal jurisdiction exists consequent to the transaction of business, maintenance of substantial contacts, and/or the commission of 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.

On July 11, 2023, under the authority of the United States District Court for the Southern District of Florida, personal jurisdiction was established on the Defendants, with the filing of a Complaint, pending the submission of a filing fee and Case Information Statement.

8. Venue:

28 U.S.C. § 1391(a)(2) – the proper venue for a civil action shall be determined without regard to whether the action is local or transitory in nature.

Parties

9. Plaintiff

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

10. Defendants

CHRISTOPHER J. CHRISTIE – 46 COREY LANE, MENDHAM, NJ 07945 (“DEFENDANT CHRISTIE”).

**OFFICER KENNETH MURPHY – MORRISTOWN POLICE DEPARTMENT, 200 SOUTH STREET
MORRISTOWN, NJ 07963-4152 (“DEFENDANT MURPHY”)**

Facts

11. From 2002 to 2012, Plaintiff Kaul revolutionized the field of minimally invasive spine surgery by inventing and successfully performing the first percutaneous outpatient spinal fusion in February 2005 at the Market Street Surgical Center in Saddlebrook, New Jersey.

12. As a consequence of the invention/successful performance of this industry changing procedure, Plaintiff Kaul's professional and commercial success escalated exponentially, and his businesses generated immense wealth based on the superiority of his technique over those performed by his surgeon competitors, who did not possess the surgical skills to perform Plaintiff Kaul's percutaneous procedure.

13. Plaintiff Kaul's competitors, unable to compete with Plaintiff Kaul in the minimally invasive spine surgery market, and feeling threatened by his rapidly increasing professional/commercial/reputational success, commenced conspiring against him.

14. From 2005 to 2008, the conspiracy consisted of, amongst other things: (i) slandering Plaintiff Kaul's name with patients; (ii) instructing/coercing physicians in the community to not refer patients to Plaintiff Kaul; (iii) instructing/coercing hospitals to not grant Plaintiff Kaul admitting privileges; (iv) coercing medical device representatives to not provide Plaintiff Kaul the devices/material he required to conduct the percutaneous spinal fusions, by threatening to have members of their surgical societies refuse to use their products; (v) colluding with insurance companies in the generation of medical 'opinions' denying payment to Plaintiff Kaul for his rendering of clinical services.

15. In approximately 2008, Plaintiff Kaul's competitors, recognizing the failure of their prior tactics, did engage with The Kaul Cases Defendant, and about to then be the 2009 New Jersey Governor, Christie, in a quid pro quo scheme, in which bribes were funneled into his personal/business/political 'coffers' and other financial vehicles.

16. In exchange for the bribes, Defendant Christie abused state executive power and ordered his AG/OAL Judge/Medical Board to commence 'sham' legal proceedings to illegally suspend (2012) and then revoke (2014) Plaintiff Kaul's license.

17. The licensing proceedings in the New Jersey Office of Administrative Law (April 9 to June 28, 2013) were conducted illegally and involved corruption of the administrative law judge and The Kaul Cases Defendant, Jay Howard Solomon and at least two hundred and seventy-eight (278) separate instances of evidential tampering/witness tampering/perjury/evidential omission in the final report issued by The Kaul Cases Defendant, Jay Howard Solomon, on December 13, 2013.

18. In a period from approximately 2010 to late 2015, Defendant Christie abused the executive power of state and his influence from his tenure (2000-2008) as the US Attorney for the District of New Jersey, to have violated Plaintiff Kaul's human/constitutional rights in administrative/state/state-appellate/bankruptcy/district courts within the geographic boundaries of the State of New Jersey, the purpose being to eliminate or otherwise effectively terminate Plaintiff Kaul's existence.

19. The purpose of eliminating/otherwise terminating Plaintiff Kaul was to attempt to prevent him from exposing, through litigation, the crimes of The Kaul Cases Defendants.

20. On February 22, 2016, Plaintiff Kaul filed suit against Defendant Christie and others in the United States District Court (Kaul v Christie: 16-CV-02364) (K1), on charges of knowing/willful violations of RICO/Antitrust and violations of Plaintiff Kaul's human/constitutional rights.

21. In or around May 2016, Defendant Christie, in collusion and conspiracy with certain persons in the New Jersey Office of the Attorney General and the Mercer County Prosecutor's Office, willfully abused the power of state to file a knowingly false criminal indictment against Plaintiff Kaul, in retaliation for the filing of K1.

22. Defendant Christie and his co-conspirators concocted and schemed to use the US wires and apparatus of state to perpetrate a knowingly illegal fraud against Plaintiff Kaul in an attempt to intimidate/harass him into not prosecuting K1, in an effort to conceal the crimes/human rights violations committed against Plaintiff Kaul by himself and The Kaul Cases Defendants.

23. The knowingly false indictment claimed that Plaintiff Kaul had allegedly deprived the state of tax revenue.

24. Defendant Christie and his co-conspirators knew that their allegations were false, and that the perpetration of the fraud through the apparatus of state constituted the commission of the felonies of wire fraud/public corruption/perjury.

25. Defendant Christie and his co-conspirators knew that in their commission of the felonies of wire fraud/public corruption/perjury; they willfully and with malice deprived Plaintiff Kaul of his human/civil/constitutional rights.

26. Defendant Christie and his conspirators, despite cognizance of the illegality of their misconduct, did act with impunity, as they filed the indictment with Peter Warshaw, a state court judge appointed by Defendant Christie to the Trenton bench. Plaintiff Kaul sent Warshaw a letter, dated October 11, 2016, informing him of, amongst other things, the conflict of interest (Exhibit 2). Plaintiff Kaul received no response.

27. Under orders from Defendant Christie, a paper copy of the fraudulent tax indictment was transmitted via the US mail to Plaintiff Kaul's ex-residence in Bernardsville in or around May/June 2016.

28. In 2016, Plaintiff Kaul's ex-residence was occupied by his ex-wife and two (2) young children, who had lived in the house since 2003 with Plaintiff Kaul until he relocated into Manhattan in 2005, that being the last year of his residence.

29. Plaintiff Kaul's ex-wife never forwarded him the papers of Defendant Christie's fraudulent tax indictment.

30. At approximately 1:30 am on September 16, 2016, Plaintiff Kaul was arrested at his residence by eight armed officers from the Somerset County Sheriff's Office on a warrant for unpaid child support, pursuant to a case filed by Plaintiff Kaul's ex-wife with the child support probation department of the State of New Jersey.

31. Subsequent to the arrest, Plaintiff Kaul was taken to the Somerset County Jail where he was told by a child probation officer that unless he paid thirty thousand dollars (\$30,000), he would not be released.

32. Plaintiff Kaul informed this individual that consequent to the illegal suspension (2012)/revocation (2014) and their legal sequelae, he had entered a state of poverty, and thus could not make any payments.

33. Plaintiff Kaul was then medically evaluated and found to have an excessively high blood pressure, but was nonetheless placed in a holding cell at approximately 3 am and at 7am he was transferred to a jail cell without having received any antihypertensive medications.

34. At approximately 9 am, Plaintiff Kaul's blood pressure was again measured and had increased, and so he was transferred to the medical unit within the jail, where he was placed on EKG, oxygen, and blood pressure monitoring, and had conducted a twelve (12) lead EKG.

35. Plaintiff Kaul remained handcuffed to the medical unit bed.

36. After several hours of intravenous therapy, nitroglycerin therapy and intravenous antihypertensives, Plaintiff Kaul's condition had not improved, and so he was transferred via to

Robert Wood Johnson University Hospital in Somerset, New Jersey, via an ambulance, in which he remained handcuffed to the stretcher.

37. Plaintiff Kaul was rapidly transferred to the emergency room and then onto the cardiac unit, where he was placed on intensive cardiac monitoring, but continued to be handcuffed to the bed and guarded by several prison officers.

38. In the early morning of September 17, 2016, Plaintiff Kaul's then partner, a nurse, paid two thousand dollars (\$2,000) to the State of New Jersey towards the alleged child support, without which Plaintiff Kaul would not have been released and would have been returned to jail.

39. Subsequent to the Somerset County Sheriff's Department receiving confirmation of the \$2,000 payment, the officers commenced the process to release Plaintiff Kaul, which involved checking as to any outstanding warrants.

40. In the process it was discovered that there was an alleged outstanding warrant from Mercer County, and upon informing Plaintiff Kaul of this alleged warrant and that instead of being released, he would be transferred into the custody of the Mercer County Sheriffs and transported to the Mercer County Correctional Center in Trenton, NJ, for further processing and appearance before a judge.

41. Plaintiff Kaul's physician, who had been markedly disturbed by the events he observed in witnessing a colleague with resistant hypertension chained to a hospital bed, informed the prison guards that the stresses associated with transferring Plaintiff Kaul to Trenton would likely cause him to sustain a lethal myocardial infarction.

42. The Somerset County Sheriffs Office informed the Mercer County Sheriff's Office, who informed the judge, Peter Warshaw, who adjourned the hearing and stated that the court would mail Plaintiff Kaul a notice of the new date.

43. At approximately 4:30 pm Plaintiff Kaul departed the hospital with his partner, who had been prevented by the prison guards from seeing Plaintiff Kaul upon either his admission to the emergency room on September 16, 2016, or while chained to the bed in the cardiac unit.

44. Plaintiff Kaul returned to his residence, and continued his prosecution of Kaul v Christie: 16-CV-02364 (K1), undeterred and in fact fortified by the events of the prior days. Plaintiff Kaul submitted a request to the K1 Magistrate Judge, in which he sought a Temporary Restraining Order and Preliminary Injunction against the State of New Jersey (Exhibit 1). The petition was ignored.

45. Approximately two (2) weeks later, Plaintiff Kaul received a letter from the Trenton court, in which the hearing date regarding the alleged tax indictment, had been scheduled for mid-October.

46. Upon receiving the letter, Plaintiff Kaul telephoned the prosecutor's office and during a conversation with a Rachel Cook, the assistant prosecutor assigned to the case, Plaintiff Kaul requested he be sent a copy of the entire file pertaining to the alleged indictment, in order that he could review and prepare for the October hearing.

47. The file was never sent and despite several unanswered and unreturned telephone calls/messages, no information was ever sent to Plaintiff Kaul.

48. Without any understanding or knowledge of the basis of the allegations, Plaintiff Kaul sent a letter to the judge, Peter Warshaw, informing him that he would not attend the hearing until he received the requested information, in accordance with his constitutional rights.

49. Plaintiff Kaul received no response from the court or the prosecutor's office, and as of the filing of this Complaint, has not received a copy of the alleged indictment or the materials on which the purported indictment was based/procured, the reason being that the 'indictment'

was and is a 'Fraud on the Court', a fact that the law required be known or ought to be known by all state/federal law enforcements agencies/persons within the State of New Jersey and the District of New Jersey.

50. From September 2017 to February 2021, Plaintiff Kaul submitted applications to the states of Pennsylvania/New Jersey/New York for medical licenses, and was, as part of the process, subjected to criminal background checks by state/federal authorities, that involved fingerprinting and the checking for any outstanding arrest warrants. (Exhibits 4 + 5).

51. No outstanding warrants were found, and Plaintiff Kaul passed all criminal background checks.

52. On February 24, 2021, Plaintiff Kaul filed a lawsuit in the United States District Court for the District of Massachusetts (Kaul v Boston Partners: 21-CV-10326) (K11-2), in which Defendant Christie was charged with, amongst other things, racketeering and violating Plaintiff Kaul's human/civil/constitutional rights.

53. On May 26, 2021, Defendant Christie was served with a copy of the Summons/Complaint at his law office in Morristown, New Jersey.

54. On May 27, 2021, in retaliation for having been sued/served, Defendant Christie, in collusion/conspiracy with persons employed by county and state police agencies, did illegally and without warrants, enter Plaintiff Kaul's place of residence/work and seize his person.

55. The events of the 'Kaul Kidnapping Scheme' are memorialized in a letter filed on May 28, 2021, by Plaintiff Kaul in K11-2 (Exhibit ---) and of note is the fact that no warrant from Mercer County was ever produced, because the indictment was fraudulent, which explains why the Morristown police officers deposited my person at the hospital and left the building.

56. Despite Defendant Christie's illegal scheme to attempt to harass/intimidate Plaintiff Kaul into ceasing his prosecution of The Kaul Cases, which included having local New Jersey police forces harass process servers delivering legal papers to The Kaul Cases Defendants and having a New Jersey deputy attorney general threaten Plaintiff Kaul with arrest if he continued the prosecution, Plaintiff Kaul continued the prosecution.

57. From 2012 onwards, The Kaul Cases Defendants scheme of public corruption/obstruction of justice has involved the corruption of, amongst others, New Jersey based politicians/judges/prosecutors/police.

58. On June 14, 2023, during a police traffic stop in Morristown, Plaintiff Kaul was informed by Defendant Kenneth Murphy and a colleague that there existed a warrant for his arrest from Mercer County, New Jersey.

59. The approximate time from the moment Plaintiff Kaul was stopped to the time he was informed of the warrant was thirty (30) minutes, during which Defendant Murphy/his colleague engaged in conversation with a person/s over the communication system in their car.

60. The conversation was audible to Plaintiff Kaul and involved discussion about the purported Mercer County warrant.

61. When Defendant Murphy/his colleague approached Plaintiff Kaul's car and informed him of the purported Mercer County warrant, Plaintiff Kaul asked if the warrant was related to his child support case, to which Defendant Murphy knowingly misrepresented that it was, when in fact Defendant Murphy knew it pertained to the illegal Mercer County tax indictment.

62. Defendant Murphy knowing that there was no legitimate warrant, did not present Plaintiff Kaul with a copy of the warrant, but instead ordered Plaintiff Kaul to exit the car, which he did.

63. Defendant Murphy denied Plaintiff Kaul's request to call his girlfriend to inform her of the ongoing events and that he would not be meeting her.

64. Defendant Murphy, knowing that there was no legitimate warrant, did conduct a public examination of Plaintiff Kaul's person, in the knowledge that the examination was illegal and constituted a violation of Plaintiff Kaul's human/civil/constitutional rights.

65. Defendant Murphy's public examination was purposed to harass/intimidate/humiliate Plaintiff Kaul, with the by-passing of traffic.

66. Defendant Murphy, knowing that his physical apprehension of Plaintiff Kaul's person was illegal, did then further restrain Plaintiff Kaul's person with handcuffs and place him in the back of his car.

67. Defendant Murphy, knowing that there was no legitimate warrant, did then illegally transport Plaintiff Kaul's person to the Morristown Police Station.

68. Defendant Murphy, knowing that there was no legitimate warrant, and seeking to conceal from public view the illegal transport of Plaintiff Kaul, did enter the police station through a small well hidden rear exit, that bypassed the public booking area into which Plaintiff Kaul had been taken on May 27, 2021.

69. The transport of Plaintiff Kaul in this clandestine manner was consistent with Defendant Murphy's guilty state-of-mind, in knowing that there existed no legitimate arrest warrant, and that his illegal seizure of Plaintiff Kaul's person did willfully and knowingly violate Plaintiff Kaul's human/constitutional/civil rights.

70. Defendant Murphy entered a small bay and walked Plaintiff Kaul from the car down a set of bare concrete steps to a door which opened into a small room, which Defendant Murphy and Plaintiff Kaul entered.

71. At no point in time from the seizure of Plaintiff Kaul's person to his transfer to the US Marshals Service did any police officer or person inform him of his rights or of his right to remain silent.

72. An individual by the name of Underhill appeared, and began questioning Plaintiff Kaul.

73. Plaintiff Kaul was photographed, but not fingerprinted and was then instructed to remove his shoes and placed in a cell in which the temperature was excessively low.

74. Plaintiff Kaul was wearing no socks and after what seemed to be approximately two (2) hours in the cell pressed a communication button on the wall and indicated at a wall camera that he required assistance. His requests were ignored.

75. After what Plaintiff Kaul subsequently surmised was approximately four (4) hours, the door opened and Defendant Murphy and his colleague entered, and informed Plaintiff Kaul that he was to be transferred to the Mercer County Correctional Center.

76. Defendant Murphy and his colleague instructed Plaintiff Kaul to 'put his shoes on' and they then handed him into the custody of two individuals wearing badges and shirts on which were emblazoned words indicating they belonged to a "FUGITIVE" task force of the United States Marshals Service.

77. These individuals instructed Plaintiff Kaul to face the wall, and then proceeded to place a shackling system on his person, in which a wide leather band was placed around his waist to

which was tethered a set of handcuffs that were placed around Plaintiff Kaul's wrists, while attaching a set of cuffs around Plaintiff Kaul's ankles that restrained the motion of his legs.

78. At no point was Plaintiff Kaul permitted to make a telephone call.

79. Plaintiff Kaul was then walked from this underground area back up the bare concrete steps, and into the back seat of a black car with blacked out windows, in which he was restrained with a harness.

80. Plaintiff Kaul was not provided the names of the two individuals wearing insignia from the United States Marshals Service.

81. Plaintiff Kaul was transported from the Morristown Police Station to the Mercer County Correctional Center, with the car reaching speeds of almost 100 mph, causing a travel time of approximately one (1) hour.

82. Plaintiff Kaul's person was seized by Defendant Murphy at approximately 9:30 am EST, and he was transferred into the Mercer County Correctional Center at approximately 2:30 pm EST.

83. Plaintiff Kaul was led from the black car through a door into a small waiting area in which there was sat an African American male, in which there was a one-way mirror, on the other side of which sat a person and in which there was a TV repeating a video regarding the reporting of prison rape.

84. Still cuffed at the wrists/ankles, Plaintiff Kaul sat on a bench for approximately thirty (30) minutes, and was then instructed by a jail officer to enter a processing area, where the cuffs were removed by one of the United States Marshals, an individual in his fifties with dark hair and approximately five feet ten inches and two hundred pounds.

85. As this individual was removing the cuffs, Plaintiff Kaul told him that if he wanted to know who Plaintiff Kaul was that he should go to www.drrichardkaul.com. He repeated this information, and Plaintiff Kaul confirmed its accuracy.

86. Plaintiff Kaul was then moved into another room where he was fingerprinted, placed in prison attire, photographed, and given a blanket, sheet, some slippers, a cup, toothbrush, toothpaste, and deodorant.

87. Plaintiff Kaul was then given directions to the prison cell, it being an enclosed area in which there approximately seventy (75) beds, organized in sets of bunks of three, and in which there were multiple men sleeping on the floor in extremely unhygienic conditions.

88. Plaintiff Kaul's period of illegal detainment was in excess of twenty-four (24) hours.

89. On the morning of Thursday June 15, 2023, at approximately 7 am EST, a person purporting to be a nurse appeared at the cell gates, her appearance was announced by a prison guard and a number of men formed a queue at the gate.

90. Plaintiff Kaul joined this queue, seeking to obtain his blood pressure medications, which he had been prevented from taking the prior day.

91. The purported nurse handed Plaintiff Kaul a small paper cup containing four tablets that did not look like Plaintiff Kaul's usual blood pressure medications.

92. Plaintiff Kaul enquired as to the nature of each tablet, and was informed that the medications were the ones of which he had informed the intake persons.

93. At approximately 9 am EST, the prison guard enquired if Plaintiff Kaul wanted to see the prison psychiatrist, to which he responded in the negative.

94. At approximately 11 am EST, Plaintiff Kaul, along with a group of other men were escorted to the floor on which the medical unit was situated, but because the waiting room was full, Plaintiff Kaul was re-directed to the virtual court room, where he believed he would have an exchange with a judge.

95. Plaintiff Kaul entered an area in which there were several small rooms in which there were phones and telecommunications screens.

96. The prison guard instructed Plaintiff Kaul to enter one of the rooms and pick up the phone, which Plaintiff Kaul did; and a conversation then ensued between Plaintiff Kaul and a person who purported to be a representative of the public defenders office, tasked to ascertain whether Plaintiff Kaul qualified for public defender assistance.

97. This female person asked Plaintiff Kaul a series of questions and concluded that Plaintiff Kaul did qualify for a public defender, although Plaintiff Kaul did neither request nor indeed want a public defender, as he intended on representing himself.

98. At the conclusion of the conversation, Plaintiff Kaul was escorted back to the medical unit and entered into the waiting room, where there were sat approximately twenty (20) men.

99. Approximately fifteen (15) minutes after entering the medical unit, there was an incident in which another man, a rather frail/confused one, had thrown an empty paper cup at the prison guard, which resulted in a number of heavily armed men entering the room, violently apprehending this slightly built/confused individual, and instructing all other men to move into the corridor next to the waiting room.

100. Plaintiff Kaul was subsequently called into see a doctor, who knew of Plaintiff Kaul's physician status, and who stated that it was highly unusual for a physician to be held in the medium-maximum security facility that is the Mercer County Correctional Center.

101. The physician asked Plaintiff Kaul a series of questions pertaining to suicidal ideation, and enquired as to whether Plaintiff Kaul had considered suicide, to which Plaintiff Kaul answered in the negative.

102. The physician responded that professionals of Plaintiff Kaul's age who find themselves held in medium-maximum security facilities are at a very high risk of suicide, and require mental health evaluations.

103. Plaintiff Kaul expressed that he did not have any suicidal ideation, but the physician recommended Plaintiff Kaul be seen by a mental health evaluator.

104. Plaintiff Kaul was then escorted from the medical unit to the mental health evaluation unit, where he entered a room, in which was sat an individual who purported to be a mental health evaluator.

105. This person enquired if Plaintiff Kaul wanted to make a phone call, to which Plaintiff Kaul responded in the affirmative and stated that he wanted to call his lawyer, as he had not been permitted to speak to a lawyer since his arrest by Defendant Murphy.

106. This person stated that Plaintiff Kaul was not permitted to call a lawyer and could only call a "loved one", which Plaintiff Kaul did, and during which he quickly instructed his friend to call Plaintiff Kaul's lawyer.

107. Plaintiff Kaul was then escorted back to the cell area, but approximately thirty (30) minutes later, he was escorted back to the medical unit, where he saw a nurse who presented him with a paper cup containing a large tablet of Librium.

108. Plaintiff Kaul enquired as to why he was being prescribed an anti-psychotic medication that causes mental infirmity in otherwise healthy individuals, to which the evidently nervous nurse answered that it was to mitigate Plaintiff Kaul's symptoms of withdrawal.

109. Plaintiff Kaul stated that he was not experiencing withdrawal from opiate narcotics, as he had never taken any, and did not require a medication such as Librium.

110. The nurse informed Plaintiff Kaul that she had been instructed to have Plaintiff Kaul consume the Librium.

111. Plaintiff Kaul placed the tablet in his mouth, but under his tongue, swallowed some water, and upon re-entering the cell, went to the bathroom area and spat the tablet into the toilet.

112. The nervous nurse failed to inspect Plaintiff Kaul's mouth after he had deposited the tablet.

113. The nervous nurse also, quite accidentally, informed Plaintiff Kaul that he was to be held in the facility for at least thirty (30) days.

114. It became rapidly apparent to Plaintiff Kaul that Defendant Christie's scheme was to have Plaintiff Kaul rendered/labelled mentally incompetent, in order to subsequently use the label against him in Plaintiff Kaul's prosecution of The Kaul Cases and his efforts to have his NJ license reinstated and or procure licenses in other states/countries.

115. It also became apparent to Plaintiff Kaul that Defendant Christie's scheme involved attempting to have Plaintiff Kaul held for as long as possible, with the intention of having him, while in a mentally incapacitated state, physically injured/killed, in order to prevent him from continuing his prosecution of The Kaul Cases by his elimination through either death or severe physical/psychological injury.

116. At approximately 7:30 pm, more than twenty-four (24) hours since the illegal seizure of Plaintiff Kaul's person by Defendant Murphy and without having seen a judge, Plaintiff Kaul was instructed by a prison guard that he was to immediately depart the facility.

117. Plaintiff Kaul was provided no documentation regarding any subsequent legal proceedings pertaining to the fraudulent tax indictment, but was given copies of the traffic tickets from Defendant Murphy, that were issued on June 14, 2023, during and as part of his knowingly illegal seizure of Plaintiff Kaul's person.

118. Plaintiff Kaul was transported from the Mercer County Correctional Center to the center of Trenton, where he was disembarked from the prison van at approximately 9:30 pm.

119. Plaintiff Kaul arrived at his residence at approximately 12:30 am June 16, 2023.

Legal Claims

42 U.S.C. § 1983 – CIVIL ACTION FOR DEPRIVATION OF RIGHTS

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

COUNT ONE

AGAINST DEFENDANTS CHRISTIE/MURPHY

VIOLATION OF PLAINTIFF KAUL'S DUE PROCESS RIGHTS PURSUANT TO THE FIFTH, EIGHT AND FOURTEENTH AMENDMENTS OF THE UNITED STATES CONSTITUTION

121. Plaintiff Kaul incorporates all of the above facts as if re-pled:

122. Defendant Christie, in causing the filing in May 2016 of a knowingly false tax indictment/legal instrument, did, while occupying the Office of the New Jersey Governor, knowingly and with malice, abuse the power of state as a 'state actor'.

123. Defendant Christie, as a 'state actor' did act under color of law in knowing violation of the law and of Plaintiff Kaul's human/constitutional/civil rights.

124. Defendant Christie, as a 'state actor' in knowingly violating the law and Plaintiff Kaul's human/constitutional/civil rights for the purpose of having filed a false criminal charge against Plaintiff Kaul, did knowingly commit a 'Fraud on the Court'.

125. Defendant Christie's commission of crime was committed against Plaintiff Kaul, to whom he caused and continues to cause irreparable injury and insult.

126. Defendant Christie's commission of crime was committed against the process of justice to which he caused and continues to cause irreparable injury and insult.

127. Defendant Christie's commission of crime was committed against the Office of the New Jersey Governor, to which he caused and continues to cause irreparable injury and insult.

128. Defendant Christie's commission of crime was committed against the Office of the New Jersey Attorney General, to which he caused and continues to cause irreparable injury and insult.

129. Defendant Christie's commission of crime was committed against the public, to which he caused and continues to cause irreparable injury and insult.

130. Defendant Christie's commission of crime was motivated by his political ambition to become the 2016 US President.

131. Defendant Christie, in the commission of crime/violation of civil rights, did know he was a 'state actor' engaging in a knowingly illegal conspiracy with other 'state actors' within the Office of the New Jersey Attorney General.

132. Defendant Christie, in the commission of crime/violation of civil rights, did know he was a 'state actor' engaging in a knowingly illegal use of the US wires.

133. Defendant Christie's willful/knowing/malicious deprivation of Plaintiff Kaul's human/constitutional/civil rights caused and continues to cause injury to Plaintiff Kaul, and as such Defendant Christie remains liable to Plaintiff Kaul for compensatory, consequential, and punitive damages.

134. Defendant Murphy, in acting with a knowledge of the illegality of the warrant on June 14, 2023, did so in his capacity as a 'state actor' pursuant to a section 1983 claim.

135. Defendant Murphy, in the knowledge that the warrant was illegal, did, while acting under color of law, knowingly violate Plaintiff Kaul's human/constitutional/civil rights.

136. Defendant Murphy's knowing violation of Plaintiff Kaul's human/constitutional/civil rights were committed through the illegal arrest, imprisonment, and denial of Plaintiff Kaul's request to alert a third party of his whereabouts.

137. Defendant Murphy's illegal seizure of Plaintiff Kaul's person and violation of his rights, while a 'state actor' acting under color of law, has caused him to incur liability pursuant to section 1983.

138. Defendant Murphy, an employee of the Morristown Police Department, did know of the illegal seizure of Plaintiff Kaul's person on May 27, 2021.

139. Defendant Murphy, in the knowledge of the illegality of the May 27, 2021, seizure; the illegality of the warrant and the illegality of the June 14, 2023, seizure, did nonetheless commit these violations of law and Plaintiff Kaul's rights, as he had received orders to do so.

COUNT TWO

AGAINST DEFENDANTS CHRISTIE/MURPHY

**VIOLATION OF PLAINTIFF KAUL'S RIGHT PURSUANT TO THE FOURTH AMENDMENT OF THE
UNITED STATES CONSTITUTION**

140. "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."

141. The conspiracy underpinning, surrounding, and causing the issuance in May 2016 of a fraudulent tax indictment, the illegal seizure of Plaintiff Kaul's person on May 27, 2021, and the illegal seizure of Plaintiff Kaul's person on June 14, 2023, does, pursuant to the doctrine of vicarious liability (SEDIMA, S. P. R. L. v. IMREX CO., INC., ET AL. No. 84-648. 473 U.S. 479 (1985)) confer on Defendant Christie the liability of Defendant Murphy's illegal seizure of Plaintiff Kaul, as if Defendant Christie conducted the illegal seizure himself.

142. Defendant Murphy's June 14, 2023, illegal seizure of Plaintiff Kaul's person, although conducted with a knowing illegality, would never have occurred had Defendant Christie not had issued the May 2016 fraudulent tax indictment.

143. The law prohibits Defendant Murphy from raising a probable cause defense. See Berg v County of Allegheny, 219 F. 3d 261 – Court of Appeals, 3rd Circuit 2000 (Exhibit 3):

144. "The Supreme Court's decision in Whiteley v. Warden, 401 U.S. 560, 91 S.Ct. 1031, 28 L.Ed:2d 306 (1971), as well as our own subsequent decisions, make clear that an erroneously issued warrant cannot provide probable cause for an arrest. In Whiteley, a county sheriff

obtained a warrant for Whiteley's arrest based on a conclusory complaint. Police officers in another jurisdiction arrested Whiteley, discovering evidence later introduced at his trial. The state argued that because the arresting officers were unaware of the defect in the warrant, they had probable cause to arrest whether or not the sheriff did. But the Supreme Court held that the arrest was unconstitutional and ordered the evidence excluded:

Certainly, police officers called upon to aid other officers in executing arrest warrants are entitled to assume that the officers requesting aid offered the magistrate the information requisite to support an independent judicial assessment of probable cause. Where, however, the contrary turns out to be true, an otherwise illegal arrest cannot be insulated from challenge by the decision of the instigating officer to rely on fellow officers to make the arrest." at 270

145. Neither can Defendant Murphy claim the "I was only taking orders" defense, a defense debunked at the Nuremberg Trials.

146. Defendant Murphy's illegal seizure of Plaintiff Kaul was made without probable cause, as Defendant Murphy knew the tax indictment related warrant was illegal, but for reasons of professional advancement entered into the conspiracy formed on May 26/27, 2021, between Defendant Christie and the Morristown Police Department.

147. Further substantiating Defendant Murphy's defenseless position is the fact that he, upon communicating with persons at the Morristown Police Department, knew that the May 27, 2021, seizure of Plaintiff Kaul's person was illegal

148. Further substantiating Defendant Murphy's defenselessness is the fact that he, upon communicating with persons at the Morristown Police Department, knew that the illegal May 27, 2021, seizure of Plaintiff Kaul's person was a retaliatory act initiated/orchestrated by Defendant Christie in an attempt to harass/intimidate/injure/kill Plaintiff Kaul, in order to cause him to cease his prosecution of The Kaul Cases Defendants.

149. Defendant Murphy, with this information in mind, knew that the law prohibited him from seizing Plaintiff Kaul's person, and thus he is without any defense as to his knowingly illegal seizure of Plaintiff Kaul's person.

COUNT THREE

AGAINST DEFENDANTS CHRISTIE/MURPHY

42 U.S.C. § 1985 (3) – CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS

150. "If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators."

151. The conspiracy that commenced against Plaintiff Kaul did so in approximately 2005/2006, when Plaintiff Kaul invented and successfully performed the first percutaneous minimally invasive outpatient spinal fusion.

152. From 2005/2206 this conspiracy has expanded to include, amongst others, the Morristown Police Department, which did knowingly enter the conspiracy on May 26/27, 2021, upon the encouragement by Defendant Christie of senior persons within the department.

153. Within the conspiracy there was an agreement, both tacit and explicit, that the successful execution of the scheme to eliminate Plaintiff Kaul (jail/suicide/murder) would require his civil rights be violated.

154. Defendants Christie and his co-conspirators at the Morristown Police Department knew that the willful violation of Plaintiff Kaul's civil rights constituted a felony, but did nonetheless attempt to perpetrate the scheme in the belief that Plaintiff Kaul would be eliminated on May 27, 2021, by having him transferred to the Mercer County Correctional Center, where he was to be seriously injured/killed, in order to render him unable to continue his prosecution of The Kaul Cases.

155. The conspiracy to violate Plaintiff Kaul's civil rights continued from the Morristown Police Department to the United States Marshals Service and into the Mercer County Correctional Center, where the scheme, for which Defendants Christie/Murphy, and in fact all of The Kaul Cases Defendants, pursuant to RICO's vicarious liability doctrine, are liable, involved an attempt to use anti-psychotics to render Plaintiff Kaul mentally infirm, psychiatrically labelled, susceptible to serious injury/death, in order to effectively eliminate his right to life and to actually eliminate Plaintiff Kaul.

156. It has become all but impossible to place a lead bullet in Plaintiff Kaul's head (that opportunity was lost in 2021) and so the schemes now involve pharmacological bullets.

Relief

1. Injunctive relief prohibiting any persons/agencies that either are or ever have been associated/contracted/employed/otherwise related to any legal elements/agencies of the State of New Jersey/its counties and or their agents from any further attempts at harassment/intimidation/interference with the person and rights of Plaintiff Kaul.
2. Compensatory/Consequential/Punitive relief in the amount of five hundred million dollars (\$500,000,000).
3. An order to Defendant Christie that he is to disseminate to all state agencies/courts/judges the above judgments.

Conclusion

K11-15 represents an unhinged escalation of force that constitutes further conclusive evidence of the guilt of The Kaul Cases Defendants, to a criminal standard. This evidence will be submitted into K11-14 in support of motions for Summary Judgment.

The State of New Jersey is a Defendant in K11-5 (India), and the Indian Government is now appraised of the events/facts of this case and others.

Plaintiff Kaul respectfully informs this Court that its inaction in October 2016 regarding Plaintiff Kaul's request for a TRO/PI and subsequent obstruction of Plaintiff Kaul's efforts at prosecuting The Kaul Cases are partially responsible for the events of May 27, 2021/June 14, 2023, and should Plaintiff Kaul be injured/'suicided'/'murdered', the Indian Government will demand The Kaul Cases Defendants be brought to justice in the US, and will exercise its power over American citizens/corporations in India.

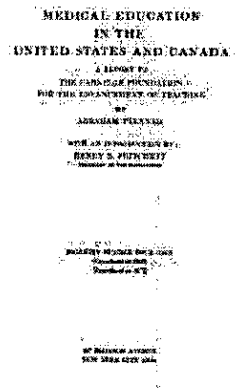
Dated: July 27, 2023


RICHARD ARJUN KAUL, MD

Flexner Report

The *Flexner Report*^[1] is a book-length landmark report of medical education in the United States and Canada, written by Abraham Flexner and published in 1910 under the aegis of the Carnegie Foundation. Many aspects of the present-day American medical profession stem from the *Flexner Report* and its aftermath. The Flexner report has been criticized for introducing policies that encouraged systemic racism.^{[2][3][4]}

The *Report*, also called Carnegie Foundation Bulletin Number Four, called on American medical schools to enact higher admission and graduation standards, and to adhere strictly to the protocols of mainstream science in their teaching and research. The report talked about the need for revamping and centralizing medical institutions. Many American medical schools fell short of the standard advocated in the *Flexner Report* and, subsequent to its publication, nearly half of such schools merged or were closed outright. Colleges in electrotherapy were closed.



The title page for the Flexner Report

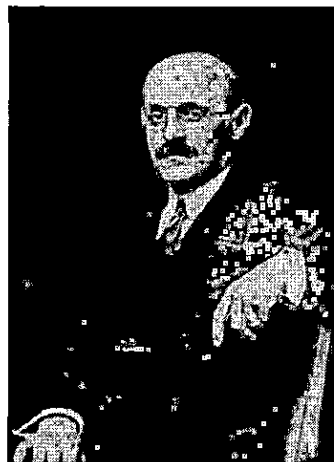
Homeopathy, traditional osteopathy, eclectic medicine, and physiomedicalism (botanical therapies that had not been tested scientifically) were derided.^[5]

The Report also concluded that there were too many medical schools in the United States, and that too many doctors were being trained. A repercussion of the *Flexner Report*, resulting from the closure or consolidation of university training, was the closure of all but two "negro" medical schools and the reversion of American universities to male-only admittance programs to accommodate a smaller admission pool. Universities had begun opening and expanding female admissions as part of women's and co-educational facilities only in the mid-to-latter part of the 19th century with the founding of co-educational Oberlin College in 1833 and private colleges such as Vassar College and Pembroke College.

Background

In 1904, the American Medical Association (AMA) created the Council on Medical Education (CME),^[6] whose objective was to restructure American medical education. At its first annual meeting, the CME adopted two standards: one laid down the minimum prior education required for admission to a medical school; the other defined a medical education as consisting of two years training in human anatomy and physiology followed by two years of clinical work in a teaching hospital. Generally speaking, the council strove to improve the quality of medical students, looking to draw from the society of upper-class, educated students.^[7]

In 1908, seeking to advance its reformist agenda and hasten the elimination of schools that failed to meet its standards, the CME contracted with the Carnegie Foundation for the Advancement of Teaching to survey American medical education. Henry Pritchett, president of the Carnegie Foundation and a staunch advocate of medical school reform, chose Abraham Flexner to conduct the survey. Neither a physician, a scientist, nor a medical educator, Flexner held a Bachelor of Arts degree and operated a for-profit school in Louisville, Kentucky.^[8] He visited every one of the 155 North American medical schools then in operation, all of which differed greatly in their curricula, methods of assessment, and requirements for admission and graduation. Summarizing his findings, he wrote:^[9]



Abraham Flexner

Each day students were subjected to interminable lectures and recitations. After a long morning of dissection or a series of quiz sections, they might sit wearily in the afternoon through three or four or even five lectures delivered in methodical fashion by part-time teachers. Evenings were given over to reading and preparation for recitations. If fortunate enough to gain entrance to a hospital, they observed more than participated.

The Report became notorious for its harsh description of certain establishments, describing Chicago's fourteen medical schools, for example, as "a disgrace to the State whose laws permit its existence . . . indescribably foul . . . the plague spot of the nation." Nevertheless, several schools received praise for excellent performance, including Western Reserve (now Case Western Reserve), Michigan, Wake Forest, McGill, Toronto, and particularly Johns Hopkins, which was described as the 'model for medical education'.^[10]

Recommended changes

To help with the transition and change the minds of other doctors and scientists, John D. Rockefeller gave many millions to colleges, hospitals and founded a philanthropic front group called "General Education Board" (GEB).^[11]

When Flexner researched his report, many American medical schools were small "proprietary" trade schools owned by one or more doctors, unaffiliated with a college or university, and run to make a profit. A degree was typically awarded after only two years of study with laboratory work and dissection optional. Many of the instructors were local doctors teaching part-time. Regulation of the medical profession by state governments was minimal or nonexistent. American doctors varied enormously in their scientific understanding of human physiology, and the word "quack" was in common use.

Flexner carefully examined the situation. Using the Johns Hopkins School of Medicine as the ideal,^[12] he issued the following recommendations:^[13]

1. Reduce the number of medical schools (from 155 to 31) and the number of poorly trained physicians;
2. Increase the prerequisites to enter medical training;
3. Train physicians to practice in a scientific manner and engage medical faculty in research;
4. Give medical schools control of clinical instruction in hospitals
5. Strengthen state regulation of medical licensure

Flexner expressed that he found Hopkins to be a "small but ideal medical school, embodying in a novel way, adapted to American conditions, the best features of medical education in England, France, and Germany." In his efforts to ensure that Hopkins was the standard to which all other medical schools in the United States were compared, Flexner went on to claim that all the other medical schools were subordinate in relation to this "one bright spot."^[14] Flexner believed that admission to a medical school should require, at minimum, a high school diploma and at least two years of college or university study, primarily devoted to basic science. When Flexner researched his report, only 16 out of 155 medical schools in the United States and Canada required applicants to have completed two or more years of university education.^[15] By 1920, 92 percent of U.S. medical schools required this of applicants. Flexner also argued that the length of medical education should be four years, and its content should be what the CME agreed to in 1905. Flexner recommended that the proprietary medical schools should either close or be incorporated into existing universities. He stated that medical schools needed be part of a larger university since a proper stand-alone medical school would have to charge too much in order to break even financially.

Less known is Flexner's recommendation that medical schools appoint full-time clinical professors. Holders of these appointments would become "true university teachers, barred from all but charity practice, in the interest of teaching." Flexner pursued this objective for years, despite widespread opposition from existing medical faculty.

Flexner was the child of German immigrants, and had studied and traveled in Europe. He was well aware that one could not practice medicine in continental Europe without having undergone an extensive specialized university education. In effect, Flexner demanded that American medical education conform to prevailing practice in continental Europe.

By and large, medical schools in Canada and the United States followed many of Flexner's recommendations. However, schools have increased their emphasis on matters of public health.

Consequences of the report

Many aspects of the medical profession in North America changed following the *Flexner Report*. Medical training adhered more closely to the scientific method and became grounded in human physiology and biochemistry. Medical research aligned more fully with the protocols of scientific research.^[16] Average physician quality significantly increased.^[13]

Medical school closings

Flexner sought to reduce the number of medical schools in the US.^[17] A majority of American institutions granting MD or DO degrees as of the date of the Report (1910) closed within two to three decades. (In Canada, only the medical school at Western University was deemed inadequate, but none was closed or merged subsequent to the Report.) In 1904, there were 160 MD-granting institutions with more than 28,000 students. By 1920, there were only 85 MD-granting institutions, educating only 13,800 students. By 1935, there were only 66 medical schools operating in the US.

Between 1910 and 1935, more than half of all American medical schools merged or closed. The dramatic decline was in some part due to the implementation of the Report's recommendation that all "proprietary" schools be closed and that medical schools should henceforth all be connected to universities. Of the 66 surviving MD-granting institutions in 1935, 57 were part of a university. An important factor driving the mergers and closures of medical schools was that all state medical boards gradually adopted and enforced the Report's recommendations. In response to the Report, some schools fired senior faculty members as part of a process of reform and renewal.^[18]

Impact on African-American doctors and patients

The Flexner report has been criticized for introducing policies that encouraged systemic racism^{[2][3][19][20]} and sexism.^[4]

Flexner advocated closing all but two of the historically black medical schools. As a result, only Howard University College of Medicine and Meharry Medical College were left open, while five other schools were closed. Flexner's view was that black doctors should treat only black patients and should play roles subservient to those of white physicians. The closure of the five schools, and the fact that black students were not admitted to many U.S. medical schools for the next 50 years, has contributed to the low numbers of American-born physicians of color, and the ramifications are still felt more than a century later.^[21]

Flexner's findings also restricted opportunities for African-American physicians in the medical sphere. Even the Howard and Meharry schools struggled to stay open following the Flexner Report, having to meet the institutional requirements of white medical schools, reflecting a divide in access to health care between white and African-Americans. Following the Flexner Report, African-American students sued universities, challenging the precedent set by Plessy v. Ferguson. However, those students were met by opposition from schools, who remained committed to segregated medical education. It was not until 15 years after Brown v. Board of Education in 1954 that the AAMC ensured access to medical education for African-Americans and minorities by supporting the diversification of medical schools.^[22]

Along with his adherence to germ theory, Flexner argued that, if not properly trained and treated, African-Americans posed a health threat to middle and upper-class whites.^[23]

"The practice of the Negro doctor will be limited to his own race, which in its turn will be cared for better by good Negro physicians than by poor white ones. But the physical well-being of the Negro is not only of moment to the Negro himself. Ten million of them live in close contact with sixty million whites. Not only does the Negro himself suffer from hookworm and tuberculosis; he communicates them to his white neighbors, precisely as the ignorant and unfortunate white contaminates him. Self-protection not less than humanity offers weighty counsel in this matter; *self-interest seconds philanthropy*. The Negro must be educated not only for his sake, but for ours. He is, as far as the human eye can see, a permanent factor in the nation."^[23]

The view that Flexner and his report were detrimental to Black medical schools is largely refuted by Thomas N. Bonner, a scholar referred to as a "distinguished historian" by the AAMC. Bonner contended that Flexner worked to save the two Black medical schools that were graduating most of the Black physicians at that time.^[24]

Impact on alternative medicine

When Flexner researched his report, "modern" medicine faced vigorous competition from several quarters, including osteopathic medicine, chiropractic medicine, electrotherapy, eclectic medicine, naturopathy, and homeopathy.^[25] Flexner clearly doubted the scientific validity of all forms of medicine other than that based on scientific research, deeming any approach to medicine that did not advocate the use of treatments such as vaccines to prevent and cure illness as tantamount to quackery and charlatanism. Medical schools that offered training in various disciplines including electromagnetic field therapy, phototherapy, eclectic medicine, physiomedicalism, naturopathy, and homeopathy, were told either to drop these courses from their curriculum or lose their accreditation and underwriting support. A few schools resisted for a time, but eventually most complied with the Report or shut their doors.^[26]

Impact on osteopathic medicine

Although almost all the alternative medical schools listed in Flexner's report were closed, the American Osteopathic Association (AOA) brought a number of osteopathic medical schools into compliance with Flexner's recommendations to produce an evidence-based practice. The curricula of DO- and MD-awarding medical schools are now nearly identical, the chief difference being the additional instruction in osteopathic schools of osteopathic manipulative medicine.

Impact on role of physician

The vision for medical education described in the Flexner Report narrowed medical schools' interests to disease, and not on the system of health care or society's health beyond disease. Preventive medicine and population health were not considered a responsibility of physicians, bifurcating "health" into two separate fields: scientific medicine and public health.^[27]

See also

- Committee of Ten

References

1. Flexner, Abraham (1910), *Medical Education in the United States and Canada: A Report to the Carnegie Foundation for the Advancement of Teaching* (http://archive.carnegiefoundation.org/publications/pdfs/eilibrary/Carnegie_Flexner_Report.pdf) (PDF), Bulletin No. 4., New York City: Carnegie Foundation for the Advancement of Teaching, p. 346, OCLC 9795002 (<https://www.worldcat.org/oclc/9795002>), retrieved August 22, 2021
2. Laws, Terri (2021-03-01). "How Should We Respond to Racist Legacies in Health Professions Education Originating in the Flexner Report?" (<https://journalofethics.ama-assn.org/article/how-should-we-respond-racist-legacies-health-professions-education-originating-flexner-report/2021-03>). *AMA Journal of Ethics*. 23 (3): 271–275. doi:10.1001/amajethics.2021.271 (<https://doi.org/10.1001%2Famajethics.2021.271>). ISSN 2376-6980 (<https://www.worldcat.org/issn/2376-6980>). PMID 33818380 (<https://pubmed.ncbi.nlm.nih.gov/33818380>). S2CID 233028996 (<https://api.semanticscholar.org/CorpusID:233028996>).
3. Wright-Mendoza, Jessie (2019-05-03). "The 1910 Report That Disadvantaged Minority Doctors" (<https://daily.jstor.org/the-1910-report-that-unintentionally-disadvantaged-minority-doctors/>). *JSTOR Daily*. Retrieved 2022-05-01.
4. Redford, Gabrielle (November 17, 2020). "AAMC renames prestigious Abraham Flexner award in light of racist and sexist writings" (<https://www.aamc.org/news-insights/aamc-renames-prestigious-abraham-flexner-award-light-racist-and-sexist-writings>). *AAMC*. Retrieved 2022-05-01.
5. Flexner, Abraham. "Abraham Flexner's View of Homeopathic Schools: An Excerpt from the Flexner Report (1910)" (<https://www.homeowatch.org/history/flexner.html>). *HomeoWatch. Quackwatch*. Retrieved 11 June 2019.

**UNITED STATES
POSTAL SERVICE®**

**PRIORITY®
MAIL**

Delivery date specified for domestic use.
Shipments include \$100 of insurance (restrictions apply).
Priority Mail® service included for domestic and many international destinations.
International insurance.**
Internationally, a customs declaration form is required.
Does not cover certain items. For details regarding claims
see Domestic Mail Manual.

FROM:

RUN
6 NO P
N+AC

United States Courts
Southern District of Texas
FILED

AUG 26 2024

Nathan Ochsner, Clerk of Court

UNITED S
515 RUS
HOUSTON M

VISIT
ORDER

UNITED STATES POSTAL SERVICE®		Retail	
P	US POSTAGE PAID		Origin: 10994
	\$22.95		08/22/24 3592300129-8
PRIORITY MAIL®			
8 Lb 10.8 Oz		RDC 03	
EXPECTED DELIVERY DAY: 08/24/24			
SHIP TO:		C057	
515 RUSK ST			
HOUSTON TX 77002-2600			
USPS SIGNATURE® TRACKING #			
			
9510 8132 2441 4235 4577 54			
			

For Domestic shipments, the maximum weight is 70 lbs. For international shipments, the maximum weight is 20 lbs.

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

RICHARD ARJUN KAUL, MD

(b) County of Residence of First Listed Plaintiff NEW YORK (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

PROPRIA PERSONA PLAINTIFF

DEFENDANTS

FEDERATION STATE MEDICAL BOARDS, JAMES HOWARD SOI OMON FT AI

County of Residence of First Listed Defendant TARRANT COUNTY, TX (IN U.S. PLAINTIFF CASES ONLY)

United States Courts Southern District of Texas IN TEXAS LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

FILED

AUG 26 2024

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF, DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, INTELLECTUAL PROPERTY RIGHTS, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): RICO/SECTION 1983. Brief description of cause: DEFENDANTS ONGOING VIOLATIONS OF RICO AND PLAINTIFF'S CIVIL RIGHTS CONTINUE TO CAUSE PLAINTIFF ONGOING/NEW INJUR

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ MORE THAN \$75,000. CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE JEFFREY BROWN/ANDREW EDISON DOCKET NUMBER 3:24-CV-00163

DATE SIGNATURE OF ATTORNEY OF RECORD

July 11, 2024 August 22, 2024 R.K.

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE