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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**

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SONY PRO SEC 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

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(1)

## Cornyn, Coons Bill to Apply STOCK Act Requirements to Federal Judges Signed Into Law

In: All News (/newsroom) Posted 05/13/2022

Share: **f** ([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)

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[requirements-federal-judges-signed-law](https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-act-requirements-federal-judges-signed-law) **t** ([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+Sign](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)

[ed+Into+Law&url=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-](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)

[act-requirements-federal-judges-signed-law](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) **m** ([mailto:?subject=Cornyn, Coons Bill to Apply](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)

[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-](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)

[requirements-federal-judges-signed-law](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))

*"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

## **Exhibit 2**

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January 20, 2021

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Senator Ted Cruz  
Russell Senate Office Building, 404  
Washington, DC 20510

Re: **The Kaul Cases**  
**Obstruction of Justice**

**The Kaul Cases:**

K1 - Kaul v Christie: 16-CV-02364  
K2 - Kaul v Christie: 18-CV-08086  
K3 - Kaul v Schumer: 19-CV-13477  
K4 - Kaul v Stolz: 18-CV-01489  
K5 - Kaul v Federation: 20-CV-18853  
K6 - State criminal indictment v. Defendant Andrew Gregory Kaufman, MD  
K7 - Kaul v Federation: 20-CV-01612  
K11-1 - Kaul v Federation: 21-CV-00057  
K11-2 - Kaul v Kolodny: Docket No. Pending  
P1 - Kaul/Patel v Allstate: 19-CV-08946  
P2 - Kaul/Patel v State of New Jersey/Crist: 19-CV-09232

Dear Senator Cruz,

I write this letter with the greatest respect for the public office you currently occupy, but with a realization that the political body in America has become completely corrupted by for-profit corporations. Politicians within American federal/state governments are no longer servants of the public, but are slaves of these corporations. Companies that metaphorically rape the the American public in their ruthless pursuit of profit.

I write this letter to alert you to the above matters and to the fact that the Defendants or agents representing the Defendants will attempt to have you abuse your political power to obstruct my prosecution of The Kaul Cases. The legal/political bodies in America are

interminably intertwined and when quasi-criminal cases that involve senior members of either party, Democratic/Republican, are filed, cases that expose the rampant corporate corruption of American politics. there is a 'closing of ranks'. Money trumps political partisanship, and in these cases, one of which involves Defendant/Senator Cory Booker, Defendant/Senate Majority Leader Charles E. Schumer and Defendant/NJ Senate President Steven Sweeney, the risk of political interference is certain. All of these Defendants have been bribed by the health insurance/banking/hospital/medical industries, of which the Defendants are members. I am sure this is not news to you.

I write this letter to respectfully request that by February 2, 2021 you confirm that neither you nor any agents acting under your instruction, have interfered in any of The Kaul Cases, with the intent of obstructing my prosecution of the cases. Interference for the purposes of this letter is defined as:

Any form of digital/non-digital communication, including face-face meetings, in which the Defendants either bribed/promised to bribe you as part of a quid pro quo scheme, to have you abuse your political power to obstruct justice in The Kaul Cases.

Please submit this confirmation to drrichardkaul@gmail.com, by signing/dating the bottom of this letter.

I believe it is important you understand that the corruption of government by for-profit healthcare corporations continues to seriously injure the psychological/physical welfare of the American people. The highest COVID-19 related mortality/morbidity in the western world, the so called "**opiate epidemic**" and now the "**pain epidemic**" are but three (3) lethal consequences of this corruption. America was founded by men of principle, who dreamed of a country that would serve its people. Many Americans have given their lives to protect this dream. Please don't betray these souls by being involved in any of the Defendants' schemes, to prevent me from prosecuting the Defendants to the fullest extent of the law. I have given my word that ninety percent (90%) of the monies procured will be used to establish educational and healthcare programs (copy enclosed).

Finally, I quote the closing paragraph from DEADLY SPIN: AN INSURANCE COMPANY INSIDER SPEAKS OUT ON HOW CORPORATE PR IS KILLING HEALTH CARE AND DECEIVING AMERICANS By Wendell Potter - Bloomsbury Press:

**"I believe that one day the United States really will have one of the finest and most equitable health care systems in the world, and that insurance companies**



**[Defendant Allstate/Geico] and banks [Defendant TD] and oil companies - in fact, all big corporations - will ultimately become more socially responsible.**

**People will demand it. It will take time and vigilance, but we can force even the biggest and most powerful corporations to be more honest and transparent in the way they do business and in the way they treat us, their customers, and in the way they treat the planet.**

**We will never be free of spin, but we can be wise to it, and we can push back against it. There is too much at stake not to try."** Page 248

I urge you to read this book.

The outcome of The Kaul Cases (Kaul v Kolodny/Boston Partners Corporation-K11-2 to be filed on February 2, 2021) has consequences for the lives of millions of Americans and thousands of members of the American medical profession. As importantly, however, it has consequences for America's global position. The Roman Empire fell from within, as will America, if the cancer of corporate corruption is not eradicated. Waiting at the gate is China. As a citizen of India, a country that has since independence in 1947 fought three (3) wars with China, I can tell you that a world ruled by the Chinese is not one we want. My father was a wing commander in the Indian Air Force in the 1962 conflict.

The Kaul Cases, for many reasons, are of immense public interest, and thus this letter will be made public. I believe it is important the people know if you are a public servant or a corporate slave, in order they be informed as to whom deserves their vote. The letter will be publicized on February 2, 2021.

I look forward to your response. If however, I receive no response, I will conclude you have conspired/are conspiring with the Defendants/agents to obstruct my prosecution of The Kaul Cases. This evidence will then be submitted to the state/federal prosecutorial/investigatory authorities in support of letters about to come into their possession. The evidence will also be submitted to members of the S/P 500.

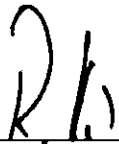
The Kaul Cases do indeed make the case for the emergent need for political campaign finance reform in the United States. Political corruption kills, and four hundred thousand (400,000) COVID related deaths are proof beyond not just any reasonable doubt, but beyond ANY doubt.

Please find enclosed a copy of a letter I sent you, in or around March 22, 2019, the subject matter of which is:

**“Senator Charles Schumer + Political interference in judicial process”**

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Yours sincerely



Richard Arjun Kaul, MD

cc: All Counsel of record via email  
All parties with a legal or other interest  
U.S.C.A. for the Third Circuit  
U.S.C.A. for District of Columbia  
U.S.C.A. for the Fifth Circuit  
NYSE  
All US Senators/Congressmen

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Senator Ted Cruz

## **Exhibit 3**

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May 9, 2019

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

2019 JUN -3 P 2:45

DR. HARSHAD PATEL  
3725 GEORGE BUSBEE PARKWAY  
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[Harshadpatel0111@gmail.com](mailto:Harshadpatel0111@gmail.com)

RICHARD ARJUN KAUL, MD  
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201 989 2299  
[drrichardkaul@gmail.com](mailto:drrichardkaul@gmail.com)

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

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

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

Dear Judge Linares,

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

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

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

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

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

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

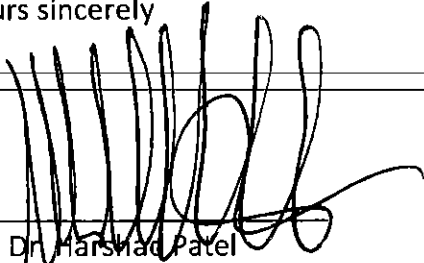
In full recognition of your esteemed position within the judicial body of the United States of America, and of your purpose to do justice, we assert that because of the "**politico-legal**" nexus that undeniably connects the federal judiciary with the body politic, it would not serve the interests of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

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

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

We thank you for your attention to this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dr. Harshad Patel', written over a horizontal line.

Dr. Harshad Patel

cc: All Counsel of record  
Clerk of the Court

*R. Kaul*

Richard Arjun Kaul, MD

May 9, 2019

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

2019 MAY 10 P 4: 20

RICHARD ARJUN KAUL, MD  
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201 989 2299  
drichardkaul@gmail.com

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

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

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

## **Exhibit 4**

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

May 5, 2022

Jose L. Linares  
McCarter & English  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102

Re: **Kaul v ICE: 21-CV-06992**  
**K11-7**  
**NOTICE OF PRESERVATION**

Dear Mr. Linares,

Please accept this letter as NOTICE OF PRESERVATION of all digital and non-digital information that relates, pertains, refers or is any way associated with any of the evidence, facts, arguments, and persons identified in the above case, and IN THE MATTER OF THE SUSPENSION OR REVOCATION OF LICENSE OF RICHARD A. KAUL, MD OAL DOCKET NO. BDS 08959-2012N.

K11-7 is found at:

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

For your information, please also find emailed the K11-7 file.

Yours sincerely



\_\_\_\_\_  
RICHARD ARJUN KAUL, MD