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November 11th 2015

International Criminal Court
Information and Evidence Unit
Office of the Prosecutor
Post Office Box 19519
2500 CM The Hague
The Netherlands

Re: Supply of chemical weapon precursors by New Jersey Governor, Christopher J. Christie, to Syrian rebel forces between 2012-2013.

Dear Sir/Madam

My name is Richard Arjun Kaul. I am a permanent resident of the United States, a citizen of India, and a British-trained physician. I was born in India on 5 November 1964, trained in medicine at the Royal Free Hospital, in London, graduating in July 1988. I underwent post-graduate training in both the UK and the USA and have worked in New Jersey, USA since 2001.

I wish to file a formal criminal complaint against Christopher J. Christie, the Governor of the State of New Jersey, USA. Mr. Christie also occupied the position of US Attorney for the federal district of New Jersey. He was appointed to this position by President George W Bush in 2000 and served till 2008, a period which covered the Iraq War.

I believe that between 2012-2013 Christopher J. Christie was involved in the sale of chemical weapon precursors from Dupont Pharmaceuticals in Pompton Lakes, New Jersey, USA to Syrian rebel forces. Mr. Christie knew, or should have known, that the chemicals would be used for the manufacture of weapons or the means of causing death and injury in the war in Syria and should therefore be held criminally liable for his role in this crime against humanity.

Legal statute

This complaint is filed under Article 7, Section 1, paragraph (b) of the Rome Statute of the International Criminal Court:

Crimes against humanity

1. For the purpose of this Statute, "crime against humanity" means any of the following acts when committed as part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack:
 - (b) Extermination.

Information

In 2007 I established a medical practice in Pompton Lakes, New Jersey, and between April 2012 and April 2013 I gathered the information on which this complaint is based, through direct interactions with the following parties :

1. **Kenneth Hollenbeck**- a New Jersey Republican attorney with Scarinci + Hollenbeck, who had close political/business ties with Christie; and **Frank Bruneti**, an associate at this law firm who had been retained by me to provide legal advice on taxation.

2. **Boruch Freedman**, a New York/New Jersey businessman/arms dealer. Originally from ex-soviet bloc republic, Bukhara rented my house in Manhattan in 2012 and also a client of Scarinci + Hollenbeck
3. **Christopher J.Christie**, New Jersey governor- Please see attached documents.
4. **CCPL**, an environmental protection group, based in Pompton Lakes, New Jersey, which Christie silenced with false promises to clean their chemically polluted land. They provided information about the sale by DuPont of the chemical precursors and of Christie's involvement in this.

Information about Freedman's involvement in dealing arms, was given to me by the real estate broker, **Gordon Sokich**. Freedman is a Bukharan Jew and at the time he rented the house was married with three children. Freedman was particularly concerned about the security system in the house at the time of renting. It also turned out that Freedman and I were clients of the same New Jersey law firm, Scarinci and Hollenbeck, which meant that the firm could represent neither of us during the rental transaction.

In early 2013 Kenneth Hollenbeck, one of the senior partners in the law firm, voluntarily made the following statement during a meeting we had in the conference room at his Lyndhurst office " **Boruch Freedman tells us he is an avionics dealer** ". I specifically remember thinking it strange that an attorney should discuss another client's privileged conversation with me, particularly in regards to such sensitive information. Additionally when Hollenbeck made the comment he seemed visibly agitated. I believe that Hollenbeck was concerned that I would make the connection between Christie and the chemical weapon precursors sent to Syria.

Hollenbeck is a New Jersey republican who has many close political and business ties with the current governor, Christopher J Christie. DuPont pharmaceuticals, which manufactures the chlorine based products used in chemical weapons, is located in Pompton Lakes, New Jersey, also the location of my medical practice, where Christie devoted a disproportionate amount of his time in 2012-2013 despite its relatively small voting relevance.

I believe that it is significant that, in 2013, when chemical weapons were used in Syria neither Christie nor the New Jersey appointed senator, Jeffrey Chiesa, made any public comment denouncing the act unlike every other American politician, including New Jersey Senator **Robert Menendez**, who was openly critical particularly in the light of New Jersey's large Syrian population. I believe that Christie's involvement with Hollenbeck and Freedman in the sale of chemical weapon precursors from New Jersey based DuPont Pharmaceuticals to Syrian intermediaries could explain this and should be investigated.

I believe that the chemical components were labeled as fertilizers when they were shipped from Port Newark, New Jersey to the Port of Aqaba in Jordan. Christie met with King Addullah both before and after the shipment took place. The chemicals were then transported on the Hejaz Railway to a storage facility just outside Damascus where they were combined with components brought in by Freedman from Bukhara. The resulting Mustard gas and Sarin were then sold to rebel forces. I believe that the Assad regime were already in possession of significant stockpiles of these chemicals and therefore had no need to purchase them. In an article in 2013, Robert Fisk of the London Independent made a statement that the chemical weapon precursors were manufactured in New Jersey. I believe that the chemical plants, involved, belonged to DuPont pharmaceuticals and that refineries in Elizabeth, New Jersey were used to package the chlorine-based components before they were shipped to the Port of Aqaba in Jordan.

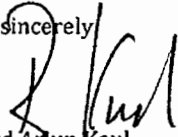
Conclusion

I believe the evidence detailed in this matter will prove that Mr.Christie is guilty of the stated crime and I hope the International Criminal Court will deem it worthy of further investigation.

Sworn to and subscribed
before me this

14th day of Nov. 2015

Yours sincerely,



Richard Arjun Kaul

LORRAINE THOMPSON
NOTARY PUBLIC OF NEW JERSEY
Commission No. 2263486
My Commission Expires Sept. 21, 2020



cc:

Barack Obama,
President of America,
The White House,
1600 Pennsylvania House NW,
Washington, DC 20500,
United States.

David Cameron,
British Prime Minister,
10 Downing Street,
London SW1 2AA,
United Kingdom.

Jeremy Corbyn MP,
House of Commons,
London SW1A 0AA
United Kingdom.

Robert Fisk,
The London Independent,
2 Derry Street,
London W8 5HF,
United Kingdom.

Vladimir Putin,
President of Russia
23 Ilyinka Street,
Moscow, 103132
Russia.

Bashar Assad,
President of Syria
Damascus,
Syria

Narendra Modi,
Indian Prime Minister,
Panchavati,
7, Race Course Road,
New Delhi,
India.