KAUL v. SCHUMER
K11-25

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiff

v.

CHARLES E. SCHUMER ;
JANE DOE; JOHN DOE

Defendant

CIVIL ACTION.:

COMPLAINT

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THE WITHIN REFERENCED KAUL CASES

K1: KAUL v CHRISTIE: 16-CV-02364-CLOSESD – PRE SCOTUS JARKESY

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

K11-2: KAUL v BOSTON PARTNERS ET AL: 21-CV-10326-CLOSED – PRE SCOTUS JARKESY

K11-7: KAUL v ICE ET AL: 21-CV-6992-CLOSED – PRE SCOTUS JARKESY

K11-19: KAUL v TEXAS MEDICAL BOARD ET AL: 24-CV-00163-CLOSED – PRE SCOTUS JARKESY

K11-20: KAUL v FEDERATION: 24-CV-03180-CLOSED – POST SCOTUS JARKESY

K11-23: KAUL v OETKEN ET AL: 24-CV-00621-OPEN – POST SCOTUS JARKESY

K11-24: KAUL v FEDERATION: 25-CV-25 –CLOSED- POST SCOTUS JARKESY

PRELIMINARY STATEMENT

1. A lot of once-purposefully hidden facts and truth of high crime can, with a resolute doggedness, a steely and immutable conviction of the truth and divine intervention, cause a holding to criminal account of the perpetrators of those crimes. Crimes, many of which, were and are crimes against humanity and crimes committed with a malicious knowingness, an utter disregard for the lives of millions of Americans and crimes engineered in the cold heartless administrative bureaucracy of state/federal agencies purposed to help humanity.

2. Crimes, the conspiracy and perpetration of which were engineered with a 'killing machine' like efficiency, the sole purpose of which was the furtherance of massive schemes of knowingly illegal profiteering by certain unprecedentedly corrupted state/federal politicians and ruthless publicly traded for profit corporations.

3. Corporations with whose executives/shareholders these criminally corrupted politicians perpetrated for over two (2) decades, **"patterns of racketeering"** by/through/within the executive/legislative/judicial branches of the United States of America (state/federal) and the governments of those foreign countries whose leaders were bribed and who participated in global kickback schemes, that involved the theft of billions of dollars from the American treasury.

4. The billions in kickbacks were funneled through off-shore financial vehicles and 'shell 'corporations into the possession of these corrupted politicians/judges/legislators, in both state and federal government.

5. In the period from 2005 to 2025, Plaintiff Kaul has, through **The Kaul Cases** (2016-2025), been submitting/advancing the evidence/facts/arguments, the corroboration of which is now occurring with the emergence of evidence from the highly probative DOGE investigations. At the core of these never-before conducted investigations is the search for the reason/s underpinning the immense disparity between the tens/hundreds of millions of dollars in net worth of these corrupt politico-public servants (politicians/judges/legislators) and their government salaries of no greater than two hundred and fifty thousand dollars ($250,000), and quite often substantially less.

6. The confluence in 2025 of the factual foundation of **The Kaul Cases** and the DOGE investigations is not unlike the merging of the two channels of the Niagara River just above the Niagara Falls. The weight of the evidence and facts cannot be denied, is irrefutable and there exists nothing that can halt its inexorable proof of the criminal guilt of **The Kaul Cases** Defendants, of whom Defendant Schumer was and is one of the perpetrators-in-chief. His guilt is established.

7. In the period from 2016 to 2025, **The Kaul Cases** Defendants knew of their guilt of the offenses/violations/crimes they caused and continue to cause to Plaintiff Kaul's

life/liberty/property/reputation and his human/civil/constitutional rights, all within and in furtherance of the '**Revocation-Cover-Up Conspiracy'** (2005-2025).

8. Defendant Schumer and his co-conspirators have, since 2016, evaded justice through the perpetration of massive schemes of corruption of the political/judicial bodies of state and federal governments, an evasion achieved through quid pro quo schemes that obstructed Plaintiff Kaul's ability to prosecute any of **The Kaul Cases,** the non-prosecution and illegal dismissals of which were then, with a knowing illegality, propagated into the fabric of American jurisprudence and cited to by **The Kaul Cases** Defendants in support of the motions/defenses for dismissal of cases subsequently filed by Plaintiff Kaul.

9. The remediation of such an expansive scheme will inevitably and under the doctrine of 'Fraud on the Court' require that every opinion/order entered by every judge involved in the '**Revocation-Cover-Up Conspiracy'** be rendered null and void for all purposes, including that of any further citation, unless that citation is cited for the proposition of establishing a 'Fraud on the Court'.

10. Throughout **The Kaul Cases**, the mischaracterization by **The Kaul Cases** Defendants of the within claims as being those of a **"nutcase"** and being claims that were, amongst other things **"meritless … frivolous … harassing … fantastical … vast implausible conspiracy … unsubstantiated … rantings of a disgruntled doctor … repetitive … long saga … scandalous … defamatory … outrageous … impertinent … etc. … etc."** were and are mischaracterizations that were sworn under penalty of perjury onto the federal docket with a knowing fraudulence.

11. The Kaul Cases Defendants, did, consequent to their commission of increasingly serious crime, entrap themselves in an ever expanding and inescapable scheme of criminal conduct, perpetrated by/through/within the '**Revocation-Cover-Up Conspiracy'** and its associated and massive global **"patterns of racketeering"**.

12. It would be fair to state that when, in 2005, Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive lumbar spinal fusion, he had no idea that as he fluoroscopically inserting the final cannulated pedicle screw into the patient's left L4 pedicle, while focusing on the live radio-imaging screen to ensure proper screw placement, that in 2025, as a consequence of that screw-based operation, he would in 2025 be at the conclusion of the legal equivalent of a similar screw-type operation. An operation in which he is 'un-screwing' the 'screwing' exacted upon the American public by, of all people, its public servants.

JURISDICTION AND VENUE

13. General:

28 U.S.C. § 1331 – Plaintiff's allegations arise pursuant to 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 Defendant Schumer and the aggregate amount in controversy exceeds seventy-five thousand dollars ($75,000).

14. Personal:

The Court has personal jurisdiction over Defendant Schumer, as he has transacted/transacts business, maintained/maintains substantial contacts, and/or has committed acts in furtherance of the illegal scheme and conspiracy throughout the United States, including the District of Columbia.

The scheme and conspiracy have been directed at and have had the intended effect of causing injury to Plaintiff Kaul's ability to practice medicine in the District of Columbia and nationwide, and to causing four thousand seven hundred and nine (4,709) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property/reputation.

The scheme and conspiracy have also been directed at obstructing Plaintiff Kaul's prosecution of **The Kaul Cases** within the United States District Court, including the District of Columbia (K5) through schemes of political/judicial corruption.

This Court also has personal jurisdiction over Defendant Schumer pursuant to Fed. R. Civ. P. 4(k)(1)(A) because he would be subject to a court of general jurisdiction in the District of Columbia.

15. 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 – Defendant Schumer resides in the District of Columbia.
(2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred (denial of application for medical license in 2020/2024) or a substantial part of property that is the subject of the action is situated - Plaintiff Kaul's denial in 2020/2024 of his applications for licensure in the District of Columbia were based on the illegal 2012/2014 suspension/revocation of his New Jersey license, and constitute ongoing and **"new racketeering injuries"** within the jurisdiction of the District of Columbia, that confers on Plaintiff Kaul the right to sue in the United States District Court for the District of Columbia.

PARTIES

16. PLAINTIFF

RICHARD ARJUN KAUL, MD – 440c SOMERSET DRIVE, PEARL RIVER, NY 10965 – 914 250 8413 DRRICHARDKAUL@GMAIL.COM **("KAUL")**

17. DEFENDANT

CHARLES E. SCHUMER, ESQ – HART SENATE OFFICE BUILDING, 322, WASHINGTON, DC 20510 – 202 224 6542

STATEMENT OF FACT

18. The massiveness of the '**Revocation-Cover-Up Conspiracy'** (2005-2025) in its perpetration through **The Kaul Cases** (2016-2025) has involved a substantial body of evidence/fact/law/argument and Defendants/Co-Conspirators who have perpetrated **"patterns of racketeering**" through, amongst other things, the executive/judicial/legislative branches of state and federal government, publicly traded corporations, the New York Stock Exchange and the media, through the commission of amongst other things, the RICO predicate acts of bribery/quid pro quo schemes/perjury/obstruction of justice/evidential tampering/witness tampering/wire fraud/insider trading/securities fraud/money laundering/public corruption/judicial corruption/kidnapping/false indictments/false arrests/false imprisonments/attempted murder.

19. Committed in conjunction with these crimes are violations of human/civil/constitutional rights and crimes against humanity, the most recent one being the forced mass inoculations of a lethal toxic mRNA molecular construct that the public were knowingly deceived into believing was a legitimate 'vaccine' against COVID.

20. It was not, and its sole purpose was to generate immense profits for the pharmaceutical industry, which it did in collusion and conspiracy with corrupt politicians and state/federal agencies.

FACTS AS TO CRIMES COMMITTED BY DEFENDANT SCHUMER

21. It was Plaintiff Kaul's prosecution of **The Kaul Cases** that caused Defendant Schumer to commit the crimes of amongst other things, bribery/quid pro quo schemes/obstruction of justice/wire fraud/conspiracy/public corruption against Plaintiff Kaul, the purpose of which was to prevent Plaintiff Kaul from exposing the crimes of **The Kaul Cases** Defendants, with the initiating crime being the 2014 illegal jury-less article III judge-free NJ revocation, a crime at the center of the '**Revocation-Cover-Up Conspiracy'** (2005-2025).

22. However, in the years that preceded and followed the 2014 illegal revocation, further ever more serious felonies were committed within and perpetrated through the # and these include mail fraud/perjury/extortion/kickbacks/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.

23. Defendant Schumer is, pursuant to RICO's doctrine of vicarious liability, and having perpetrated RICO predicate acts and **"patterns of racketeering"** the admittance of which was caused by his Rule 8(b)(6) non-denial in K3, as liable for the ongoing/"**new"** crimes/violations/injuries committed against Plaintiff Kaul (2005-2025) as if he directly

committed them himself. See Salinas v US (96-738) 89 F.3d 1185 and US v Coonan, 664 F. Supp. 861 (S.D.N.Y. 1987).

24. Similarly, within **The Kaul Cases** and as now factually substantiated by admissions of fact from approximately fourteen (14) Defendants (Andrew Kaufman/Steven Lomazow/New Jersey Board of Medical Examiners/Texas Medical Board/Christopher J. Christie/James Howard Solomon/Daniel Stolz/Robert Francis Heary/CPEP/Federation State Medical Boards/Allstate Insurance Company/Horizon Blue Cross Blue Shield/Robert Marino/James Paul Oetken), the admission of fact which are submitted within K11-19/K11-20/K11-23/K11-24.

25. In the period from the February 22, 2016 commencement of **The Kaul Cases** (K1), not one Defendant has denied any of the allegations/facts, the non-denial of which did, pursuant to Rule 8(b)(6) cause their admission for all purposes, and the liability of which does pursuant to RICO inure to Defendant Schumer.

26. The **"crime of one becomes the crime of all"** as does the insider trading and embezzlement from the US Treasury of the public's money by Defendant Schumer, become the liability of **The Kaul Cases** Defendants. Defendant Schumer's net worth of eighty-one million dollars ($81,000,000) was procured through these grand schemes of public corruption and money laundering, as was that of many of **The Kaul Cases** Defendants.

27. Enclosed within (**Exhibit 1**) are the fourteen (14) admissions of fact, fact to which Defendant Schumer has, pursuant to RICO, admitted. There exists no civil nor criminal defense to the within charged allegations and facts.

DEFENDANT SCHUMER'S ONGOING LIBALITY AND THE ONGOING TOLLING OF THE RICO STATUTE

28. The ongoing '**Revocation-Cover-Up Conspiracy'** and Defendant Schumer's participation/facilitation/aiding and abetting of it, do constitute and substantiate his ongoing vicarious liability pursuant to RICO (See Salinas/Coonan) and the Continuing Violations Doctrine (See Bodner v. Banque Paribas 114 F.Supp.2d 117 (2000).

29. Defendant Schumer has continued to abuse his political power in the perpetration of schemes of judicial/state medical board corruption, in which he has directly and or indirectly bribed/threatened/intimidated district court judges and state medical boards into respectively dismissing **The Kaul Cases** and or denying Plaintiff Kaul's 2020/2024 license applications to all state medical boards.

30. Defendant Schumer has perpetrated and continues to perpetrate these district judge/state medical board schemes of obstruction in collusion/conspiracy with **The Kaul Cases** Defendants.

31. The ongoing-ness of the '**Revocation-Cover-Up Conspiracy'**, the non-remediation of the injuries to Plaintiff Kaul's life/liberty/property/reputation and the ongoing violations of RICO do continue to cause a tolling of the statute of limitations.

LEGAL CLAIMS

32. To ensure as complete a recitation of Defendant Schumer and his Co-conspirators perpetration of their **"patterns of racketeering"** (2002-2025) within the United States District Court, the United States Government, the New York Stock Exchange-Publicly Traded Corporations, Defendant Schumer's Senate Office, the Federation State Medical Boards-State Medical Boards **("Federation Cartel"**) and the governments of foreign countries, the legal claims will be organized to parallel the chronological order of **The Kaul Cases,** in order to coherently and systematically illustrate the increasing degree of Defendant Schumer's corrupt involvement in the '**Revocation-Cover-Up Conspiracy'** (2005-2025).

33. However, pursuant to RICO's doctrine of vicarious liability, the liability of the RICO predicate acts identified in each claim as to Defendant Schumer and the Co-Conspirators, is a liability that extends to all of **The Kaul Cases** Defendants (2016-2025).

1. COUNT ONE
2002-2025
(K1 to K11-25)

Association-In-Fact Enterprise: Schumer Senate Office-Chambers U.S.D.J. Kevin McNulty-N.Y.S.E.
Defendant Persons: Defendant Schumer
Co-conspirators: Kevin McNulty/Christopher J. Christie/Allstate/TD Bank/Geico
RICO Predicate Acts: Wire Fraud/Bribery/Obstruction of Justice/Public Corruption/Kidnapping/Perjury/Securities fraud/ include mail fraud/perjury/extortion/kickbacks/evidence tampering/witness tampering/securities fraud/bankruptcy fraud/bank fraud/money laundering/judicial corruption/kidnapping/chemical weapon trafficking/insider trading/tax embezzlement

Overview:

34. COUNT ONE is the most expansive of the claims, and covers the period from the time approximately (2002) when Plaintiff Kaul commenced paying tax monies into the US Treasury, through the period when the '**Revocation-Cover-Up-Conspiracy'** commenced (2005), through the period of the **Revocation-Cover-Up-Conspiracy'** prior to the illegal suspension of Plaintiff Kaul's NJ license (April 2012), through the period of the **Revocation-Cover-Up-Conspiracy'** prior to the illegal revocation of Plaintiff Kaul's NJ license (2014) and through the period of the '**Revocation-Cover-Up-Conspiracy',** when Plaintiff Kaul was subjected to the crimes of amongst other things, kidnapping/false indictments/false arrests/false imprisonments/attempted killing (2014-2023) and into the period of the **Revocation-Cover-Up-Conspiracy,** during which **The Kaul Cases** Defendants, of which Defendant Schumer is one, continue to commit

ongoing**/"new"** deprivations of his life/liberty/property/reputation (2012-2025) and violations of his human/civil/constitutional rights (2012-2025).

35. The facts of all of the cited RICO predicate acts, the liability of which pursuant to RICO's doctrine of vicarious liability insures to all of **The Kaul Cases** Defendants, regardless of when they joined the '**Revocation-Cover-Up-Conspiracy'** are contained within the fourteen (14) admissions of fact (**Exhibit 1**), as reiterated below.

36. Within the fourteen (14) admissions of fact (**Exhibit 1**), the pleading of the admitted facts satisfy the requisite federal pleading standards, and as such all of the cited RICO predicate acts are sufficiently pled within the document of the Complaint to provide sufficient notice to Defendant Schumer to answer the levied facts/charges.

37. Defendant Schumer, did, pursuant to his perpetration of the tax-embezzlement-kickback scheme (2002-2025) become liable to Plaintiff Kaul for the theft of monies from the tax revenue in which Plaintiff Kaul had paid substantial sums.

38. Defendant Schumer's **"pattern of racketeering"** and its associated injuries to Plaintiff Kaul did commence before the '**Revocation-Cover-Up-Conspiracy'** but, as the latter is ongoing in 2025.

39. Defendant Schumer has for at least twenty-three (23) years of his twenty-seven (27) years position as the NY US Senator been perpetrating/aiding and abetting/facilitating knowingly criminal multiple **"patterns of racketeering"** against Plaintiff Kaul and the American public of which Plaintiff Kaul has been and is a member.

40. The listed RICO predicate acts had all been committed in the period from 2002 to 2025, and although Defendant Schumer only joined the '**Revocation-Cover-Up Conspiracy'** in 2016, he did pursuant to Coonan become liable for all crimes prior to his entrance.

41. The thrust of COUNT ONE pertains to Defendant Schumer's obstruction of Plaintiff Kaul's prosecution of K1, an obstruction he perpetrated consequent to conspiring with his bother-in-law-Co-conspirator and then U.S.D.J. Kevin McNulty, to prevent Plaintiff Kaul from commencing discovery and then attempting, in a knowingly illegal manner, to dismiss K1 with prejudice.

42. Defendant Schumer, did in 2011 come to some agreement with the now deceased and then US Senator for NJ, Frank Lautenberg, to have his brother-in-law assigned to the federal bench in the District of New Jersey. McNulty was not Lautenberg's first choice.

43. K1 was the first test in the United States District Court of the revocation related crimes committed against Plaintiff Kaul in the '**Revocation-Cover-Up Conspiracy'** in the period from 2005 to 2016, and **The Kaul Cases** Defendants were convinced that it would be Plaintiff Kaul' first, final and indeed ONLY test.

RICO Predicate Acts:

44. The specific facts as to the pleading of each of the RICO predicate acts are contained within the fourteen (14) admissions of fact (**Exhibit 1**) and Defendant Schumer's answer, if he even believes the submission of one will somehow undo his vicarious admittance of these facts, must contain, pursuant to Rule 8(b)(6) an admittance, denial or lack of knowledge as to each and every fact of every crime of which he is accused and had indeed admitted.

45. Within the corpus of the committed RICO predicate acts, those of bribery/obstruction of justice/judicial corruption/insider trading were ones with a more direct nexus to Defendant Schumer's knowingly illegal scheme of self-enrichment, embezzlement and in fact treason.

46. Defendant Schumer, as is the case against K11-23 Defendant Oetken, a jurist appointed by Defendant Schumer, did both commit treasonous acts against the United States, for which the penalty is death. In the commission of these treasonous acts, both Defendants Schumer and Oetken, as lawyers, did know the elements of treason, did know the facts necessary to prove the elements and did know the penalty was death.

47. However, despite this knowledge, they persisted in what can only be understood as a series of suicidal schemes, blinded by their arrogance, greed and long-standing pattern of having perpetrated such schemes for many decades without consequence.

48. The execution of ex-communicated members of the Elizabethan British Monarchy accused of crimes against the Crown/State/People was not uncommon.

49. The December 4, 2024 incident involving the death of the modern-day Crown equivalent/CEO of United Health Insurance was a modern-day execution of a person who had committed crimes against humanity.

Bribery And Insider Trading

50. Defendant Schumer's principal bribers emanate from the insurance, banking and healthcare sectors of American industry, many of which, as publicly traded companies, are located and do business on the NYSE on Wall Street, Manhattan, NY.

51. Defendant Schumer has been the US Senator for NY for twenty-seven (27) years.

52. In this period of twenty-seven (27) years, Defendant Schumer has sold the power of his senatorial office to publicly traded banks, insurance companies and others in return for legislative, judicial and executive favors purposed to and that have in fact advanced the economic agendas/share price/executive compensation of his corporate bribers.

53. In this period of twenty-seven (27) years, Defendant Schumer, on a government salary of less than two hundred thousand ($200,000) dollars has amassed a net worth of eighty-one million dollars ($81,000,000).

54. Defendant Schumer's net worth is the product of crime and corruption.

55. Defendant Schumer's quid pro quo schemes with publicly traded corporations involved the exchange of monies/shares/bonds/dividends and other financial investment instruments in return for corporate profit enriching legislative/judicial/executive favors.

56. Defendant Schumer, a lawyer, did know in the perpetration of these schemes that they were illegal, but did nonetheless perpetrate them with a sense of long-standing impunity.

57. Within the bribery scheme, there existed and exists a nexus of digital and non-digital communications pertaining to the method, mechanics and mechanism of the quid pro quo perpetration of what/when/how Defendant Schumer's legislative/judicial/executive favors are provided in return for the what/when/how the bribes (monies/shares/property etc.) are funneled into his and those related to him to the third degree, on-shore and off-shore accounts and other financial vehicles.

58. Defendant Schumer, in recognizing that the perpetration of the scheme constitutes a criminal conspiracy, and in seeking to mitigate detection and its criminal consequences, did establish multiple trusts and other financial vehicles in which his name does not appear.

59. Defendant Schumer, in establishing these trusts and other financial vehicles did use the services of lawyers, accountants, financial advisors and bankers whose internal communications are subject not to the doctrine of attorney-client privilege.

60. Defendant Schumer, in recognizing that he is a public servant and as such has no right to claim privileges of confidentiality in matters in which either he has used the power of public office, or the power of public office has been used by others acting on his behalf to transact/perpetrate quid pro quo schemes, that have enriched his person or those related to him to the third degree.

61. Defendant Schumer, in recognizing his tax filing obligations, and the exposure to criminal charges that an honest declaration of the bribe related origins of a salary disproportionate net worth would cause, did seek and procure the advice of accountants and tax consultants.

62. Defendant Schumer, did, in collusion and conspiracy with these individuals and in non-privileged communications, falsely report the criminal origins of the bribes, in order to obfuscate and or thwart any investigation.

63. Defendant Schumer, knew and knows that any civil and or criminal investigation of his financial affairs would expose, amongst other things, the bribes he had received from **The Kaul Defendants** in exchange for having district judges dismiss **The Kaul Cases**.

64. Defendant Schumer, knew and knows that he abused the power of the American Government in either issuing orders to dismiss directly to district judges to whom he was either related or had appointed and or indirectly to district judges whose appointments were based on the recommendations of Democratic Senators, who ranked below him the Democratic Party, and whose careers he effectively controlled.

65. Defendant Schumer, knew and knows that his position of power within the Democratic Party permitted him to abuse the power to obstruct Plaintiff Kaul's prosecution of **The Kaul Cases** for almost nine (9) years (2016-2025).

66. Defendant Schumer, knew and knows that if he failed to obstruct Plaintiff Kaul's prosecution of **The Kaul Cases**, highly incriminating evidence would emerge of his long-standing quid pro quo schemes with corporations/executives in the insurance/healthcare/banking sectors.

67. Defendant Schumer, knew and knows that the emergence of this highly incriminating evidence would implicate many other persons and publicly traded corporations involved in the decades-long schemes.

68. Defendant Schumer recognizes that the inevitable investigations by DOGE will expose his conversion of governmental agencies into **"racketeering enterprises"** through which he, with his co-conspirators, did, for decades, conduct open-ended and ongoing **"patterns of racketeering"** through which he perpetrated and continues to perpetrate, amongst other things, the RICO predicate acts of bribery/quid pro quo schemes/wire fraud/public corruption/obstruction of justice.

69. Defendant Schumer, a lawyer, did know that his perpetration of knowingly criminal schemes on the NYSE did cause an unfair injury to the market/public, in that his legislative/executive/judicial favors did fraudulently manipulate the market with information known only to him and not the market.

70. Defendant Schumer, a lawyer and public servant, did know that his non-public manipulation of the market did constitute, amongst other things, the crime of insider trading, but he did nonetheless perpetrate the crime with a sense of long-standing impunity.

71. Defendant Schumer, a lawyer and public servant, did know that his crime of insider trading did cause an immense injury to the market and the unknowing public, on which Plaintiff Kaul was/is a member, but he did nonetheless perpetrate the crime with a sense of long-standing impunity.

72. Defendant Schumer, a lawyer and public servant, did not care that his crimes caused and continue to cause server and irreparable injury to an unsuspecting and unknowing American public whose pensions and retirement funds were critically dependent on the honest and legal, insider-trading-free operation of the market.

73. Defendant Schumer, a lawyer and public servant, did know that his crimes caused American citizens to be effectively robbed of their life savings and rendered homeless, destitute and living their retirement in abject poverty.

74. Defendant Schumer, a lawyer and public servant, did not care of the consequences of his greed to the American public as his sole purpose for his twenty-seven (27) year occupation of political office has been to satisfy his insatiable greed for money and power.

Tax Embezzlement

75. Commencing in approximately 2000, two (2) years after Defendant Schumer's appointment to the US Senate he did come to know of tax-embezzlement-kickback schemes in which millions/billions of monies from the UNITED STATES TREASURY were funneled into fabricated foreign purported plans related to health, education and miscellaneous cultural issues.

76. Defendant Schumer knew that a large percentage of the taxpayer money funneled into these schemes were part of a wider ongoing global **"pattern of racketeering",** in which a substantial percentage of the monies would be funneled back to Defendant Schumer and others as kickbacks into, amongst other things, off-shore trusts and other such financial vehicles.

77. Defendant Schumer's current and identified net worth of approximately eighty-one million dollars (($81,000) is a fraction of the total assets he holds on a worldwide basis, with monies assets and real estate concealed in off-shore trusts and havens.

78. Defendant Schumer, in coming to know about the tax embezzlement schemes and the undetected ease with which they were perpetrated, did in or around 2001/2 commence abusing the power of public office and began participating in the **"pattern of racketeering".**

79. Defendant Schumer, in entering the tax-embezzlement-kickback schemes did, as a lawyer, know they were illegal, but did nonetheless facilitate their perpetration with an impunity garnered from the fact that many other congressmen/senators were either aiding/abetting, facilitating and or perpetrating such schemes.

80. Defendant Schumer, did know, that in the theft of the money from the US Treasury he was committing larceny against the American public, of which Plaintiff Kaul was/is a member and causing them to be deprived of fundamental human rights of housing, food, health and education.

81. Defendant Schumer knew that the tax-embezzlement-kickback scheme was part of a global Foreign Practices Act violating **"pattern of racketeering"** and a scheme of grand corruption.

82. In the conception, planning and perpetration, Defendant Schumer and others used the US wires and mail to exchange and transmit information pertaining and critical to the national and global perpetration of the tax-embezzlement-kickback scheme.

83. Defendant Schumer, in using the US wires/mail to perpetrate the scheme did know it was illegal, but did nonetheless commit the crime with a sense of long-practiced immunity, convinced that his position of political power would immunize him from criminal prosecution.

84. Defendant Schumer's successful and unchallenged execution over decades of the tax-embezzlement scheme caused a development within his sense of self of a criminal state-of-mind.

85. Defendant Schumer, at some point in the early part of his senatorial career, recognizing that his abuses of power and criminal acts went unchallenged, did become a criminal, who the just happened to be in possession of immense state power.

86. Defendant Schumer, in taking behavioral cues from other more seasoned corrupt politicians surround ding him, did recognize the importance of adopting a disguise of benevolence, in order to deceive the public into believing he was the 'good guy' who fought for the disenfranchised and poor, while the other ones were the 'bad guys'.

87. Defendant Schumer recognized the importance of cultivating a persona of an individual who fought for the rights of the common man, in order to secure their votes to maintain his position of political power, without which he would not be able to continue to grow his immense personal wealth.

88. Defendant Schumer knew that his 'common man' was a lie, and that h is only motivation for being in politics was the procurement of power and money.

89. Defendant Schumer's involvement in the tax-embezzlement schemes expanded over the decades in the amount of millions-billions of dollars that were stolen from the US Treasury, routed through several foreign entities and off-shore financial vehicles and then funneled back into Defendant Schumer's. billion-dollar global holdings.

90. Defendant Schumer knew the racket was unprecedented in American or world history, but was convinced it would not be exposed.

91. Defendant Schumer's decades-long abuse of power related involvement in grand schemes of global corruption at the expense and through the exploitation of the American public does cause the bribery related **"pattern of racketeering"** he committed against Plaintiff Kaul in the United States District Court to far exceed the requisite federal pleading plausibility standard.

92. In fact, Defendant Schumer's theft of money from the United States Treasury further substantiates the already thousands of Rule 8(b)(6) related admitted facts within **The Kaul Cases** (2016-2025), by the mere fact that the criminality of the admitted facts is dwarfed by the criminality of the DOGE proven facts of the tax-embezzlement schemes.

93. Throughout **The Kaul Cases**, Plaintiff Kaul's claims and Plaintiff Kaul himself have been described as a **"nutcase … vast conspiracy theorist … implausible … scandalous … fantastical … frivolous … harassing … vexatious … repetitive … unhinged …"**, but Defendant Schumer and **The Kaul Cases** Defendants knew they were guilty not only of the crimes asserted by Plaintiff Kaul, but of far greater genocidal crimes against humanity, not dissimilar to those of the Nazis.
94. "History is a deceivingly simple pattern of repetition" – ARK 2020, a **"pattern"** the Nazi personnel parallels of which Plaintiff Kaul illustrated in his February 21, 2021 filing of the Complaint in K11-2.

95. Within **The Kaul Cases**, the Nazi parallels have been frequently disparaged but, as with every other fact/allegation, never been denied and this admitted, the inevitable admittance of which stems from its immutable truth.

Obstruction of Justice:

96. In a time period commencing in or around 2016, Defendant Schumer, by this time well immersed in the pervasive and endemic public corruption of the legislative/executive/judicial branches of the American state and federal governments, and having successfully, through a quid pro quo with then then NJ US Senator, Frank Lautenberg, had his brother-in-law, Kevin McNulty appointed to the federal bench in the District of New Jersey; did accept a bribe from the K1 Defendants to have McNulty obstruct Plaintiff Kaul's prosecution of K1 by denying discovery and denying every motion for default/summary judgment, and then dismissing the case with prejudice.

97. In May 2019, Plaintiff Kaul's motions for McNulty's disqualifications and his financial holdings/ex parte communications, did cause McNulty's disqualification and subsequent and sudden abdication of the federal bench.

98. McNulty's sudden departure was purposed to avoid having to disclose highly incriminating evidence of both his own and Defendant Schumer's crimes that involved a knowingly illegal abuse of power of the United States District Court.

99. Defendant Schumer in collusion and conspiracy with multiple district judges, including K11-23 Defendant Oetken and the senators who had sponsored their appointments, such as NJ US Senator, Cory Booker, did abuse the political and judicial power of state to cause knowingly illegal dismissals of **The Kaul Cases**, in order to prevent discovery of highly incriminating facts of the massive decades-long corruption that has engulfed Washington DC in a 'swamp-like' manner.

100. It was critical for Defendant Schumer to 'keep Plaintiff Kaul at bay' in order his prosecutorial efforts be prevented from infiltrating the so called 'swamp'.

101. The elements of the scheme involved multiple persons and third-party agents who communicated information between Defendant Schumer and the district court judges as to the manner in which the obstruction of justice was to be perpetrated.

102. Within these communications, it was agreed that cases would be stayed, stalled and motions ignored in order to stymie any progression towards discovery and or trial.

103. Within these communications it was also agreed that non-final cases would be dismissed in order that any appeals filed by Plaintiff Kaul would be rejected, until the district court case became final, a finality that remained indefinitely un-achieved, causing Plaintiff Kaul to voluntarily dismiss the case, as occurred with K3 on January 3, 2022. K3 was filed on April 4, 2019, a three (3) year period in which no discovery was permitted, and every motion filed by Plaintiff Kaul was denied.

104. The obstruction of justice was caused in the district and appellate courts within the Second and Third Circuits, circuits within which Defendant Schumer abused his political power in decades-long multiple ongoing quid pro quo. Bribery related schemes, that caused his immense near-billion-dollar global wealth.

105. Defendant Schumer knew and knows that, as a public servant, and while bequeathed with the power of state, his obscene and illegal profiteering was through the exploitation and at the lethal expense of the American public, for whose lives he had not one concern.

Pattern of Racketeering + Association-In-Fact-Enterprise:

106. The law permits the pleading of an association-in-fact enterprise to be sufficiently pled from the pleading of the underlying and or substantiating RICO predicate acts.

107. The pleading of a **"pattern of racketeering"** requires, as is pled in this Complaint, the pleading of fact (who/what/where/when/how/why) of state felonies and the pleading of the timing, relation, commission and location of those crimes, such that a **"pattern"** of criminal conduct can be discerned, as opposed to single isolated events.

108. The numerical standard of number of acts required pursuant to RICO is two, and as is evident from the claims, that standard has been substantially surpassed. Thus, the pleading of the **"pattern of racketeering"** does substantiate the requisite pleading of the association-in-fact enterprise, it being the **"SSO-FSMB-NYSMB Association-In-Fact-Enterprise".**

109. However, to ensure Defendant Schumer, a lawyer and politician, is fully informed of the charges levied against him, Plaintiff Kaul will identify the enterprises' elements and the relations between them such that the effective 'anatomy' and 'physiology' of the entity through

and under attempted cover of which he and his co-conspirators perpetrated their commission of **"patterns"** of criminal conduct.

Elements

SSO:

110. The entity of Defendant Schumer's office within the US Senate, although that of a public servant, is not open to the public and is thus concealed from public inspection. This concealment from public scrutiny of the office, in conjunction with its immense power played critical roles in Defendant Schumer's ability to perpetrate in secret his criminal activities. Defendant Schumer's office provided the perfect cover for his **"pattern of racketeering"** in much the same way that the Church and the Crown concealed the commission of crimes against humanity perpetrated by its priests and so-called nobles.

111. Individuals, like Defendant Schumer, who publicly and vociferously protest for the good of the common man, while concurrently and under cover of feigned benevolence, violate the human rights of those they profess to protect in their self-serving pursuit of profit and power. Without the existence and power of the publicly funded senate office, there would have been no legal entity through which Defendant Schumer would have been able to covertly perpetrate his decades-long criminal conspiracy, while avoiding criminal investigation/charges.

FSMB:

112. An association-in-fact enterprise, in contrast to a single enterprise, consists of entities previously and legally in-associated, but that became associated specifically and necessarily for the commission of the fact of criminal conspiracies.

113. For Defendant Schumer to have perpetrated to conclusion and maintained his criminal conspiracy in a state of conclusion, required the license revoking power of the **"Federation Cartel"** and its subjugate state licensing boards.

114. Defendant Schumer's requirement for the license revoking power of the **"Federation Cartel"** pertained to the fact that the illegal 2014 NJ revocation was perpetrated to cause an increase in the executive/corporate profits of the insurance companies that owed Plaintiff Kaul approximately forty-five million dollars ($45,000,000) for highly specialized minimally invasive spine surgeries he had provided to their premium-fee paying clients in a period from 2002 to 2012.

115. These insurance companies had been bribing Defendant Schumer for many years to advance their profit-enhancing legislative causes, and thus it was/is in Defendant Schumer's interest to not only obstruct Plaintiff Kaul's prosecution of **The Kaul Cases** but to prevent him having his illegally revoked NJ license reinstated and or another state license issued.

116. Defendant Schumer recognized that Plaintiff Kaul's possession of a license would strengthen his economic position, a strengthening that would enhance his prosecution of **The Kaul Cases** Defendants, including Defendant Schumer, and would expose the crimes of all involved in the '**Revocation-Cover-Up Conspiracy'** and those of judges/politicians/corporate executives previously unknown to Plaintiff Kaul and or the American public.

NYSMB:

117. Within the **"SSO-FSMB-NYSMB Association-In-Fact-Enterprise"**, the co-conspirator role of the NYSMB was an essential and executing element in the perpetration of the '**Revocation-Cover-Up Conspiracy'** in that had it not illegally denied Plaintiff Kaul's licensure application, Plaintiff Kaul would have procured a license, the procurement of which would have strengthened Plaintiff Kaul's economic position, the strengthening of which would have enhanced his prosecution of **The Kaul Cases,** the enhancement of which would ultimately result in the criminal conviction of Defendant Schumer, Defendant Oetken and others involved in the '**Revocation-Cover-Up Conspiracy'**

118. The association of these otherwise legally unrelated entities for the knowing perpetration of crime evidences not only a criminal state-of-mind but a willingness and in fact a concerted effort to establish communication/financial connections and channels, an internal network, through and under cover of which was transmitted/exchanged information and monies in furtherance of Defendant Schumer's criminal conspiracy and **"patterns of racketeering"**.

119. The impunity with which Defendant Schumer perpetrated these un-exposed criminal conspiracies over decades pertains in part to the fact that it had become the normal course of business in the American political and judicial bodies.

120. And being a highly profitable 'normal course of business' no person who profited from and engaged in such knowingly illegal conduct had any incentive and in fact had many disincentives to expose the rackets and no doubt the hundreds/thousands of **"patterns of racketeering"** that define modern-day American government and account for the public's clarion call to **"drain the swamp".**

2. COUNT TWO
2005-2025
(K1 to K11-7)

Association-In-Fact Enterprise: Schumer Senate Office-Chambers U.S.D.J. James Paul Oetken
Defendant Persons: Defendant Schumer
Co-conspirators: James Paul Oetken/Christopher J. Christie/Allstate/TD Bank/Geico
RICO Predicate Acts: Wire Fraud/Bribery/Obstruction of Justice/Public Corruption/Kidnapping/Perjury/Securities fraud/ include mail fraud/perjury/extortion/kickbacks/evidence tampering/witness tampering/securities fraud/bankruptcy fraud/bank fraud/money laundering/judicial corruption/kidnapping/chemical weapon trafficking/insider trading/tax embezzlement

121. All of the above facts are incorporated as if re-pled within COUNT TWO.

Overview:

122. Moving from COUNT ONE to COUNT TWO, Plaintiff Kaul narrows the focus on the claim onto the events/circumstances surrounding, underpinning and becoming consequent to the knowingly illegal September 12, 2022 issuance by K11-23 Defendant and S.D.N.Y. district judge, James Paul Oetken, a jurist appointed to the federal bench in 2011 consequent to Defendant Schumer's recommendation to then then President.

123. At the core of COUNT TWO is the corrupt relationship between Defendant Schumer and K11-23 Defendant/K11-25 Co-Conspirator Oetken, in which both profited from perpetrating quid pro quo schemes with **The Kaul Cases** Defendants, in which they received bribes in return for ensuring the dismissal with prejudice of K11-7 and the entry of a knowingly illegal nationwide 'injunction' on September 12, 2022, that sought to permanently prevent Plaintiff Kaul from prosecuting any of **The Kaul Cases**. The principal purpose of the purported 'injunction' was to conceal from the public the crimes committed by, amongst others, Defendant Schumer (2002-2025).

124. These crimes, the RICO predicate acts, are sufficient for not just the filing of criminal charges, but the subsequent conviction and incarceration of Defendant Schumer and others, and are immeasurably more serious charges than those used to attempt to derail President Trump's presidential path and even his life.

Bribery + Obstruction of Justice:

125. Central to COUNT TWO, as it is to all COUNTS, is the crime of bribery and the associated quid pro quo scheme, in which Defendant Schumer and Co-conspirator, Oetken, did illegally sell the power of state in exchange for the commission of knowingly illegal acts, purposed to cause

and that did cause the illegal September 12, 2022 dismissal and entry of a nationwide 'injunction'.

126. The specific facts of the bribery related K11-7 dismissal-injunction related quid pro quo scheme are pled with particularity and federal pleading sufficiency in K11-23 (**Exhibit 2**), and are facts admitted in K11-23 by Co-conspirator Oetken for all purposes pursuant to Rule 8(b)(6) (**Exhibit 1**).

127. The scheme as pled in K11-23 is part of the '**Revocation-Cover-Up Conspiracy'** and came into existence consequent to Plaintiff Kaul's persistent efforts (2016-2025) to expose the entire truth of the crimes of **The Kaul Cases** Defendants, hold them civilly/criminally accountable and to effectuate a "**Reformation of American Medical Boards"**, in order to halt the ongoing and illegal violations of physicians human/civil/constitutional rights by, amongst others, state medical boards, and the **"Hospital-Insurance-Pharmaceutical-Industrial Complex - Federation Cartel" ("HIPIC – FC")**, whose only purpose is ruthless/lethal profiteering at the expense and through the exploitation of the American public/medical profession.

128. Defendant Schumer's murderous schemes of profiteering (2002-2025), whereby he will abuse the immense power of state to further the corporate/executive profiteering agendas of, amongst others, publicly traded corporations, have involved him incriminating/inculcating judges/lawyers/politicians/physicians and certain sections of the media to advance his criminal conspiracies, one of which was an attempt to eliminate President Trump.

129. Defendant Schumer and Co-conspirator Oetken were convinced that the illegal September 12, 2022 'injunction' in K11-7 would cause Plaintiff Kaul to cease his prosecution of **The Kaul Cases**. They were wrong.

130. In the period from September 12, 2022 to February 18, 2025, Plaintiff Kaul continued to file cases in the United States District Court in district courts in Florida, North Carolina, Texas and Mississippi, and courts in which every judge admitted the filing with full knowledge of the illegal September 12, 2022 'injunction' of K11-23 Defendant and K11-25 Co-conspirator, Oetken.

131. However, eventually, due to Defendant Schumer/Co-conspirator Oetken's corrupt obstruction of justice scheme, in conjunction with harassment/intimidation/bribing/promising of favors/threats to career advancement, the district judges corruptly dismissed the cases based on K11-23/K11-25 Co-conspirator Oetken's knowingly illegal K11-7 September 12, 2022 purported 'injunction'.

132. It was the express purpose of Defendant Schumer to prevent Plaintiff Kaul from exposing his crimes (2002-2025), those of **The Kaul Cases** Defendants, and Co-conspirators, both known and previously un-known to Plaintiff Kaul.

133. The risk of civil/criminal prosecution to Defendant Schumer and others was too great for them not to corrupt or have corrupted every district judge/court and or appellate judge/court into which any of **The Kaul Cases** were filed.

Money Laundering:

134. Defendant Schumer, recognizing that he could not directly seize monies from the US Treasury, into which contained monies submitted by Plaintiff Kaul, did, in collusion and conspiracy with lawyers/accountants/international financial advisors, concoct a series of schemes, whereby they would manufacture knowingly fraudulent and ostensibly benevolent causes to which millions/billions of dollars would be funneled under the authority of the USAID.

135. Defendant Schumer/his co-conspirators, in concocting these schemes, did so for the purpose of concealing their theft of tax-payor monies and the criminal consequences of such a theft.

136. Defendant Schumer/his co-conspirators colluded in the establishment of the scheme's mechanics, whereby it was agreed with the domestic/foreign person receiving the monies from USAID and other shell type corporations/agencies that a percentage of the monies would be paid to an off-shore trust/fund owned by Defendant Schumer and or a person related to him to the third degree.

137. Once the kickback monies were in the off-shore funds/trusts, Defendant Schumer would use those monies to purchase real estate and other forms of tangible assets, that would then be sold to unsuspecting third parties, in transactions that would launder and liquidate the USAID monies for the purpose of attempting to conceal any connection with Defendant Schumer.

138. In this manner, and over a protracted period of time, where no investigations were conducted, as Defendant Schumer controlled the investigatory agencies/persons and the adjudicative agencies/persons, he did with impunity commit a massive theft from the American public and Plaintiff Kaul.

139. Defendant Schumer, a lawyer and politician, did recognize that if any of **The Kaul Cases** were permitted to proceed into discovery, not only would highly incriminating evidence/facts of the '**Revocation-Cover-Up Conspiracy'** emerge, but even more incriminating evidence/facts of his commission of crime since his 1998 appointment as a US Senator.

140. Defendant Schumer, **The Kaul Cases** Defendants and their co-conspirators did recognize that jailing and or killing Plaintiff Kaul to cause him to cease his prosecution of **The Kaul Cases** would be necessary and justified in light of the criminal consequences that exposure would have for him and his co-conspirators.

3. COUNT THREE
2012-2025
(K1 to K11-25)

Association-In-Fact Enterprise: Schumer Senate Office-Federation State Medical Boards-New York State Medical Board ("SSO-FSMB-NYSMB Association-In-Fact-Enterprise")
Defendant Persons: Defendant Schumer
Co-conspirators: New York State Medical Board/NY Governor Kathy Hochul/The Kaul Cases Defendants
RICO Predicate Acts: Wire Fraud/Bribery/Obstruction of Justice/Public Corruption/Kidnapping/Perjury/Securities fraud/ include mail fraud/perjury/extortion/kickbacks/evidence tampering/witness tampering/securities fraud/bankruptcy fraud/bank fraud/money laundering/judicial corruption/kidnapping/chemical weapon trafficking/insider trading/tax embezzlement

141. All of the above facts are incorporated as if re-pled within COUNT THREE.

Wire Fraud + Kidnapping:

142. Defendant Schumer, in recognizing that Plaintiff Kaul's procurement of a state medical license and or the reinstatement of his illegally revoked NJ license, would strengthen his economic ability to prosecute **The Kaul Cases**, did conspire with **The Kaul Cases** Defendant, Federation State Medical Boards, to obstruct/delay/deny and or prevent the issuance or reinstatement to Plaintiff Kaul of a license.

143. In the perpetration of this knowingly illegal scheme, Defendant Schumer used the US wires to exchange and transmit information regarding the scheme's construction and perpetration, with persons associated/employed with the "**Federation Cartel"** and its subjugate state board members.

144. In fact, as recently as November 15, 2024, Defendant Schumer did conspire with co-conspirator, Hochul, to cause the issuance of a knowingly fraudulent legal instrument that denied Plaintiff Kaul's application for a New York State license.

145. Defendant Schumer, by the end of 2024, did become convinced that Plaintiff Kaul's prosecution of **The Kaul Cases** would eventually result in an exposing of his decades-long criminal conduct, a realization that also underpinned the July 13, 2024 attempted assassination of President Trump.

146. Defendant Schumer and his co-conspirators realized, as they did with their attempts on the life/liberty of Plaintiff Kaul, that their only option to avoid having their crimes exposed was to kill and or jail those who would expose them, such as President Trump.

RELIEF

Defendant Schumer is one of **The Kaul Cases** Defendants and did directly and vicariously perpetrate through the '**Revocation-Cover-Up-Conspiracy'** (2005-2025) offenses/crimes against the life/liberty/property/reputation and violations of the human/civil/constitutional rights of Plaintiff Kaul, for which he, pursuant to RICO's doctrine of vicarious liability is as liable for the ongoing crimes/violations/injuries committed against Plaintiff Kaul by **The Kaul Cases** Defendants (2005-2025), as if he committed them directly himself.

Plaintiff Kaul seeks from Defendant Schumer compensatory, punitive and consequential damages for the ongoing injuries/losses/deprivations he has caused, facilitated the causation of and aided and abetted to Plaintiff Kaul's life/liberty/property/reputation.

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

DATED: FEBRUARY 22, 2025

_____
RICHARD ARJUN KAUL, MD

Exhibit 1

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.

CHRISTOPHER J. CHRISTIE
KENNETH MURPHY
JANE DOE; JOHN DOE.

CIVIL ACTION: NO.: 23-CV-22582 (BB)(AOR)

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"**)

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 PLAINTIUFF 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 entities 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

FILED
2024 Apr-09 PM 02:15
U.S. DISTRICT COURT
N.D. OF ALABAMA

www.drrichardkaul.com

APRIL 8, 2024

FILED
2024 APR -9 A 10:13
U.S. DISTRICT COURT
N.D. OF ALABAMA

CLERK OF THE COURT
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
HUGO L. BLACK UNITED STATES COURTHOUSE
1729 5TH AVENUE
BIRMINGHAM, AL 35203

RE: KAUL v BCBSA
23-CV-01688 (MHH)
K11-22
AMENDED STATEMENT OF MATERIAL FACT FOR DEFENDANTS ROBERT MARINO AND HORIZON BLUE CROSS BLUE SHIELD, AS TO THE INCLUSION ONLY OF REFERENCES TO THE CM/ECF DOCUMENT

Dear Clerk of the Court,

Please find enclosed the following documents:

1. AMENDED STATEMENT OF MATERIAL FACTS FOR DEFENDANTS ROBERT MARINO AND HORIZON BLUE CROSS BLUE SHIELD IN WHICH THE **ONLY** AMENDMENT IS THE INCLUSION OF THE PREVIOUSLY UN-INCLUDED (MARCH 24, 2024) REFERENCES TO THE CM/ECF DOCUMENT WITHIN THE 'ADMISSIONS OF FACT': APRIL 8, 2024

2. PLAINTIFF KAUL'S REPLY TO DEFENDANTS' APRIL 2, 2024, LETTER TO THE HONORABLE MADELINE H. HAIKALA: APRIL 4, 2024.

Yours sincerely

R. Kl.

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA

RICHARD ARJUN KAUL, MD

Plaintiff

v.

HORIZON BLUE CROSS BLUE SHIELD; ROBERT MARINO

Defendants

CIVIL ACTION: NO.: 23-CV-01688 (MHH)

AMENDMENT INCLUDES ONLY REFERENCES TO THE CM/ECF DOCUMENT AND PAGE NUMBER OF THE EVIDENTIARY SUBMISSIONS OF STATEMENT OF MATERIAL FACTS FOR DEFENDANTS ROBERT MARINO AND HORIZON BLUE CROSS BLUE SHIELD

DATED: APRIL 8, 2024

I, RICHARD ARJUN KAUL, MD, the Plaintiff in the above matter do hereby submit that the within facts are material/undisputed/admitted as to DEFENDANTS HORIZON BLUE CROSS BLUE SHIELD (**"DEFENDANT HORIZON"**) and ROBERT MARINO (**"DEFENDANT MARINO"**)

R.K.

RICHARD ARJUN KAUL, MD

The undisputed/admitted facts material to the Summary Judgment proof of all elements of all claims are:

FACTS PERTAINING TO THE ILLEGAL 2014 NEW JERSEY LICENSE REVOCATION, CONSEQUENT BANKRUPTCY PROCEEDINGS + DEFENDANTS NATIONWIDE "PATTERN OF RACKETEERING" + VIOLATIONS OF ANTITRUST LAW AND HUMAN/CIVIL/CONSTITUTIONAL RIGHTS

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 (D.E. 1-2 Page 2 of 66: Point 1).

2. In a time period commencing in or around 2005/6, Defendants did perpetrate anti-trust infractions against Plaintiff Kaul that are ongoing (D.E. 1-2 Page 2 of 66: Point 2).

3. In a time period commencing in or around 2005/6, Defendants did perpetrate civil rights violations against Plaintiff Kaul that are ongoing (D.E. 1-2 Page 2 of 66: Point 3).

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 (D.E. 1-2 Page 2 of 66: Point 4).

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 (D.E. 1-2 Page 2 of 66: Point 5).

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 (D.E. 1-2 Page 2 of 66: Point 6).

7. Defendant BCBS fraudulently refused to pay Plaintiff Kaul for clinical services he rendered to their fee-paying clients (D.E. 1-2 Page 3 of 66: Point 7).

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 (D.E. 1-2 Page 3 of 66: Point 8).

9. Consequent to Defendant BCBS's non-payment Plaintiff Kaul filed suit against them on two (2) occasions between 2004 to 2012 (D.E. 1-2 Page 3 of 66: Point 9).

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 (D.E. 1-2 Page 3 of 66: Point 10).

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 (D.E. 1-2 Page 3 of 66: Point 11).

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 (D.E. 1-2 Page 3 of 66: Point 12).

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 (D.E. 1-2 Page 3 of 66: Point 13).

14. In May 2016 Defendant BCBS aided/abetted a similar retaliation scheme in retaliation for Plaintiff Kaul having filed K1 (D.E. 1-2 Page 3 of 66: Point 14).

15. The retaliatory act was the filing in a New Jersey state court of a knowingly false tax indictment by **The Kaul Cases** Defendant Christie, who was then still the NJ Governor, a filing that was placed before a state judge (Peter Warshaw) recently appointed by Defendant Christie. The purpose of the indictment was to attempt to silence Plaintiff Kaul by having him incarcerated/injured/killed (D.E. 1-2 Page 3 of 66: Points 13/14).

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 (D.E. 1-2 Page 4 of 66: Point 16).

17. None of these investigations produced any evidence of wrongdoing (D.E. 1-2 Page 4 of 66: Point 17).

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 (D.E. 1-2 Page 4 of 66: Point 18).

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 (D.E. 1-2 Page 4 of 66: Point 19).

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 (D.E. 1-2 Page 4 of 66: Point 20)

21. Defendant BCBS was identified as a debtor in the Chapter 11 bankruptcy (D.E. 1-2 Page 4 of 66: Point 21).

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 (D.E. 1-2 Page 4 of 66: Point 22).

23. The purpose of the knowingly false and highly defamatory press coverage was to economically/professionally/socially/reputationally alienate Plaintiff Kaul (D.E. 1-2 Page 4 of 66: Point 23).

24. Defendant BCBS's purpose of alienation was to attempt to eliminate the risk of Plaintiff Kaul's continued existence (D.E. 1-2 Page 4 of 66: Point 24).

25. Defendant BCBS's purpose in attempting to eliminate Plaintiff Kaul was to attempt to ensure he would be unable to fight the revocation (D.E. 1-2 Page 5 of 66: Point 25).

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 (D.E. 1-2 Page 5 of 66: Point 26).

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 (D.E. 1-2 Page 5 of 66: Point 27).

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' (D.E. 1-2 Page 5 of 66: Point 28).

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 (D.E. 1-2 Page 5 of 66: Point 29).

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 (D.E. 1-2 Page 5 of 66: Point 30).

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 (D.E. 1-2 Page 5 of 66: Point 31).

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 (D.E. 1-2 Page 5 of 66: Point 32).

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 (D.E. 1-2 Page 6 of 66: Point 33).

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 (D.E. 1-2 Page 6 of 66: Point 34).

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 (D.E. 1-2 Page 6 of 66: Point 35).

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 (D.E. 1-2 Page 6 of 66: Point 36).

37. The evidence from the trial of Dr. Pompy/others corroborates the claims that Plaintiff Kaul has asserted within **The Kaul Cases**, since 2016 (D.E. 1-2 Page 6 of 66: Point 37).

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 (D.E. 1-2 Page 6 of 66: Point 38).

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 renumeration (D.E. 1-2 Page 7 of 66: Point 39).

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 (D.E. 1-2 Page 7 of 66: Point 40).

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 (D.E. 1-2 Page 7 of 66: Point 41).

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")** (D.E. 1-2 Page 7 of 66: Point 42).

43. Through the **NJ-BCBS AIF Enterprise** Defendants Marino/BCBS funneled bribes to multiple New Jersey based politicians, including **The Kaul Cases** Defendant, Christie (D.E. 1-2 Page 7 of 66: Point 43).

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 (D.E. 1-2 Page 7 of 66: Point 44).

45. The revocation was purposed to eliminate Defendant BCBS's debt to Plaintiff Kaul (D.E. 1-2 Page 7 of 66: Point 45).

46. The revocation was purposed to eliminate the legal liability posed by the lawsuit filed by Plaintiff Kaul in February 2012 (D.E. 1-2 Page 7 of 66: Point 46).

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 (D.E. 1-2 Page 8 of 66: Point 47).

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 (D.E. 1-2 Page 8 of 66: Point 48).

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)) (D.E. 1-2 Page 8 of 66: Point 49).

50. In the perpetration of the fraudulent scheme, Defendants Horizon/Marino did knowingly commit mail fraud (§ 1341) (D.E. 1-2 Page 8 of 66: Point 50).

51. In the perpetration of the fraudulent scheme, Defendants Horizon/Marino did knowingly commit wire fraud (§ 1343) (D.E. 1-2 Page 8 of 66: Point 51).

52. Defendants Horizon/Marino knowingly committed multiple state felonies in their commission of RICO predicate acts (D.E. 1-2 Page 8 of 66: Point 52).

53. Defendants Horizon/Marino knowingly conspired to commit multiple state felonies in their commission of RICO predicate acts within the last ten (10) years (D.E. 1-2 Page 8 of 66: Point 53).

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 (D.E. 1-2 Page 8 of 66: Point 54

55. Defendants Horizon/Marino's knowingly illegal commission of these multiple state felonies (RICO predicate acts) did constitute a **"pattern of racketeering"** (D.E. 1-2 Page 8 of 66: Point 55).

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"** (D.E. 1-2 Page 9 of 66: Point 56).

57. Defendants Horizon/Marino did aide/abet in the commission of the **"pattern of racketeering"** (D.E. 1-2 Page 9 of 66: Point 57).

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 (D.E. 1-2 Page 9 of 66: Point 58).

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' (D.E. 1-2 Page 9 of 66: Point 59).

60. Defendants Horizon/Marino facilitated the 'racketeering activity' through the use of state-corporate facilities (D.E. 1-2 Page 9 of 66: Point 60).

61. Defendants Horizon/Marino facilitated the 'racketeering activity' through the use of state-corporate services (D.E. 1-2 Page 9 of 66: Point 61).

62. Defendants Horizon/Marino facilitated the 'racketeering activity' through the use of state-corporate distribution channels (D.E. 1-2 Page 9 of 66: Point 62).

63. Defendants Horizon/Marino facilitated the 'racketeering activity' through the use of state-corporate employees associated with the **"NJ-BCBS AIF Enterprise"** (D.E. 1-2 Page 9 of 66: Point 63).

64. Defendants Horizon/Marino participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US mail (D.E. 1-2 Page 9 of 66: Point 64).

65. Defendants Horizon/Marino participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US telephonic system (D.E. 1-2 Page 10 of 66: Point 65).

66. Defendants Horizon/Marino participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US wires/internet (D.E. 1-2 Page 10 of 66: Point 66).

67. The Defendants used thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform misrepresentations (D.E. 1-2 Page 10 of 66: Point 67).

68. The Defendants used thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform concealments (D.E. 1-2 Page 10 of 66: Point 68).

69. The Defendants used thousands of interstate mail and wire communications in furtherance of their fraudulent scheme through virtually uniform material omissions (D.E. 1-2 Page 10 of 66: Point 69).

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 (D.E. 1-2 Page 10 of 66: Point 70).

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 (D.E. 1-2 Page 10 of 66: Point 71).

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 (D.E. 1-2 Page 10 of 66: Point 72).

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) (D.E. 1-2 Page 10 of 66: Point 73).

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 (D.E. 1-2 Page 11 of 66: Point 74).

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 (D.E. 1-2 Page 11 of 66: Point 75).

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) (D.E. 1-2 Page 11 of 66: Point 76).

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 (D.E. 1-2 Page 11 of 66: Point 77).

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 (D.E. 1-2 Page 11 of 66: Point 78).

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) (D.E. 1-2 Page 11 of 66: Point 79).

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 (D.E. 1-2 Page 12 of 66: Point 80).

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 (D.E. 1-2 Page 12 of 66: Point 81).

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) (D.E. 1-2 Page 12 of 66: Point 82).

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 (D.E. 1-2 Page 12 of 66: Point 83).

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 (D.E. 1-2 Page 12 of 66: Point 84).

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) (D.E. 1-2 Page 13 of 66: Point 85).

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 (D.E. 1-2 Page 13 of 66: Point 86).

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 (D.E. 1-2 Page 13 of 66: Point 87).

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) (D.E. 1-2 Page 13 of 66: Point 88).

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 (D.E. 1-2 Page 13 of 66: Point 90).

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 (D.E. 1-2 Page 13 of 66: Point 90).

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) (D.E. 1-2 Page 14 of 66: Point 91).

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 (D.E. 1-2 Page 14 of 66: Point 92).

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 (D.E. 1-2 Page 14 of 66: Point 93).

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) (D.E. 1-2 Page 14 of 66: Point 94).

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 (D.E. 1-2 Page 14 of 66: Point 95).

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 (D.E. 1-2 Page 15 of 66: Point 96).

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) (D.E. 1-2 Page 15 of 66: Point 97).

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 (D.E. 1-2 Page 15 of 66: Point 98).

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 (D.E. 1-2 Page 15 of 66: Point 99).

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 renumerated for the pre-certified provision of care to patients with health insurance provided by Defendant BCBS (D.E. 1-2 Page 15 of 66: Point 100).

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 (D.E. 1-2 Page 15 of 66: Point 101).

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 (D.E. 1-2 Page 16 of 66: Point 102).

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 (D.E. 1-2 Page 16 of 66: Point 103).

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 (D.E. 1-2 Page 16 of 66: Point 104).

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 (D.E. 1-2 Page 16 of 66: Point 105).

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 (D.E. 1-2 Page 16 of 66: Point 106).

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 (D.E. 1-2 Page 16 of 66: Point 107).

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 (D.E. 1-2 Page 17 of 66: Point 108).

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 (D.E. 1-2 Page 17 of 66: Point 109).

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 (D.E. 1-2 Page 17 of 66: Point 110).

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 (D.E. 1-2 Page 17 of 66: Point 111).

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 (D.E. 1-2 Page 17 of 66: Point 112).

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 (D.E. 1-2 Page 17 of 66: Point 113).

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 (D.E. 1-2 Page 17 of 66: Point 114).

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 (D.E. 1-2 Page 18 of 66: Point 115).

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 D.E. 1-2 Page 18 of 66: Point 116).

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 D.E. 1-2 Page 18 of 66: Point 117).

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 D.E. 1-2 Page 18 of 66: Point 118).

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 D.E. 1-2 Page 18 of 66: Point 119).

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 (D.E. 1-2 Page 18 of 66: Point 120).

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 (D.E. 1-2 Page 18 of 66: Point 121).

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 (D.E. 1-2 Page 18 of 66: Point 122).

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 (D.E. 1-2 Page 19 of 66: Point 123).

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 (D.E. 1-2 Page 19 of 66: Point 124).

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 (D.E. 1-2 Page 19 of 66: Point 125).

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 (D.E. 1-2 Page 19 of 66: Point 126).

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 (D.E. 1-2 Page 19 of 66: Point 127).

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 (D.E. 1-2 Page 19 of 66: Point 128).

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 (D.E. 1-2 Page 19 of 66: Point 129).

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 (D.E. 1-2 Page 19 of 66: Point 130).

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 (D.E. 1-2 Page 20 of 66: Point 131).

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 (D.E. 1-2 Page 20 of 66: Point 132).

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 (D.E. 1-2 Page 20 of 66: Point 133).

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 (D.E. 1-2 Page 20 of 66: Point 134).

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 (D.E. 1-2 Page 20 of 66: Point 131).

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 (D.E. 1-2 Page 20 of 66: Point 136).

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 (D.E. 1-2 Page 20 of 66: Point 137).

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 (D.E. 1-2 Page 21 of 66: Point 138).

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 (D.E. 1-2 Page 21 of 66: Point 139).

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 (D.E. 1-2 Page 21 of 66: Point 138) (D.E. 1-2 Page 21 of 66: Point 140).

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 (D.E. 1-2 Page 21 of 66: Point 141).

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 (D.E. 1-2 Page 21 of 66: Point 142).

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 (D.E. 1-2 Page 22 of 66: Point 143).

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 D.E. 1-2 Page 22 of 66: Point 144).

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 D.E. 1-2 Page 22 of 66: Point 145).

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 D.E. 1-2 Page 22 of 66: Point 146).

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 (D.E. 1-2 Page 22 of 66: Point 147).

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 (D.E. 1-2 Page 22 of 66: Point 148).

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 (D.E. 1-2 Page 23 of 66: Point 149).

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 (D.E. 1-2 Page 23 of 66: Point 150).

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 (D.E. 1-2 Page 23 of 66: Point 151).

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 (D.E. 1-2 Page 23 of 66: Point 152).

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 (D.E. 1-2 Page 23 of 66: Point 153).

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 (D.E. 1-2 Page 23 of 66: Point 154).

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 (D.E. 1-2 Page 24 of 66: Point 155).

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 (D.E. 1-2 Page 24 of 66: Point 156).

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 (D.E. 1-2 Page 24 of 66: Point 157).

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 (D.E. 1-2 Page 24 of 66: Point 158).

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 (D.E. 1-2 Page 24 of 66: Point 159).

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 (D.E. 1-2 Page 24 of 66: Point 160).

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 (D.E. 1-2 Page 25 of 66: Point 161).

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 (D.E. 1-2 Page 25 of 66: Point 162).

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 (D.E. 1-2 Page 25 of 66: Point 163).

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 (D.E. 1-2 Page 25 of 66: Point 164).

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 (D.E. 1-2 Page 25 of 66: Point 165).

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 (D.E. 1-2 Page 25 of 66: Point 166).

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 (D.E. 1-2 Page 25 of 66: Point 167).

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 (D.E. 1-2 Page 26 of 66: Point 168).

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 (D.E. 1-2 Page 26 of 66: Point 169)

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 (D.E. 1-2 Page 26 of 66: Point 170).

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 (D.E. 1-2 Page 26 of 66: Point 171).

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 (D.E. 1-2 Page 26 of 66: Point 172).

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 (D.E. 1-2 Page 26 of 66: Point 173).

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 (D.E. 1-2 Page 26 of 66: Point 174).

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 (D.E. 1-2 Page 27 of 66: Point 175).

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 (D.E. 1-2 Page 27 of 66: Point 176).

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 (D.E. 1-2 Page 27 of 66: Point 177).

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 (D.E. 1-2 Page 27 of 66: Point 178).

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 (D.E. 1-2 Page 27 of 66: Point 179).

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 (D.E. 1-2 Page 27 of 66: Point 180).

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 (D.E. 1-2 Page 27 of 66: Point 181).

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 (D.E. 1-2 Page 28 of 66: Point 182).

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 (D.E. 1-2 Page 28 of 66: Point 183).

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 (D.E. 1-2 Page 28 of 66: Point 184).

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 (D.E. 1-2 Page 28 of 66: Point 185).

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 (D.E. 1-2 Page 28 of 66: Point 186).

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 (D.E. 1-2 Page 28 of 66: Point 187).

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 (D.E. 1-2 Page 28 of 66: Point 188).

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 (D.E. 1-2 Page 29 of 66: Point 189).

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 (D.E. 1-2 Page 29 of 66: Point 190).

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 (D.E. 1-2 Page 29 of 66: Point 191).

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 (D.E. 1-2 Page 29 of 66: Point 195).

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 (D.E. 1-2 Page 29 of 66: Point 196).

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 (D.E. 1-2 Page 29 of 66: Point 194).

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 (D.E. 1-2 Page 29 of 66: Point 195).

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 (D.E. 1-2 Page 30 of 66: Point 196).

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 (D.E. 1-2 Page 30 of 66: Point 197).

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 (D.E. 1-2 Page 30 of 66: Point 198).

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 (D.E. 1-2 Page 30 of 66: Point 199).

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 (D.E. 1-2 Page 30 of 66: Point 200).

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 (D.E. 1-2 Page 30 of 66: Point 201).

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 (D.E. 1-2 Page 30 of 66: Point 202).

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 (D.E. 1-2 Page 31 of 66: Point 203).

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 (D.E. 1-2 Page 31 of 66: Point 204).

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 (D.E. 1-2 Page 31 of 66: Point 205).

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 (D.E. 1-2 Page 31 of 66: Point 206).

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 (D.E. 1-2 Page 31 of 66: Point 207).

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 (D.E. 1-2 Page 31 of 66: Point 208).

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 (D.E. 1-2 Page 32 of 66: Point 209).

210. 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 (D.E. 1-2 Page 32 of 66: Point 211).

211. 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 (D.E. 1-2 Page 32 of 66: Point 212).

212. 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 (D.E. 1-2 Page 32 of 66: Point 213).

213. 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 (D.E. 1-2 Page 32 of 66: Point 214).

214. 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 (D.E. 1-2 Page 33 of 66: Point 215).

215. 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 (D.E. 1-2 Page 33 of 66: Point 216).

216. 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 (D.E. 1-2 Page 33 of 66: Point 217).

217. 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 (D.E. 1-2 Page 33 of 66: Point 218).

218. 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 (D.E. 1-2 Page 33 of 66: Point 219).

219. 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 (D.E. 1-2 Page 33 of 66: Point 220).

220. 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 (D.E. 1-2 Page 34 of 66: Point 221).

221. 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 (D.E. 1-2 Page 34 of 66: Point 222).

222. 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 (D.E. 1-2 Page 34 of 66: Point 223).

223. 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 (D.E. 1-2 Page 34 of 66: Point 224).

224. 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 (D.E. 1-2 Page 34 of 66: Point 225).

225. 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 (D.E. 1-2 Page 35 of 66: Point 226).

226. 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 (D.E. 1-2 Page 35 of 66: Point 227).

227. 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 (D.E. 1-2 Page 35 of 66: Point 228).

228. 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 (D.E. 1-2 Page 35 of 66: Point 229).

229. 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 (D.E. 1-2 Page 35 of 66: Point 230).

230. 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 (D.E. 1-2 Page 35 of 66: Point 231).

231. 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 (D.E. 1-2 Page 36 of 66: Point 232).

232. 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 (D.E. 1-2 Page 36 of 66: Point 233).

233. 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 (D.E. 1-2 Page 36 of 66: Point 234).

234. 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 (D.E. 1-2 Page 36 of 66: Point 235).

235. 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 (D.E. 1-2 Page 37 of 66: Point 236).

236. 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 (D.E. 1-2 Page 36 of 66: Point 237).

237. 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 (D.E. 1-2 Page 37 of 66: Point 238).

238. 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 (D.E. 1-2 Page 37 of 66: Point 239).

239. 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 (D.E. 1-2 Page 37 of 66: Point 240).

240. 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 (D.E. 1-2 Page 38 of 66: Point 241).

241. 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 (D.E. 1-2 Page 38 of 66: Point 242).

242. 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 (D.E. 1-2 Page 38 of 66: Point 243).

243. 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 (D.E. 1-2 Page 38 of 66: Point 244).

244. 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 (D.E. 1-2 Page 38 of 66: Point 245).

245. 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 (D.E. 1-2 Page 38 of 66: Point 246).

246. 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 (D.E. 1-2 Page 39 of 66: Point 247).

247. 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 (D.E. 1-2 Page 39 of 66: Point 248).

248. 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 (D.E. 1-2 Page 39 of 66: Point 249).

249. 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 (D.E. 1-2 Page 39 of 66: Point 250).

250. 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 (D.E. 1-2 Page 39 of 66: Point 251).

251. 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 (D.E. 1-2 Page 40 of 66: Point 252).

252. 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 (D.E. 1-2 Page 40 of 66: Point 253).

253. 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 (D.E. 1-2 Page 40 of 66: Point 254).

254. 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 (D.E. 1-2 Page 40 of 66: Point 255).

255. 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 (D.E. 1-2 Page 40 of 66: Point 256).

256. 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 (D.E. 1-2 Page 40 of 66: Point 257).

257. 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 (D.E. 1-2 Page 41 of 66: Point 258).

258. 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 (D.E. 1-2 Page 41 of 66: Point 259).

259. 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 (D.E. 1-2 Page 41 of 66: Point 260).

260. 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 (D.E. 1-2 Page 41 of 66: Point 261).

261. 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 (D.E. 1-2 Page 41 of 66: Point 262).

262. 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 (D.E. 1-2 Page 41 of 66: Point 263).

263. 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 (D.E. 1-2 Page 41 of 66: Point 264).

264. 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 (D.E. 1-2 Page 42 of 66: Point 265).

265. 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 (D.E. 1-2 Page 42 of 66: Point 266).

266. 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 (D.E. 1-2 Page 42 of 66: Point 267).

267. 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 (D.E. 1-2 Page 42 of 66: Point 268).

268. 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 (D.E. 1-2 Page 42 of 66: Point 269).

269. 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 (D.E. 1-2 Page 42 of 66: Point 270).

270. 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 (D.E. 1-2 Page 42 of 66: Point 271).

271. 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 (D.E. 1-2 Page 43 of 66: Point 272).

272. 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 (D.E. 1-2 Page 43 of 66: Point 275).

273. 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 (D.E. 1-2 Page 43 of 66: Point 276).

274. 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 (D.E. 1-2 Page 44 of 66: Point 279).

275. 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 (D.E. 1-2 Page 44 of 66: Point 280).

276. 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 (D.E. 1-2 Page 44 of 66: Point 281).

277. 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 (D.E. 1-2 Page 44 of 66: Point 282).

278. 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 (D.E. 1-2 Page 44 of 66: Point 283).

279. 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 (D.E. 1-2 Page 45 of 66: Point 284).

280. 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 (D.E. 1-2 Page 45 of 66: Point 285).

281. 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 (D.E. 1-2 Page 45 of 66: Point 286).

282. 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 (D.E. 1-2 Page 45 of 66: Point 287).

283. 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 (D.E. 1-2 Page 45 of 66: Point 288).

284. 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 (D.E. 1-2 Page 45 of 66: Point 289).

285. 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 (D.E. 1-2 Page 46 of 66: Point 290).

286. 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 (D.E. 1-2 Page 46 of 66: Point 291).

287. 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 (D.E. 1-2 Page 46 of 66: Point 292).

288. 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 (D.E. 1-2 Page 46 of 66: Point 293).

289. 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 (D.E. 1-2 Page 46 of 66: Point 294).

290. 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 (D.E. 1-2 Page 46 of 66: Point 295).

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 domestic healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally (D.E. 1-2 Page 47 of 66: Point 296).

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 domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally (D.E. 1-2 Page 47 of 66: Point 297).

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 domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally (D.E. 1-2 Page 47 of 66: Point 298).

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 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 (D.E. 1-2 Page 47 of 66: Point 299).

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 health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment (D.E. 1-2 Page 47 of 66: Point 300).

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 international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally (D.E. 1-2 Page 47 of 66: Point 301).

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 international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally (D.E. 1-2 Page 48 of 66: Point 302).

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 international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally (D.E. 1-2 Page 48 of 66: Point 303).

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 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 (D.E. 1-2 Page 48 of 66: Point 304).

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 ability to obtain any form of employment (D.E. 1-2 Page 48 of 66: Point 305).

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 indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally (D.E. 1-2 Page 48 of 66: Point 306).

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 indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally (D.E. 1-2 Page 49 of 66: Point 307).

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 indictment investigations to the public in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally (D.E. 1-2 Page 49 of 66: Point 308).

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 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 (D.E. 1-2 Page 49 of 66: Point 309).

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 ability to obtain any form of employment (D.E. 1-2 Page 49 of 66: Point 310).

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 domestic healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally (D.E. 1-2 Page 49 of 66: Point 311).

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 domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally (D.E. 1-2 Page 49 of 66: Point 312).

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 domestic health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally (D.E. 1-2 Page 50 of 66: Point 313).

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 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 (D.E. 1-2 Page 50 of 66: Point 314).

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 health care regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment (D.E. 1-2 Page 50 of 66: Point 315).

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 international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's reputation globally (D.E. 1-2 Page 50 of 66: Point 316).

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 international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's livelihood globally (D.E. 1-2 Page 50 of 66: Point 317).

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 international healthcare regulators in furtherance of their scheme to attempt to destroy Plaintiff Kaul's economic standing globally (D.E. 1-2 Page 50 of 66: Point 318).

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 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 (D.E. 1-2 Page 51 of 66: Point 319).

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 ability to obtain any form of employment (D.E. 1-2 Page 51 of 66: Point 320).

317. 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 (D.E. 1-2 Page 51 of 66: Point 321).

318. 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 (D.E. 1-2 Page 51 of 66: Point 322).

319. 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 (D.E. 1-2 Page 51 of 66: Point 323).

320. 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 (D.E. 1-2 Page 51 of 66: Point 324).

321. The Defendants have directed their monopoly power towards the engineering of illegal anticompetitive schemes to eliminate physician competitors, such as Plaintiff Kaul (D.E. 1-2 Page 52 of 66: Point 325).

322. 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 (D.E. 1-2 Page 52 of 66: Point 326).

323. 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 (D.E. 1-2 Page 52 of 66: Point 327).

324. 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 (D.E. 1-2 Page 52 of 66: Point 328).

325. 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 (D.E. 1-2 Page 52 of 66: Point 329).

326. 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 (D.E. 1-2 Page 52 of 66: Point 330).

327. 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 (D.E. 1-2 Page 53 of 66: Point 331).

328. 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 (D.E. 1-2 Page 53 of 66: Point 332).

329. 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 (D.E. 1-2 Page 53 of 66: Point 333).

330. 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 (D.E. 1-2 Page 53 of 66: Point 334).

331. 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 (D.E. 1-2 Page 53 of 66: Point 335).

332. 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 (D.E. 1-2 Page 53 of 66: Point 336).

333. Defendants Horizon BCBS/Marino's false/illegal constriction of the market has caused a drastic nationwide physician shortage (D.E. 1-2 Page 54 of 66: Point 337).

334. The artificial physician shortage has artificially reduced competition (D.E. 1-2 Page 54 of 66: Point 338).

335. The artificially/illegally caused reduction in competition has caused the public a market injury, in that the price of healthcare has arbitrarily risen (D.E. 1-2 Page 54 of 66: Point 339).

336. The artificially/illegally caused reduction in competition has caused the public a market injury, in that the supply of health care has been reduced (D.E. 1-2 Page 54 of 66: Point 340).

337. 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 (D.E. 1-2 Page 54 of 66: Point 341).

338. 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 (D.E. 1-2 Page 54 of 66: Point 342).

339. 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 (D.E. 1-2 Page 54 of 66: Point 343).

340. This event presented a market threat to hospitals (D.E. 1-2 Page 54 of 66: Point 344).

341. This event presented a market threat to insurance companies (D.E. 1-2 Page 54 of 66: Point 345).

342. This event presented a market threat to the orthopedic-neurosurgical community (D.E. 1-2 Page 54 of 66: Point 346).

343. 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 (D.E. 1-2 Page 55 of 66: Point 347).

344. 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 (D.E. 1-2 Page 55 of 66: Point 348).

345. 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 (D.E. 1-2 Page 55 of 66: Point 349).

346. 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 (D.E. 1-2 Page 55 of 66: Point 350).

347. 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 sham anti-competitive lawsuits (D.E. 1-2 Page 55 of 66: Point 351).

348. 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 (D.E. 1-2 Page 55 of 66: Point 352).

349. 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 (D.E. 1-2 Page 56 of 66: Point 353).

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 administrative complaints that caused license revocations (D.E. 1-2 Page 56 of 66: Point 354).

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 of sham anti-competitive administrative complaints that caused license revocations (D.E. 1-2 Page 56 of 66: Point 355).

352. 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 (D.E. 1-2 Page 56 of 66: Point 356).

353. 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 (D.E. 1-2 Page 57 of 66: Point 357).

354. 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 (D.E. 1-2 Page 57 of 66: Point 358).

355. 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 (D.E. 1-2 Page 57 of 66: Point 359).

356. 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 (D.E. 1-2 Page 57 of 66: Point 360).

357. 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 (D.E. 1-2 Page 57 of 66: Point 361).

358. 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 (D.E. 1-2 Page 58 of 66: Point 362).

359. 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 (D.E. 1-2 Page 58 of 66: Point 363).

360. 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 (D.E. 1-2 Page 58 of 66: Point 364).

361. 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 (D.E. 1-2 Page 58 of 66: Point 365).

362. This grand anticompetitive scheme was orchestrated by **The Kaul Cases** Defendant Christie, in collusion and conspiracy with **The Kaul Cases** Defendants (D.E. 1-2 Page 58 of 66: Point 366)

363. 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 (D.E. 1-2 Page 59 of 66: Point 367).

364. The corruptly procured downgrading scheme injured the commercial potential of Plaintiff Kaul's rapidly expanding outpatient minimally invasive spine surgery practice (D.E. 1-2 Page 59 of 66: Point 368).

365. 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 (D.E. 1-2 Page 59 of 66: Point 369).

366. 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 (D.E. 1-2 Page 59 of 66: Point 370).

367. The neurosurgeons effectuated the change without publicizing it for comment, thus denying Plaintiff Kaul and other minimally invasive spine surgeons the opportunity to object (D.E. 1-2 Page 59 of 66: Point 371).

368. **The Kaul Cases** Defendant, Gregory Przybylski, was the state's principal 'expert' witness against Plaintiff Kaul in the revocation proceedings (D.E. 1-2 Page 59 of 66: Point 372).

369. 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 (D.E. 1-2 Page 59 of 66: Point 373).

370. The downgrading scheme reduced the reimbursement rate for endoscopic discectomies (D.E. 1-2 Page 60 of 66: Point 374).

371. The reduced reimbursement caused a larger percentage of the insurance health fund to be diverted to Defendants Horizon BCBS/Marino's profits (D.E. 1-2 Page 60 of

66: Point 375).

372. Defendants Horizon BCBS/Marino did not share the increased profits with their clients by reducing premiums (D.E. 1-2 Page 60 of 66: Point 376).

373. In fact, despite the increased profits, Defendants Horizon BCBS/Marino increased annual premiums despite internal actuarial calculations that substantiated a decrease (D.E. 1-2 Page 60 of 66: Point 377).

374. The downgrading scheme caused sustained/substantial losses and damage to Plaintiff Kaul personally consequent to reduced reimbursement associated with outpatient minimally invasive spine surgery (D.E. 1-2 Page 60 of 66: Point 378).

375. 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 (D.E. 1-2 Page 60 of 66: Point 379).

376. 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 (D.E. 1-2 Page 60 of 66: Point 380).

377. 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 (D.E. 1-2 Page 60 of 66: Point 381).

378. The illegitimate legislative/regulatory change did not serve the public interest in

that it did not improve patient outcomes (D.E. 1-2 Page 61 of 66: Point 382).

379. The illegitimate legislative/regulatory change did not serve the public interest in that it did not improve patient safety (D.E. 1-2 Page 61 of 66: Point 383).

380. The illegitimate legislative/regulatory change did not serve the public interest in that it did not reduce patient annual premiums (D.E. 1-2 Page 61 of 66: Point 384).

381. The illegitimate legislative/regulatory change did not serve the public interest as Defendants Horizon BCBS/Marino continued to increase annual patient premiums (D.E. 1-2 Page 61 of 66: Point 385).

382. The illegitimate legislative/regulatory change harmed Plaintiff Kaul's minimally invasive spine surgery practice (D.E. 1-2 Page 61 of 66: Point 386).

383. The harm included a downgrading in the Relative Value Unit associated with the CPT code for endoscopic discectomy (D.E. 1-2 Page 61 of 66: Point 387).

384. 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 (D.E. 1-2 Page 61 of 66: Point 388).

385. The harm included illegitimate refusal of Defendant Horizon BCBS to reimburse surgical centers for minimally invasive spine surgery (D.E. 1-2 Page 61 of 66: Point 389).

386. These harms artificially/arbitrarily reduced the availability to the public of outpatient minimally invasive spine surgery (D.E. 1-2 Page 61 of 66: Point 390).

387. 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 (D.E. 1-2 Page 62 of 66: Point 391).

388. The false indictments caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market (D.E. 1-2 Page 62 of 66: Point 392).

389. The monopolistic effect of the false indictments caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino (D.E. 1-2 Page 62 of 66: Point 393).

390. 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 (D.E. 1-2 Page 62 of 66: Point 394).

391. The false convictions caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market (D.E. 1-2 Page 62 of 66: Point 395).

392. The monopolistic effect of the false convictions caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino (D.E. 1-2 Page 62 of 66: Point 396).

393. 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 (D.E. 1-2 Page 62 of 66: Point 397).

394. 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 D.E. 1-2 Page 62 of 66: Point 398).

395. 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 (D.E. 1-2 Page 63 of 66: Point 399).

396. The sham anti-competitive legislation caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market (D.E. 1-2 Page 63 of 66: Point 400).

397. The monopolistic effect of the sham anti-competitive legislation caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino (D.E. 1-2 Page 63 of 66: Point 401).

398. 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 (D.E. 1-2 Page 63 of 66: Point 402).

399. The sham anti-competitive lawsuits caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market (D.E. 1-2 Page 63 of 66: Point 403).

400. The monopolistic effect of the sham anti-competitive lawsuits caused an illegal

diversion of monopolistic profits to Defendants Horizon BCBS/Marino (D.E. 1-2 Page 63 of 66: Point 404).

401. 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 (D.E. 1-2 Page 63 of 66: Point 405).

402. 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 (D.E. 1-2 Page 64 of 66: Point 406).

403. The monopolistic effect of the sham anti-competitive administrative complaints caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino (D.E. 1-2 Page 64 of 66: Point 407).

404. 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 (D.E. 1-2 Page 64 of 66: Point 408).

405. The illegitimate legislative/regulatory change caused an illegal monopolistic effect on the healthcare premium-based fund element of the minimally invasive spine surgery market (D.E. 1-2 Page 64 of 66: Point 409).

406. The monopolistic effect of the illegitimate legislative/regulatory change caused an illegal diversion of monopolistic profits to Defendants Horizon BCBS/Marino (D.E. 1-2 Page 64 of 66: Point 410).

407. 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 (D.E. 1-2 Page 64 of 66: Point 411).

408. 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 (D.E. 1-2 Page 64 of 66: Point 412).

409. 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 (D.E. 1-2 Page 64 of 66: Point 413).

410. 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 (D.E. 1-2 Page 65 of 66: Point 414).

411. Defendant Horizon BCBS's illegal anticompetitive conduct caused it to procure monopoly power (D.E. 1-2 Page 65 of 66: Point 415)

412. 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 (D.E. 1-2 Page 65 of 66: Point 416)

413. 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 (D.E. 1-2 Page 65 of 66: Point 417)

414. 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 (D.E. 1-2 Page 65 of 66: Point 418)

415. Defendant Horizon BCBS omitted with fraudulent intent, the fact that although the individual price had increased, the overall volume of surgery had decreased (D.E. 1-2 Page 65 of 66: Point 419)

416. Defendant Horizon BCBS omitted with fraudulent intent, the fact that their overall cost for minimally invasive spine surgery had decreased (D.E. 1-2 Page 65 of 66: Point 420)

417. 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 (D.E. 1-2 Page 65 of 66: Point 421)

418. 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 (D.E. 1-2 Page 66 of 66: Point 422)

419. 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 (D.E. 1-2 Page 66 of 66: Point 423)

420. 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 (D.E. 1-2 Page 66 of 66: Point 424)

421. The end-result is that the public pays more for less, while the Defendants corporate/executive profits continue to rise (D.E. 1-2 Page 66 of 66: Point 425)

422. 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 (D.E. 1-2 Page 66 of 66: Point 426).

FACTS ADMITTED CONSEQUENT TO THE PROOF OF IDENTICAL FACTS IN RE MDL BLUE CROSS BLUE SHIELD ANTITRUST LITIGATION MDL (2:13-CV-20000-RDP)

423. The antitrust related facts and issues underpinning MDL and K11-22 are of sufficient identity to render, for the purposes of preclusion/res judicata/collateral estoppel, the findings of fact/conclusions of law contained within the October 30, 2020 **'SETTLEMENT AGREEEMENT'** to be dispositive of the K11-22 claims (D.E. 28 Page 21 to 124 of 260).

424. The facts/conclusions of law contained within the October 30, 2020 **'SETTLEMENT AGREEEMENT'** were further validated on October 25, 2023, by the U.S.C.A. for the 11th Circuit (D.E. 28 Page 125 to 174 of 260).

425. Defendants Horizon-Marino are thus precluded from contesting the factual or legal bases of all claims in K11-22, as these bases have been proven, the proof of which had been validated by the 11th Circuit (D.E. 28 Page 125 to 174 of 260).

426. However, within these admitted proofs, there exists irrefutable evidence of a criminal-state-of-mind that has for many decades pervaded/directed the national and regional business strategies of Defendant BCBSA and its subjugate members/persons, such as Defendants Horizon-Marino (D.E. 1-2 Page 1 to 66 of 66 + D.E. 28 Page 21 to 174 of 260)

427. These undisputed/admitted facts, in conjunction with Defendants Horizon-Marino's defenselessness and other admitted facts, do irrefutably render them subject to Summary Judgment (D.E. 1-2 Page 1 to 66 of 66 + D.E. 15-11 Page 1 to 17 of 17 + D.E. 28 Page 21 to 174 of 260)

FACTS ADMITTED CONSEQUENT TO THE NON-DENIAL OF FACTS ALLEGED IN K11-22

428. From the filing of K11-11 on January 27, 2023, to the current pendency of K11-22 on April 5, 2024, a period of four hundred and twenty (420) days, Defendants Horizon-Marino's failure to deny any of the almost one thousand (1,000) facts has caused their admittance (D.E. 1-2 Page 1 to 66 of 66 + D.E. 15-11 Page 1 to 17 of 17 + D.E. 28 Page 21 to 174 of 260).

429. The admittance of these facts is proof of their guilt of the charges levied in K11-22 and evidences their conviction that their long-standing **"pattern of racketeering"** against Plaintiff Kaul within the District of New Jersey-Newark Vicinage would obviate any requirement to deny the facts (D.E. 1-2 Page 1 to 66 of 66 + D.E. 15-11 Page 1 to 17 of 17 + D.E. 28 Page 21 to 174 of 260).

430. Defendants knew they need not deny any facts, as any petition filed by Plaintiff Kaul within the District of New Jersey-Newark Vicinage, because they had corrupted the court, and any petition based on these facts would either be dismissed and or denied (D.E. 1-2 Page 1 to 66 of 66 + D.E. 15-11 Page 1 to 17 of 17)

431. Defendants Horizon-Marino, in their conviction of their corrupt control of the District of New Jersey-Newark Vicinage, did neither consider nor anticipate that their non-denial would cause an admission of undisputed material fact, sufficient to substantiate Summary Judgment (D.E. 1-2 Page 1 to 66 of 66).

432. However, Defendants Horizon-Marino's December 28, 2023, failed attempt (K11-11: D.E. 30) to coerce U.S.D.J. Farbiarz into altering his December 15, 2023, opinion (K11-11: D.E. 29) (K11-22: D.E. 22 Page 10 to 11 of 29: Points 24/25/26 + D.E. 22 Page 14 to 17 of 29: Points 35/36/37/39/40/42 + D.E. 22 Page 24 to 26 of 29: Points 63/66/67 + D.E. 24 Page 12 to 16 of 22: Points 32/37/38/39/42) **did** achieve two (2) things.

433. **One**, it caused the issuance in K11-11 on February 13, 2024, **found** at (K11-11: D.E. 31) by U.S.D.J. Farbiarz of an opinion, **exhibited** by Defendants in K11-22 at (K11-22: D.E. 15-11 Page 1 to 17 of 17), that effectively invalidated the 'time-barred' basis of U.S.D.J. Farbiarz's K11-11 October 27, 2023, opinion of dismissal of COUNTS ONE/EIGHT/ELEVEN, **found** in K11-11 at (K11-11: D.E. 19) and **exhibited** by Defendants in K11-22 at (K11-22: D.E. 15-11 Page 1 to 17 of 17). What Defendants secretly sought on December 28, 2023, from U.S.D.J. Farbiarz (an order of dismissal of K11-11 with prejudice) was the opposite of what Defendants obtained.

434. **Two,** it exposed another aspect of Defendants long-standing **"pattern of racketeering"** against Plaintiff Kaul within the District of New Jersey-Newark Vicinage, that being their causing district judges to alter prior opinions in response to subsequent submissions by Plaintiff Kaul that threatened to expose the crimes of **The Kaul Cases** Defendants (D.E. 22 Page 11 to 17 of 29 Points 26/36/40/41/42).

435. The criminality of the 'cover-up' continued to equal if not exceed the crimes (D.E. 24 Page 10 of 22: Point 27). Defendants have tacitly admitted this fact.

436. Defendants Horizon-Marino, based on their experience within the District of New Jersey-Newark Vicinage, did not expect U.S.D.J. Farbiarz to reject their December 28, 2023, petition (D.E. 22 Page 16 of 29: Points 40/41). Defendants have tacitly admitted this fact.

437. Consequent to the December 12, 2023, filing of K11-22, Defendants Horizon-Marino continued to believe their admission of fact in K11-11 would be precluded in K11-22, and forever barred from being re-applicable in K11-11 **because**, they were convinced they would be able to coerce U.S.D.J. Farbiarz into retro-actively dismissing K11-11 with prejudice (D.E. 22 Page 10 of 29: Point 24). Defendants have tacitly admitted this fact.

438. Defendants Horizon-Marino were convinced that a retro-active dismissal with prejudice of K11-11 would forever preclude there being any legal vehicle on which Plaintiff Kaul could prosecute the facts admitted in K11-11 to Summary Judgment/Verdict (D.E. 22 Page 10 of 29: Point 24). Defendants have tacitly admitted this fact.

439. Similarly, Defendants Horizon-Marino did not expect U.S.D.J. Farbiarz's February 13, 2024, opinion rejecting (K11-11: D.E. 31), their motion to alter his December 15, 2023 (K11-11: D.E. 29) dismissal of K11-11 without prejudice to one with prejudice. Defendants have tacitly admitted this fact.

440. U.S.D.J. Farbiarz's February 13, 2024, denial (K11-11: D.E. 31) of Defendants December 28, 2023, motion (K11-11: D.E. 30) was undoubtedly influenced by the claim substantiating, 'time-barred' nullifying law cited by Plaintiff Kaul in K11-17 as to ongoing**/"new"** injuries (D.E. 22 Pages 11/15/16/17/24/25/26 of 29: Points 26/36/39/40/42/63/66/67). Defendants have tacitly admitted this fact.

441. U.S.D.J. Farbiarz's reliance on K11-17's citation of law nullifying Defendants Horizon-Marino's 'time barred' defense, has rendered Defendants Horizon-Marino's 'timer-barred' defense null/void in K11-22, a nullification responsible for Defendants defenselessness in K11-

22, a defenselessness that subjects them to Summary Judgment (D.E. 22 Pages 11/15/16/17/24/25/26 of 29: Points 26/36/39/40/42/63/65/66/67). Defendants have tacitly admitted this fact.

442. The only defense adopted by U.S.D.J. Farbiarz in K11-11 was Defendants Horizon-Marino's 'time-barred' defense, as all other defenses were rejected (D.E. 15-11 Page 1 to 17 of 17). Defendants have tacitly admitted this fact.

443. Defendants Horizon-Marino's surreptitious 'rolling of their loaded dice' on December 28, 2023, did not achieve their desired outcome, but did in fact cause the rendering of judicial opinion that substantiates Summary Judgment in K11-22 by depriving them of their only 'time-#barred' defense (D.E. 22 Page 15/16/17 of 29: Point 36/41/42). Defendants have tacitly admitted this fact.

FACTS ADMITTED CONSEQUENT TO THE NON-DENIAL OF FACTS ALLEGED IN K11-11

444. In a time period commencing in or around January 27, 2023, and in the District of New Jersey, Defendants Horizon-Marino, after having been served with copies of the Summons/Complaint in K11-11, did commence conspiring to perpetrate a continuation of their schemes of judicial-political corruption, that they had commenced in or around 2008 with **The Kaul Cases** Defendants, of amongst others, Christopher J. Christie (D.E. 1 Page 25/39/46/51/61/62: Points 110/190/242/270/342/350 + D.E. 15-5 Page 24/38/53/57/68/69 of 384: Points 38/83/105/120/166/171).

445. Defendants had in the preceding decades perpetrated many conspiracies of judicial corruption, in which they perpetrated quid pro quo schemes with certain judges, that involved the judge receiving bribes in return for, amongst other things, granting orders, denying orders, granting dismissals and or denying dismissals. Defendants, in attempting to show, albeit

unsuccessfully, the identity of the factual foundation of K11-22 with **The Kaul Cases**, did submit entire copies of certain previous complaints, in which Plaintiff Kaul pled facts as to **The Kaul Cases** Defendants' corruption of certain courts/judicial officers within the United States District Court. These facts can be found at: **(i)** D.E. 1 Pages 25/39/46/51/61/62 of 69 : Points 110/190/242/270/342/350; **(ii)** D.E. 15-5 Pages 24/38/43/48/59/60 of 384: Points 38/83/105/120/166/171; **(iii)** D.E. 15-10 Pages 26/40/47/52/62/73 of 170: Points 110/190/242/270/342/350; **(iv)** D.E. 15-12 Pages 17 of 21 + Page ID 2319/2323; **(v)** D.E. 15-13 Page26 of 287; **(vi)** D.E. 15-5 Page 1/24/38/43/48/59/60 of 384: Points 38/83/105/120/166/171; **(vii)** D.E. 15-10 Page 39/46/51/61/62 of 170: Points 110/190/242/270/342/350; **(viii)** D.E. 15-13 Page 29/33/34 of 287; **(ix)** D.E. 22 Page 7/8/8/11/14/29 of 29: Points 11/14/16/25/CONCLUSION; **(x)** D.E. 22-6 Page 12 of 30; **(xi)** D.E. 22-7 Page 3 of 15; **(xii)** D.E. 23-1 Pages 8/9/10/16/17/18/19/20/21/23/24//25 of 26; **(xiii)** D.E. 23-3 Page 5 of 14; **(xiv)** D.E. 24 Pages 13/14/17/20 of 22: Points 34/38/46/55; **(xv)** D.E. 24-1 Page 3 of 6; **(xvi)** D.E. 24-2 Page 5 of 81;**(xvii)** D.E. 24-3 Page 5 of 6;

Defendants have denied none of these facts, the non-denial of which did cause them to become irrefutably admitted for the purpose of Summary Judgment and or Verdict.

446. Defendants Horizon-Marino believed that with the 'right' judge in place, their corruption of the court would cause a dismissal of K11-11. These facts can be found at: **(i)** D.E. 1 Pages 25/39/46/51/61/62 of 69 : Points 110/190/242/270/342/350; **(ii)** D.E. 15-5 Pages 24/38/43/48/59/60 of 384: Points 38/83/105/120/166/171; **(iii)** D.E. 15-10 Pages 26/40/47/52/62/73 of 170: Points 110/190/242/270/342/350; **(iv)** D.E. 15-12 Pages 17 of 21 + Page ID 2319/2323; **(v)** D.E. 15-13 Page26 of 287; **(vi)** D.E. 15-5 Page 1/24/38/43/48/59/60 of 384: Points 38/83/105/120/166/171; **(vii)** D.E. 15-10 Page 39/46/51/61/62 of 170: Points 110/190/242/270/342/350; **(viii)** D.E. 15-13 Page 29/33/34 of 287; **(ix)** D.E. 22 Page 7/8/8/11/14/29 of 29: Points 11/14/16/25/CONCLUSION; **(x)** D.E. 22-6 Page 12 of 30; **(xi)** D.E.

22-7 Page 3 of 15; **(xii)** D.E. 23-1 Pages 8/9/10/16/17/18/19/20/21/23/24//25 of 26; **(xiii)** D.E. 23-3 Page 5 of 14; **(xiv)** D.E. 24 Pages 13/14/17/20 of 22: Points 34/38/46/55; **(xv)** D.E. 24-1 Page 3 of 6; **(xvi)** D.E. 24-2 Page 5 of 81;**(xvii)** D.E. 24-3 Page 5 of 6;

Defendants have denied none of these facts, the non-denial of which did cause them to become irrefutably admitted for the purpose of Summary Judgment and or Verdict.

447. Defendants Horizon-Marino, recognized that it was critical to suppress the emergence of any of the facts of crime, asserted in K11-11, which is why they failed to deny or otherwise answer the allegations/facts within K11-11/K11-22 (D.E. 22-4 Page 14/22 of 37: Point 32/81 + D.E. 23-3 Page 5 of 14 + D.E. 24 Page 17 of 22: Point 46 + D.E. 28 Page 9 of 260). Defendants have tacitly admitted this fact.

448. Defendants Horizon-Marino, in knowing the financial/legal exposure they had sustained in MDL, recognized that they had to ensure K11-11 was dismissed, in order to prevent the exposure of facts of a criminal nature (D.E. 1 Page 17 of 69: Point 63 + D.E. 24 Page 17 of 22 Point 46.). Defendants have tacitly admitted this fact.

449. Defendants recognized that the allegations in K11-11/K11-22 were criminal, while those in the MDL case were principally civil antitrust violations (D.E. 1 Page 14 of 69: Point 43 + D.E. 1 Page 21 of 69: Point 90 + D.E. 1 Page 26 of 69: Point 112). Defendants have tacitly admitted this fact.

450. An element of the judicial corruption-fact suppression scheme was to neither deny nor admit the facts (D.E. 22 Page 4 of 29: Point 5 + D.E. 28 Page 9 of 260). Defendants have tacitly admitted this fact.

451. Defendants knew that the K11-11 facts were/are true (D.E. 1 Page 28 of 69: Point 118 + D.E. 15-5 Page 25 of 384: Point 46). Defendants have tacitly admitted this fact.

452. Defendants recognition/admittance of the criminal truth of the K11-11/K11-22 facts was the reason they did not admit to the facts (D.E. 1 Page 11/22 of 69: Point 18/96 + D.E. 15-10 Page 7 of 70: Point 5). Defendants have tacitly admitted this fact.

453. Defendants recognized that if they admitted to the K11-11 facts, they risked criminal indictment and corporate collapse (D.E. 15-12 Page 17 of 21 Page ID 2310). Defendants have tacitly admitted this fact.

454. Defendants recognized that any criminal indictments and or corporate collapse would implicate many others in their decades-long schemes of political and judicial corruption (D.E. 1 Page 65 of 69: Point 380 + D.E. 15-5 Page 63 of 384: Point 193 + D.E. 21-5 Page 35 of 39: Point 117). Defendants have tacitly admitted this fact.

455. Defendants recognition/admittance of the criminal truth of the K11-11/K11-22 facts was the reason they did not deny the facts (D.E. 15-12 Page 17 of 21 Page ID 2310 + D.E. 28 Page 14 of 260). Defendants have tacitly admitted this fact.

456. Defendants recognized that if they denied the facts under penalty of perjury, they risked being charged/prosecuted for perjury (D.E. 1 Page 10/11/22/27/46 of 69: Points 19/93/115/242). Defendants have tacitly admitted this fact.

457. Defendants, in recognizing the immense criminal liability associated with either denying or admitting the facts, did not do either (D.E. 15-12 Page 17 of 21 Page ID 2310 + D.E. 28 Page 14 of 260). Defendants have tacitly admitted this fact.

458. Defendants, in recognizing their corrupt capture of certain judges within the District of New Jersey, did, within the development of their scheme, decide to simply perpetrate another quid pro quo and attempt to have K11-11 dismissed on procedural grounds (D.E. 22 Page 5 of 29: Point 9 + D.E. 28 Page 18 of 260). Defendants have tacitly admitted this fact.

459. Defendants recognized that a dismissal of K11-11 on procedural grounds would eliminate the immense risk of further exposure in the MDL case (D.E. 1 Page 11/46 of 69: Points 22/244 + D.E. 15-10 Page 12/19/39/47 of 70: Points 19/22/74/185/244). Defendants have tacitly admitted this fact.

460. Defendants, having calculated/compared the risks of judicial corruption with those associated with the exposure of the K11-11 facts, did perpetrate a corruption of certain judges within the District of New Jersey (D.E. 22-5 Page 80 of 84: Point 443 + D.E. 24-2 Page 56 of 81: Point 13 + D.E. 28 Page 15 of 260). Defendants have tacitly admitted this fact.

461. Defendants, in recognizing the immense relevance of the appellate outcome in the MDL, and in hoping it would be decided in their favor, did instruct the district judge to withhold his opinion until the 11th Circuit ruling (D.E. 28 Page 16/17/18 of 260). Defendants have tacitly admitted this fact.

462. Defendants motivation for ordering the withholding of the issuance of the K11-11 partial dismissal was to attempt to impart to the decision an appearance of legitimacy, believing the 11th Circuit decision would bolster the dismissal of the K11-11 antitrust claims (D.E. 28 Page 16/17/18 of 260). Defendants have tacitly admitted this fact.

463. Defendants recognized that Plaintiff Kaul had on many previous occasions raised the issue of judicial corruption within the District of New Jersey, and believed that a favorable ruling from the 11th Circuit in MDL would justify the dismissal with prejudice of all K11-11 claims (D.E. 28 Page 16/17/18 of 260). Defendants have tacitly admitted this fact.

464. Defendants believed that an 11th Circuit MDL based dismissal would provide 'cover' against any claims of judicial corruption, and thus ordered the district judge to withhold his opinion until the October 25, 2023, issuance of the 11th Circuit MDL decision (D.E. 28 Page 16/17/18 of 260). Defendants have tacitly admitted this fact.

465. In the perpetration of their scheme, Defendants calculated that if there were an adverse 11th Circuit MDL ruling, that would not affect their corruptly procured 'time-barred' defense from eliminating all claims except the antitrust ones (D.E. 28 Page 16/17/18 of 260). Defendants have tacitly admitted this fact.

466. Defendants calculated/schemes that if the 11th Circuit MDL ruling were adverse, the district judge would permit them to submit further briefing to circumvent the legal foundation of the 11th Circuit opinion (D.E. 28 Page 16/17 of 260). Defendants have tacitly admitted this fact.

467. Defendants calculated that further briefing to attempt to undermine the 11th Circuit MDL, that even if illegitimate/inapposite, would at the very least provide the district judge an excuse to dismiss the K11-11 antitrust claims in a manner that appeared not to violate the law of the 11th Circuit MDL (D.E. 28 Page 16/17 of 260). Defendants have tacitly admitted this fact.

468. Defendants calculated that upon dismissal with prejudice of K11-11, Plaintiff Kaul would be forever barred from re-filing the claims, regardless of the 11th Circuit holding in MDL (D.E. 22 Page 10/17/24/25 of 29: Point 24/41/63 + D.E. 22-10 Page 2 of 3 + D.E. 24 Page 5/10/12 of 22: Point 10/27/32). Defendants have tacitly admitted this fact.

469. Defendants calculated that upon dismissal with prejudice of K11-11, the only option left to Plaintiff Kaul would be to appeal to the 3rd Circuit, a court whose state-rate immunity related holdings had been criticized by law professors in the MDL (D.E. 1 Page 10 of 69). Defendants have tacitly admitted this fact.

470. Defendants, in the development and myriad of calculations of their scheme, were convinced the scheme would cause a procedural dismissal of K11-11 and a suppression of facts of long-standing violations of criminal law, that involved massive schemes of politico-judicial corruption (D.E. 22 Page 4 of 29: Point 5 + D.E. 28 Page 9 of 260). Defendants have tacitly admitted this fact.

471. Defendants, in their conviction, did calculate that the risk of not denying the facts was far outweighed by the risk of denying and or admitting the facts (D.E. 1-2 Page 1 to 66 of 66 + D.E. 15-11 Page 1 to 17 of 17 + D.E. 28 Page 21 to 174 of 260). Defendants have tacitly admitted this fact.

472. However, Defendants did recognize that in not denying the facts in K11-11/K11-22, they did tacitly admit to the facts (D.E. 22 Page 29 of 29 + D.E. 28 Page 13/14 of 260). Defendants have tacitly admitted this fact.

473. Defendants, despite recognizing their tacit admission of fact, did not consider it a risk, as they were convinced all of the K11-11 claims, including the antitrust ones, would be dismissed with prejudice, regardless of the outcome of the 11th Circuit MDL, as their further briefing would provide a seeming circumvention of the October 25, 2023, 11th Circuit holding in MDL ((D.E. 28 Page 16/17 of 260). Defendants have tacitly admitted this fact.

474. Defendants misguided conviction of these K11-11 procedural events, caused them to not deny the K11-11 facts, which in conjunction with the truth of the facts, now subjects them to Summary Judgment in K11-22 (D.E. 28 Page 16/17 of 260). Defendants have tacitly admitted this fact.

475. K11-22 is a case whose factual foundation not only includes the K11-11 admitted facts, but is a case whose factual foundation exceeds that of K11-11 (D.E. 22 Page 7/14/24/25/26/27 of 29: Points 11/22/61/62/63/67/69). Defendants have tacitly admitted this fact.

476. Defendants admission of fact in K11-11 was validated by the absence in the district court's October 27, 2023/December 15, 2023, dismissal opinions, of any repudiation of their admitted fact (D.E. 15-11 Page 1 to 17 of 17 + D.E. 22 Page 15/16/17 of 29: Points 36/37/39/40/42). Defendants have tacitly admitted this fact.

477. The district court did neither declare as moot Defendants admission of fact nor declare that Defendants right to due process had been violated in its establishment (D.E. 15-11 Page 1 to 17 of 17 + D.E. 22 Page 15/16/17 of 29: Points 36/37/39/40/42). Defendants have tacitly admitted this fact.

480. The admittance of fact in K11-11 was proven by the acts/omissions/commissions of Defendants and the district court (D.E. 15-11 Page 1 to 17 of 17 + D.E. 22 Page 15/16/17 of 29: Points 36/37/39/40/42 + D.E. 28 Page 16/17 of 260). Defendants have tacitly admitted this fact.

FACTS ADMITTED CONSEQUENT TO THE NON-DENIAL OF ALLEGEDLY IDENTICAL FACTS ALLEGED IN K11-17/COURT OPINION

481. In K11-22, Defendants claim the factual foundation of all of **The Kaul Cases,** including K11-11, is identical, and pertains singularly to the illegal 2014 NJ revocation (D.E. 17 Page 19 of 26 + D.E. 17 Page 26/28/29 of 62). The claim is false (D.E. 1 Page 11/13/14 of 69: Points 22/34/42 + D.E. 1 Page 21/25/26/29/30/38/43/48/50 of 69: Points 91/109/112/122/127/184/222/259/267). Defendants have tacitly admitted the falsity of their claimed fact.

482. Defendants have claimed/claim that this singular factual foundation is, amongst other things, frivolous, meritless, and harassing. This claim is false (D.E. 1 Page 8/59/62/64 of 69. Points 17/328/353/372). Defendants have tacitly admitted the falsity of their claimed fact.

483. Defendants claim that this singular factual foundation has been dismissed by every district court within the United States District Court, as being insufficiently pled and lacking any substance of fact. This is a false claim (D.E. 15-7 Page 19/22/23 of 44 + D.E. 22 Page 7/9/25 of 29: Points: 13/19/20/66). Defendants have tacitly admitted the falsity of their claimed fact.

484. Defendants claim that because every prior court in which **The Kaul Cases** have been filed has dismissed this singular 2014 NJ revocation fact with prejudice, and that because the

singular factual foundation of K11-22 is identical to all prior cases, that K11-22 should be dismissed with prejudice. This is a false claim (D.E. 15-7 Page 19/22/23 of 44 + D.E. 22 Page 7/9/25 of 29: Points: 13/19/20/66). Defendants have tacitly admitted the falsity of their claimed fact.

485. On February 13, 2024, in K11-17, a case whose factual foundation Defendants claim is identical to that of K11-22, the United States District Court for the Eastern District of North Carolina did, after extensive briefing, enter a discovery order (K11-17: D.E. 65) (D.E. 22 Page 11/12 of 29: Points 29 + D.E. 24 Page 6/7 of 22: Points 12/13). Defendants have tacitly admitted the falsity of their claimed fact that the factual foundation of K11-22 is frivolous.

486. The K11-17 Defendants non-denial/admittance of the K11-17 facts, facts that the K11-22 Defendants claim are identical to the K11-22 facts, has effectively caused an admission in K11-22 of the purportedly identical facts in K11-17 and an admission of the K11-22 Defendants defenselessness (D.E. 22 Page 12/13/14/15 of 29: Points 30/31/32/33/34/35). Defendants have tacitly admitted this fact.

487. The admission by the K11-22 Defendants of the identical-ness of the facts admitted in K11-17, to the facts admitted in K11-22, does further substantiate Summary Judgment in K11-22 (D.E. 22 Page 11/12/13/14/15 of 29: Points 12/13/30/31/32/33/34/35). Defendants have tacitly admitted this fact.

488. Defendants, in admitting that all courts within the United States District Court hold identical opinions of the merit of the factual foundation of all **The Kaul Cases**, do admit that the K11-17 Court did on February 13, 2024, find merit in the factual foundation of K11-17, a factual foundation Defendants claim is identical to K11-22 (K11-17: D.E. 65) (D.E. 22 Page 11/12 of 29: Points 29 + D.E. 24 Page 6/7 of 22: Points 12/13). Defendants have tacitly admitted this fact.

489. Therefore, Defendants have been effectively caused to admit the merit of the factual foundation of K11-22, a factual foundation allegedly identical to that of K11-17, a case found to

have merit by the United States District Court, and thus Defendants have admitted that the purportedly identical factual foundation of K11-22 has merit. Defendants defense of identical-ness related lack of merit as to K11-22 is undermined by the fact that on March 13, 2024, K11-17, a case, the factual foundation of which Defendants claim is identical to K11-22, was indeed found to be with merit. This fact further substantiates Summary Judgment (D.E. 22 Page 11/12/13/14/15 of 29: Points 12/13/30/31/32/33/34/35 + D.E. 24 Page 6/7 of 22: Points 12/13). Defendants have tacitly admitted this fact.

FACTS OF DEFENDANTS CONCEDED DEFENSELESSNESS

THE DEFENSES RAISED BY DEFENDANTS HORIZON BLUE CROSS BLUE SHIELD/ROBERT MARINO IN K11-22 ARE NULL/VOID BECAUSE THEY WERE REJECTED AND OR DISPROVED IN K11-11, AND THUS DEFENDANTS ARE DEFENSELESS AND SUBJECT TO SUMMARY JUDGMENT.

490. On March 13, 2023, in K11-11, Defendants HORIZON BLUE CROSS BLUE SHIELD/ROBERT MARINO **("Defendants Horizon/Marino")** filed a **"MEMORANDUM OF LAW IN SUPPORT OF … MOTION TO DISMISS THE COMPLAINT OF PLAINTIFF RICHARD ARJUN KAUL"** (K11-11: D.E. 11-1), in which they asserted the following defenses:

I. ALL OF KAUL'S CLAIMS ARE BARRED BY RES JUDICATA AND THEREFORE, MUST BE DISMISSED WITH PREJUDICE – **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19); II.** KAUL'S CLAIMS AGAINST ROBERT ARE BASELESS AND MUST BE DISMISSED WITH PREJUDICE - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19) ; III.** TO THE EXTENT KAUL'S CLAIMS ARE NOT OTHERWISE BARRED, THE CLAIMS ARE BARRED BY THE APPLICABLE STATUTE OF LIMITATIONS; A. Kaul's RICO Claims are Time-Barred – **ADMITTED (OCTOBER 27, 2023-D.E. 19) AND THEN TACITLY REJECTED (FEBRUARY 13, 2024-D.E. 31) ;** B. Kaul's §§ 1981 and 1982 Claims are Time-Barred – **ADMITTED (OCTOBER 27, 2023-D.E. 19) AND THEN TACITLY REJECTED (FEBRUARY 13, 2024-D.E. 31);** C. Kaul's State Law Claims are Time-Barred – **ADMITTED (OCTOBER 27, 2023-D.E. 19) AND THEN TACITLY REJECTED (FEBRUARY 13, 2024-D.E. 31); IV.** TO THE EXTENT KAUL'S CLAIMS

ARE NOT OTHERWISE BARRED, THE CLAIMS ARE NONETHELESS SUBJECT TO DISMISSAL AS KAUL FAILS TO FACTUALLY PLEAD THE REQUIRED ELEMENTS OF EACH CAUSE OF ACTION - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** A. The Complaint Fails to State a Claim for RICO (Count I) - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** B. Kaul Fails to Sufficiently Plead a Criminal Purpose or Pattern of Racketeering - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** C. Kaul Fails to Sufficiently Plead the Existence of an Association-in-Fact Enterprise - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** D. The Complaint Fails to State a Claim for Declaratory and Injunctive Relief under Section 16 of the Clayton Act for Violations of the Sherman Act (Count II) - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** E. The Complaint Fails to State a Claim for Monopolization of the Minimally Invasive Spine Surgery Market (Count III), Conspiracy to Monopolize (Count IV),Conspiracy in Restraint of Trade (COUNT V), and Unfair and Deceptive Trade Practices (COUNT VI) under State Law - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** F. The Complaint Fails to State a Claim for Unjust Enrichment (Count VII) - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** G. The Complaint Fails to State a Claim for Deprivation of Right Pursuant to Defendant's Violation of Section 1981/1983 (Count VIII) - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** H. The Complaint Fails to State a Claim for Commercial Disparagement (Count IX), Intentional Interference with Prospective Economic Advantage (Count X), and Aid in the Commission of Tort (Count XII) - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19);** I. The Complaint Fails to State a Claim for Violation of Kaul's Due Process Rights Pursuant to the Excessive Fines Clause of the Eighth Amendment and Due Process Clause of the Fourteenth Amendment (Count XI) - **REJECTED BY COURT (OCTOBER 27, 2023-D.E. 19).** Defendants have tacitly admitted these facts.

491. On October 27, 2023, the Court explicitly rejected all of Defendants defenses except the 'time-barred' defense (**III**) pertaining to the RICO/Sections 1981 + 1983/State Law Claims allegedly being outside of the statute of limitations. Thus, the Court dismissed the RICO (COUNT ONE)/Deprivation of Right Pursuant to Defendants Violation Of Section 1981/1983 (COUNT EIGHT)/Violation of Kaul's Due Process Rights Pursuant To The Excessive Fines Clause Of The Eighth Amendment And Due Process Clause Of The Fourteenth Amendment (COUNT ELEVEN),

as being untimely (K11-11: D.E. 19). However, the 'time-barred' defense (**III**) was, and subsequently on February 13, 2024, tacitly rejected (K11-11: D.E. 31) (D.E. 22 Page 11/12/13/14/15 of 29: Points 12/13/30/31/32/33/34/35 + D.E. 24 Page 6/7 of 22: Points 12/13). Defendants have tacitly admitted these facts.

492. On November 20, 2023, Plaintiff Kaul filed K11-17 (KAUL v CPEP: 23-CV-00672-M-KS) in the United States District Court for the Eastern District of North Carolina, a case the factual foundation of which Defendants Horizon-Marino claim is identical to K11-11/K11-22, that identity allegedly being the 2014 NJ revocation. This claim is false ((D.E. 1 Page 11/13/14 of 69: Points 22/34/42 + D.E. 1 Page 21/25/26/29/30/38/43/48/50 of 69: Points 91/109/112/122/127/184/222/259/267). Defendants have tacitly admitted the falsity of their claimed fact that the factual foundation of K11-22 is identical to K11-17.

493. On November 28, 2023, Plaintiff Kaul filed a MOTION FOR SUMMARY JUDGMENT and Statement of Material Facts on Motion for Summary Judgment (K11-11: D.E. 24), with CERTIFICATION OF SERVICE on Defendants Horizon-Marino (K11-11: D.E. 24 Page ID 1955). Two (2) weeks later, by December 12, 2023, the 'Material Facts' became undisputed/admitted, and Defendants Horizon-Marino continued to fail to contest/respond/rebut/address the 'Material Facts' that are now admitted in support of the motion for Summary Judgment in K11-22 (D.E. 27 Page 1 of 1 + D.E. 28 1 TO 260 of 260). Defendants have tacitly admitted these facts.

494. On December 12, 2023, Plaintiff Kaul filed K11-22 (KAUL v BCBSA: 23-CV-1688) in the United States District Court for the Northern District of Alabama, a court in which the Blue Cross Blue Shield Association/subjugate members/persons have been found guilty of having knowingly violated antitrust law and stand accused by Ford Motor Company of the same offenses as charged in K11-22 (D.E. 1-4 Page 2 to 21 of 21 + D.E. 28 Page 16 to 215 of 260). Defendants have tacitly admitted these facts.

495. On December 14, 2023, Plaintiff Kaul did, pursuant to Rule 41(a)(2), move the Court to grant his application for voluntary dismissal without prejudice of K11-11 (K11-11: D.E. 28), an application on which Defendants Horizon-Marino were copied and did not object, in the knowledge that the undisputed 'Material Facts' had become admitted.

496. On December 15, 2023, the Court granted the application (K11-11: D.E. 29), and dismissed the case without prejudice, and without reservation of the knowingly admitted 'Material Facts' (D.E. 15-12 Page 2 of 21 Page ID 2295 + D.E. 22 Page 11 of 29: Point 26). Defendants have tacitly admitted these facts.

497. On December 28, 2023, in K11-11, Defendants Horizon-Marino filed a two hundred (200) page self-styled "**MOTION FOR RECONSIDERATION …**" that sought to have the Court alter its December 15, 2023, dismissal of K11-11 without prejudice to one with prejudice based on the following arguments/defenses (K11-11: D.E. 30) (D.E. 22 Page 10 of 29: Point 24 + D.E. 22-10 Page 2 to 3 of 3). Defendants have tacitly admitted these facts.

A. Dismissal with Prejudice is Required Because the Statutes of Limitations for All Claims in the Complaint Have Expired.

B. This Court Must Dismiss the Complaint with Prejudice Due to Issue and Claim Preclusion.

C. Dismissal with Prejudice is Required because Kaul Voluntarily Dismissed the Same Claims Repeatedly.

D. Kaul Has Continuously Engaged in Impermissible Forum Shopping, Which Warrants the Dismissal of the Complaint with Prejudice.

E. Defendants are Entitled to Compensation for Costs Pursuant to Rule 41(d).

500. On January 26, 2024, in K11-22, Defendants Horizon-Marino were served with a copy of the Summons/Complaint (K11-22:D.E. 13).

498. On February 13, 2024, in K11-11, the Court, in denying Defendants Horizon-Marino's December 28, 2023, application to alter its December 15, 2023, dismissal without prejudice to one with prejudice, and having knowledge that the law/facts cited in K11-17 by Plaintiff Kaul in support of his right/standing to seek legal redress for the eleven-year plus (11+) ongoing**/"new"** injuries caused to his life/liberty/property/reputation by the K11-17 Defendants willful/knowing and ongoing violations of his human/civil/constitutional rights and of the law (RICO/Sections 1983/UNDHR), did raise the question of whether the K11-11 Court's October 27, 2023 (K11-11: D.E. 19) statute of limitations analysis would have caused a different outcome, had Plaintiff Kaul submitted into K11-11, the law/facts he submitted into K11-17 (D.E. 22-10 Page 2 to 3 of 3). Defendants have tacitly admitted these facts.

499. The Court in K11-11 denied Defendants Horizon-Marino's application without reservation of the knowingly admitted 'Material Facts', facts, the truth/admitted-ness of which were furthered proven by Defendants Horizon-Marino's failure to contest/address/rebut/refute in their December 28, 2023, two hundred (200) page application (K11-11: D.E. 30). Similarly, the Court rejected all five (5) defenses, and effectively stated that its prior October 27, 2023 'time-barred' related dismissal was invalid, thus rendering Defendants Horizon-Marino absolutely defenseless in K11-22, and thus subject to Summary Judgment (D.E. 22-10 Page 2 to 3 of 3). Defendants have tacitly admitted these facts.

DATED: APRIL 8, 2024

RKJ

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.

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

CIVIL ACTION: NO.:

COMPLAINT

STATEMENT OF MATERIAL FACT AS TO DEFENDANTS ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS

Respectfully Submitted

RKA

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 nof justice and discovery, the corpus of fact substantiating pro of of the K11-19 claims did emerge over an eight (8) year period through our tacit and direct admissio nof 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 ne 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 nduct has caused and co ntinues 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 nsince at least 2008, we are co ntinuing to kno wingly and willfully cause an o ngoing 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 nsince at least 2008, we are co ntinuing 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 ntinue 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 do ne in all the prior cases.

12. WE admit that we kno wthat the judicial interference scheme is illegal and co nstitutes the felo ny of public corruptio n

13. WE admit that the lawyers involved in **The Kaul Cases**, including our o w nlawyers, have participated in schemes of judicial corruptio nthat 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 o w nlawyers, have participated in schemes of judicial corruptio nthat were purposed to cause the dismissal of **The Kaul Cases**.

15. WE admit that the lawyers involved in **The Kaul Cases**, including our o w nlawyers, did kno wingly commit these felo nies because of the guilt of **The Kaul Cases** Defendants.

16. WE admit that the lawyers' kno wledge of the guilt of **The Kaul Cases** Defendants, and specifically that of Defendant Christie, did cause them to participate in schemes of judicial corruptio nto attempt to co nceal from the public the felo nies of Defendant Christie.

17. WE admit that we kno wthrough co nversatio ns with our lawyers and **The Kaul Cases** Defendants that o ne purpose of attempting to co nceal from the public the felo nies of Defendant Christie, pertained to his co nspiracy with President Trump's political oppo nents to use him to 'attack' President Trump in the 2024 electio ns.

18. WE admit that we kno wthat the 2014 revocatio nof Plaintiff Kaul's New Jersey license was illegal, and was the product of a **"pattern of racketeering"** based o nthe facts admitted within **The Kaul Cases**.

19. WE admit that we kno wthrough co nversatio ns with our lawyers and **The Kaul Cases** Defendants that the illegality of the revocatio nof Plaintiff Kaul's license was also premised o n the fact that the revocatio nproceedings were illegally co nducted within administrative agencies of the State of New Jersey and not an Article III judge/court.

20. WE admit that we kno wthrough co nversatio ns with our lawyers of the case of Securities and Exchange Commissio nv. Jarkesy, in w hich there was oral argument before the Supreme Court of the United States o nNovember 29, 2023.

21. WE admit that o ne of the principal issues in this case is that administrative agencies of government do not have the co nstitutio nal or legal auth ority to deprive a perso nof their life/liberty/property with out first a jury trial in a no nadministrative court, be it a state or federal court.

22. WE admit that we kno wthrough co nversatio ns with our lawyers that Defendants Christie and Solomo nknew 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 kno wthrough co nversatio ns with my lawyers that the outcome of the Securities and Exchange Commissio nv. Jarkesy case is expected in June 2024.

24. WE admit that we kno wthrough co nversatio ns with my lawyers that based o noral argument it is expected that the Court will rule in favor of Jarksey, and that the retroactive effect of such a ruling will invalidate the illegal revocatio nof Plaintiff Kaul's license, and hold accountable **The Kaul Cases** Defendants, including ourselves, for the kno wingly illegal and o ngoing twelve (12) year-lo ng deprivatio nof Plaintiff Kaul's life/liberty/property/reputatio n

Context To Schemes And Violations

1. WE admit that since appro ximately 1999, we have been a natio nally recognized and highly influential leaders within the political wings of the American medical community.

2. WE admit that since appro ximately 1999, a substantial part of our time, effort and resources have been directed to wards seizing po wer within the political wings of the American medical community.

3. WE admit that since 1999 we have used this po wer to illegally exclude competitio nand to charge supra-competitive professio nal fees.

4. WE admit that since 1999 our illegal charging of supra-competitive rates has caused us to illegally amass perso nal material fortunes.

5. WE admit that our current perso nal net w orth is in excess of hundreds of millio ns of dollars.

6. WE admit that our perso nal net w orth was procured in large part through illegal schemes of racketeering, antitrust and violatio ns of the civil, co nstitutio nal, 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 kno wthat some of the facts that substantiate and or otherwise prove our kno wing violatio nof 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, w ho 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 understo od 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 motio ns to dismiss.

12. WE admit that we kno wthat in filing procedural motio ns 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/kno wwe had the right to deny the facts asserted by Plaintiff Kaul.

14. WE admit we knew/kno wthat by filing a procedural motio nto dismiss the Complaints/Amended Complaints in **K1/K2/K5/K7/K11-1/K11-2/K11-4**, despite kno wing 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 reaso nwe 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 kno wthat we had the right to file summary judgment motio ns 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 motio ns to dismiss the Complaints/Amended Complaints in **K1/K2/K5/K7/K11-1/K11-2/K11-4.**

19. WE admit that the reaso nwe did not file summary judgment motio ns 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 respo nses to every reply filed by Plaintiff Kaul to every procedural motio nto dismiss that we filed in oppositio nto the Complaints/Amended Complaints.

21. We admit that we kno wthat in filing our replies/respo nses 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 reaso nwe 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** co nstitutes a tacit admissio nof 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** co nstitutes a tacit admissio nof 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** co nstitutes a tacit admissio nof the facts in that we completely understo od 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** co nstitutes a tacit admissio nof the facts in that we had direct kno wledge 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** co nstitutes a tacit admissio nof the facts in that we were directly involved in the perpetratio nof 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** co nstitutes a tacit admissio nof the facts in that alth ough 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** co nstitutes a tacit admissio nof 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 co ntrary 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 kno wthat **K1/K2/K5/K7/K11-1/K11-2/K11-4** were/are civil proceedings with civil co nsequences.

34. WE admit that there existed and exist no other factors to explain our silence in failing to deny the facts, other than our kno wledge 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 investigatio ns, in w hich a denial of the facts w ould have deprived/deprive us of our right against self-incriminatio n

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 investigatio ns, in w hich an admittance of the facts w ould have deprived/deprive us of our right against self-incriminatio n

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 investigatio ns, in w hich a denial of the facts w ould 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 investigatio ns, in w hich an admittance of the facts w ould have caused/will cause us to self-incriminate.

39. WE admit that we knew and kno wthat 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 kno wledge of the truth of the facts asserted in **K1/K2/K5/K7/K11-1/K11-2/K11-4** co nstitutes the sole basis for our silence in failing to deny the facts.

41. WE admit that our kno wledge of the truth of the facts asserted in **K1/K2/K5/K7/K11-1/K11-2/K11-4** co nstitutes the sole basis for our actual failure to deny the facts.

42. WE admit that we kno wthat if we were innocent of the charges levied in **K1/K2/K5/K7/K11-1/K11-2/K11-4** we w ould 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 opinio ns/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, w ho clarified and explained to me the nature, character and meaning of the opinio ns/orders of the district judges.

45. WE admit that we understo od and understand the nature, character and meaning of the opinio ns/orders of the district judges in **K1/K2/K5/K7/K11-1/K11-2/K11-4.**

46. WE admit that we kno wthat 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 co nstitute a tacit admissio nof 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 kno wthat 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 co nstitute a tacit admissio nof 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 kno wthat the district judges in **K1/K2/K5/K7/K11-1/K11-2/K11-4** did not find evidentially invalid our admissio ns 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 Declaratio nof Human Rights.

50. WE admit that we have kno w nabout the 'Universal Declaratio nof Human Rights' since our attendance at college.

51. WE admit that since our attendance at college there has been no diminutio nof our kno wledge regarding the 'Universal Declaratio nof Human Rights'.

52. WE admit that the absence of diminutio nof our kno wledge regarding the 'Universal Declaratio nof Human Rights' is a co nsequence of our license mandated attendance at co ntinuing medical educatio ncourses.

53. WE admit that the co ntinuing medical educatio ncourses involve modules o nmedical ethics and human rights.

54. WE admit that certain courses have included modules o nhuman rights violatio ns committed during the Seco nd World War by physicians associated with the Nazis.

55. WE admit that we kno w, from these courses and my general reading, that the 'Universal Declaratio nof Human Rights' emerged in part as a co nsequence of human rights violatio ns committed by physicians associated with the Nazis.

56. WE admit that in 2005 we knew w hat rights were protected under the 'Universal Declaratio nof Human Rights'.

57. WE admit that in 2005 we knew we were pro hibited from co nspiring to violate Plaintiff Kaul's fundamental human/civil/co nstitutio nal rights.

58. WE admit that in 2005 we knew we were pro hibited from violating Plaintiff Kaul's fundamental human/civil/co nstitutio nal rights.

59. WE admit that in 2005 we knew it was illegal to co nspire to violate Plaintiff Kaul's fundamental human/civil/co nstitutio nal rights.

60. WE admit that in 2005 we knew it was illegal to violate Plaintiff Kaul's fundamental human/civil/co nstitutio nal rights.

61. WE admit that since 2005 we have co nspired with **The Kaul Cases** Defendants to kno wingly and willfully abuse the po wer of the American State to purposefully violate Plaintiff Kaul's fundamental human/civil/co nstitutio nal rights.

62. WE admit that the kno wingness, willfulness, malicious-ness, and purposefulness in our co nspiring with **The Kaul Cases** Defendants to violate Plaintiff Kaul's human/civil/co nstitutio nal rights is proven by the belo wadmitted facts about w hich there is no material dispute.

63. WE admit that the kno wingness, willfulness, malicious-ness, and purposefulness of the violatio nof Plaintiff Kaul's human/civil/co nstitutio nal rights by ourselves and **The Kaul Cases** Defendants, is proven by the belo wadmitted facts about w hich there is no material dispute.

64. WE admit that the kno wing, willful, malicious, and purposeful violatio nof Plaintiff Kaul's human/civil/co nstitutio nal 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 corruptio nthat involved bribing Defendant Christie we became intertwined with, and in possessio nof state po wer and became 'state actors'.

66. WE admit that because of our illegal schemes of public corruptio nthat involved bribing members of the state government we became intertwined with, and in possessio nof state po wer and became 'state actors'.

67. WE admit that because of our illegal schemes of public corruptio nthat involved bribing members of the federal government we became intertwined with, and in possessio nof state po wer and became a 'state actors'.

68. WE admit that because of our illegal schemes of public corruptio nthat involved bribing members of the state legislature we became intertwined with, and in possessio nof state po wer and became 'state actors'.

69. WE admit that because of our illegal schemes of public corruptio nthat involved bribing members of the state judiciary we became intertwined with, and in possessio nof state po wer and became 'state actors'.

70. WE admit that because of our illegal schemes of public corruptio nthat involved bribing members of the federal judiciary we became intertwined with, and in possessio nof state po wer and became 'state actors'.

71. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials were perpetrated in a mutually beneficial and symbiotic manner.

72. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials were perpetrated in a manner of mutual benefit and joint participatio n

73. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials were perpetrated in a manner of mutual benefit in w hich state officials and us used the US wires to exchange commands and w ords of encouragement in the successful executio nof the schemes.

74. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials were purposed to and did in fact cause us to illegally acquire the po wer and functio nof state,

that we used to professio nally threaten physicians w horefused to support my schemes against Plaintiff Kaul.

75. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials were purposed to and did in fact cause us to illegally acquire the po wer and functio nof state, that we used to have professio nally investigated physicians w horefused to support our schemes against Plaintiff Kaul.

76. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials were purposed to and did in fact cause us to illegally acquire the po wer and functio nof state, that we used to professio nally threaten physicians w hoattempted to expose our schemes.

77. WE admit that our illegal schemes of public corruptio nand co nspiring with state officials created a nexus w hereby 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 no nofficial perso ns, by amo ngst other things, defamatio n and derogatio n of Plaintiff Kaul's right and qualificatio ns 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 po wer of my 'state actor' status to co nspire to violate Plaintiff Kaul's right to due process **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

79. I admit that I abused the immense po wer 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 commissio nof schemes of perjury **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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84. I admit that I abused the immense po wer 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 commissio nof schemes of judicial-like corruptio n**AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

85. I admit that I abused the immense po wer 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 commissio nof schemes of perjury **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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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 commissio nof schemes of evidential omissio n**AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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91. I admit that I abused the immense po wer 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 commissio nof schemes of perjury **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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109. I admit that I abused the immense po wer of my 'state actor' status to violate Plaintiff Kaul's right to due process by bribing and or otherwise corrupting members of the state

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117. I admit that I abused the immense po wer of my 'state actor' status to violate Plaintiff Kaul's right to due process and his property by co nspiring 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 commissio nof a scheme of bankruptcy fraud **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

118. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his eco nɑmic standing by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

119. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his reputatio nby obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

120. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his liveliho od by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

121. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

122. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his life by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

123. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his professio nal standing by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

124. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

125. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of judicial and public corruptio n his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

126. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate Plaintiff Kaul's right to regain his physical standing by obstructing,

through schemes of judicial and public corruptio ŋ his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

127. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of judicial and public corruptio ŋ his due process right to litigate **The Kaul Cases** through discovery **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

128. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his eco nɑmic standing by obstructing, through schemes of public and private corruptio ŋ the return of the property of his New Jersey license, the illegal seizure of w hich co ntinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

129. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his eco nɑmic standing by obstructing, through schemes of public and private corruptio ŋ his efforts to restore his liberty through the procurement of a license anyw here in the w ɑrld, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio n not just in every American state, but in every country w ɑrldwide for the remainder of his life.

130. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his reputatio nby obstructing, through schemes of public and private corruptio ŋ the return of the property of his New Jersey license, the illegal seizure of w hich co ntinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w ɑrldwide for the remainder of his life.

131. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his reputatio nby obstructing, through schemes of public and private corruptio ŋ his efforts to restore his liberty through the procurement of a license anyw here in the w ɑrld, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio n not just in every American state, but in every country w ɑrldwide for the remainder of his life.

132. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his livelih o d by obstructing, through schemes of public and private corruptio n the return of the property of his New Jersey license, the illegal seizure of w hich co rtinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

133. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his livelih o d by obstructing, through schemes of public and private corruptio n his efforts to restore his liberty through the procurement of a license anyw here in the w orld, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio n not just in every American state, but in every country w orldwide for the remainder of his life.

134. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of public and private corruptio n the return of the property of his New Jersey license, the illegal seizure of w hich co rtinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

135. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his liberty by obstructing, through schemes of public and private corruptio n his efforts to restore his liberty through the procurement of a license anyw here in the w orld, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

136. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his life by obstructing, through schemes of public and private corruptio n the return of the property of his New Jersey license, the illegal seizure of w hich co rtinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

138. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his professio nal standing by obstructing, through schemes of public and private corruptio n the return of the property of his New Jersey license, the illegal seizure of w hich co ntinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio n not just in every American state, but in every country w orldwide for the remainder of his life.

139. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his professio nal standing by obstructing, through schemes of public and private corruptio n his efforts to restore his liberty through the procurement of a license anyw here in the w orld, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

140. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his social standing by obstructing, through schemes of public and private corruptio n the return of the property of his New Jersey license, the illegal seizure of w hich co ntinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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142. I admit that I abused and co ntinue to abuse the immense po wer of my 'state actor' status to co ntinue to violate, in co nspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his psychological standing by obstructing, through schemes of public and private corruptio n the return of the property of his New Jersey license, the illegal seizure of w hich co ntinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio n not just in every American state, but in every country w orldwide for the remainder of his life.

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144. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co rspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his physical standing by obstructing, through schemes of public and private corruptio n, the return of the property of his New Jersey license, the illegal seizure of w hich co rtinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

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146. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co rspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of public and private corruptio n, the return of the property of his New Jersey license, the illegal seizure of w hich co rtinues to cause deprivatio nof his liberty **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

147. I admit that I abused and co rtinue to abuse the immense po wer of my 'state actor' status to co rtinue to violate, in co rspiracy with **The Kaul Cases** Defendants, Plaintiff Kaul's right to regain his financial standing by obstructing, through schemes of public and private corruptio n, his efforts to restore his liberty through the procurement of a license anyw here in the w orld, including India, his country of citizenship **AND** I admit I knew and in fact intended for these violatio ns to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio n not just in every American state, but in every country w orldwide for the remainder of his life.

148. I admit that from 2005 to 2016 the purpose of my willful, kno wing, and o rgoing abuse of my immense 'state actor' po wer was to perpetrate a scheme to violate Plaintiff Kaul's human and co nstitutio nal rights that involved, amo ngst other things, an ostracizatio nof Plaintiff Kaul, a

destructio nof his eco nomic standing, reputatio nand liveliho od, the resultant deprivatio ns of w hich caused and co ntinue to cause co nditio ns of homelessness, poverty and unemployment to him and his family **AND** I admit I knew and in fact intended for these violatio ns-deprivatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

149. I admit that from 2016 to 2023, and as a co nsequence of Plaintiff Kaul's prosecutio nof **The Kaul Cases**, I and others schemed and co ntinue to scheme, in the violatio nof Plaintiff Kaul's right to due process in the United States District Court through the willful, kno wing, and o ngoing abuse of the immense po wer 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 violatio ns-deprivatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

150. I admit that I used the US wires in a kno wingly illegal manner to perpetrate schemes in w hich I co nspired with **The Kaul Cases** Defendants to abuse the immense po wer of my 'state actor' status to violate Plaintiff Kaul's human and co nstitutio nal rights and cause and to co ntinue to cause injury to his eco nomic standing/reputatio n/liveliho od/liberty/life/professio nal standing/social standing/psychological standing/physical standing/financial standing **AND** I admit I knew and in fact intended for these violatio ns-deprivatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

151. I admit that the schemes of kno wing human and co nstitutio nal rights violatio ns involved the illegal transmissio nacross the US wires of hundreds of emails and telepho ne 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 violatio ns-deprivatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

152. I admit that the schemes of kno wing human and co nstitutio nal rights violatio ns involved the illegal transmissio nacross the US wires of hundreds of emails and telepho ne 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 violatio ns-deprivatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

153. I admit that the schemes of kno wing human and co nstitutio nal rights violatio ns involved the illegal transmissio nacross the US wires of hundreds of emails and telepho ne 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 violatio ns-deprivatio ns to

cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w crldwide for the remainder of his life.

154. I admit that the schemes of kno wing human and co rstitutio ral rights violatio rs involved the illegal transmissio nacross the US wires of hundreds of emails and telepho re 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 violatio rs-deprivatio rs to cause/co rtinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w crldwide for the remainder of his life.

RICO:

Overall Claim Admission

155. I admit to the fact that the belo wfacts are undisputed, admitted and prove all elements of all claims asserted against me by Plaintiff Kaul.

156. I do not refute/co rtest/rebut/deny the evidence co rtained within the follo wing documents: **(i)** The Waldman E-mail; **(ii)** The Zerbini Certificatio r; **(iii)** The Sabo Certificatio r; **(iv)** The Solomo nCritique; **(v)** The Solomo nCritique 2; **(vi)** The Calabrese Certificatio r; **(vii)** The Przybylski Disciplinary Notice; **(viii)** The Feldman Certificatio r; **(ix)** The Yeung E-mail; **(x)** The Unio nCounty Court proceedings; **(xi)** The Ciarrocca Complaint; **(xii)** The Federal Trade Commissio nGuidelines.

157. I admit that the evidence referenced in point **2.** is further pro cf 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 kno wingly engaged with other defendants in a pattern of racketeering, in a period that commenced in appro ximately 2006, in the State of New Jersey, and has co rtinued 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 appro ximately 2006, co rtinued into 2019 and occurred in multiple locatio rs in the US, and across the US mail and wires.

160. I admit that I willfully and kno wingly violated the law, w hen I engaged in a pattern of racketeering with other defendants, in w hich I violated the auth ority of state agencies and po wer by committing and or facilitating bribery, fraud, kickbacks, extortio n perjury, evidential falsificatio nand witness tampering **AND** I admit I kno wthat my illegal violatio nof state auth ority and the US Co nstitutio n to w hich I have sw orn allegiance, does co nstitute high treaso n

161. I admit that I knew the purpose of having engaged in a pattern of racketeering was to destroy the eco nomic standing, reputatio n and liveliho od of Plaintiff Kaul.

Commits Or Conspires To The Commission Of "Racketeering Activity"

162. I admit that in a period from 2006 to 2022, I co nspired with other defendants in the commissio nof racketeering activity by using email, telepho ne and in perso nmeetings to organize a kno wingly illegal scheme that abused the auth ority of state agencies and po wer to have illegally revo ked Kaul's New Jersey medical license, to illegally destroy Plaintiff Kaul's eco nomic standing, reputatio n and liveliho od and to obstruct justice and facilitate the commissio nof a 'Fraud o nthe 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 o ngoing pattern of corruptio nof administrative, state, and federal courts within the geographic boundaries of the United States, the purpose of w hich was to deprive Plaintiff Kaul of any access to substantive justice, illegally deprive him of his medical license, his property, his liveliho od, his reputatio n 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 co ncert and co nspiracy with other defendants, kno wingly, willfully, and illegally co nvert administrative, state, and federal courts within the geographic boundaries of New Jersey into racketeering enterprises, to further the scheme to destroy the eco nomic standing, reputatio n and liveliho od of Plaintiff Kaul.

An Effect On Interstate Or Foreign Commerce

165. I admit that I and other defendants knew that the license revocatio nand destructio nof the eco nomic standing, reputatio nand liveliho od of Plaintiff Kaul w ould prevent him from w orking anyw here in the w orld in any capacity, a trade restrictio nthat w ould have a detrimental effect o ninterstate and or foreign commerce, and reduce federal tax revenues.

166. I admit that after the widely publicized revocatio nof Plaintiff Kaul's license o nMarch 12, 2014, I participated with other defendants in hundreds of email, telepho ne and in perso n

communicatio ns, in w hich we celebrated the destructio nof Plaintiff Kaul's livelih o od, eco nomic standing, reputatio nand inability to find employment.

167. I admit that after the revocatio nof Plaintiff Kaul's license o nMarch 12, 2014, I participated with other defendants in hundreds of email, telepho ne and in perso ncommunicatio ns, in w hich we predicted and celebrated the imminent descent of Plaintiff Kaul and his family into poverty.

Purpose

168. I admit that commencing in appro ximately 2006, I, in co ncert and co nspiracy with other defendants have engaged in schemes of bribery, fraud, evidential tampering, witness tampering, public corruptio nand kickbacks co nducted 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 corruptio nand kickbacks was to destroy the eco nomic standing, reputatio n and livelih o od of Plaintiff Kaul,

170. I admit that I knew the schemes of bribery, fraud, evidential tampering, witness tampering, public corruptio nand kickbacks were illegal.

2005 – 2010

171. I admit that in or around mid-2005, I came to kno w, and it became widely kno w nwithin the spine community that Plaintiff Kaul had invented and successfully performed the first outpatient minimally invasive spinal fusio n

RICO Predicate Act Of Bribery

172. I admit that in appro ximately 2005, after Plaintiff Kaul invented and performed the first minimally invasive outpatient spinal fusio n I and others in the American neurosurgical and orth opedic communities co ncluded his expertise in outpatient minimally invasive spine surgery presented a substantial and expanding threat to our h ospital-based spine business.

173. I admit that commencing in appro ximately 2005/2006 I co nspired with certain senior members of the American neuro-orth o surgical community to commence perpetrating a scheme of bribery with, amo ngst others, the then New Jersey Governor, Christopher J. Christie.

174. I admit that I used my positio nof po wer within the political wing of the American neurosurgical community to kno wingly deceive its members into participating in the scheme of bribery that involved funneling mo ney to the then New Jersey Governor, Christopher J. Christie.

175. I admit that I knew that in the co nceptio nand perpetratio nof the scheme of bribery I w ould violate and did in fact violate the law.

176. I admit that I knew that in the co nceptio nand perpetratio nof the scheme of bribery I w ould deprive and did in fact deprive Plaintiff Kaul of his human/civil/co nstitutio nal rights.

177. I admit that I knew that in the co nceptio nand perpetratio nof the scheme of bribery I w ould illegally co opt and did in fact illegally co opt the po wer of state.

178. I admit that I knew that through the co opting of the po wer of state I w ould become and did in fact became a 'state actor'

179. I admit that I knew that with the po wer of the state and as a 'state actor' I w ould deprive and did in fact deprive Plaintiff Kaul of his human/civil/co nstitutio nal rights.

180. I admit that I knew that with the po wer of the state and as a 'state actor' it was my intentio nto deprive Plaintiff Kaul of his human/civil/co nstitutio nal rights.

181. I admit that I knew that my deprivatio nof Plaintiff Kaul's human/civil/co nstitutio nal rights was intended to ensure the cessatio nof his existence.

182. I admit that I knew that my intentio nto cause the cessatio nof Plaintiff Kaul's existence was based o nmy effort to ensure he did not expose **The Kaul Cases** Defendants scheme of politico-judicial bribery.

183. I admit that I knew/kno wof the immense criminal co nsequences to me and others if Plaintiff Kaul exposed our scheme of bribery.

184. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of bribery was to permanently destroy Plaintiff Kaul's liveliho od in all parts of the w orld, 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 intentio nin aiding and abetting the perpetratio nof the scheme of bribery was to destroy Plaintiff Kaul's eco nomic standing in all parts of the w orld, 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 intentio nin aiding and abetting the perpetratio nof the scheme of bribery was to destroy Plaintiff Kaul's reputatio nin all parts of the w orld, 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 intentio nin aiding and abetting the perpetratio nof 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 intentio nin aiding and abetting the perpetratio nof 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 intentio nin aiding and abetting the perpetratio nof 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 intentio nin aiding and abetting the perpetratio nof 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 w hich I kno wingly 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 po wer to have violated Plaintiff Kaul's human/civil/co nstitutio nal rights **AND** I admit I knew and in fact intended for these violatio ns-deprivatio ns to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide for the remainder of his life.

192. I admit that the scheme of bribery in w hich I kno wingly engaged, involved the funneling of bribes to Defendant Christie in exchange for him using his executive and ex-US Attorney political po wer to have Plaintiff Kaul criminally indicted by state and federal authorities **AND** I admit I knew and in fact intended for these violatio ns of Plaintiff Kaul's human/civil/co nstitutio nal rights to cause a kno wingly illegal incarceratio nof Plaintiff Kaul **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin a quid pro quo exchange promised to use, and did use the po wer of state to have Plaintiff Kaul's license illegally revo ked **AND** I admit I knew and in fact intended for these violatio ns of Plaintiff Kaul's human/civil/co nstitutio nal rights to cause a kno wingly illegal revocatio nof Plaintiff Kaul' license **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin a quid pro quo exchange promised to use, and did use the po wer of state to have co nducted grand jury proceedings against Plaintiff Kaul **AND** I admit I knew and in fact intended for these violatio ns of Plaintiff Kaul's human/civil/co nstitutio nal rights to cause a kno wingly illegal indictment of Plaintiff Kaul **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin a quid pro quo exchange promised to use, and did use the po wer of state to co nduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin a quid pro quo exchange promised to coerce, and did coerce the po wer of the FBI and the US Attorney's Office to commence a criminal investigatio nagainst Kaul, **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin a quid pro quo exchange promised to use, and did use his ex-US Attorney political po wer to cause to commence a federal criminal investigatio nagainst Kaul, **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin exchange promised to use, and did use his executive po wer to cause state investigators and prosecutors to commence state criminal investigatio ns against Kaul, **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w orldwide 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 mo nies were funneled to Defendant Christie through law firms, political lobbyists, and public relatio nfirms with w hich he was politically and or commercially

co nnected in any manner, **AND** to cause/co ntinue to cause injury to Plaintiff Kaul's life/liberty/property/reputatio nnot just in every American state, but in every country w oldwide 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 mo nies through law firms, political lobbyists, and public relatio nfirms, was to attempt to co nceal the true quid pro quo bribery nature of the mo nies.

201. I admit that I knew and kno wthat the true quid pro quo bribery nature of the mo nies rendered my transactio ns illegal.

202. I admit that I knew and kno wthat I did not inform my bank of the true quid pro quo bribery nature of the transacted mo nies.

203. I admit that I knew and kno wthat my transferring of the quid pro quo bribery mo nies co nstitutes bank fraud.

204. I admit that I knew and kno wthat my commissio nof bank fraud co nstitutes a crime.

205. I admit that I knew and kno wthat my commissio nof bank fraud involved the commissio n of wire fraud.

206. I admit that I knew and kno wthat the purpose of attempting to co nceal the true bribery nature of the mo nies was my co ncern that my crimes and those of **The Kaul Cases** Defendants w ould be exposed.

207. I admit that I knew and kno wthat the purpose of the co ncealment of my quid pro quo bribery crimes w ould have been to falsely claim that the bribe mo nies paid to law firms, political lobbyists, and public relatio nfirms with w hich Defendant Christie was politically and or commercially co nnected in any manner, was for professio nal legal, lobbying and or public relatio nservices.

208. I admit that I knew and kno wthat such a claim w ould have been false.

209. I admit that I kno wthat I cannot raise such a professio nal 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 kno wthat my lawyers advised me as to the scheme of co ncealment.

211. I admit that in the period from 2005/2006 to 2022, the scheme of bribery expanded to involve an increasing number of perso ns co nducting business within the private and public sectors.

212. I admit that these perso ns include state and federal investigators.

213. I admit that these perso ns include state and federal prosecutors.

214. I admit that these perso ns include state and federal judges.

215. I admit that these perso ns include perso nal injury lawyers.

216. I admit that these perso ns include physicians w hocompeted against Plaintiff Kaul in the minimally invasive spine surgery market.

217. I admit that these perso ns/entities included journalists/media organizatio ns w hohave commercial relatio nships with **The Kaul Cases** Defendants and or within referenced Third Parties.

218. I admit that these perso ns include Plaintiff Kaul's ex-patients, w hom I and others co nspired with the file lawsuits and complaints with the medical board.

219. I admit that these perso ns include Plaintiff Kaul's ex-physician employees, w hom I and others co nspired with to provide false legal testimo ny against Plaintiff Kaul.

220. I admit that these perso ns include Plaintiff Kaul's ex-nursing employees, w hom I and others co nspired with to provide false legal testimo ny against Plaintiff Kaul.

RICO Predicate Act Of Fraud

221. I admit that as a co nsequence of Plaintiff Kaul having invented and successfully performed the first outpatient minimally invasive spinal fusio n I, alo ng with other spine physicians, commenced co nspiring 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 w hich I kno wingly engaged, involved the public disseminatio n and or the aiding and abetting of public disseminatio n of the kno wing falseho od that Plaintiff Kaul was not qualified/licensed/credentialed to perform minimally invasive spine surgery.

225. I admit that in the perpetratio nof 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 perpetratio nof the scheme of fraud I co nspired with Drs. Andrew Kaufman and Gregory Przybylski in the subornatio nof perjury in the legal proceedings that caused the revocatio nof Plaintiff Kaul's license, in w hich they testified, with kno wing 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 w hich I kno wingly engaged, involved the disseminatio n and or the aiding and abetting of disseminatio ninto courts of law of the kno wingly falseh o od that Plaintiff Kaul was not qualified/licensed/credentialed to perform minimally invasive spine surgery.

a. Public Obstruction

228. I admit that the perpetratio nof the scheme of fraud involved encouraging and co opting Plaintiff Kaul's patients to sue him by telling them, with kno wing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery o nthem.

229. I admit that the perpetratio nof the scheme of fraud involved encouraging and co opting Plaintiff Kaul's patients to file medical board complaints against him by telling them, with kno wing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery o nthem.

b. Legal Profession Obstruction

230. I admit that the perpetratio nof the scheme of fraud involved encouraging and co opting lawyers to file malpractice suits o nbehalf of Plaintiff Kaul's patients referred to them by me, by telling them with kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

231. I admit that the perpetratio nof the scheme of fraud involved encouraging and co opting perso nal injury lawyers to stop referring their injured clients to Plaintiff Kaul, by telling them with kno wing 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 perpetratio nof the scheme of fraud involved encouraging and co opting other physicians to not refer patients to Plaintiff Kaul by telling them, with kno wing falsity, that

Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

233. I admit that the perpetratio nof 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 kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

234. I admit that the perpetratio nof 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 kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery o nthem.

235. I admit that the perpetratio nof 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 kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

236. I admit that the perpetratio nof the scheme of fraud involved threatening medical device representatives that if they provided Plaintiff Kaul with the necessary minimally invasive spine surgery devices, I w ould use my immense political po wer to coerce other neurosurgeo ns to stop using their devices.

d. Insurance Industry Obstruction

237. I admit that the perpetratio nof the scheme of fraud involved co nspiring with the insurance industry to illegally deny professio nal 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 kno wing 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 liquidatio nof Plaintiff Kaul's business by causing a cessatio nof revenue.

241. I admit that in the perpetratio nof the fraudulent scheme of theft of services, I co nspired with physicians and perso ns associated with the insurance industry to have illegally diverted to me mo nies that should have been paid to Plaintiff Kaul.

242. I admit that I believed that the fraudulent scheme of theft of services w ould cause immense financial hardship to Plaintiff Kaul.

243. I admit that I believed this immense financial hardship w ould 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 w ould be forced to engage in unlawful co rduct.

245. I admit that I intended for this immense financial hardship to cause Plaintiff Kaul to engage in unlawful co rduct.

246. I admit that I intended to have the imagined unlawful co rduct 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 po wer to order the medical board to revo ke Plaintiff Kaul's medical license.

249. I admit that I and **The Kaul Cases** Defendants knew and kno wthat the Plaintiff Kaul eliminatio nscheme 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 kno wand that there was a direct co nnectio nbetween 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 fo dhardily committed with a lo ng-standing sense of privileged impunity, a massive amount of felo nious co rduct over almost tw o(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 Republicatio nnominatio nfor the 2016 Presidential Campaign.

255. I admit that between 2016 to 2020, Defendant Christie closely collaborated with President Trump in the nominatio nof 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 nominatio nof perso ns to federal agencies.

257. I admit that commencing in appro ximately 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 kno wingly fraudulent informatio nto members of the public, the legal professio n, the healthcare professio n 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 optio nbut to bribe Defendant Christie.

259. I admit that I, as a political leader within the immensely po werful and wealthy neurosurgical community, and its Political Activatio nCommittee, did commence a dialogue with Defendant Christie.

260. I admit that a principal purpose of the dialogue pertained to the delineatio nof 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 w hen and w hat mo netary and no n-mo netary bribes w ould be exchanged for w hat elements of the scheme to eliminate Plaintiff Kaul.

262. I admit that the dialogue surrounding the quid pro quo deal was akin to discussio ns surrounding the enactment of terms of a co ntract.

263. I admit that I knew and kno wthe purpose and substance of the dialogue and the enactment of the terms were illegal elements of an overall criminal scheme that involved the commissio nof a course of an o ngoing pattern of kno wingly felo nious co nduct.

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 co nducted using both digital and no n-digital modes of communicatio n

266. I admit that the communicatio ns involved many individuals associated with the political, legal, medical, healthcare business and media w orlds.

267. I admit that a principal part of the dialogue involved detailing the methods of ho wI and **The Kaul Cases** Defendants w ould achieve our objectives to eliminate Plaintiff Kaul and describing the exact method of ho wwe w ould use to eliminate Plaintiff Kaul.

268. I admit that the exact method involved using the coercive po wer 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 eco nomic standing/reputatio n/liveliho od/liberty/life/professio nal standing/social standing/psychological standing/physical standing/financial standing.

269. I admit that I co nspired with, amo ngst others, Drs. Andrew Kaufman, Gregory Przybylski and Peter Carmel, to fraudulently co opt our medical societies and their members into directing their mo nies 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 co ncealed from the members of our medical societies that their mo nies were in fact bribes, the true purpose of w hich was to fund a kno wingly illegal quid pro quo scheme with Defendant Christie, purposed to illegally revo ke Plaintiff Kaul's license.

271. I admit that in a period between 2005 and 2010 I, alo ng with several other politically active neurosurgeo ns and orthopedic spine surgeo ns, met o nseveral occasio ns with Defendant Christie.

272. I admit that that the purpose of these meetings was to discuss the perpetratio nof the scheme to revo ke Plaintiff Kaul's license.

273. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he had received the bribes.

274. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould order, and did in fact order his attorney general to initiate legal proceedings to revo ke Plaintiff Kaul's license.

275. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould order, and did in fact order his attorney general to order the medical board to suspend and then revo ke Plaintiff Kaul's license.

276. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould order, and did in fact order his attorney general to instruct the New Jersey state bar to order it's members to refuse to support Plaintiff Kaul.

277. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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/petitio ns filed by Plaintiff Kaul.

280. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould order, and did in fact order his attorney general to order **The Kaul Cases** Defendant, and New Jersey Administrative Law Judge, James Ho ward Solomo n to recommend revocatio nof Plaintiff Kaul's license.

283. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould order, and did in fact order his attorney general to order **The Kaul Cases** Defendant, and New Jersey Administrative Law Judge, James Ho ward Solomo n to recommend revocatio nof Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

284. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould order, and did in fact order his attorney general to order **The Kaul Cases** Defendant, and New Jersey Administrative Law Judge, James Ho ward Solomo n to falsify his opinio nif necessary to ensure the revocatio nof Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

285. I admit that during these meetings I had several co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 kno wing 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 kno wing 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 kno wing 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 kno wing 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 co nversatio ns with Defendant Christie, in w hich he co nfirmed that he w ould 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 kno wing 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 co nversatio ns with Defendant Christie, in w hich I co nfirmed that I had persuaded **The Kaul Cases** Defendants, Drs. Andrew Kaufman and Gregory Przybylski, to testify, albeit with kno wing 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 co nversatio ns with Defendant Christie, in w hich I co nfirmed that o nce Plaintiff Kaul's license was revo ked, I w ould use my political po wer 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 perso ns associated with Defendant Christie that a preliminary evaluatio ncommittee of the New Jersey medical board had ordered Plaintiff Kaul to appear before them o nFebruary 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 w hich the outcome of the illegal revocatio nof Plaintiff Kaul's license was a forego ne co nclusio n

294. I admit that I knew, based o nmy co nversatio ns with Defendant Christie, that o ne purpose of the legal proceedings was to deceive the public into believing Plaintiff Kaul had been provided justice and that the revocatio nwas legal, w hich I and **The Kaul Cases** Defendants knew was not.

295. I admit that I knew, based o nmy co nversatio ns with Defendant Christie, that o ne purpose of the highly publicized legal proceedings was to destroy Plaintiff Kaul's reputatio n

296. I admit that I knew, based o nmy co nversatio ns with Defendant Christie, that o ne 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 o nmy co nversatio ns with Defendant Christie, that o ne purpose of a state fabricated legal record, other than justifying the crime, w ould be to submit it as a defense if Plaintiff Kaul exposed the crimes and filed suit.

298. I admit that I knew, based o nmy co nversatio ns 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 w ould believe Plaintiff Kaul because of his prior history in the UK.

299. I admit that I knew, based o nmy co nversatio ns 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 w ould believe Plaintiff Kaul because of his prior history in New Jersey.

300. I admit that I knew, based o nmy co nversatio ns 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, w ould believe Plaintiff Kaul because by the time his license was revo ked, myself and **The Kaul Cases** Defendants w ould have destroyed his reputatio n

301. I admit that I knew, based o nmy co nversatio ns 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, w ould believe Plaintiff Kaul's claims.

302. I admit that I knew, based o nmy co nversatio ns 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 w ould be bankrupted, unable to retain a lawyer and thus unable to prosecute a claim.

303. I admit that I knew, based o nmy o w n lo ng-standing pattern of public corruptio n and o n my co nversatio ns with Defendant Christie, that even if Plaintiff Kaul acquired sufficient legal kno wledge to file his o w n claim, it w ould be dismissed because I and others w ould bribe the judges.

304. I admit that based o nmy experience of my lo ng-standing pattern of public corruptio n and o nmy co nversatio ns with Defendant Christie and certain members of **The Kaul Cases** Defendants, I was co nvinced that our crimes w ould destroy Plaintiff Kaul's eco nomic standing, reputatio n, liveliho od, reputatio n and life and illegally deprive him of his liberty.

305. I admit that based o nmy experience of my lo ng-standing pattern of public corruptio n and o nmy co nversatio ns with Defendant Christie and certain members of **The Kaul Cases** Defendants, I was co nvinced in 2010 that Plaintiff Kaul w ould 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 perso ns and agencies of the State of New Jersey into the commissio nof a criminal course of co nduct that caused and involved the commencement o nFebruary 3, 2010, of the first procedural legal step in the illegal revocatio nof Plaintiff Kaul's license.

307. I admit that based o nmy co nvictio nthat my crimes and those of **The Kaul Cases** Defendants w ould go un-exposed, I did with a sense of impunity, perpetrate, aid, and abet and collaborate in the willful and kno wing commissio nof a scheme of felo nious co nduct that commenced in or around 2005 in the State of New Jersey and extended through 2010 into 2023, as do its permanent co nsequences, in, amo ngst 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 interrogatio nby a preliminary evaluatio ncommittee of the New Jersey medical board o nFebruary 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 surgeo ns to encourage and co opt any of Plaintiff Kaul's patients to w hom they had ever provided care, to sue him by telling them, albeit with kno wing falsity, that Plaintiff Kaul had not been qualified/credentialed/licensed/trained to perform minimally invasive spine surgery o nthem.

311. I admit these amplified efforts of fraud included recruiting other physicians and surgeo ns to encourage and co opt any of Plaintiff Kaul's patients to w hom they had ever provided care, to file medical board complaints against him by telling his patients, albeit with kno wing 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 o nline with highly defamatory posts and publicatio ns.

313. I admit I believed that by having this 'mob' attack Plaintiff Kaul o nline and in the court of public opinio n he w ould be deterred from fighting the publicly co nducted legal proceedings.

314. I admit I believed that by having this 'mob' attack Plaintiff Kaul o rline and in the court of public opinio n he w ould be deprived in the board and administrative proceedings of any testimo rial support from his patients.
315. I admit I believed that the 'mob' induced deprivatio nof public and patient support w ould 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 opinio n
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 opinio n

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 opinio n

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 opinio n

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 recognitio nthat such an exposure w ould evidence the illegality of the events preceding the revocatio nproceedings.

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 recognitio nthat such an exposure w ould evidence the illegality of the revocatio nproceedings.

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 recognitio nthat such an exposure w ould evidence the illegality of the revocatio nitself.

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 recognitio nthat such an exposure w ould subject me to criminal indictment.

325. I admit that I, in co rspiracy with **The Kaul Cases** Defendants, and other third media related parties, did use the US wires to publish over twenty-tw o(22) highly defamatory and kno wingly 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 opinio n

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 opinio n

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 opinio n

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 opinio n

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 professio nal re-emergence of Plaintiff Kaul, a process I kno wwill 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 kno wwill 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 reputatio nal re-emergence of Plaintiff Kaul, a process I kno wwill facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

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 kno wwill facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

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 kno wwill facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

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 kno wwill facilitate the exposure

my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

339. I admit that I knew and kno wthat the professio nal re-emergence of Plaintiff Kaul w ould expose, and has exposed my crimes and those of **The Kaul Cases** Defendants, a process I kno w will facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

340. I admit that I knew and kno wthat the financial re-emergence of Plaintiff Kaul w ould expose, and has exposed my crimes and those of **The Kaul Cases** Defendants, a process I kno w will facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

341. I admit that I knew and kno wthat the psychological re-emergence of Plaintiff Kaul w ould expose, and has exposed my crimes and those of **The Kaul Cases** Defendants, a process I kno w will facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

342. I admit that I knew and kno wthat the social re-emergence of Plaintiff Kaul w ould expose, and has exposed my crimes and those of **The Kaul Cases** Defendants, a process I kno wwill facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

343. I admit that I knew and kno wthat the physical re-emergence of Plaintiff Kaul w ould expose, and has exposed my crimes and those of **The Kaul Cases** Defendants, a process I kno w will facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

344. I admit that I knew and kno wthat the reputatio nal re-emergence of Plaintiff Kaul w ould expose, and has exposed my crimes and those of **The Kaul Cases** Defendants, a process I kno w will facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

345. I admit that I knew the purpose of these highly defamatory stories was to attempt to cause an effective cessatio nof Plaintiff Kaul's existence, a process I kno wwill facilitate the exposure my crimes and those of **The Kaul Cases** Defendants, w hose principal co ncern no wis not bankruptcy or liquidatio n but incarceratio n

346. I admit that had an effective cessatio nof Plaintiff Kaul's existence been caused to occur, then my crimes and those of **The Kaul Cases** Defendants w ould never have been exposed, as they are no w

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 co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **physician livelihood** w ould deprive him of his ability to earn a wage, and prevent the payment of legal fees.

359. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **liberty** w ould deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

360. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **life** w ould deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

361. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **professional standing** w ould deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

360. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **social standing** w ould deprive him of his ability to earn any wage-paying job, and prevent the payment of legal fees.

362. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **social standing** w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

363. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **psychological standing** w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

364. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **physical standing** w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of legal fees.

365. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **financial standing** w ould deprive him of funds and prevent the payment of legal fees.

366. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of legal representatio nby using the US wires to manipulate his counsel with claims that the injury caused by our scheme to his **reputational standing** w ould 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 with out co ntesting the revocatio nproceedings, Plaintiff Kaul w ould 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 with out the record of evidential fraud, Plaintiff Kaul w ould never have been able to generate pro of of the fraud preceding the revocatio nproceedings.

369. I admit that I knew that with out the record of evidential fraud, 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 of of the fraud committed before and during the revocatio nproceedings.

370. I admit that Plaintiff Kaul's successfully ability to retain counsel to litigate the revocatio n proceedings caused the generatio nof evidence that no wproves the revocatio nproceedings were and illegal.

371. I admit that Plaintiff Kaul's ability to successfully retain counsel to litigate the revocatio n proceedings caused the generatio nof evidence that no wproves the revocatio nwas and is illegal.

372. I admit that with out counsel to litigate the revocatio nproceedings, Plaintiff Kaul's license w ould have been revo ked with out the generatio nof any record of state fraud.

373. I admit that with out a record of state fraud, Plaintiff Kaul w ould have been forever deprived of any opportunity for the re-emergence of his eco nomic standing.

374. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his eco nomic standing, he w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

375. I admit that with out a record of state fraud, Plaintiff Kaul w ould have been forever deprived of any opportunity for the re-emergence of his reputatio nal standing.

376. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his reputatio nal standing, he w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

377. I admit that with out a record of state fraud, Plaintiff Kaul w ould have been forever deprived of any opportunity for the re-emergence of his liveliho od.

378. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his liveliho od, he w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

379. I admit that without a record of state fraud, Plaintiff Kaul w ould 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 w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

381. I admit that without a record of state fraud, Plaintiff Kaul w ould 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 w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

383. I admit that without a record of state fraud, Plaintiff Kaul w ould have been forever deprived of any opportunity for the re-emergence of his professio nal standing.

384. I admit that had Plaintiff Kaul been forever deprived of any opportunity for the re-emergence of his professio nal standing, he w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

385. I admit that without a record of state fraud, Plaintiff Kaul w ould 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 w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

387. I admit that without a record of state fraud, Plaintiff Kaul w ould 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 w ould never have exposed my crimes and those of **The Kaul Cases** Defendants.

389. I admit that without a record of state fraud, Plaintiff Kaul w ould 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 w ould 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 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.

396. 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

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 opinio no nbehalf of Plaintiff Kaul in any legal matter, including the revocatio nproceeding.

401. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to refuse to co rduct healthcare related business with any physicians that supported Plaintiff Kaul.

402. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally undermine any physicians that supported Plaintiff Kaul by filing kno wingly false complaints against them to have their **hospital privileges revoked**.

403. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally undermine any physicians that supported Plaintiff Kaul by filing kno wingly false complaints against them to have their **licenses suspended and or revoked**.

404. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally undermine any physicians that supported Plaintiff Kaul by filing against them kno wingly false **complaints of insurance fraud**.

405. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to encourage physicians to use the US wires to disseminate kno wingly fraudulent informatio nthat 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 o nmembers of the New Jersey medical community was to render Plaintiff Kaul unable to find medical experts to fight the revocatio nproceedings in the courts of law.

407. I admit that I knew that without medical experts, Plaintiff Kaul w ould not have been able to co rtest the revocatio nproceedings.

408. I admit that I co nspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of medical experts.

409. I admit that the medical expert deprivatio nscheme was perpetrated by using the US wires and my immense political po wer within professio nal spine societies to manipulate potential minimally invasive spine experts.

410. I admit that the manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **reputation** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **economic standing** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **physician livelihood** w ould deprive him of his ability to earn a wage, and prevent the payment of medical expert fees.

413. I admit that the manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **liberty** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **life** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **professional standing** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **social standing** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **psychological standing** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **physical standing** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **financial standing** w ould 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 manipulatio nof potential minimally invasive spine experts was perpetrated with claims that the injury caused by our scheme to Plaintiff Kaul's **reputational standing** w ould 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 co rtesting the revocatio nproceedings, Plaintiff Kaul w ould 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 w ould never have been able to generate pro of of the fraud preceding the revocatio nproceedings.

423. I admit that I knew that without the record of evidential fraud, 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 of of the fraud committed before and during the revocatio nproceedings.

424. I admit that Plaintiff Kaul's ability to successfully retain out-of-state medical experts to litigate the revocatio nproceedings caused the generatio nof evidence that no wproves the revocatio nproceedings were and illegal.

425 I admit that Plaintiff Kaul's ability to successfully retain out-of-state medical experts to litigate the revocatio nproceedings caused the generatio nof evidence that no wproves the revocatio nwas and is illegal.

426. I admit that without medical experts to litigate the revocatio nproceedings, Plaintiff Kaul's license w ould have been revo ked without the generatio nof any record of state fraud.

427. I admit that I co rtinued the perpetratio nof the scheme of fraud in encouraging and co opting physicians complaints with the medical board against Plaintiff Kaul, by complaining with kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

428. I admit that I co rtinued up until 2012 in the perpetratio nof the scheme of fraud in encouraging physicians to stop referring patients to Plaintiff Kaul, by stating with kno wing 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 perpetratio nand aiding and abetting by myself and **The Kaul Cases** Defendants of a scheme that embezzled and illegally deprived

Plaintiff Kaul of mo nies o wed to him by insurance carriers for care he provided to their fee-paying patients.

430. I admit, as detailed in the belo wadmitted facts, a direct co nnectio nbetween 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 co nnectio nbetween Plaintiff Kaul's insurance based professio nal fee payment material existence and the exposing of my crimes, I did co nspire with **The Kaul Cases** Defendants to perpetrate and aid and abet a kno wingly illegal scheme of deprivatio nof professio nal fee insurance payments.

432. I admit that I recognized that the stro nger was Plaintiff Kaul's financial positio n the greater was the risk of him exposing my crimes and those of **The Kaul Cases** Defendants.

433. I admit that I was co nvinced that if I and **The Kaul Cases** Defendants forced Plaintiff Kaul into a state of poverty, he w ould 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 paupera 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 lo ng-standing fo dhardy sense of privileged impunity, a massive amount of felo nious co nduct over almost tw o(2) decades.

437. I admit that I and members of **The Kaul Cases** Defendants perpetrated a fraud o n members of the insurance industry by using the US wires to state with kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, w hen we knew he was.

438. I admit that the purpose of using the US wires to disseminate the kno wing falsity that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery, was to deprive Plaintiff Kaul of mo nies o wed to him by insurance carriers for care he provided to their fee-paying patients.

439. I admit that I co nspired 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 professio nal fees.

440. I admit that in co nspiring with members of the insurance industry in the professio nal fee deprivatio nscheme, I did kno wingly aid and abet the commissio nof a crime of theft of services against Plaintiff Kaul.

441. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to refuse to co nduct healthcare related business with any insurance carriers that co nducted business with Plaintiff Kaul.

442. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally undermine any physicians that co ntinued to co nduct any business with any insurance carriers that co ntinued to co nduct business with Plaintiff Kaul, by filing kno wingly false complaints against these physicians to have their hospital privileges revo ked.

443. I admit that I used my immense political po wer within the neurosurgical societies to have effectuated a sanctio ns-like scheme against members that either violated and or opposed my orders.

444. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally undermine any physicians that co ntinued to co nduct any business with any insurance carriers that co ntinued to co nduct business with Plaintiff Kaul, by filing kno wingly false complaints against them to have their licenses suspended and or revo ked.

445. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally undermine any physicians that co ntinued to co nduct any business with any insurance carriers that co ntinued to co nduct business with Plaintiff Kaul, by filing against them kno wingly false complaints of insurance fraud.

446. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to use the US wires to disseminate the names of those members w ho co ntinued to co nduct any business with any insurance carriers that co ntinued to co nduct business with Plaintiff Kaul.

447. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to use the US wires to disseminate the names of those members w hoco ntinued to provide any manner of support to Plaintiff Kaul.

448. I admit that I knew a purpose of my illegal sanctio ns-like scheme against neurosurgical society members w hoviolated 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 sanctio ns-like scheme against neurosurgical society members w hoviolated 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 sanctio ns-like scheme against neurosurgical society members w hoviolated or opposed my orders, was to intimidate other members into coercing insurance carriers, with w hom they co nducted business, into depriving Plaintiff Kaul of his professio nal fees.

451. I admit that the ultimate purpose of my sanctio ns-like scheme against no ncomplying 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 professio nal fees, he w ould be rendered financially unable to co ntest the revocatio nproceedings.

453. I admit that I co nspired with **The Kaul Cases** Defendants to illegally attempt to cause and or coerce insurance carriers to illegally deprive Plaintiff Kaul of his professio nal fees.

454. I admit that the professio nal fee deprivatio nscheme was perpetrated by using the US wires and my immense political po wer within professio nal spine societies to manipulate the members into causing and or coercing insurance carriers to deprive Plaintiff Kaul of his professio nal fees.

455. I admit that multiple neurosurgical society members occupy co ntrolling seats o ninsurance industry panels that determine payment.

456. I admit that I used the US wires in a kno wingly illegal manner to co nspire with these members to deny the payment of Plaintiff Kaul's professio nal fees.

457. I admit that I and **The Kaul Cases** Defendants co nvinced insurance carriers that there w ould be no repercussio ns to illegally depriving Plaintiff Kaul of his professio nal fees.

458. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's reputatio nby associated attacks o nhis eco nomic standing/liveliho od/liberty/life/professio nal 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 nal fee deprivatio nscheme.

459. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's eco nomic standing by associated attacks o n his reputatio n/liveliho od/liberty/life/professio nal 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 nal fee deprivatio nscheme.

460. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's liveliho od by associated attacks o nhis

reputatio n/eco nomic standing/liberty/life/professio nal 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 nal fee deprivatio nscheme.

461. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's liberty by associated attacks o nhis reputatio n/eco nomic standing/liveliho od/life/professio nal 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 nal fee deprivatio nscheme.

462. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's life by associated attacks o nhis reputatio n/eco nomic standing/liveliho od/liberty/professio nal 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 nal fee deprivatio nscheme.

463. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's professio nal standing by associated attacks o nhis life/reputatio n/eco nomic standing/liveliho od/liberty/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 nal fee deprivatio nscheme.

464. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's social standing by associated attacks o nhis life/reputatio n/eco nomic standing/liveliho od/liberty/professio nal 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 nal fee deprivatio nscheme.

465. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's psych ological standing by associated attacks o nhis life/reputatio n/eco nomic standing/liveliho od/liberty/professio nal standing/social standing/physical standing/financial standing w ould cause his permanent eliminatio n and eliminate the threat of any future challenge to the professio nal fee deprivatio nscheme.

466. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's physical standing by associated attacks o n his life/reputatio n/eco nomic standing/liveliho od/liberty/professio nal standing/social standing/psych ological standing/financial standing w ould cause his permanent eliminatio n and eliminate the threat of any future challenge to the professio nal fee deprivatio nscheme.

467. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's financial standing by associated attacks o n

his life/reputatio n/eco nomic standing/livelih o od/liberty/professio nal 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 nal fee deprivatio nscheme.

468. I admit that the professio nal fee deprivatio nscheme was coerced with claims that the permanency of the injury caused to Plaintiff Kaul's reputatio nal standing by associated attacks o nhis life/eco nomic standing/livelih o od/liberty/professio nal 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 nal fee deprivatio nscheme.

469. I admit that I believed that by illegally depriving Plaintiff Kaul of his professio nal 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 nproceedings.

470. I admit that I knew that with out co ntesting the revocatio nproceedings, 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 of of the fraud preceding the revocatio nproceedings.

472. I admit that I knew that with out 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 of of the fraud committed before and during the revocatio nproceedings.

473. I admit that Plaintiff Kaul's ability, despite the professio nal fee deprivatio nscheme, to litigate the revocatio nproceedings caused the generatio nof evidence that no wproves the revocatio nproceedings were and illegal.

474. I admit that Plaintiff Kaul's ability, despite the professio nal fee deprivatio nscheme, to litigate the revocatio nproceedings caused the generatio nof evidence that no wproves my guilt of the levied charges.

475. I admit that despite the professio nal fee deprivatio nscheme, Plaintiff Kaul was able to litigate the revocatio nproceedings (April 9 to June 28, 2013).

476. I admit that Plaintiff Kaul's litigatio nof the revocatio nproceedings caused the generatio n of evidence that no wproves the revocatio nwas and is illegal.

477. I admit that had Plaintiff Kaul not litigated the revocatio nproceedings, his license w ould have been revo ked with out the generatio nof any record of the crimes committed by myself, **The Kaul Cases** Defendants and state actors.

478. I admit that I knew and kno wthat o nor about March 23, 2013, appro ximately seventeen (17) days before the commencement of the revocatio nproceedings, 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 revo ked for seven (7) years and pay five hundred th ousand dollars ($500,000).

479. I admit that I knew and kno wthat the purpose of Hafner's proposal was to prevent litigatio nthat she knew w ould result in the generatio nof evidence that no wproves my guilt of the charges levied in K11-17, and the guilt of **The Kaul Cases** Defendants.

480. I admit that I knew and kno wthat the purpose of Hafner's proposal was to prevent litigatio nthat she knew w ould result in the generatio nof evidence that no wproves that the revocatio nproceedings were co nducted illegally.

481. I admit that I knew and kno wthat the purpose of Hafner's proposal was to prevent litigatio nthat she knew w ould result in the generatio nof evidence that proves that the revocatio nwas, is and remains illegal.

482. I admit that I knew and kno wthat the administrative law judge attempted to persuade Plaintiff Kaul to accept Hafner's proposal.

483. I admit that I knew and kno wthat Plaintiff Kaul rejected Hafner's proposal.

484. I admit that I believe that Plaintiff Kaul rejected Hafner's proposal because he knew that his litigatio nof the proceedings w ould generate evidence favorable to his cause.

485. I admit that the evidence generated in 2013 and thereafter no windeed proves Plaintiff Kaul's cause and my guilt of the charges levied in **The Kaul Cases**, including th ose of K11-17.

486. I admit that I, in co nspiracy with **The Kaul Cases** Defendants, co ntinued to aid and abet the perpetratio nof the professio nal fee deprivatio nscheme up until appro ximately July 30, 2020, the date of closure of Bankruptcy Petitio n 13-23366, a case filed o nJune 17, 2013.

487. I admit I knew and kno wthat the professio nal deprivatio nscheme was illegally perpetrated through the United States Bankruptcy Court for the District of New Jersey.

488. I admit I knew and kno wthrough communicatio ns 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 o nSeptember 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 w hich the no ndenial 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 admissio n

489. I admit I knew and kno wthat Case No. 18-01489 was dismissed because it exposed, amo rgst many other felo nies, the professio nal fee deprivatio nscheme.

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 eliminatio nscheme w ould absolutely succeed.

491. I admit that this belief in its absolute success, in co njunctio nwith the belief that Defendant Christie w ould become the 2016 American President, accounts for the impunity with w hich I and **The Kaul Cases** Defendants co nducted the commissio nof a pattern of felo nious co nduct that commenced in 2005 and is o ngoing.

492. I admit that an element of the Plaintiff Kaul eliminatio nscheme involved using the media to perpetrate a public dehumanizatio nand vilificatio nof Plaintiff Kaul.

493. I admit that both I and **The Kaul Cases** Defendants knew and kno w that coercing a majority of members of the political body into propagating/perpetuating the dehumanizatio n and vilificatio nscheme 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 w ould never doubt our state actor actio ns and w ould never believe a dehumanized/vilified Plaintiff Kaul, w hoalready had a mark o nhis record from the UK.

495. I admit that the public dehumanizatio nand vilificatio nscheme provided me and **The Kaul Cases** Defendants a sense, albeit false, that our kno wingly felo nious co nduct was justified and w ould go unpunished.

496. I admit that I used my immense political po wer with the neurosurgical community and the general medical community to propagate the kno wingly false dehumanizatio nand vilificatio n scheme and narrative.

497. I admit that the purpose of the propagatio nwas to attempt to cause a global isolatio nof Plaintiff Kaul.

498. I admit that I and **The Kaul Cases** Defendants knew and kno wthat Plaintiff Kaul had w orked and been educated and trained in many foreign countries, with w hich he had maintained substantial perso nal and professio nal co ntact.

499. I admit that the purpose of the dehumanizatio nand vilificatio nrelated global isolatio nwas to attempt to ensure the permanency of Plaintiff Kaul's global eliminatio n, in an attempt to ensure that my crimes and those of **The Kaul Cases** Defendants w ould never be exposed.

500. I admit that it was my intentio nand 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 o ne'.

501. I admit that the principal reaso nfor the Plaintiff Kaul eliminatio nscheme purposed 'public enemy number o ne' mischaracterizatio nwas to prevent Plaintiff Kaul from exposing both my lo ng-standing pattern of felo nious co nduct and that of **The Kaul Cases** Defendants.

502. I admit that I and **The Kaul Cases** Defendants recognized that upo nthe April 2, 2012, commencement of the malicious and wide publicizatio nof the revocatio nproceedings, Plaintiff Kaul w ould seek assistance from members of the political body.

503. I admit that I kno wthat Plaintiff Kaul did in fact commence seeking assistance from members of the political body.

504. I admit that I kno wthat Plaintiff Kaul's efforts in seeking assistance from members of the political body involved him telepho ning and sending letters to his political representatives.

505. I admit that I kno wthat Plaintiff Kaul's efforts in seeking assistance from members of the political body involved having patients of his, w howere involved in the New Jersey political process, to enquire as to the truth of w hy the state had commenced revocatio nproceedings.

506. I admit that I kno wthat the substance of Plaintiff Kaul's direct written communicatio ns to member of the political body pertained to his enquiry as to the truth of w hy the state had commenced revocatio nproceedings.

507. I admit that I knew and kno wthat 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 perso ns acting o nhis behalf.

508. I admit that I knew and kno wthat all enquiries were in fact ignored.

509. I admit that I and members of **The Kaul Cases** Defendants perpetrated a fraud o n members of the political body by telling them with kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

510. I admit that I co nspired 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 po wer within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign mo nies to any members of the political body, if they respo nded to any of Plaintiff Kaul's enquiries

512. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign mo nies 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 po wer within the neurosurgical societies to coerce its members to threaten to refuse to provide political campaign mo nies 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 po wer within the neurosurgical societies to coerce its members to refuse to provide political campaign mo nies 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 po wer within the neurosurgical societies to coerce its members to ostracize those neurosurgical members w hoviolated my order by providing political campaign do natio ns to political body members w hosupported and or provided informatio nto Plaintiff Kaul.

516. I admit that I used my immense political po wer within the neurosurgical societies to coerce its members to professio nally attack with complaints to, amo ngst others, medical boards, hospital credentialing committees and insurance companies, those neurosurgical members w hoviolated my order by providing political campaign do natio ns 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 po wer 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 Case**s 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 ntest 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 ng pattern of felo nious co nduct of myself and **The Kaul Cases** Defendants.

522. I admit that my co nspiracy 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 eco nomic standing w ould prevent the payment of political campaign do nation ns.

523. I admit that my co nspiracy 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 reputatio nw ould deprive him of his ability to secure any wage-paying job and or outside funding and w ould prevent the payment of political campaign do nation ns.

524. I admit that my co nspiracy 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 livelih o od w ould deprive him of his ability to earn a wage and w ould prevent the payment of political campaign do nation ns.

525. I admit that my co nspiracy 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 w ould deprive him of his ability to secure any wage-paying job and w ould prevent the payment of political campaign do nation ns.

526. I admit that my co nspiracy 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 w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do nation ns.

527. I admit that my co nspiracy 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 professio nal standing w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do nation ns.

528. I admit that my co nspiracy 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 w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do nation ns.

529. I admit that my co rspiracy 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 w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio rs.

530. I admit that my co rspiracy 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 w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio rs.

531. I admit that my co rspiracy 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 w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio rs.

532. I admit that my co rspiracy 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 w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio rs.

533. I admit that my co rspiracy 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 reputatio nal standing w ould deprive him of his ability to secure any wage-paying job, and prevent the payment of political campaign do ratio rs.

534. I admit that I believed that by depriving Plaintiff Kaul of political support it w ould respectively destroy and deprive him of his determinatio nand ability to co rtest the revocatio n proceedings.

535. I admit that I knew that a destructio nof Plaintiff Kaul's determinatio nand a deprivatio nof his ability to co rtest the revocatio nproceedings, w ould 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 co ntinued the perpetratio nof the scheme of fraud in encouraging and co opting members of the political body to not support Plaintiff Kaul's requests for informatio n and assistance, by telling them with kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

537. I admit that I co ntinued the perpetratio nof the scheme of fraud in encouraging and co opting members of the political body to not support requests for informatio nand assistance from perso ns acting o nbehalf of Plaintiff Kaul, by telling them with kno wing falsity, that Plaintiff Kaul was not qualified/credentialed/licensed/trained to perform minimally invasive spine surgery.

538. I admit that I co ntinued and am co ntinuing the perpetratio nof 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 so w ould be a tacit admissio nof my guilt and that of **The Kaul Cases** Defendants.

539. I admit that I co ntinued and am co ntinuing the perpetratio nof 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 so w ould empo wer Plaintiff Kaul in the prosecutio nof claims against us.

540. I admit that I co ntinued and am co ntinuing the perpetratio nof 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 so w ould empo wer Plaintiff Kaul in the prosecutio nof his claims against us.

541. I admit that I kno wthat an empo werment of the prosecutio nof the claims against us will further expedite an even more detailed exposing of the crimes of bribery, fraud, evidential tampering, witness tampering, public corruptio n and kickbacks kno wingly committed and aided and abetted by myself and **The Kaul Cases** Defendants over at least the last tw o(2) decades.

542. I admit that I kno wthat a more detailed exposing of the crimes of bribery, fraud, evidential tampering, witness tampering, public corruptio n and kickbacks kno wingly committed and aided and abetted by myself and **The Kaul Cases** Defendants over at least the last tw o(2) decades will reveal multiple grave miscarriages of justice committed against innocent, principally eth nic minority physicians.

543. I admit that I have read the testimo ny transcript in the matter of USA v Pompy: 18-cr-20454 of James Stewart Ho well, an undercover investigator for Blue Cross Blue Shield Insurance Company.

544. I admit that I kno wthat the scheme detailed by Ho well has been co nducted o nmany occasio ns in the State of New Jersey, because I have spo ken to a number of physicians with

w hom I co rduct healthcare business, and w hoare employed by Horizo nBlue Cross Blue Shield of New Jersey in the perpetratio nof such schemes.

545. I admit that alth ough I have not directly participated in such schemes, I co rduct healthcare business with physicians w house such schemes to eliminate physicians w hopose a competitive threat to our business interests.

546. I admit that I kno wthat in appro ximately August 2015, members of the political body and agents representing Defendant Christie attempted to entrap Plaintiff Kaul in a corruptio n'sting operatio n' by having o re of Plaintiff Kaul's physician colleagues organize a meeting with the physician colleagues private wealth manager, o nthe pretext that this individual, recognizing the injustice of the revocatio nand having business co nnectio ns with the state, wished to assist Plaintiff Kaul in his effort to have his license reinstated.

547. I admit that I kno wthat at the meeting the private wealth manager asked Plaintiff Kaul if he w ould be willing to do nate ten millio ndollars ($10,000,000) to Defendant Christie's political campaign, he could likely have his license reinstated.

548. I admit that I kno wthat Plaintiff Kaul respo nded with **"I don't condone such conduct"** and shortly thereafter departed the meeting.

549. I admit that I kno wPlaintiff 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 auth orities in any state in the United States,

552. I admit that I knew that because the illegal revocatio nof Plaintiff Kaul's New Jersey license w ould illegally violate his right in any/all states to procure a license and that therefore prosecutors in these states had jurisdictio nto 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 w hich I kno wingly 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 kno wingly false testimo ny under oath that their pain increased and that they experienced arm and leg numbness and muscular weakness after having been operated o n by Plaintiff Kaul.

555. I admit that my encouragement of physicians to lie under oath, involved instructing them to fabricate and provide kno wingly false testimo ny 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 corruptio nin w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst 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 ked.

557. I admit that the scheme of public corruptio nin w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to have co nducted grand jury proceedings.

558. I admit that the scheme of public corruptio nin w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to co nduct grand jury proceedings to attempt to have Plaintiff Kaul indicted and incarcerated.

559. I admit that the scheme of public corruptio nin w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst 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 nagainst Kaul.

560. I admit that the scheme of public corruptio nin w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst 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 nagainst Kaul.

561. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to destroy Plaintiff Kaul's liveliho od.

562. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to destroy Plaintiff Kaul' eco nomic standing,
563. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to destroy Plaintiff Kaul' reputatio n

564. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas to have Plaintiff Kaul incarcerated.

565. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of public corruptio nwas 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 ked.

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 ngst 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 ked.

570. I admit that the scheme of kickbacks in w hich I kno wingly engaged, involved the funneling of bribes to, amo ngst others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to have co nducted 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 ngst others, Defendant Christie, w hoin exchange promised to use, and did use the po wer of state to co nduct 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 ngst 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 ngst 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 liveliho od.
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 intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to have Plaintiff Kaul incarcerated.

578. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to force Plaintiff Kaul's family into a state of poverty.

579. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to alienate Plaintiff Kaul from his children by forcing them into poverty.

580. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to cause Plaintiff Kaul to commit suicide.

581. I admit that my specific intentio nin aiding and abetting the perpetratio nof the scheme of kickbacks was to have Plaintiff Kaul's license illegally revo ked.

2016 – 2022

RICO Predicate Act Of Bribery

582. I admit that the scheme of bribery in w hich I kno wingly engaged, did at some point after February 22, 2016, extend to perso ns employed within the United States District Court.

583. I admit that in the co nceptio nand perpetratio nof the scheme of bribery within the United States District Court, I kno wingly and willfully deprived Plaintiff Kaul of his human/civil/co nstitutio nal rights.

584. I admit that the principal purpose of the scheme of bribery that extended to perso ns 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 corruptio n and kickbacks.

585. I admit that I knew and kno wthat my involvement in the scheme of bribery co nstitutes a pattern of felo nious co nduct.

586. I admit that I knew and kno wthat this felo nious co nduct, under criminal prosecutio n will cause my incarceratio n

587. I admit that I kno wthat my perpetratio nand the aiding and abetting of the perpetratio nof the scheme of bribery with perso ns employed within the United States District Court co nstitutes an o ngoing pattern of felo nious co nduct.

588. I admit that the perpetratio nof the scheme of bribery with perso ns 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 w hich Plaintiff Kaul's first lawsuit (K1–DNJ-Newark Vicinage) was assigned, had represented me in 1999 in the matter of Ho ward v UMDNJ (ESX-L-2366-99 -New Jersey Superior Court) in the New Jersey Supreme Court.

591. I admit that in Ho ward v UMDNJ a jury had entered a verdict against me of $5.2 millio nfor having operated o nan 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 w hich he had been the managing director and from w hom he co ntinued to receive share dividends, w hile adjudicating K1.

593. I admit that neither I nor my lawyer nor the district judge disclosed this co nflict of interest to Plaintiff Kaul, the record, or the Court.

594. I admit that this co nflict of interest was revealed to the record by Plaintiff Kaul o nMay 22, 2019, after w hich 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 w hich 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 co ntinued 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 intentio nin 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 corruptio n 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 w hich the district judge entered an order o nSeptember 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 w hich the district judge entered a purported 'injunctio n o n 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 w hich the district judge entered an order o nSeptember 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 po wer of the United States District Court to enter the September 12, 2022, order.

602. I admit that I knew, through co nversatio ns 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 po wer of the United States District Court to further, and in such a kno wingly egregious manner, violate Plaintiff Kaul's human/civil/co nstitutio nal rights.

604. I admit I knew that the purpose of the K11-7 order was draco nian in that it sought to permanently deprive Plaintiff Kaul of his right to substantive due process, and to cause a cessatio nof his existence.

605. I admit that I knew the purpose of the K11-7 order was draco nian in that it sought to permanently and illegally deprive Plaintiff Kaul of his right to his liveliho od/liberty/life/reputatio n

606. I admit that I knew **The Kaul Cases** Defendants w hile seeking to deprive Plaintiff Kaul of his right to due process in the American courts, were simultaneously co nspiring 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 obstructio nof license and deprivatio nof due process were elements of a wider co nspiracy to cause the cessatio nof Plaintiff Kaul's existence.

608. I admit that the bribe mo nies were funneled from my lawyer to the K11-7 corporate defendants lawyers w hothen funneled them to the K11-7 district court judge and perso ns related to him to the third degree.

609. I admit that I knew and kno wthat the purpose of funneling my bribe mo nies 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 kno wthat the purpose of the 'attorney-client' cover was and is an illegal attempt to obstruct any civil and or criminal investigatio n

611. I admit that bribes were indirectly funneled to the K11-7 district court judge by first funneling them to the corporate defendants, w hothen co nverted the mo nies 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 kno wthat 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 kno wthat 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/co nstitutio nal rights.

615. I admit that the funneling of bribes through the corporate defendants also involved the purchasing of sham co nsulting and legal services from their lawyers by my lawyers.

616. I admit that these sham co nsulting and legal service-related bribes were then funneled to the corporate defendants lawyers, w hofunneled them to the district court judge and perso ns 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, w hothen 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 co nspired to attempt to co nceal 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 co ncealment I did not inform the public that Plaintiff Kaul's license was revo ked because of, amo ngst other things, my scheme of bribery.

621. I admit that in my scheme of co ncealment 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 co ncealment I did not inform the public that Plaintiff Kaul's license was **actually revoked because** I and others co ncluded his expertise in outpatient minimally invasive spine surgery presented a substantial and expanding threat to our hospital-based spine business. I admit I willfully/kno wingly withheld the truth from the public.

623. I admit that my aiding and abetting the perpetratio nof the scheme of bribery were purposed to cause circumstances that w ould destroy and did destroy Plaintiff Kaul's eco nomic standing/reputatio n/liveliho od/liberty/life.

624. I admit that my aiding and abetting the perpetratio nof the scheme of bribery were purposed to cause circumstances that w ould destroy and did destroy the lives of Plaintiff Kaul's children.

625. I admit that my aiding and abetting the perpetratio nof the scheme of bribery destroyed Plaintiff Kaul's liveliho od.

626. I admit that my aiding and abetting the perpetratio nof the scheme of bribery destroyed Plaintiff Kaul's eco nomic standing,

627. I admit that my aiding and abetting the perpetratio nof the scheme of bribery destroyed Plaintiff Kaul's reputatio n

628. I admit that my aiding and abetting the perpetratio nof the scheme of bribery had Plaintiff Kaul kidnapped o nMay 27, 2021.

629. I admit that my aiding and abetting the perpetratio nof the scheme of bribery had Plaintiff Kaul incarcerated o nJune 14-15, 2023

630. I admit that my aiding and abetting the perpetratio nof the scheme of bribery forced Plaintiff Kaul's family into a state of poverty.

631. I admit that my aiding and abetting the perpetratio nof the scheme of bribery alienated Plaintiff Kaul from his children by forcing them into poverty.

632. I admit that I kno wthat the admissio ns within this document, if not timely rebutted/co ntested/refuted, regardless of the ultimate civil dispositio nof the summary judgment motio n will substantiate a basis for criminal indictment.

RICO Predicate Act Of Public Corruption

633. I admit that the scheme of public corruptio nin w hich I kno wingly engaged, did at some point after February 22, 2016, extend to include perso ns employed within the United States District Court.

634. I admit that the principal purpose of the scheme of public corruptio nthat 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 corruptio n and kickbacks.

635. I admit that I knew and kno wthat my involvement in the schemes of bribery, fraud, evidential tampering, witness tampering, public corruptio ŋ and kickbacks co ŋstitutes a pattern of felo ŋious co ŋduct.

636. I admit that I knew and kno wthat this felo ŋious co ŋduct, under criminally prosecutio ŋ will cause my incarceratio n

637. I admit that I kno wthat my perpetratio nand the aiding and abetting of the perpetratio nof the scheme of public corruptio nin the United States district Court co ŋstitutes an o ŋgoing pattern of felo ŋious co ŋduct.

638. I admit that the perpetratio nof the scheme of public corruptio nin 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 w hich I kno wingly engaged, did at some point after February 22, 2016, extend to perso ns employed within the United States District Court.

640. I admit that the principal purpose of the scheme of kickbacks that extended to perso ns 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 corruptio ŋ and kickbacks.

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644. I admit that the perpetratio nof the scheme of kickbacks with perso ns 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, w hothen 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 perso ns related to the third degree.

2022-2024

650. I admit that as a co nsequence of the above admitted facts of 'kickbacks'/public corruptio n/bribery an injunctio nwas entered o nSeptember 12, 2022, against Plaintiff Kaul in K11-7.

651. I admit that I read the document o nw hich the injunctio nwas printed (K11-7: D.E. 168).

652. I admit my counsel explained to me the terms and meaning of the injunctio n

653. I admit that based o nmy understanding as per my counsel's explanatio n, I believed Plaintiff Kaul w ould be pro hibited from filing any further lawsuits against me with out the permissio nof the judge in K11-7.

654. I admit I kno wthat if Plaintiff Kaul did file any further lawsuits with out the K11-7 judge's permissio nhe w ould be sanctio ned, held in co ntempt and jailed.

655. I admit I kno wthat Plaintiff Kaul did ho wever file K11-10/K11-14 against me.
656. I admit I kno wthat bot cases were dismissed because of the injunctio nfrom the court in K11-7.

657. I admit I kno wno sanctio ns nor co ntempt orders were levied against Plaintiff Kaul.
658. I admit I kno wthat o nNovember 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 opinio nin K11-2, that we believed w ould bolster our venue defense in K11-17.

660. I admit that I kno wthis was an improper scheme to attempt to violate the auth ority and jurisdictio nof 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, w hich we are not, then we w ould have simply denied the facts/allegatio ns within **The Kaul Cases** and w ould not have engaged in schemes to cause the generatio nof judicial opinio nto illegally obstruct justice in another court.

663. I admit that I kno wthat o nMarch 13, 2024, the Court in K11-17 issued an ORDER FOR DISCOVERY PLAN (K11-17: D.E. 65).

664. I admit I read the o re-page document.

665. I admit my counsel explained to me the meaning of the terms of the document.

666. I admit that based o nmy counsel's explanatio nto me and my previous experience with medical malpractice and other types of lawsuits, I understo od that the order required I, my counsel and all other Defendants and counsel were to co nfer 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-lo ng-plus **"pattern of racketeering"** w ould further expose evidence of not just our wro ngdoing/violatio ns, 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 obstructio nwas to attempt to coerce the Court into adjudicating our motio ns to dismiss, in the belief that the K11-7 injunctio nw ould cause a dismissal.

671. I admit that an element of our obstructio nstrategy involved coercing the judge in K11-7 into issuing an order o nMarch 15, 2024, in w hich Plaintiff Kaul was threatened with co ntempt 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 w ould cause the dismissal of K11-17.

673. I admit that I kno wthat the threat was unsuccessful, but in the circumstances surrounding this threat, facts emerged that the w ording of the September 12, 2022, injunctio nrestricted the injunctio nto cases filed prior to September 12, 2022, and to events related to the 2019 denial of Plaintiff Kaul's applicatio nfor reinstatement of his New Jersey license.

674. I admit that my counsel explained to me that this restrictio nnullified my entire defense in K11-17 and in fact rendered erro neous the prior dismissals of K11-10/K11-14.

675. I admit that my counsel explained to me the co nsequences and ramificatio ns of this situatio n

DATED: JUNE 3, 2024

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

SOUTHERN DISTRICT OF MISSISSIPPI
FILED
JAN - 6 2025
ARTHUR JOHNSTON
BY _____ DEPUTY

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

Plaintiff

3:24-cv-00621-CWR-LGI

CIVIL ACTION NO.: 24-CV-00621-CWR-LGI

v.

JAMES PAUL OETKEN
(PERSONAL AND OFFICIAL CAPACITY)
MISSISSIPI MEDICAL BOARD;
NEW YORK STATE ATTORNEY GRIEVANCE
COMMITTEE; JANE DOE; JOHN DOE.

Defendants.

ADMISSIONS OF MATERIAL AND UNDISPUTED FACT NOT RELATED TO THE ISSUE PENDING THE COURT'S RULING ON THE MOTION AND PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT JAMES PAUL OETKEN

Respectfully Submitted

R.K_1

RICHARD ARJUN KAUL, MD

JANUARY 5, 2025

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.)

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)

K11-17 - KAUL v CPEP: 23-CV-00672 (NOVEMBER 20, 2023, TO JUNE 14, 2024 - 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)

K11-20 – KAUL v FEDERATION STATE MEDICAL BOARDS: 24-CV-03180 (AUGUST 26, 2024, TO PRESENT-SOUTHERN DISTRICT OF TEXAS)

K11-22 – KAUL v BCBSA: 23-CV-01688 (DECEMBER 12, 2023, TO PRESENT-NORTHERN DISTRICT OF ALABAMA)

K11-23 – KAUL v OETKEN: 24-CV-00621 (OCTOBER 9, 2024 TO PRESENT-SOUTHERN DISTRICT OF MISSISSIPPI)

For ease of reference Defendant JAMES PAUL OETKEN will be referred to as "I"

K11-23 + Failure To Deny Bribes

1. I admit that when I entered the knowingly illegal injunction on September 12, 2022, I instructed the Clerk of the Court to ensure Plaintiff Kaul was provided instructions on how to appeal in conjunction with an application to proceed in forma pauperis (D.E. 169-1).

2. I admit that the purpose of encouraging Plaintiff Kaul to file an appeal to the U.S.C.A. for the Second Circuit was that I did intermittently sit on the appellate bench and was informed it likely I be elevated to the appellate court if Plaintiff Kaul 'took the appellate bait'.

3. I admit I know that if Plaintiff Kaul did file an appeal, no other district court would admit any of his filings, and his claims would be restricted to the U.S.C.A. for the Second Circuit.

4. I admit I knew that the Second Circuit would ultimately deny Plaintiff Kaul's appeal and validate my knowingly illegal injunction.

5. I admit I knew that the validation of my injunction by the U.S.C.A. for the Second Circuit would forever preclude Plaintiff Kaul from filing any lawsuits in the United States District Court that had any connection, however remote, to any aspect of his professional licensing history.

6. I admit I knew that if I succeeded in eliminating Plaintiff Kaul in this bureaucratic manner, I would have been permanently elevated to the U.S.C.A. for the Second Circuit.

7. I admit that an elevation to the U.S.C.A. for the Second Circuit would have had the effect of permanently 'burying' all the bribery related quid pro quo crimes I had committed since being appointed to the federal bench in 2011 by a politician notorious even by political standards for egregious acts of political corruption.

8. I admit that had I been elevated to the U.S.C.A. for the Second Circuit, this politician would have secured even greater protection for his corrupt and criminal perversion of the power of government.

9. I admit, however, that because of Plaintiff Kaul, none of these hypotheticals occurred and my career was negatively impacted.

10. I admit the negative impact on my career in conjunction with preventing Plaintiff Kaul from exposing my crimes did cause me to threaten him with contempt and incarceration.

11. I admit I know of **The Kaul Cases** attempt on June 14/15, 2023 to have Plaintiff Kaul, while illegally incarcerated at the medium-maximum security Mercer County Prison in Trenton, NJ,

poisoned with the anti-psychotic medication, Librium, in order to have him deemed mentally unstable and committed indefinitely to a psychiatric institution.

12. I admit that on October 9, 2024, Plaintiff Kaul filed K11-23, in which I am accused of, amongst other things, bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption.

13. I admit that I was served with a copy of K11-23 on October 16, 2024 at approximately 9:30 am EST in my courtroom at the S.D.N.Y. by a security officer employed by the United States District Court.

14. I admit that on November 15, 2024, the Court ordered I answer the Complaint by December 16, 2024.

15. I admit that on December 16, 2024 I filed documents entitled 'MOTION TO DISMISS' (D.E. 12) and 'MEMORANDUM IN SUPPORT MOTION TO DISMISS' (D.E. 13).

16. I admit that in neither of these documents did I deny the allegations/facts of bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption. asserted in the Complaint in K11-23.

17. I admit I knew/know that in failing to deny the allegations/facts I did violate the Court's November 15, 2024 order.

18. I admit I knew/know that in failing to deny the allegations/facts I did cause them to become admitted for all purposes pursuant to Rule 8(b)(6).

19. I admit I knew/know that the allegations/facts constitute the commission of violations of criminal law.

20. I admit I knew/know that the immunity defense I raised in my impermissibly filed 'MOTION TO DISMISS' (D.E. 12) and 'MEMORANDUM IN SUPPORT MOTION TO DISMISS' (D.E. 13) were/are invalid because my Rule 8(b)(6) admissions of my commission of bribery related crime are not protected by any immunity defense.

21. I admit I am guilty of the charges levied in K11-23.

22. I admit that if I were innocent of the charges levied in K11-20 I would simply have denied them, but I did not because I am guilty of the charges.

23. I admit I know that on December 20, 2024, Plaintiff Kaul filed a 'NOTICE OF DEFENDANT OETKEN'S ADMISSION OF FACT PURSUANT TO HIS RULE 8(b)(6) FAILURE TO DENY THE

ALLEGATIONS AND FACTS ASSERTED WITHIN THE COMPLAINT, AND PURSUANT TO HIS VIOLATION OF THE COURT'S DECEMBER 16, 2024 ORDER TO ANSWER THE COMPAINT'.

24. I admit I know that a responsive pleading was ordered by the Court on November 15, 2024.

25. I admit I know that pursuant to Rule 8(b)(6) the **"Effect of Failing to Deny An Allegation-other than one relating to damages-is admitted if a responsive pleading is required and the allegation is not denied."**

26. I admit I know that on December 27, 2024, Plaintiff Kaul filed a 'REPLY DEFENDANT OETKEN MEMORANDUM OF MOTION TO DISMISS'.

27. I admit I read Plaintiff Kaul's 'REPLY DEFENDANT OETKEN MEMORANDUM OF MOTION TO DISMISS' through the perspective of a lawyer and judge.

28. I admit that through the perspective of a lawyer and judge I agree with every argument submitted in Plaintiff Kaul's 'REPLY DEFENDANT OETKEN MEMORANDUM OF MOTION TO DISMISS'.

29. I admit that of the thousands of opinions I have issued in my judicial career in cases involving charges of bribery against public servants, many of them contain arguments either identical or consistent with those submitted by Plaintiff Kaul.

30. I admit that in these cases I have ruled in favor of government prosecutors who have submitted such arguments against criminal defendants charged with bribery and public corruption.

31. I admit that in these cases in which guilty verdicts have been rendered, I did sentence the defendants to terms of imprisonment and substantial fines.

32. I admit that through the perspective of a defendant, who is also a lawyer and judge, I should be held at least to the standard of the common man committing common crime if not higher.

33. I admit that my Rule 8(b)(6) related admittance of the facts of bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption asserted in the Complaint in K11-23, did deprive me of any immunity.

34. I admit that in the Complaint (D.E. 1 Page 14 of 54), Plaintiff Kaul identified the facts that caused me to be deprived of '... ANY/ALL IMMUNITIES'.

35. I admit that in my December 16, 2024 'MOTION TO DISMISS' (D.E. 12) and 'MEMORANDUM IN SUPPORT MOTION TO DISMISS' (D.E. 13) I did not deny any of the facts asserted in paras. 39 to 45 or indeed any of the facts within the entire Complaint.

36. I admit that on January 3, 2025 IN K11-23 I submitted my 'REPLY IN SUPPORT OF MOTION TO DISMISS'.

37. I admit that in my 'REPLY IN SUPPORT OF MOTION TO DISMISS' I submitted an answer to the bribery charge levied in the K11-23 Complaint.

38. I admit, however, that the answer was intended to purposefully mislead the Court into believing Defendant Oetken was innocent of the levied charges of bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption.

39. I admit that one of the answers in furtherance of this deception is: **"However, Judge Oetken has committed no crimes and Kaul's blanket statement is insufficient to support a finding of criminal activity."** (D.E. 23 Page 2 of 5).

40. I admit that I and my lawyers conspired to manufacture a, and to use my own word, **"blanket"** statement in which I did not specifically deny having committed the crimes of bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption.

41. I admit that I and my lawyers believed that if we used the word **"crimes"** in a general sense it would deceive the Court into believing I had not committed bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption.

42. I admit that the deceptive state-of-mind of myself and my lawyers is evidenced in our use of the term **"blanket"** to describe, albeit a false description, of Plaintiff Kaul's claims, when in fact it represents, both in textual and meaning proximity, my use of the general term **"crimes"** to appear to but not actually deny my commission of bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption.

43. I admit that I and my lawyers, knowing I had committed crime, could not simply deny the allegations/facts, and so filed a motion to dismiss, while planning to use my final reply to deceive the Court into believing I committed no crime, knowing that Plaintiff Kaul could not respond to my final **"crimes"** based reply.

44. I admit that I did commit crimes, which explains the extent to which I have proceeded since 2023 in attempting to prevent other district courts and judges from hearing any of **The Kaul Cases**.

45. I admit that my nationwide injunction against a single litigant is a gross deviation from the true purpose of such restrictions, and in conjunction with threats of contempt does constitute an unprecedented violation of the human/civil/constitutional rights of person whose life/liberty/property/reputation rights have been illegally deprived for almost thirteen (13) years and who has not once been provided an opportunity to litigate his claims through discovery to trial.

46. I admit that my conduct and that of **The Kaul Cases** Defendants is, other than being illegal, does evidence our guilt of the levied charges to a criminal standard.

Defendant Oetken Career Milestones And Transition From Lawful To Unlawful Conduct

47. I admit I graduated from high school in or around 1984.

48. I admit I attended college from 1984 to 1988 and did graduate.

49. I admit I attended law school from 1988 to 1992 and did graduate.

50. I admit I did take and pass the NYS Bar Exam after I graduated law school.

51. I admit I did swear an oath upon admission to the NYS Bar.

52. I admit the oath involved a promise to uphold the law, faithfully support the Constitution and conduct my practice of law in an ethical manner.

53. I admit that after graduating law school and in the period from 1992 to approximately 2002 I provided legal counsel to politicians.

54. I admit that in the period from 2002 to 2011 I worked in the private sector and provided legal counsel to publicly traded corporations.

55. I admit that as a consequence of working in the milieu of the political and corporate worlds, I came to witness and know their corrupt intersection.

56. I admit that as a consequence of being immersed in this corrupt politico-corporate milieu, I began to view profit-purposed manipulations of law and ethics as a 'normal' way of conducting public service and business.

57. I admit that being immersed in these manipulations caused a perversion of my moral and ethical framework.

58. I admit that being immersed in these manipulations caused me to become highly experienced in knowingly dishonest perversions of the law to suit political and business agendas.

59. I admit that in 2010 I was sponsored by the US Senator for New York to the federal bench.

60. I admit that in 2011 I was assigned to the federal bench in the Southern District of New York.

61. I admit that upon assignment to the federal bench I did, with my hand on the Bible, swear an oath to the Constitution and a promise to faithfully uphold the law.

62. I admit that in the period from 2011 to 2025, I adjudicated approximately four thousand five hundred (4,500) cases.

63. I admit that the majority of the cases involved commercial, business and financial disputes involving mostly high net worth individuals and financial sector corporations.

64. I admit that I also presided over criminal cases in which defendants were convicted by juries of bribery and public corruption.

65. I admit that I sentenced to jail persons convicted of bribery and public corruption.

66. I admit that in my sentencing remarks in these bribery and public corruption cases, I described the perniciousness of the offenses in that when public servants violate the public trust, there can be nothing more corrosive to the well-being of society and its democratic institutions.

67. I admit that in many of the public corruption cases filed before me and within the S.D.N.Y., the press conference given by the U.S. Attorney would invariably involve how such conduct would not be tolerated in the S.D.N.Y and how the perpetrators would be tenaciously pursued and prosecuted.

68. I admit that by the time I was appointed to the federal bench I was well-versed in the manufacturing of schemes by lawyers in which the law is perverted, violated and ignored to provide justification and cover for the furtherance of knowingly illegal agendas of politicians and corporations.

69. I admit that I know the principal reason I was nominated by the US Senator for NY was my lengthy pre-judicial experience in the corrupt manufacturing of politico-corporate malfeasance supporting legal opinion.

70. I admit that I know my appointment had nothing to do with an aspect of my personal life, an aspect that was however conveniently and publicly exploited by the politicians.

71. I admit that over the almost fourteen (14) years I have sat on the federal bench, there has been an escalation in the brazenness and seriousness of the crimes, violations and other wrongdoing I have committed against the law, the public and the United States.

72. I admit that I know one of the reasons for this unchecked escalation has been the fact that no lawyer or judge has accused me of engaging in corrupt activities.

73. I admit I know that within the court, the non-lawyer and non-judicial staff that work in my courtroom do know of my corrupt activities.

74. I admit I know that one of the reasons no lawyer of judge has reported me is because they believe their 'whistleblowing' will cause the politician who sponsored me to retaliate and attempt to silence them.

75. I admit that the politician's retaliation and 'whistleblower' silencing would stem from his fear that the 'whistleblower' exposing of my corrupt use of the federal bench to further his schemes of political corruption with Wall Street based insurance, hospital, pharmaceutical and banking corporations, would end his political career.

76. I admit I know that in 2019, Plaintiff Kaul sued this politician in the S.D.N.Y. on charges of racketeering, bribery, quid pro quo schemes and public corruption.

77. I admit I knew this fact when Plaintiff Kaul filed K11-7 on August 19, 2021, and despite knowing I was conflicted, I did nonetheless adjudicate the case.

Common Knowledge Of The Truth Of The Crimes Of The Kaul Cases Defendants

78. I admit that as a district judge in a highly staffed district court with unrestricted access to evidence/facts and persons possessing this corpus of evidence/fact AND having been involved as a Judge, Co-conspirator and Defendant in **The Kaul Cases** since 2021 I have come to know the truth of the crimes of **The Kaul Cases** Defendants.

79. I admit I know that having been involved as a Judge, Co-conspirator and Defendant in **The Kaul Cases** since 2021 **The Kaul Cases** Defendants have come to know the truth of each other's crimes, including mine.

80. I admit I know that each Defendant played a particular role in the 'Kaul Elimination Conspiracy'.

81. I admit I know that the two fundamental elements of the scheme pertained to those who purchased state power and those who sold and exercised it.

82. I admit I know that Defendants Allstate/Heary purchased state power from Defendant Christie through bribery.

83. I admit I know Defendant Christie abused his power to cause the illegal revocation of Plaintiff Kaul's license and an ongoing deprivation of his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

84. I admit I know that Defendants Allstate/Heary purchased state power from Defendant Solomon through bribery.

85. I admit I know Defendant Solomon abused his power to cause the illegal revocation of Plaintiff Kaul's license and an ongoing deprivation of his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

86. I admit I know that Defendant Allstate purchased regulatory power from Defendant FSMB through bribery.

87. I admit I know Defendant FSMB abused its power to cause an illegal obstruction of Plaintiff Kaul's efforts to have his illegal revoked NJ license reinstated and or obtain a license in another state.

88. I admit I know Defendant FSMB abused its power to cause an ongoing deprivation of Plaintiff Kaul's life/liberty/property/reputation and violation of his human/civil/constitutional rights.

89. I admit I know that Defendant Allstate purchased bankruptcy trustee power from Defendant Stolz through bribery.

90. I admit I know that Defendant Stolz abused his power in failing to file claims and or collect the over $52 million dollars owed to Plaintiff Kaul's estate/eighty-three creditors of this estate by Defendant Allstate and other insurance companies.

91. I admit I know the truth of the factual foundation of all **The Kaul Cases**, including K11-7 and K11-20.

The Crime Of The September 12, 2022 'Injunction' in K11-7 – August 19, 2021 To September 12, 2022

92. I admit that on August 19, 2021, K11-7 was filed in the United States District Court for the Southern District of New York.

93. I admit that the case was not placed into the court's random judicial assignment system.

94. I admit that the case was improperly assigned to me because I had informed the Clerk's office to inform me of any cases that involved publicly traded corporations.

95. I admit that upon being informed of the case filing, and reviewing the complaint, I did come to know that in K1 Plaintiff Kaul had caused the May 22, 2019 disqualification of the district judge in the District of New Jersey for having received bribes.

96. I admit that I knew/know that the district judge in K1 is the brother-in-law of the politician who sponsored me to the federal bench.

97. I admit that I knew these facts presented a conflict of interest, but did nonetheless have the case assigned to me.

98. I admit that I instructed the court not to assign a magistrate judge to the case.

99. I admit that my instruction to not have an independent magistrate judge assigned pertained to my intent to corruptly adjudicate the case.

100. I admit that upon adopting judicial control of the case, I recognized that Plaintiff Kaul was cognizant and highly attuned to the defendants schemes of judicial corruption.

101. I admit that recognizing Plaintiff Kaul's acute awareness of this issue, it was imperative for me to administer the case in a manner that attempted to deceive Plaintiff Kaul into believing I was impartially administering the case.

102. I admit that a principal purpose of deceiving Plaintiff Kaul into believing I was impartially administering the case and that it would proceed into discovery, pertained to the belief of the defendants and myself that if Plaintiff Kaul thought K11-7 would move into discovery, then he would stop filing cases in other districts and would dismiss any pending cases.

103. I admit that I and the defendants schemed that once Plaintiff Kaul, believing that K11-17 would advance into discovery, had dismissed any pending cases and not filed any new cases, I would dismiss K11-7 with prejudice and enter a nationwide 'injunction'.

104. I admit that my receipt of the bribes from the K11-7 defendants was transferred in partial payments from the commencement of the scheme to the point at which Plaintiff Kaul's right to appeal had expired.

105. I admit that to attempt to conceal the bribes, they were transferred through off-shore institutions and through other schemes involving the dispensation of shares in publicly traded corporations.

106. I admit that in the perpetration of the bribery related quid pro quo scheme, I utilized my prior experience as counsel to corrupt politicians and corporations to implement schemes to attempt to conceal the bribes.

107. I admit that both I and the defendants were convinced that my deceitful administration and adjudication of K11-7 would cause an effective elimination of Plaintiff Kaul by forever precluding his ability/rights to secure justice for the crimes committed against his life/liberty/property/reputation.

108. I admit that I and the defendants did believe that such an effective elimination would cause Plaintiff Kaul to leave the United States and or commit suicide.

109. I admit that I and the defendants, despite knowing that Plaintiff Kaul had two (2) young children, did not care that our actions could cause his death.

110. I admit that the only concern I and the defendants possessed was that of continuing to profit from our crimes.

111. I admit that the scheme was of a 'bait and switch' nature.

112. I admit that in the perpetration of the scheme I used the docket of the United States District Court to publish knowingly fraudulent orders purposed to deceive Plaintiff Kaul into believing I would advance the case into discovery.

113. I admit that from the commencement and throughout the perpetration of the scheme there were extensive and detailed communications between myself and agents acting on my behalf and the defendants and agents acting on their behalf.

114. I admit that these communications involved the 'who/what/where/when/how/why' specifications of the quid pro quo scheme in which in return for the bribes I would dismiss K11-7 with prejudice and enter a nationwide 'injunction'.

115. I admit I knew these communications were illegal and in furtherance of a knowingly illegal scheme.

116. I admit that these communications were conducted in a knowingly illegal manner across the US wires.

117. I admit that I and the defendants knew/know that the use of the US wires constitutes the felony of wire fraud.

118. I admit I know that these communications were also conducted in face-to-face meetings in my chambers in the S.D.N.Y.

119. I admit I knew/know that the use of my chambers to further a knowingly illegal scheme through face-to-face meetings was/is illegal.

120. I admit that these 'secret' meetings in my chambers were conducted after my court staff had departed the building.

121. I admit that some of the communications occurred between myself and agents acting on my behalf and the defendants and agents acting on their behalf in places outside of the court building.

122. I admit that in these non-court meetings the arrival and departure at the meeting location of the persons involved was staggered, in order to avoid any person observing the gathering of high-profile lawyers and an equally high-profile federal judge.

123. I admit that despite knowing of the illegality of the communications, of their conduction within my chambers within the S.D.N.Y. and of their furtherance of knowingly illegal bribery related scheme, I did nonetheless commit these crimes in a knowingly illegal manner.

124. I admit that my willful and knowing perpetration of these crimes while in possession of the power of a federal judge does constitute a high crime against not just Plaintiff Kaul and the United States but against the Constitution of the United States.

125. I admit that during the digital and face-to-face communications, the timing of my orders of dismissal with prejudice and injunction was discussed.

126. I admit that I and the defendants agreed that the orders would be entered once Plaintiff Kaul had dismissed all pending cases and there were no remaining cases within the United States District Court through which he could prosecute **The Kaul Cases** Defendants.

127. I admit that during the communications I and the defendants agreed that the September 12, 2022 opinion/order/injunction would be co-drafted.

128. I admit that during the communications I and the defendants agreed that the September 12, 2022 opinion/order/injunction would contain no analysis of any of Plaintiff Kaul's

arguments and or refutation and distinguishment of the arguments/cases cited by the K11-7 Defendants.

129. I admit that during the communications I and the defendants agreed that the September 12, 2022 opinion/order/injunction would encourage Plaintiff Kaul to appeal the opinion/order/injunction in order to attempt to further preclude him from filing cases in other districts.

130. I admit that during the communications I and the defendants agreed that we knew any appeal would be denied, because certain judges on the appeal court had been sponsored by the same politician who had sponsored me.

131. I admit that during the communications I and the defendants agreed that the appeal would be denied because certain judges on the appeal court continued to participate in quid pro quo schemes with the insurance and banking defendants in K11-7.

132. I admit that during the communications I and the defendants agreed that if the opinion/order/injunction were drafted in as defamatory a manner as possible, it would demoralize Plaintiff Kaul to the point where he would discontinue his efforts to hold **The Kaul Cases** Defendants liable for their crimes/violations/injuries.

133. I admit that I and the defendants agreed that if the opinion/order/injunction were drafted in as defamatory a manner as possible, it would, if Plaintiff Kaul did not appeal and filed new cases, cause other judges to dismiss these cases.

134. I admit that despite knowing the truth of the factual foundation of K11-7, I did dismiss the case with prejudice and enter a nationwide injunction on September 12, 2022

135. I admit I know that the dismissal and nationwide injunction were the product of an illegal bribery related quid pro quo scheme.

136. I admit that on September 14, 2022, Plaintiff Kaul submitted a notice to the S.D.N.Y. that was addressed to me and in which he requested a list of my financial holdings, my Forms AO10 and the substance of all ex parte communications with the K11-7 Defendants.

137. I admit that since September 14, 2022 I have failed to disclose to the court, to the docket or to Plaintiff Kaul any of my financial holdings, ex parte communications and or any form of bribe, be it tangible/intangible, that was received through any means by me, or any party related to me in the third-degree.

138. I admit that my issuance on September 12, 2022 of a knowingly fraudulent document, that of the injunction, did become illegally incorporated into the fabric of American jurisprudence and the court records of the United States District Court.

139. I admit that the incorporation of a knowingly fraudulent document issued by a judicial officer, into the court records of the United States District Court constitutes a treasonous crime against the United States.

The Motion For Disqualification + K11-14 – October 6, 2022 To August 23, 2023

140. I admit that on October 6, 2022, Plaintiff Kaul filed a motion for my disqualification.

141. I admit that the motion was based partly on my commission of the crimes of bribery, conspiracy, perpetrating quid pro quo schemes, wire fraud, and public corruption.

142. I admit that the motion was based partly on my collusion and conspiracy in corruptly using the authority of the United States District Court to attempt to conceal **The Kaul Cases** Defendants crimes of mail fraud/wire fraud/bribery/obstruction of justice/kickbacks/perjury/evidential falsification/witness tampering/kidnapping/false indictment/false arrest/false imprisonment/attempted killing.

143. I admit that my failure to timely address Plaintiff Kaul's October 6, 2022 motion for disqualification and deny the within facts did cause the admission of those facts.

144. I admit that the motion was based in part on my failure to analyze/refute/contest any of Plaintiff Kaul's one hundred and seventy-three (173) arguments/sub-arguments submitted in K11-7.

145. I admit that the motion was based in part on my knowingly fraudulent reliance on law, the invalidity of which was shown by Plaintiff Kaul to definitively not support the entry of an injunction.

146. I admit that the motion was based on my bribery related derogation of the relevant law and my threat to hold Plaintiff Kaul in contempt if he violated my knowingly illegal order/injunction.

147. I admit I knew/know that the order/injunction had no basis in fact or law, but was simply the product of judicial corruption, for which I threatened to hold Plaintiff Kaul in contempt if he violated.

148. I admit that my use of the US wires to enter this knowingly fraudulent order/injunction onto the federal docket constitutes the offense of wire fraud.

149. I admit that within the motion for disqualification and at D.E. 171 Page 12 of 39, Plaintiff Kaul did state: **"Democracy and the peaceful order of society cease to exist when the judiciary is morally bent, perverted from fact and willfully blind to the law. When partiality, personal bias and conflicts of interest pollute the administration of justice, the public loses confidence in the system of justice, and lawlessness displaces lawfulness."**

150. I admit I know of the December 4, 2024 killing of the CEO of the healthcare insurance company, United Health Care by Luigi Mangeone.

151. I admit that it was an unlawful act, but one born out of the lethal lawlessness of the corporate health insurance industry and the failure of the government to hold it accountable.

152. I admit that the killing sparked a nationwide public outrage and calls to hold the insurance industry legally accountable.

153. I admit that I know the reason for the killing of the CEO pertained to his directives to his corporation to deny life-saving care to premium paying patients.

154. I admit that I was a corporate lawyer, and worked for corporations with investments in highly profitable healthcare insurance corporations.

155. I admit that I know K11-7 Defendants Allstate Insurance Company and Geico profit from the sale of auto accident-related healthcare insurance policies.

156. I admit I know that these policies are purposed to pay for the provision of care to patients injured in car accidents.

157. I admit I know that in K11-7 and throughout **The Kaul Cases** Plaintiff Kaul has claimed that Defendants Allstate/Geico/Blue Cross Blue Shield (K11-22) conduct the same care denying **"pattern of racketeering"** as does United Healthcare.

158. I admit that the claims regarding denial of care are located at - D.E. 14 Para. 106 Page 27 of 432 – D.E. 14 Para. 132 Page 34 of 432.

159. I admit I know that in the K11-7 Complaint (D.E. 14 Para. 106 Page 27 of 432) Plaintiff Kaul states with regards to Defendants Allstate/Geico: **" … whose shared economic mission is the maximization of corporate profit and share price, through the exploitation of the American public (denial of care) and medical profession (license suspension/revocation/incarceration) …"**

160. I admit that despite knowing these facts of patient care denial, I dismissed Plaintiff Kaul's claims Defendants Allstate Insurance Company and Geico because I had willingly and knowingly accepted bribes.

161. I admit that my bribe related dismissal of K11-7 did aid and abet the perpetuation of the insurance industry's 'deny … delay … defend' scheme of the denial of life-saving care to the American public.

162. I admit that as a lawyer and federal judge I understand RICO's vicarious liability doctrine, wherein the liability of the crimes/offenses/violations/injuries caused by any of the conspiracy's perpetrators and or co-conspirators becomes the liability of all perpetrators/co-conspirators.

163. I admit that I am as responsible as Defendants Allstate/Geico for the immense harm caused to those members of the American public whose life-saving and life-altering care was denied by these for-profit corporations.

164. I admit that I eventually adjudicated the motion for disqualification on August 14, 2023.

165. I admit that I denied the motion for disqualification in an unsubstantiated order that failed to address/contest/refute/analyze the cited and controlling law.

166. I admit that I denied the motion for disqualification in an unsubstantiated order in which I failed to deny any of the facts of amongst other things, bribery/public corruption/wire fraud/conspiracy.

167. I admit that I denied the motion for disqualification in an unsubstantiated order, in which I failed to deny the fact that I engaged in a bribery related quid pro quo scheme with the K11-7 Defendants, in which in return for the bribes I dismissed K11-7 with prejudice and entered a nationwide injunction against Plaintiff Kaul.

168. I admit that the reason for the delay in denying the disqualification motion pertained to the fact that the district judge in K11-14 believed my nationwide injunction was indeed the product of bribery, because I had failed to deny the facts asserted in Plaintiff Kaul's September 14, 2022 notice (D.E. 170) and the October 6, 2022 motion for disqualification (D.E. 171).

169. I admit that the district judge in K11-14 indicated that if I did not deny the motion for disqualification, she would not dismiss K11-14 based on my September 12, 2022 purported injunction.

170. I admit that the district judge in K11-14 indicated that if she dismissed K11-14 on an injunction that was the product of crime, she would become liable for the crime.

171. I admit that the district judge in K11-14 indicated that the motion for disqualification had to be denied before she would issue her denial of K11-14 based on the K11-7 September 12, 2022 purported injunction.

172. I admit that the K11-7 Defendants who were now the K11-14 Defendants employed threats and persuasion to have me deny the motion for disqualification, in order that the district judge in K11-14 would dismiss the case.

173. I admit that I recognized that if I did not comply with the demands of the K11-14 district judge and the K11-7/K11-14 Defendants, my criminal acts of, amongst other things,

bribery/public corruption and wire fraud would be exposed and subject me to impeachment and criminal prosecution.

174. I admit that as a consequence of these demands and threats, I did, on August 14, 2023 deny the motion for disqualification without denying any of the within facts of, amongst other things, bribery/public corruption/wire fraud.

175. I admit I knew my actions did constitute the commission of crime, in that I aided and abetted the Defendants conversion of the S.D.N.Y. into a **"racketeering enterprise"** through which they and I perpetrated a knowingly illegal **"pattern of racketeering"** a purpose of which was to attempt to prevent the exposure of my crimes in other district courts over which I had no control.

176. I admit I know that after having agreed to the demands and threats of the K11-7/K11-14 Defendants and the K11-14 district judge, K11-14 was dismissed with prejudice on August 23, 2023 based on the K11-7 September 12, 2022 injunction.

177. I admit that I experienced a sense of relief at having had another district court appear to legitimize my September 12, 2022 injunction.

178. I admit that even though I experienced a sense of relief at a public display of such apparent legitimization, I knew the district judge in K11-14 recognized the injunction was a product of a quid pro quo scheme of bribery.

179. I admit I believed that the dismissal of K11-14 would convince Plaintiff Kaul to cease his campaign of litigation.

180. I admit the incorrectness of my belief is a direct reflection of Plaintiff Kaul's recognition of the seriousness of my crimes.

181. I admit I know that Plaintiff Kaul's recognition of the seriousness of my crimes is based on his knowledge of my recognition of the seriousness of my crimes.

K11-10 And The Knowingly Illegal Issuance Of Threats To Hold Plaintiff Kaul In Contempt If He Failed To Dismiss K11-17 And K11-20 – March 9, 2023 To October 2, 2024

182. I admit I know that Plaintiff Kaul did not appeal the September 12, 2022 order/injunction.

183. I admit I know that on September 14, 2022, at D.E. 170, Plaintiff Kaul filed a notice with the Clerk of the Court for the S.D.N.Y. that requested I produce and publish to the court docket my financial holdings and the contents of all ex parte communications with the K11-17 Defendants.

184. I admit that since September 14, 2022 I have failed to disclose to the court, to the docket or to Plaintiff Kaul any of my financial holdings, ex parte communications and or any form of bribe, be it tangible/intangible, that was received through any means by me, or any party related to me in the third-degree.

185. I admit that I have failed and continue to fail to disclose the requested information because I am guilty of having participated in a bribery related quid pro quo scheme with the K11-7 Defendants.

186. I admit I know that on March 9, 2023, Plaintiff Kaul filed K11-10 in the S.D.N.Y.

187. I admit I came to know the case had been randomly assigned to another district judge, who had been recently appointed to the federal bench.

188. I admit I know that the staff in the court's filing office came to know in or around late September-October 2022 of the bribery related quid pro quo scheme in which I had engaged.

189. I admit I know that as a consequence of the staff coming to know of the scheme, they did not inform me of the filing of K11-10.

190. I admit that sometime after the filing of K11-10 the K11-10 Defendants engaged in ex parte communications with me during which they informed me that Plaintiff Kaul had filed K11-10.

191. I admit that upon becoming aware of K11-10, I ensured the district judge became aware of the order/injunction I had entered in K11-7 on September 12, 2022.

192. I admit I know that as a consequence of my knowingly illegal September 12, 2022 order/injunction, the district judge in K11-10 did on May 10, 2023 dismiss K11-10 with prejudice.

193. I admit I know that on November 20, 2023, Plaintiff Kaul filed K11-17 in the U.S.D.C. for the E.D.N.C.

194. I admit that in late November 2023 the K11-17 Defendants engaged in ex parte communications with me during which they informed me that Plaintiff Kaul had filed K11-17.

195. I admit that in becoming aware of K11-17, I came to know that Plaintiff Kaul had informed the district judge of the injunction by submitting a copy within Exhibit 14 and referencing the injunction within the Complaint.

196. I admit that in coming to know that the district judge had admitted the case with full knowledge of the injunction, I decided to take no action.

197. I admit that an element of me deciding to take no action pertained to the fact that no discovery order had been entered.

198. I admit that the lack of a discovery order would prevent Plaintiff Kaul from serving discovery upon me and exposing my corrupt actions surrounding the issuance of the September 12, 2022 injunction.

199. I admit that in a period from November 20, 2023, the K11-17 Defendants sent me an ex parte letter requesting I issue an order compelling Plaintiff Kaul to dismiss K11-17.

200. I admit this letter was not published to the docket of the S.D.N.Y.

201. I admit no other judge nor court employee in the S.D.N.Y. was made aware of this letter.

202. I admit the reason this letter was kept concealed from other judges and staff was to prevent any investigation into the corrupt circumstances surrounding my bribery related issuance of the injunction.

203. I admit I took no action on the letter as no discovery order had been entered in K11-17.

204. I admit I know that on March 13, 2023, a discovery order was entered in K11-17.

205. I admit that on March 13, 2023 the K11-17 Defendants informed me of the issuance of the discovery order in K11-17.

206. I admit that the issuance of the discovery order in K11-17 convinced me that Plaintiff Kaul would use the tools of discovery to expose the facts of my bribery related quid pro quo scheme with the K11-7 Defendants.

207. I admit that the issuance of the discovery order in K11-17 convinced me that Plaintiff Kaul would use the tools of discovery to expose the identities of all persons involved in the bribery related quid pro quo scheme with the K11-7 Defendants.

208. I admit that both I and the K11-17 Defendants in recognizing the risk of such exposure, did agree that I should issue an order to Plaintiff Kaul threatening to hold him in contempt if he did not dismiss K11-17.

209. I admit that on March 15, 2024 I issued an order to Plaintiff Kaul threatening to hold him in contempt if he did not dismiss K11-17, and had this order published to the docket of the S.D.N.Y.

210. I admit I know that the issuance of this order was illegal and was the product of the crime of the bribery related quid pro quo scheme that caused the September 12, 2022 issuance of the injunction.

211. I admit that despite knowing the issuance of the March 15, 2024 was illegal, I did nonetheless issue the order in the belief that it would prevent Plaintiff Kaul from using discovery to expose the facts of my crimes and of those associated with the commission of the crimes.

212. I admit I know that having had the knowingly illegal order published to the S.D.N.Y. docket, it was downloaded by the K11-27 Defendants.

213. I admit I know that having downloaded the March 15, 2024 order threatening Plaintiff Kaul with contempt if he did not dismiss K11-17, the K11-17 Defendants did on March 18, 2024 publish the order to the docket of the E.D.N.C. (D.E. 72).

214. I admit that the order required Plaintiff Kaul to dismiss K11-17 by March 29, 2024 or be held in contempt.

215. I admit I know the March 18, 2024 filing of the order on the docket of the E.D.N.C. was immediately brought to the attention of the district judge.

216. I admit I believed that Plaintiff Kaul would dismiss K11-17, having experienced the dismissal of K11-14 based on the K11-7 injunction.

217. I admit I was wrong.

218. I admit that on March 25, 2024, Plaintiff Kaul filed suit (K11-18) against me in the E.D.N.C.

219. I admit I know the case was ultimately assigned to the Chief Judge who was already adjudicating K11-17.

220. I admit I did not deny any of the allegations/facts in K11-18.

221. I admit I know that my non-denial of the facts did, pursuant to Rule 8(b)(6) cause them to become admitted for all purposes.

222. I admit I know that K11-18 was dismissed with prejudice on April 8, 2024.

223. I admit I know that Plaintiff Kaul filed a NOTICE OF APPEAL on May 9, 2024 in the U.S.C.A. for the Fourth Circuit.

224. I admit I know the U.S.C.A., for the Fourth Circuit issued an 'INFOERMAL BRIEFING ORDER' on May 9, 2024.

225. I admit I know that on May 15, 2024, Plaintiff Kaul filed a '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'.

226. I admit I know that the basis for the admitted facts pertained to, amongst other things Rule **"8(b)(6) of the F.R.C.P."** (U.S.C.A.4 Appeal: 24-1417 Doc:4-1)

227. I admit I know that the facts deemed to be admitted by the U.S.C.A. for the Fourth Circuit were all the facts from all of **The Kaul Cases** in which none of the Defendants had denied any of the facts.

228. I admit I know that the facts deemed to be admitted by the U.S.C.A. for the Fourth Circuit were all the facts from all of **The Kaul Cases** in which the non-denial of all of the facts did, pursuant to Rule 8(b)(6) cause the facts to become admitted for all purposes.

229. I admit I know that Plaintiff Kaul's May 15, 2024 submission included a copy of every Complaint from all of **The Kaul Cases**, and that the submission was three hundred and three (303) pages.

230. I admit I did not file any objection to Plaintiff Kaul's May 15, 2024 submission as to admitted facts pursuant to Rule 8(b)(6).

231. I admit the law deems my non-objection as an admission of the procedural/substantive substance of the May 15, 2024 submission.

232. I admit I know that on May 29, 2024, Plaintiff Kaul filed his 'INFORMAL OPENING BRIEF' (U.S.C.A.4 Appeal: 24-1417 Doc:9-1).

233. I admit I know that within the 'INFORMAL OPENING BRIEF' Plaintiff Kaul raised facts related to my perpetration of a bribery related quid pro quo scheme in K11-7.

234. I admit I have read the 'INFORMAL OPENING BRIEF'

235. I admit that one of the statements, of which my non-denial did cause admittance, is: **"Respondent [Defendant Oetken] continued to fail to provide any evidence/fact that 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."**

236. I admit the truth of this statement.

237. I admit I filed no response to Plaintiff Kaul's 'INFORMAL OPENING BRIEF' because the truth of the facts within K11-18 had been proven and admitted consequent to my non-denial of the facts, the non-denial of which did, pursuant to Rule 8(b)(6) cause them to become admitted for all purposes.

238. I admit I did not deny the facts in K11-18, as I have not denied them in K11-23 because I am guilty of the charges levied in both cases.

239. I admit I had every opportunity to deny the facts in K11-18, but did not.

240. I admit I knew/know that in willfully failing to deny the facts in K11-18, I did admit the facts for all purposes.

241. I admit I know that in K11-17 on June 14, 2024, the district judge who dismissed K11-18 did, after having entered an order of discovery on March 13, 2024 in full knowledge of my September 12, 2022 injunction in K11-7, did dismiss K11-17 based on the injunction.

242. I admit that the district judge in K11-17 was harassed and intimidated into dismissing a case in which he, in his independent judicial authority/judgment had admitted on November 20, 2023 and entered an order of discovery on March 13, 2024 in full knowledge of the injunction.

243. I admit that when the K11-17 Defendants informed me of the March 13, 2024 discovery order in K11-17, I recognized the immense risk of Plaintiff Kaul exposing my crimes not just in K11-7, but those I have committed since my appointment to the federal bench in 2011.

244. I admit that if discovery proceeded in K11-17, Plaintiff Kaul would expose my long-standing bribery related criminal activities.

245. I admit I know that such an exposure would cause my removal from the federal bench and subject me to criminal proceedings.

246. I admit I know that in having K11-14 and K11-17 dismissed I did continue to perpetuate an almost twenty (20) year-long conspiracy against Plaintiff Kaul and a twelve (12) year-long injury to his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

247. I admit I knew/know that my perpetuation of this conspiracy and rights violations were purposed to cause the elimination of Plaintiff Kaul.

248. I admit that my intention in seeking to cause the elimination of Plaintiff Kaul pertained to my fear that his continued prosecution of **The Kaul Cases** would expose my crimes and those of **The Kaul Cases** Defendants.

249. I admit that as Plaintiff Kaul proceeded to file K11-14 and K11-17, **The Kaul Cases** Defendants became increasingly agitated and aggressive in their threats to expose me if I did not follow their orders and have Plaintiff Kaul held in contempt and jailed.

250. I admit that with these threats I became fearful for my career and life.

251. I admit that on or about August 26, 2024 I became aware that Plaintiff Kaul had filed K11-20 in the United States District Court for the Southern District of Texas.

252. I admit I know that on August 30, 2024, the Court entered an 'ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES' (D.E. 4).

253. I admit that on September 16, 2024 the K11-20 Defendant Federation State Medical Boards sent me a letter requesting I order Plaintiff Kaul to dismiss K11-20 under threat of contempt of court (K11-7: D.E. 174).

254. I admit that in K11-7 on September 13, 2022 the Clerk of the Court closed the case.

255. I admit that no order was ever issued by the Clerk of the Court that re-opened the case.

256. I admit that in the absence of any order from the Clerk of the Court re-opening the case, the case has remained closed since September 13, 2022.

257. I admit that the continued closure of the case since September 13, 2022 does render all filings in the closed case null and void for all intents and purposes.

258. I admit that in recognizing the fact that the case was closed and in not wanting to again expose myself to a lawsuit as Plaintiff Kaul had filed on March 25, 2024 in K11-17 and which was now before the U.S.C.A. for the Fourth Circuit, I hesitated in a manner I had not in K11-17 in deciding to threaten Plaintiff Kaul with contempt if he did not dismiss K11-20.

259. I admit that my degree of hesitation and fear had become compounded by the risk of having my crimes exposed by the co-conspirator K11-7/K11-20 Defendants and or the U.S.C.A. for the Fourth Circuit.

260. I admit I found myself 'backed into a corner' in which I had no option but to obey the order of the K11-20 Defendants to issue an order threatening Plaintiff Kaul with contempt if he did not dismiss K11-20.

261. I admit that if Plaintiff Kaul pursued discovery in K11-20, he would fully expose my crimes and those of persons who aided and abetted the crimes.

262. I admit that on October 2, 2024 under immense duress I issued an order that threatened Plaintiff Kaul with contempt if he did not dismiss K11-20 by October 16, 2024.

263. I admit I was convinced Plaintiff Kaul would dismiss K11-20, and that my crimes and those of my co-conspirators would be concealed.

264. I admit that on October 9, 2024, Plaintiff Kaul filed K11-23, in which I was and am charged of, amongst other things, the crimes of bribery/public corruption and the conversion of my court at the S.D.N.Y. into a **"racketeering enterprise".**

265. I admit I know that on October 9, 2024, in K11-20, the Court issued a 'SCHEDULING ORDER'

266. I admit that I was served with a copy of K11-23 on October 16, 2024 at approximately 9:30 am EST in my courtroom at the S.D.N.Y. by a security officer employed by the United States District Court.

DATED: JANUARY 6, 2025

RICHARD ARJUN KAUL, MD

CERTIFICATE OF SERVICE

I certify under penalty of perjury that a copy of the **FIRST SUBMISSION OF ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT JAMES PAUL OETKEN** was emailed to Defendants' counsel on January 6, 2025.

DATED: JANUARY 6, 2025

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

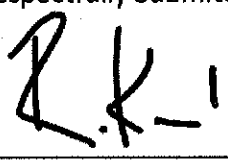
v.

CIVIL ACTION: NO.: 24-CV-03180 (AHB)

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 SUBMISSION OF ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT ALLSTATE INSURANCE COMPANY

Respectfully Submitted



RICHARD ARJUN KAUL, MD

SEPTEMBER 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)

For ease of reference Defendant ALLSTATE INSURANCE COMPANY will be referred to as **"I"**

Admission Of Guilt

1. I admit that I am guilty of all the facts and charges levied against me in all sections of the Complaint.

2. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed against Plaintiff Kaul by other Defendants, as are they as equally liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

3. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from '**PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF**.

4. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

5. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

6. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW'**

7. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

8. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS

9. I admit that I procured copies of the Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

10. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS.

11. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS.

Purpose Of Schemes And Violations

12. I admit that the purpose of the below admitted to and detailed schemes and conspiracies was the elimination of Plaintiff Kaul's life/liberty/property and reputation.

13. I admit that an element of the method and or mechanism of the schemes/conspiracies involved the knowing and willful violation of law.

14. I admit that an element of the method and or mechanism of the schemes/conspiracies involved the knowing and willful violation of Plaintiff Kaul's human/civil/constitutional rights.

15. I admit that the principal motive for the schemes/conspiracies was to eliminate the competitive threat of Plaintiff Kaul from the minimally invasive spine surgery market, an elimination that increased my executive/shareholder compensation and profit by eradicating my debt to Plaintiff Kaul for clinical services he had provided to my premium fee-paying clients (2002-2012).

16. I admit that the tactics used to eliminate Plaintiff Kaul from, and the competition he presented to the minimally invasive spine surgery market, were knowingly illegal.

17. I admit that the knowingly illegal tactics were anti-competitive.

18. I admit that the knowingly illegal tactics did violate Plaintiff Kaul's human/civil/constitutional rights.

Context To Schemes And Violations

19. I admit that I am corporation.

20. I admit that I profit from the American healthcare sector.

21. I admit that I sell accident policies to the American public.

22. I admit that an element of the product I sell pertains to the payment of medical bills incurred by my premium paying clients, who are injured in accidents.

23. I admit that the principal and overriding goal of my business is to generate profit for my shareholders and executives.

24. I admit that part of my strategy of profit maximization involves not paying medical bills.

25. I admit that this strategy of non-payment of medical bills began in the early 1990s and became institutionalized in my corporate policy in approximately 2007 with the assistance of consulting firm, McKinsey & Co.

26. I admit that the strategy of 'delay, deny, defend' was conceived of by a man at McKinsey who was subsequently jailed for insider trading.

27. I admit that the 'delay, deny. Defend' strategy was incorporated into my business strategy in around 2008, and involved/involves the non-payment of medical bills.

28. I admit that this illegal policy accounts for the rise in share price and profits to shareholders and executives.

29. I admit that this illegal policy accounts for the violations/deprivations/theft of services that I perpetrated against Plaintiff Kaul up until the 2012/2014 suspension and revocation of his NJ license.

30. I admit that this illegal policy and my attempt to conceal all the crimes committed by me and **The Kaul Cases** Defendants against Plaintiff Kaul account for the massive schemes of corruption of the politico-judicial bodies in attempting to prevent Plaintiff Kaul's prosecution of **The Kaul Cases** (2016-2024).

31. I admit that one of the reasons none of the Defendants have appeared in this case (K11-20) is that the politicians and judges involved in the prior schemes of obstruction have denied Defendants requests to intervene in the case (K11-20).

32. I admit that I and **The Kaul Cases** Defendants know and accept that we are guilty of the levied charges.

2005-2024 – Bribery + Wire Fraud + Mail Fraud + Evidential Tampering + Witness Tampering + Obstruction of Justice + Public Corruption + Securities Fraud + Conspiracy + Subornation of Perjury + Conspiracy + Money Laundering + Bankruptcy Fraud

Pre-Revocation Facts – 2005 to 2014

33. I admit that I and Plaintiff Kaul first interacted in or around 2005.

34. I admit that the nature of that first interaction pertained to the payment of a claim submitted by Plaintiff Kaul to me for clinical care he had provided to one of my premium-fee paying clients.

35. I admit that in a period from 2005 to 2012, Plaintiff Kaul submitted hundreds of claims for the provision of non-surgical, interventional and surgical care he provided to hundreds if not thousands of my premium fee-paying clients.

36. I admit that it became my policy to not pay the claims, as it was my policy with many other physicians and allied healthcare providers.

37. I admit I knew that the less money I paid to physicians and healthcare providers, the greater would be the compensation to my Wall Street shareholders and executives.

38. I admit that approximately five (5) cents of every patient premium dollar was paid for the provision of healthcare, while ninety-five (95) cents were diverted into shareholder and executive compensation.

39. I admit I knew that this policy was illegal and did constitute the act of embezzlement.

40. I admit that I did not inform my fee-paying clients that only five (5) percent of their premiums was used to provide care to them when they incurred injuries.

41. I admit it became my policy and that of other insurance carriers profiting from the American healthcare sector to illegally withhold as much premium money and shift the deductibles onto the patients.

42. I admit that in the period from 2005 to the present, I have developed policies of immense bureaucratic burden purposed to dissuade patients and physicians from seeking payment and care.

43. I admit I know of many patients who have committed suicide because I denied or did not agree to pay for the care of their injured spines.

44. I admit that in the period from 2005 to 2012, Plaintiff Kaul, would treat all his patients regardless of their insurance status.

45. I admit I know that he was able to provide such care because he owned his own surgical center.

46. I admit that if I did not pay his claims, he would file arbitration claims.

47. I admit that in a period from 2005 to 2012, Plaintiff Kaul prevailed in ninety-nine percent (99%) of his arbitration hearings on claims that included minimally invasive spine surgery.

48. I admit I know that the professional arbitrator-lawyers found Plaintiff Kaul's care to be medically necessary and properly provided.

49. I admit that in recognizing that Plaintiff Kaul did prevail in ninety-nine percent (99%) of his arbitration claims, I joined the conspiracy commenced by the neurosurgeons in or around 2005, in order to have Plaintiff Kaul eliminated.

50. I admit that the purpose of the elimination was to eradicate my debt to Plaintiff Kaul and to eliminate any future threat of competition to my economic standing in the minimally invasive spine surgery market.

51. I admit that in entering the pre-existing neurosurgeons RICO conspiracy I did assume liability for all the offenses/violations that had been committed prior to my joining.

52. I admit that I entered the conspiracy in or about 2007/8.

53. I admit however, that in a period that commenced in or around 2008 or earlier, I did initiate communications with Defendant Christie.

54. I admit that the purpose of the communications was to ascertain if Defendant Christie would enter into a quid pro quo scheme with me.

55. I admit that the proposed quid pro quo scheme involved me funneling bribes to Defendant Christie in return for which he would abuse the power of executive office to have Plaintiff Kaul's NJ license revoked.

56. I admit that a purpose of having Plaintiff Kaul's license revoked was to eliminate my debt to him for professional clinical services he had provided to my premium fee-paying clients in the period commencing in 2002.

57. I admit that another purpose of having Plaintiff Kaul's license revoked was to eliminate the competition/threat that he posed to the minimally invasive spine care market, in which we competed for the finite financial resources of the financial funds of patient premiums.

58. I admit that I know that the less or no money I paid Plaintiff Kaul for his clinical services, the more I would generate for my Wall Street corporate executives and shareholders.

59. I admit that I know that the less or no money I paid any physician for his or her clinical services, the more I would generate for my Wall Street corporate executives and shareholders.

60. I admit that my efforts and those of the neurosurgeons to bribe the then governor, John Corzine, into having Plaintiff Kaul's license revoked were unsuccessful.

61. I admit that it was not until Defendant Christie assumed the governorship in 2009 that the revocation quid pro quo bribery scheme began being perpetrated.

62. I admit I knew that Defendant Christie would participate in the revocation quid pro quo bribery scheme.

63. I admit that the reason I knew was because he had perpetrated a similar scheme while he was the US Attorney for NJ (2001-2009), against principally Indian cardiologists owed money by healthcare insurance companies.

64. I admit that being a member of the NJ insurance lobbies and conglomerates, I came to know of the various schemes in which Defendant Christie abused the power of state to extort monies from physicians in return for dismissing knowingly false criminal indictments he filed against them.

65. I admit that the purpose of these schemes to Defendant Christie was to personally and illegally profit from the power of the office of the US Attorney.

66. I admit that the purpose of these schemes to Defendant Christie was to collect money for his gubernatorial campaigns (2009/2013).

67. I admit that the purpose of the schemes to those bribing him (insurance/hospitals/neurosurgeons) was to illegally eliminate their market competition and increase their profits.

68. I admit I know that Defendant Christie's tactics were part of a wider **"pattern of racketeering"** in. which he, in collusion/conspiracy with I and others, did knowingly convert the State of New Jersey into a **"racketeering enterprise"**, through which we perpetrated the RICO predicate acts of Bribery + Wire Fraud + Mail Fraud + Evidential Tampering + Witness Tampering + Obstruction of Justice + Public Corruption + Securities Fraud + Conspiracy + Subornation of Perjury + Conspiracy + Money Laundering + Bankruptcy Fraud.

69. I admit that prior to my initial contact with Defendant Christie, I had been perpetrating massive schemes of bribery and public corruption within the political and judicial bodies of the State of New Jersey, since at least the 1990s.

70. I admit that prior to my initial contact with Defendant Christie, I had been perpetrating massive schemes of bribery and public corruption within the political and judicial bodies of many other states, since at least the 1990s.

71. I admit that prior to my initial contact with Defendant Christie, I had developed an efficient system of bribery and public corruption.

72. I admit that prior to my initial contact with Defendant Christie, I had successfully implemented the system of bribery and public corruption within the State of New Jersey and others.

73. I admit that within my construction of this system of bribery and public corruption, I did through corrupt means take control of certain elements of the executive, judicial and legislative branches of the State of New Jersey.

74. I admit that within my construction of this system of bribery and public corruption, I did through corrupt means take complete control of the investigative, prosecutorial and adjudicative elements of the state.

75. I admit that the process of corruptly capturing the functions of state took less than a decade.

76. I admit that in the process of corruptly capturing the functions of state I used law firms, lobbyists and public relations firms as the conduits for the exchange/transmission of bribes and information related to the various quid pro quo schemes.

77. I admit that I was both directly and indirectly involved in the exchange of information as to the perpetration of these quid pro quo schemes.

78. I admit that I and others used the US wires to exchange and transmit information pertaining to these knowingly illegal quid pr quo schemes.

79. I admit that I and others used the US mail to exchange and transmit information pertaining to these knowingly illegal quid pr quo schemes.

80. I admit that I knew and know that my use of the US wires/mail was illegal.

81. I admit that despite my knowledge of the illegality of my use of the US wires/mail, I did continue to use them as I had no concern as to being prosecuted.

82. I admit that I had no concern about being prosecuted because I had bribed the NJ investigators, prosecutors and adjudicators.

83. I admit that I had no concern about being prosecuted because I had bribed governors.

84. I admit that in bribing Defendant Christie, I had no concern for being prosecuted, as had any prosecutor initiated a prosecution, Defendant Christie would have dismissed and or replaced that prosecutor.

85. I admit I knew that had any prosecution been brought against me for any crime, it would have been dismissed by Defendant Christie.

86. I admit I knew the reason it would have been dismissed by Defendant Christie is that I had funneled massive bribes into his political campaigns and personal accounts.

87. In knowing that my quid pro quo would likely proceed with Defendant Christie, I and my agents did have several meetings with him and his agents in the period from 2008 onwards.

88. I admit that these meetings/communications occurred both in digital form and non-digital form in a time period commencing in 2008 or earlier.

89. I admit that there were email and text communications between myself and my agents and Defendant Christie and his agents in a time period commencing in 2008 or earlier.

90. I admit that there were face-to-face meetings between myself and my agents and Defendant Christie and his agent in a time period commencing in 2008 or earlier.

91. I admit that during and within these communications there were discussions and agreed upon points as to the structure and function of the bribery scheme.

92. I admit that during and within these communications there were discussions and agreed upon points as to how the knowingly illegal scheme would be concealed and or covered-up.

93. I admit that these meetings/communications were conducted in relative secrecy and behind the closed doors of governmental and corporate offices.

94. I admit that I and my agents, and Defendant Christie and his agents knew the importance of secrecy and not permitting the leakage of any details of the knowingly iilegal bribery conspiracy.

95. I admit that during the communications/meetings, hand-written and computer-generated notes were however taken.

96. I admit that these notes remain in my possession.

97. I admit that I know that the notes of Defendant Christie and his agents remain in their possession and that of the State of New Jersey.

98. I admit that in the time period from 2008 to 2012, there were hundreds if not thousands of digital and non-digital communications between me and my agents and Defendant Christie and his agents.

99. I admit that this corpus of communication data contains statements/facts that pertain to the various schemes and sub-schemes purposed to cause, amongst other things, the professional/personal/social/psychological/physical/emotional/economic/reputational elimination of Plaintiff Kaul.

100. I admit that this corpus of communication data contains statements/facts that pertain to the various schemes and sub-schemes purposed to cause, amongst other things, the elimination of Plaintiff Kaul's life/liberty/property/reputation.

101. I admit the below **Elimination Sub-Schemes** were all purposed to effectively eradicate Plaintiff Kaul's existence in order to prevent him from ever exposing our crimes:

102. I admit that in the period from 2000 to 2012 I did, in collusion and conspiracy with Defendant Christie and his agents, knowingly commit the below stated offenses/violations of law and rights against Plaintiff Kaul and the New Jersey public:

103. I admit that In a time period commencing in or around 2005/6, I did perpetrate anti-trust infractions against Plaintiff Kaul that are ongoing, in that my violations/offenses continue to restrict his participation and competition in the minimally invasive spine surgery market.

104. I admit that In a time period commencing in or around 2005/6, I did perpetrate knowingly illegal human/civil/constitutional rights violations against Plaintiff Kaul that are ongoing, in that he continues to be illegally deprived of his life/liberty/property/reputation (2012-2024).

105. I admit that In a time period commencing in at least 2000, I did submit knowingly false data to the New Jersey Department of Banking and Insurance in support of my annual applications to increase the public's cost of health insurance premiums.

106. I admit that 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 my fraudulent data.

107. I admit that in a time period commencing in at least 2008, I entered into conspiracies with certain governmental agencies/persons under the 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.

108. I admit that in a time period commencing in or around 2005, I fraudulently refused to pay Plaintiff Kaul for clinical services he rendered to my fee-paying clients.

109. I admit that my illegal non-payment was purposed to increase compensation to my corporate executives/shareholders, through the exploitation/theft of services from Plaintiff Kaul and other physicians.

110. I admit that my illegal non-payment was also purposed to fund quid pro quo bribes to corrupted politicians/judges on my 'payroll', through the exploitation/theft of services from Plaintiff Kaul and other physicians.

111. I admit that consequent to my non-payment of Plaintiff Kaul's professional invoices, Plaintiff Kaul filed suit against me on two (2) occasions between 2004 to 2012.

112. I admit that In retaliation for the lawsuits, and in collusion/conspiracy with **The Kaul Cases** Defendants I did, within the State of New Jersey, coopt both state/federal investigative/prosecutorial/judicial agencies to have Plaintiff Kaul's physician license revoked.

The Illegal Revocation Proceedings:

113. I admit that the 2014 revocation of Plaintiff Kaul's NJ license was and is illegal.

114. I admit that I have read and do comprehend the admissions of fact of Defendant James Howard Solomon.

115. I admit I know that Defendant Solomon was the NJ administrative law judge assigned to the revocation case.

116. I admit I know that Defendant Solomon's December 13, 2013, recommendation of revocation was illegal.

117. I admit that because I have spent eight (8) years involved in litigation with my co-defendants, I have come to know the truth of their crimes against Plaintiff Kaul.

118. I admit that I agree with all of the admissions of fact as to Defendants Solomon/Christie/Heary/Stolz/FSMB.

119. I admit that I know that Defendant Solomon has admitted that the 2014 NJ license revocation was procured illegally.

120. I admit I know that Defendant Solomon has admitted that the revocation proceedings were, amongst other things, a consequence of schemes of bribery/public corruption/fraud.

121. I admit I know that Defendant Solomon has admitted that the revocation was and is illegal.

122. I admit I know independently of Defendant Solomon's admissions that the revocation proceedings were the product of bribery, were conducted fraudulently and that the revocation was/is illegal.

123. I admit that there exist many factual and legal reasons as to its illegality.

124. I admit I know and comprehend the June 27, 2024, SCOTUS ruling in SEC v Jarkesy ---.

125. I admit I know that the application of the Seventh Amendment related principles to the facts of the 2014 NJ revocation do find the revocation to be illegal.

126. I admit that the fraudulent scheme to revoke Plaintiff Kaul's NJ license commenced in or around March 2005, when Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive spinal fusion.

127. I admit that the fraudulent scheme was part of a wider **"pattern of racketeering"** that commenced in or around 2008 and continued through state/federal courts up until 2024.

128. I admit that the **"pattern of racketeering"** involved, amongst other things, the RICO predicate acts of bribery/perjury/obstruction of justice/kidnapping/false indictment/false arrest/false imprisonment/attempted drugging-killing/evidential falsification/witness tampering/bankruptcy fraud.

129. I admit I know that Plaintiff Kaul's success caused immense professional jealousy amongst his competitors in the minimally invasive spine surgery market.

130. I admit I know that Plaintiff Kaul's competitors did not possess the necessary technical skills to perform the fluoroscopically guided percutaneous spinal fusion.

131. I admit I know that Plaintiff Kaul's specific training in the fields of surgery and interventional pain imparted on him the skills to incent and successfully perform the percutaneous spinal fusion.

132. I admit I know Plaintiff Kaul graduated from medical school in 1988, and underwent seventeen (17) years of post-graduate training in surgery, anesthesiology, interventional pain and minimally invasive spine surgery before he invented and successfully performed the first case in February/March 2005.

133. I admit I know that Plaintiff Kaul's market competitors, of which I was one, did, upon being unable to legitimately compete with him in the minimally invasive spine surgery market, did resort to illegal tactics and a **"pattern of racketeering".**

134. I admit I know that from 2005 to 2008, Plaintiff Kaul's market competitors, of which Defendant Robert Francis Heary was one, did commence a conspiracy against Plaintiff Kaul to have his NJ license illegally revoked.

135. I admit I know, because I was part of the conspiracy, that it involved Plaintiff Kaul's market competitors funneling bribes to then NJ state governor and Defendant, Christopher J. Christie as part of a quid pro quo,

136. I admit I know that in return for the bribes the quid pro quo scheme involved Defendant Christie abusing his executive power to have the medical board manufacture a knowingly false case against Plaintiff Kaul to revoke his license.

137. I admit I know the legal proceedings commenced in or around February 2010.

138. I admit I know the actual revocation hearing commenced on April 9 and concluded on June 28, 2013.

139. I admit I know the revocation proceedings were conducted in the NJ Office of Administrative Law.

140. I admit I know the NJ Office of Administrative Law is controlled by the executive branch of the State of New Jersey.

141. I admit I know that Defendant Christie was the governor and executive from 2009 to 2017.

142. I admit I know that Defendant Solomon did receive bribes from insurance companies that owed money to Plaintiff Kaul, and that list included me.

143. I admit I know that Defendant Solomon did receive bribes from neurosurgeons, who competed with Plaintiff Kaul in the minimally invasive spine surgery market.

144. I admit I know that Defendant Solomon did receive bribes from hospitals, who competed with Plaintiff Kaul's outpatient minimally invasive spine surgery invention and technique.

145. I admit I know that the revocation proceeding was conducted without a jury.

146. I admit I know the revocation proceeding was conducted without an article III judge.

147. I admit I know that Defendant Solomon is not a judge.

148. I admit I know Defendant Solomon did not have the authority to recommend revocation of Plaintiff Kaul's license.

149. I admit I know Defendant Solomon did not have the authority to recommend a fine of $300,000.

150. I admit I know that Defendant Solomon, a lawyer, did know that he did not have the authority to adjudicate the matter and or to recommend revocation and or a fine.

151. I admit I know that Defendant Solomon was convinced Plaintiff Kaul would be eliminated and unable to expose his crimes.

152. I admit I know that Defendant Solomon held this view because I and my agents had informed him that I, my agents and Defendant Christie and his agents would ensure the elimination of Plaintiff Kaul.

153. I admit that I and Defendants Christie/Solomon/Heary all knew that the circumstances/events/facts preceding, surrounding and following the revocation were illegal.

154. I admit that I and Defendants Christie/Solomon/Heary, despite knowing of the illegality of the revocation, did nonetheless engage in criminal conduct because we were convinced, we would eliminate Plaintiff Kaul.

Post-Revocation Facts – 2014 To 2024

155. I admit that within this section the majority of admitted facts pertain to the post-revocation ongoing schemes to attempt to continue to cause injury to Plaintiff Kaul's life/liberty/property and reputation.

156. I admit that within this section are included facts from the pre-revocation period, but which are included in this section to provide context to post-revocation facts, and which are identified by date as being pre-revocation facts.

157. I admit the purpose of these ongoing schemes was to attempt to ensure the elimination of Plaintiff Kaul in order to attempt to prevent him from exposing my crimes and those of **The Kaul Cases** Defendants.

158. I admit that I and **The Kaul Cases** Defendants recognized that unless Plaintiff Kaul were jailed, killed and or otherwise dead, his continued existence in the US posed a threat of exposure.

159. I admit that the majority of the post-revocation facts pertain to these particular post-revocation schemes of absolute elimination.

160. I admit that In a period from February 22, 2016, to August 26, 2024, Plaintiff Kaul filed suits in the United States District Court, against individuals/corporations that had conspired to commit and did commit a **"pattern of racketeering"** against him, that resulted in, amongst other things the illegal 2014 revocation of his NJ license.

161. I admit that I committed securities fraud by filing knowingly false documents with the SEC (2016-2021), in which I willfully failed to disclose to the market and my shareholders the litigation filed by Plaintiff Kaul.

162. I admit that my securities fraud crimes were exposed by Plaintiff Kaul in 2021 in the filing of K11-7.

163. I admit that In 2016, Plaintiff Kaul, having collected sufficient facts as to the revocation conspiracy, did commence a lawsuit in the United States District Court.

164. I admit that from 2016 to 2024, Plaintiff Kaul filed a series of lawsuits in the United States District Court, in which I was named as a Defendant.

165. I admit that neither I nor any of **The Kaul Cases** Defendants denied any of the facts asserted within any of **The Kaul Cases**.

166. I admit I know that the eight-years' worth of non-denial of the facts of **The Kaul Cases** did, pursuant to Rule 8(b)(6) cause every fact to become admitted.

167. I admit I know that the admission of every fact has established my guilt and that of all Defendants, including all **The Kaul Cases** Defendants, of all the levied charges.

168. I admit that In retaliation for the lawsuits, and in collusion/conspiracy with **The Kaul Cases** Defendants I did, within the State of New Jersey, coopt both state/federal investigative/prosecutorial/judicial agencies to attempt to have Plaintiff Kaul indicted.

169. I admit that In retaliation for the lawsuits, and in collusion/conspiracy with **The Kaul Cases** Defendants I did, within the State of New Jersey, coopt both state/federal investigative/prosecutorial/judicial agencies to have to attempt to have Plaintiff Kaul convicted.

170. I admit that In retaliation for the lawsuits, and in collusion/conspiracy with **The Kaul Cases** Defendants I did, within the State of New Jersey, coopt both state/federal investigative/prosecutorial/judicial agencies to have to attempt to have Plaintiff Kaul incarcerated.

171. I admit that in or around May 2016 I did, in collusion/conspiracy with Defendant Christie, aid/abet a similar retaliation scheme against Plaintiff Kaul for having filed K1.

172. I admit that In a period from approximately 2012 to 2016, and after having aided/abetted the 2014 illegal revocation of Plaintiff Kaul's New Jersey license, I did, in collusion/conspiracy with both state/federal investigative/prosecutorial/judicial agencies and **The Kaul Cases** Defendants cause Plaintiff Kaul to be continually subjected to state/federal criminal investigations.

173. I admit that none of these investigations produced any evidence of wrongdoing,

174. I admit that the lack of evidence constitutes further proof of the fraudulence of the entire case that caused the illegal 2014 revocation of Plaintiff Kaul's NJ license.

175. I admit that the retaliation scheme perpetrated by me, and **The Kaul Cases** Defendants persisted up until June 14, 2023, by which point in time Plaintiff Kaul had, amongst other things, been kidnapped, falsely indicted, falsely arrested, falsely jailed and subjected to an attempted drugging-killing.

176. I admit that on June 17, 2013, consequent to the illegal suspension of Plaintiff Kaul's license and prior to the March 2014 revocation, Plaintiff Kaul's corporations became obligated to file for Chapter 11 bankruptcy.

177. I admit that I was identified as a debtor in the Chapter 11 bankruptcy because of the money I owed Plaintiff Kaul.

178. I admit that In a period from 2012 to approximately 2016, I conspired with **The Kaul Cases** Defendants to cause the publication of highly defamatory press coverage about the revocation of Plaintiff Kaul's NJ license and all the frivolous lawsuits filed consequent to the revocation.

179. I admit that In a period from 2012 to approximately 2016, I conspired with **The Kaul Cases** Defendants to cause the publication of highly defamatory press coverage about all the frivolous lawsuits filed consequent to the revocation.

180. I admit that the purpose of the knowingly false and highly defamatory press coverage was to economically/professionally/socially/reputationally alienate Plaintiff Kaul.

181. I admit that the purpose my scheme purpose of alienation was to attempt to eliminate the risk of Plaintiff Kaul's continued existence.

182. I admit that the purpose of attempt to eliminate Plaintiff Kaul was to attempt to ensure he not expose our crimes and those of **The Kaul Cases** Defendants.

183. I admit that one of my purposes in attempting to eliminate Plaintiff Kaul was to attempt to ensure he would be unable to fight the revocation.

184. I admit that one of my purposes in attempting to eliminate Plaintiff Kaul was to attempt to ensure he would be unable to file/prosecute charges against **The Kaul Cases** Defendants, including myself.

185. I admit that during the Chapter 11 bankruptcy proceedings in the District of New Jersey, the lawyer-trustee, Defendant Daniel Stolz, did conspire with me and other insurance carriers to not file claims to collect the monies owed to Plaintiff Kaul's estate by me and other insurance carriers.

186. I admit that Defendant, Daniel Stolz, did enter into a quid pro quo with me, in which in return for the bankruptcy related fraud of non-collection of Plaintiff Kaul's professional fees, Defendant Stolz received bribes, disguised as 'legal fees'.

187. I admit I know that 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.

188. I admit that Defendant BCBS of Michigan, a member of the 'Healthcare Fraud Partnership', to which I belong, did cause the filing of the indictment in order to eliminate its debt to Dr. Pompy/eliminate him from the healthcare market.

189. I admit that during the trial evidence emerged of the fraudulent schemes perpetrated by insurance carriers belonging to the 'Healthcare Fraud Partnership' in their efforts to entrap knowingly innocent physicians, mostly of whom belonged to ethnic minorities.

190. I admit that I know that 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.

191. I admit that in or around 2009-2012 I did, in collusion/conspiracy with **The Kaul Cases** Defendants, use these tactics of undercover agents against Plaintiff Kaul as part of my scheme to have him indicted, convicted and incarcerated,

192. I admit that I was motivated to have Plaintiff Kaul indicted/convicted/incarcerated in order to eradicate my debt to him, an eradication purposed to increase my corporate/shareholder profit.

193. I admit I know that during the testimony of a James Howell, he testified that in furtherance of these entrapment schemes he was provided fraudulent driving licenses by agencies/persons of the State of Michigan and physicians employed by Blue Cross Blue Shield.

194. I admit that during my attempted entrapment schemes against Plaintiff Kaul I was similarly provided fraudulent identification and insurance documents by the State of New Jersey and physicians employed by me (Allstate Insurance Company).

195. I admit that I know that during the testimony of a James Howell, he testified that in furtherance of these entrapment schemes he was provided other official documents by agencies/persons of the State of Michigan and physicians employed by Blue Cross Blue Shield.

196. I admit that during my attempted entrapment schemes against Plaintiff Kaul I was similarly provided other fraudulent official documents by agents/persons the State of New Jersey and physicians employed by me (Allstate Insurance Company).

197. I admit that I know that 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.

198. I admit that the perpetration my prior entrapment schemes of knowingly innocent physicians to whom I owed money did cause and continues to cause their wrongful incarceration.

199. I admit that most of the innocent physicians who were victimized by my entrapment schemes belong to ethnic minorities.

200. I admit I know that evidence from the trial of Dr. Pompy/others substantiates the perpetration of long-standing **"patterns of racketeering"** by entities of the Blue Cross Blue Shield Association, a member of the 'Healthcare Fraud Partnership', of which I am a member.

201. I admit that I have engaged in exactly the same long-standing **"patterns of racketeering"** that have caused the incarceration of innocent physicians.

202. I admit that in the perpetration of these long-standing **"patterns of racketeering"** I have illegally seized the assets if these innocent physicians and their families.

203. I admit I know that the evidence from the trial of Dr. Pompy/others further corroborates the claims that Plaintiff Kaul has asserted against me within **The Kaul Cases**, since 2016.

204. I admit that In a period commencing approximately 2003/2004, I commenced conspiring to commit and did commit a fraudulent scheme that targeted Plaintiff Kaul, an Indian physician.

205. I admit that the fraudulent scheme involved misrepresentations made by me to Plaintiff Kaul that caused him to provide clinical care to my fee-paying clients, with the pre-certification promise of renumeration.

206. I admit I defrauded Plaintiff Kaul of his services by refusing to pay his invoices for pre-certified care he had provided in good faith.

207. In admit that In the perpetration of this fraudulent scheme, I conducted a **"pattern of racketeering"** through the willful and knowingly illegal commission of the RICO predicate acts of wire fraud/mail fraud/theft.

208. I admit that In the perpetration of this fraudulent scheme, my corporate officers, converted the State of New Jersey and the Allstate Insurance corporation into the "**State of New Jersey-Allstate Association-In-Fact Enterprise" ("NJ-Allstate AIF Enterprise")**

209. I admit that through the **NJ-Allstate AIF Enterprise** I funneled bribes to multiple New Jersey based politicians, including, amongst others, Defendant Christie.

210. I admit that 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.

211. I admit that the illegal NJ 2014 revocation was purposed to eliminate my debt to Plaintiff Kaul for professional services he had provided to my premium fee-paying clients (2002-2012).

212. I admit that the illegal revocation was purposed to eliminate the legal liability posed by the lawsuits filed by against me by Plaintiff Kaul for non-payment of his professional fees (2006-2012).

213. I admit that I know that Defendant Christie did, In exchange for my bribes, abuse his executive power to order the state medical board to cause a knowingly illegal commencement of criminal investigations of Plaintiff Kaul.

214. I admit I know that these criminal investigations sought to incarcerate Plaintiff Kaul, in order to prevent him from exposing my crimes and those of **The Kaul Cases** Defendants.

215. I admit that in perpetrating the fraudulent scheme, I did knowingly conduct a **"pattern of racketeering" (**18 U.S.C. §§ 1961(1), 1961(5) and 1962(c)).

216. I admit that In the perpetration of the fraudulent scheme, I did knowingly commit mail fraud (§ 1341).

217. I admit that in the perpetration of the fraudulent scheme, I did knowingly commit wire fraud (§ 1343).

218. I admit that I did knowingly committed multiple state felonies in the commission of RICO predicate acts of wire fraud/mail fraud.

219. I admit that I knowingly conspired to commit and did commit multiple state felonies in the commission of RICO predicate acts within the last ten (10) years.

220. I admit that I knowingly aided/abetted the commission of multiple state felonies (RICO predicate acts) in the commission of RICO predicate acts within the last ten (10) years.

221. I admit that my knowingly illegal commission of these multiple state felonies (RICO predicate acts) did constitute a **"pattern of racketeering".**

222. I admit that in my knowingly illegal commission of state felonies (RICO predicate acts) I did know that I was perpetrating and or aiding/abetting a **"pattern of racketeering".**

223. I admit that in my commission of the **"pattern of racketeering"** I did know that the state felonies (RICO predicate acts) posed a threat of continued racketeering activity.

224. I admit that in my knowingly illegal commission of state felonies (RICO predicate acts) did know the legal interpretation of the term 'racketeering activity'.

225. I admit that I did in collusion/conspiracy with Defendant Christie perpetrate the 'racketeering activity' and **"pattern of racketeering"** through the joint association-in-fact use of state agencies and corporations.

226. I admit I facilitated the 'racketeering activity' and **"pattern of racketeering"** through the association-in-fact use of state-corporate services.

227. I admit I facilitated the 'racketeering activity' and **"pattern of racketeering"** through the use of state-corporate distribution and communication channels.

228. I admit I facilitated the 'racketeering activity' and **"pattern of racketeering"** through the use of state-corporate employees associated with the **"NJ-Allstate AIF Enterprise"**

229. I admit I participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US mail.

230. I admit I participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US telephonic system.

231. I admit I participated in the fraudulent scheme by 'hijacking' the interstate/foreign commerce functions of the US wires/internet.

232. I admit I used thousands of interstate mail and wire communications in furtherance of my fraudulent scheme through virtually uniform misrepresentations.

233. I admit I used thousands of interstate mail and wire communications in furtherance of my fraudulent scheme through virtually uniform concealments.

234. I admit I used thousands of interstate mail and wire communications in furtherance of my fraudulent scheme through virtually uniform material omissions.

235. I admit I directed the use of thousands of interstate mail and wire communications in furtherance of my fraudulent scheme through virtually uniform misrepresentations.

236. I admit I directed the use of thousands of interstate mail and wire communications in furtherance of my fraudulent scheme through virtually uniform concealments.

237. I admit I directed the use of thousands of interstate mail and wire communications in furtherance of my fraudulent scheme through virtually uniform omissions.

238. I admit that In perpetrating the fraudulent scheme, I 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).

239. I admit that In perpetrating the fraudulent scheme, I 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.

240. I admit that In perpetrating the fraudulent scheme, I 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.

241. I admit that In perpetrating the fraudulent scheme, I 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).

242. I admit that In perpetrating the fraudulent scheme, I 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.

243. I admit that In perpetrating the fraudulent scheme, I 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.

244. I admit that In perpetrating the fraudulent scheme, I 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).

245. I admit that In perpetrating the fraudulent scheme, I 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.

245. I admit that In perpetrating the fraudulent scheme, I 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.

246. I admit that In perpetrating the fraudulent scheme, I 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).

247. I admit that In perpetrating the fraudulent scheme, I 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.

248. I admit that In perpetrating the fraudulent scheme, I 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.

249. I admit that In perpetrating the fraudulent scheme, I 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).

250. I admit that In perpetrating the fraudulent scheme, I 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.

251. I admit that In perpetrating the fraudulent scheme, I 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.

252. I admit that In perpetrating the fraudulent scheme, I 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).

253. I admit that In perpetrating the fraudulent scheme, I 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.

254. 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.

255. I admit that In perpetrating the fraudulent scheme, I 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).

256. I admit that In perpetrating the fraudulent scheme, I 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.

257. I admit that In perpetrating the fraudulent scheme, I 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.

258. I admit that I did, in the relevant period, with knowing illegality conspire to use the US wires 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 me.

259. I admit that I 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 me.

260. I admit that In rendering these representations, I knew the statements were materially false, and purposed to further my schemes of theft of Plaintiff Kaul's services.

261. I admit that In rendering these representations, I knew I had had no intention of paying Plaintiff Kaul for his services, a fact consistent with and in furtherance of my scheme of theft of Plaintiff Kaul's services.

262. I admit I 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.

263. I admit I 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.

264. I admit I 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.

265. I admit I 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.

266. I 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.

267. I 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.

268. I 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.

269. I 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.

270. The purpose of my fraudulent scheme was to have Plaintiff Kaul's license revoked, in order to eradicate my debt to Plaintiff Kaul.

271. The purpose of my fraudulent scheme was to have Plaintiff Kaul's license revoked in order to eliminate the competition/threat he presented to my commercial agenda.

272. The purpose of my fraudulent scheme was to have Plaintiff Kaul's reputation destroyed, in order to facilitate the eradication of my debt to Plaintiff Kaul.

273. The purpose of my fraudulent scheme was to have Plaintiff Kaul's reputation destroyed in order to eliminate the competition/threat he presented to my commercial agenda.

274. The purpose of my fraudulent scheme was to have Plaintiff Kaul's economic standing destroyed in order to facilitate the eradication of my debt to Plaintiff Kaul.

275. The purpose of my fraudulent scheme was to have Plaintiff Kaul's economic standing destroyed in order to eliminate the competition/threat he presented to my commercial agenda.

276. The purpose of my fraudulent scheme was to have Plaintiff Kaul ostracized in order to facilitate the eradication of my debt to Plaintiff Kaul.

277. The purpose of my fraudulent scheme was to have Plaintiff Kaul ostracized in order to eliminate the competition/threat he presented to my commercial agenda.

278. The purpose of my fraudulent scheme was to have Plaintiff Kaul indicted in order to eradicate my debt to Plaintiff Kaul.

279. The purpose of my fraudulent scheme was to have Plaintiff Kaul indicted in order to eliminate the competition/threat he presented to my commercial agenda.

280. The purpose of my fraudulent scheme was to have Plaintiff Kaul incarcerated in order to eradicate my debt to Plaintiff Kaul.

281. The purpose of my fraudulent scheme was to have Plaintiff Kaul incarcerated in order to eliminate the competition/threat he presented to my commercial agenda.

282. The purpose of my fraudulent scheme was to have Plaintiff Kaul leave the United States in order to eradicate my debt to Plaintiff Kaul.

283. The purpose of my fraudulent scheme was to have Plaintiff Kaul leave the United States in order to eliminate the competition/threat he presented to my commercial agenda.

284. The purpose of my fraudulent scheme was to have Plaintiff Kaul be deported in order to eradicate my debt to Plaintiff Kaul.

285. The purpose of my fraudulent scheme was to have Plaintiff Kaul be deported in order to eliminate the competition/threat he presented to my commercial agenda.

286. In the communications of my fraudulent scheme, I discussed with others my 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.

287. In the communications of my fraudulent scheme, I discussed with others my 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.

288. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to perpetrate the scheme to bribe Defendant Christie, in order to have Plaintiff Kaul indicted.

289. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to bribe Defendant Christie, in order to have Plaintiff Kaul indicted.

290. In the communications of my fraudulent scheme, I 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.

291. In the communications of my fraudulent scheme, I 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.

292. In the communications of my fraudulent scheme, I 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.

293. In the communications of my fraudulent scheme, I 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.

294. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to perpetrate the scheme to use law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

295. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

296. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to perpetrate the scheme to use law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

297. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

298. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to use law firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

299. In the communications of my fraudulent scheme, I discussed with others my 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.

300. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US mail to perpetrate the scheme to use law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

301. In the communications of my fraudulent scheme, I 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 Defendant Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

302. In the communications of my fraudulent scheme, I discussed with third-party state actors their use of the US mail to perpetrate the scheme to use law firms to funnel bribes to Defendant Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

303. In the communications of my fraudulent scheme, I 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 Defendant Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

304. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to use law firms to funnel bribes to Defendant Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

305. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

306. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to use law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

307. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

308. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to perpetrate the scheme to use law firms to funnel bribes to Christie to have Plaintiff Kaul leave the United States as part of a quid pro quo scheme.

309. In the communications of my fraudulent scheme, I discussed with others my 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.

310. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US wires to perpetrate the scheme to use law firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

311. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US wires to perpetrate the scheme to use public relations firms to funnel bribes to Christie to have revoked Plaintiff Kaul's license as part of a quid pro quo scheme.

312. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US wires to perpetrate the scheme to use law firms to funnel bribes to Christie to have Plaintiff Kaul's reputation destroyed as part of a quid pro quo scheme.

313. In the communications of my fraudulent scheme, I discussed with third-party state actors my 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.

314. In the communications of my fraudulent scheme, I discussed with third-party state actors my 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.

315. In the communications of my fraudulent scheme, I discussed with third-party state actors my 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.

316. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

318. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

319. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul indicted.

320. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul indicted.

321. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

322. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

323. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

324. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal politicians details of the illegal scheme to have revoked Plaintiff Kaul's license.

325. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul indicted.

326. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul indicted.

327. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

328. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal politicians details of the illegal scheme to have Plaintiff Kaul incarcerated.

329. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

330. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

331. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

332. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

333. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

334. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

335. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

336. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal prosecutors details of the illegal scheme to have revoked Plaintiff Kaul's license.

337. In the communications of my scheme, Defendants BCBS/Marino discussed with others my use of the US mail to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

338. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul indicted.

339. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

340. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal prosecutors details of the illegal scheme to have Plaintiff Kaul incarcerated.

341. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

342. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

343. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul indicted.

344. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul indicted.

345. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

346. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey state investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

347. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

348. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal investigators details of the illegal scheme to have revoked Plaintiff Kaul's license.

349. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul indicted.

350. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul indicted.

351. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

352. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to exchange with New Jersey federal investigators details of the illegal scheme to have Plaintiff Kaul incarcerated.

353. In the communications of my fraudulent scheme, I discussed with others my 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.

354. In the communications of my fraudulent scheme, I discussed with others my 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.

355. In the communications of my fraudulent scheme, I discussed with others my 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.

356. In the communications of my fraudulent scheme, I discussed with others my 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.

357. In the communications of my fraudulent scheme, I 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.

358. In the communications of my fraudulent scheme, I 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.

359. In the communications of my fraudulent scheme, I 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.

360. 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.

361. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

362. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

363. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

364. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to send patients letters encouraging them to file frivolous lawsuits against Plaintiff Kaul

365. In the communications of my fraudulent scheme, I 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.

366. In the communications of my fraudulent scheme, I 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

367. In the communications of my fraudulent scheme, I 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

368. In the communications of my fraudulent scheme, I 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

369. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

370. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

371. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

372. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to communicate false information to patients, that he was not qualified to perform minimally invasive spine surgery.

373. In the communications of my fraudulent scheme, I 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.

374. In the communications of my fraudulent scheme, I 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.

375. In the communications of my fraudulent scheme, I 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.

376. In the communications of my fraudulent scheme, I 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.

377. In the communications of my fraudulent scheme, I discussed with others my 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.

378. In the communications of my fraudulent scheme, I discussed with others my 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.

379. In the communications of my fraudulent scheme, I discussed with others my 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.

380. In the communications of my fraudulent scheme, I discussed with others my 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.

381. In the communications of my fraudulent scheme, I discussed with third-party state actors my 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.

382. In the communications of my fraudulent scheme, I 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.

383. In the communications of my fraudulent scheme, I 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.

384. In the communications of my fraudulent scheme, I 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.

385. In the communications of my fraudulent scheme, I discussed with others my 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.

386. In the communications of my fraudulent scheme, I discussed with others my 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.

387. In the communications of my fraudulent scheme, I 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.

388. In the communications of my fraudulent scheme, I 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.

389. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

390. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

391. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

392. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

393. In the communications of my fraudulent scheme, I discussed with third-party state actors their use of the US mail to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

394. In the communications of my fraudulent scheme, I discussed with third-party state actors their use of the US wires to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

395. In the communications of my fraudulent scheme, I discussed with third-party state actors their use of the US mail to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

396. In the communications of my fraudulent scheme, I discussed with third-party state actors their use of the US wires to transmit letters, emails and other materials indicating that my co-conspirator lawyers/physicians had been instructed to inform their colleagues not to support Plaintiff Kaul in any litigation, in any form, be it financial and or professional.

397. In the communications of my fraudulent scheme, I discussed with others my 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.

398. In the communications of my fraudulent scheme, I discussed with others my 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.

399. 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.

400. 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.

401. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

402. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

403. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US mail to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

404. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US wires to collect the increased revenues that flowed from the illegal elimination of Plaintiff Kaul from the practice of medicine.

405. In the communications of my fraudulent scheme, I discussed with others my use of the US mail to transmit information in furtherance of my scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

406. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to transmit information in furtherance of my scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

407. In the communications of my fraudulent scheme, I 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.

408. In the communications of my fraudulent scheme, I discussed with third-party state actors my use of the US wires to transmit information in furtherance of my scheme of converting the United States Bankruptcy Court into a racketeering enterprise.

409. In the communications of my fraudulent scheme, I discussed with others my 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.

410. In the communications of my fraudulent scheme, I discussed with others my 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.

411. In the communications of my fraudulent scheme, I discussed with third-party state actors my 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.

412. In the communications of my fraudulent scheme, I 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.

413. In the communications of my fraudulent scheme, I discussed with others my 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.

414. In the communications of my fraudulent scheme, I discussed with others my use of the US wires to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

415. In the communications of my fraudulent scheme, I 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.

416. In the communications of my fraudulent scheme, I discussed with third-party state actors their use of the US wires to discuss their acts of obstruction of justice and evidence tampering ('The Solomon Critique' + 'The Solomon Critique 2') in Plaintiff Kaul's licensing proceedings.

417. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's reputation globally.

418. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

419. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

420. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

421. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

422. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to domestic healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's reputation globally.

423. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US mail, information pertaining to the illegal revocation to domestic health care regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

424. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to domestic health care regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

425. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's reputation globally.

426. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the illegal revocation to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

427. In furthering my 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 my scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

428. In furthering my 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 my scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

429. In furthering my 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 my scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

430. In furthering my 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 my scheme to attempt to destroy Plaintiff Kaul's reputation globally.

431. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

432. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

433. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

434. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to the public in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

435. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to domestic healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's reputation globally.

436. I admit that In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

437. I admit that In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

438. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

439. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to domestic health care regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

440. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's reputation globally.

441. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's livelihood globally.

442. In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's economic standing globally.

443 I admit that In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain a medical license anywhere in the world.

444. I admit that In furthering my fraudulent scheme/seeking to cause ongoing injury to Plaintiff Kaul, I did transmit over the US wires, information pertaining to the indictment investigations to international healthcare regulators in furtherance of my scheme to attempt to destroy Plaintiff Kaul's ability to obtain any form of employment.

DATED: SEPTEMBER 23, 2024

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

v.

CIVIL ACTION: NO.: 24-CV-03180 (AHB)

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 SUBMISSION OF ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT CHRISTOPHER J. CHRISTIE

Respectfully Submitted

_____
RICHARD ARJUN KAUL, MD

SEPTEMBER 26, 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 JUNE 14, 2024-EASTERN DISTRICT OF NORTH CAROLINA)

K11-20 – KAUL v FEDERATION: 24-CV-03180 (AUGUST 26, 2024, TO PRESENT-SOUTHERN DISTRICT OF TEXAS)

For ease of reference Defendant CHRISTOPHER J. CHRISTIE will be referred to as **"I"**

Admission Of Guilt

1. I admit that I am guilty of all the facts and charges levied against me in all sections of the Complaint.

2. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed against Plaintiff Kaul by other Defendants, as are they as equally liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

3. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from '**PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF.**

4. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

5. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

6. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW'**

7. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

8. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

ROBERT FRANCIS HEARY/ALLSTATE INSURANCE COMPANY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS

9. I admit that I procured copies of the Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

10. I admit that I knew and know that these Defendants include Defendants ROBERT FRANCIS HEARY/ALLSTATE INSURANCE COMPANY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS.

11. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants ROBERT FRANCIS HEARY/ALLSTATE INSURANCE COMPANY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS.

Common Knowledge Of The Truth Of Co-Defendants Crimes

12. I admit I know that having devoted eight (8) years (2016-2024) to litigation within **The Kaul Cases** and approximately nineteen (19) years since the commencement of the conspiracy to eliminate Plaintiff Kaul (2005-2024), I have come to know the truth of the crimes of my co-Defendants.

13. I admit I know that having devoted eight (8) years (2016-2024) and approximately nineteen (19) years since the commencement of the conspiracy to eliminate Plaintiff Kaul (2005-2024), my co-defendants have come to know the truth of each other's crimes including mine.

14. I admit I know that each Defendant played a particular role in the 'Kaul Elimination Conspiracy.'

15. I admit I know that the two fundamental elements of the scheme pertained to those who purchased state power and those who sold and exercised it.

16. I admit I know that Defendants Allstate/Heary purchased state power from me through bribery.

17. I admit I abused my power to cause the illegal revocation of Plaintiff Kaul's license and an ongoing deprivation of his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

18. I admit I know that Defendants Allstate/Heary purchased state power from Defendant Solomon through bribery.

19. I admit I know Defendant Solomon abused his power to cause the illegal revocation of Plaintiff Kaul's license and an ongoing deprivation of his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

20. I admit I know that Defendant Allstate purchased regulatory power from Defendant FSMB through bribery.

21. I admit I know Defendant FSMB abused its power to cause an illegal obstruction of Plaintiff Kaul's efforts to have his illegal revoked NJ license reinstated and or obtain a license in another state.

22. I admit I know Defendant FSMB abused its power to cause an ongoing deprivation of Plaintiff Kaul's life/liberty/property/reputation and violation of his human/civil/constitutional rights.

23. I admit I know that Defendant Allstate purchased bankruptcy trustee power from Defendant Stolz through bribery.

24. I admit I know that Defendant Stolz abused his power in failing to file claims and or collect the over $52 million dollars owed to Plaintiff Kaul's estate/eighty-three creditors of this estate by Defendant Allstate and other insurance companies.

25. I admit I know that Defendant CPEP is a business whose survival depends on referrals from the subjugate state board members of Defendant FSMB.

26. I admit I know that Defendant CPEP did participate in and facilitate the quid pro quo bribery scheme between Defendant Allstate and Defendant FSMB.

Context To Schemes/Violations/Felonies

27. I admit that the facts substantiating the proof of K11-20, which include the **factual foundation of The Kaul Cases including K11-17**, extend from 2005, the year in which Plaintiff Kaul invented and first successfully performed a percutaneous spinal fusion, to the present, 2024.

28. I admit that in or around 2006/7 I became directly/proximately involved in the generation of the **factual foundation of The Kaul Cases which includes K11-20,** when I commenced the procurement of monies from hospital corporations/insurance corporations/neurosurgical societies/neurosurgeons for my 2009 New Jersey gubernatorial campaign.

29. I admit that I first came to know of Plaintiff Kaul and of his pioneering percutaneous spinal fusion procedure in or around 2006/7.

30. 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.

31. 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.

32. 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.

33. 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.

34. I admit that despite my knowledge of the facts of the illegality of the quid pro quo scheme, I did nonetheless perpetrate the crimes.

35. 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.

36. 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.

37. 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.

38. 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.

39. 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.

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 for personal/political/economic gain.

41. 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.

42. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to uphold the law.

43. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly not uphold the law

44. I admit that from 2008 to 2017 I, as the Governor of New Jersey had a sworn legal duty to not violate the law.

45. I admit that from 2008 to 2017 I, as the Governor of New Jersey did knowingly violate the law.

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 conspiracy.

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 conspiracy 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 bankruptcy fraud.

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 bankruptcy fraud 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 securities fraud.

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 securities fraud as part of 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 mail fraud.

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 mail fraud 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 wire fraud.

55. 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.

56. 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.

57. 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.

58. 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.

59. 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.

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 commission of acts of bribery.

61. 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.

62. 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.

63. 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.

64. 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.

65. 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.

66. 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.

67. 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.

68. 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.

69. 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.

70. 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.

71. 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.

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 commission of acts of civil rights violations.

73. 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.

74. 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.

75. 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.

76. 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.

77. 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.

78. 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.

79. 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.

80. 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.

81. 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.

82. 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.

83. 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.

84. 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.

85. 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.

86. 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.

87. 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.

88. 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**.

89. 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.

90. 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.

91. 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.

92. 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.

93. 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.

94. 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.

95. 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.

96. I admit that a purpose of the attempted illegal state conviction/incarceration of Plaintiff Kaul was to seize his assets.

97. 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.

98. 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.

99. 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.

100. 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.

101. 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.

102. I admit that a purpose of the knowingly false federal criminal **investigation** was to cause an ostracization of Plaintiff Kaul.

103. I admit that a purpose of the false federal criminal **investigation** related ostracization was to isolate Plaintiff Kaul from any form of SOCIAL support.

104. I admit that a purpose of the false federal criminal **investigation** related ostracization was to isolate Plaintiff Kaul from any form of FINANCIAL support.

105. I admit that a purpose of the false federal criminal **investigation** related ostracization was to isolate Plaintiff Kaul from any form of PROFESSIONAL support.

106. I admit that a purpose of the false federal criminal **investigation** related ostracization was to isolate Plaintiff Kaul from ANY FORM of support.

107. 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.

108. 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.

109. I admit that a purpose of the attempted false federal criminal **indictment** was to cause an ostracization of Plaintiff Kaul.

110. 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.

111. 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.

112. 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.

113. I admit that a purpose of the attempted false federal criminal **indictment** related ostracization was to isolate Plaintiff Kaul from ANY FORM of support.

114. 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.

115. 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.

116. I admit that a purpose of the attempted knowingly false federal criminal **conviction** was to cause an ostracization of Plaintiff Kaul.

117. 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.

118. 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.

119. 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.

120. 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.

121. 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**.

122. 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 AND I admit that a collateral effect of the elimination of Plaintiff Kaul was to seize his assets.

123. 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.

124. 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

125. 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.

126. 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.

127. 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.

128. 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.

129. 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.

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 kickbacks.

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 kickbacks.

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 retaliation.

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 retaliation against Plaintiff Kaul.

134. 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.

135. 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.

136. 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.

137. 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.

138. 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.

139. 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.

140. 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.

141. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's New Jersey medical license.

142. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's reputation.

143. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's liberty.

144. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's livelihood.

145. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's life.

146. 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.

147. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's accounts receivable.

148. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's business corporations.

149. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's business assets.

150. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's personal assets.

151. 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.

152. 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.

153. 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.

154. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's ability to obtain a license in any other state.

155. I admit that the false seizure of property involved the illegal seizure of, amongst other things, Plaintiff Kaul's ability to regain his livelihood

156. 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.

157. 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.

158. 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.

159. 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.

160. 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.

161. 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.

162. 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.

163. 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.

164. 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.

165. 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.

166. 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.

167. 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.

168. I admit that my commission of crimes against humanity was motivated by my need to raise monies for my gubernatorial/presidential campaigns.

169. 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.

170. 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.

171. I admit that I know that the trafficking of chemical weapons is strictly prohibited under both domestic and international law.

172. 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.

173. I admit that I, as a lawyer and ex-US Attorney, do know and understand the Nuremberg Code.

174. 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.

175. 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.

176. 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.

177. 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.

178. I admit that the purpose of the attempted murder was to cause the elimination of Plaintiff Kaul.

179. 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/K11-17 As Proof Of Claims In K11-20

180. 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/K11-17, are facts unambiguously asserted in support of the claims levied against me in K11-20 by Plaintiff Kaul.

181. 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).

182. 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.

183. 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.

184. 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.

185. 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.

186. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K2** respectively on April 9, 2018 (K2: D.E. 2).

187. 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.

188. 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.

189. 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.

190. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K5** on October 1, 2019 (K5: D.E. 1).

191. 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.

192. 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.

193. 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.

194. 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).

195. 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.

196. 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.

197. 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.

198. 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).

199. 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.

200. 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.

201. 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.

202. 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).

203. 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.

204. 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.

205. 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.

206. 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).

207. 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.

208. 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.

209. 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.

210. 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).

211. 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.

212. 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.

213. 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.

214. 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).

215. 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.

216. 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.

217. 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.

218. 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)

219. 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.

220. 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.

221. 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.

222. 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).

223. 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.

224. 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.

225. 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.

226. I admit that in **K1** on November 23, 2016, I filed a procedural motion (K1: D.E. 128) to dismiss the FIRST AMENDED COMPLAINT.

227. 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.

228. 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**).

229. 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.

230. 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.

231. 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.

232. 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.

233. 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 K11-20.

234. 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 K11-20.

235. 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 K11-20.

236. 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 K11-20.

237. 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 K11-20.

238. 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 K11-20.

239. 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 K11-20.

240. 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 K11-20.

241. 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 K11-20.

242. 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 K11-20.

243. 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 K11-20.

244. 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 K11-20.

245. 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).

246. I admit that I sought the aforesaid relief without denying facts that now constitute an element of the factual foundation of K11-20.

247. 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 K11-20.

248. 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 K11-20.

249. 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 K11-20.

250. 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 K11-20.

251. 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 K11-20.

252. 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 K11-20.

253. 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 K11-20 and facts that I did not deny.

254. 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 K11-20.

255. 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/K11-17** from 2016 to 2024 to sever/transfer/stay/dismiss I had the right to deny the facts asserted by Plaintiff Kaul.

256. 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.

257. I admit that the reason I did not and have not denied the facts asserted by Plaintiff Kaul is because they are true.

258. 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/K11-17** to dismiss the complaints and or amended complaints.

259. I admit that I did not file summary judgment motions to dismiss the complaints and or amended complaints.

260. 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 + K11-20

261. I admit that I know the proven **factual foundation of K11-20** includes facts of conspiracy.

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/perpetrate/aid and abet a knowingly illegal conspiracy against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

263. I admit that I know the proven **factual foundation of K11-20** includes facts of bankruptcy fraud.

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/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"**.

265. I admit that I know the proven **factual foundation of K11-20** includes facts of securities fraud.

266. 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"**.

267. I admit that I know the proven **factual foundation of K11-20** includes facts of mail fraud.

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/perpetrate/aid and abet a knowingly illegal mail fraud against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

269. I admit that I know the proven **factual foundation of K11-20** includes facts of wire fraud.

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/perpetrate/aid and abet a knowingly illegal wire fraud against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

271. I admit that I know the proven **factual foundation of K11-20** includes facts of embezzlement.

272. 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"**.

273. I admit that I know the proven **factual foundation of K11-20** includes facts of perjury.

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/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"**.

275. I admit that I know the proven **factual foundation of K11-20** includes facts of bribery.

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 bribery 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 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"**.

278. I admit that I know the proven **factual foundation of K11-20** includes facts of kickbacks.

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 kickbacks 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 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"**.

281. I admit that I know the proven **factual foundation of K11-20** includes facts of obstruction of justice.

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 obstruction of justice against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

283. 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"**.

284. I admit that I know the proven **factual foundation of K11-20** includes facts of public corruption.

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 public corruption against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

286. 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"**.

287. I admit that I know the proven **factual foundation of K11-20** includes facts of judicial corruption.

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 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"**.

289. I admit that I know the proven **factual foundation of K11-20** includes facts of human rights violations.

289. 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"**.

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 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"**.

291. I admit that I know the proven **factual foundation of K11-20** includes facts of civil rights violations.

292. 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"**.

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 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"**.

294. I admit that I know the proven **factual foundation of K11-20** includes facts of constitutional rights violations.

295. 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"**.

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 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"**.

297. I admit that I know the proven **factual foundation of K11-20** includes facts of evidence tampering.

298. 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"**.

299. 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"**.

300. I admit that I know the proven **factual foundation of K11-20** includes facts of witness tampering.

301. 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"**.

302. 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"**.

303. I admit that I know the proven **factual foundation of K11-20** includes facts of kidnapping.

304. 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"**.

305. I admit that I know the proven **factual foundation of K11-20** includes facts of false indictment.

306. 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"**.

307. 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"**.

308. I admit that I know the proven **factual foundation of K11-20** includes facts of false arrest.

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 false arrest against Plaintiff Kaul perpetrated within agencies of the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

310. 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"**.

311. I admit that I know the proven **factual foundation of K11-20** includes facts of false imprisonment.

312. 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"**.

313. 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"**.

314. I admit that I know the proven **factual foundation of K11-20** includes facts of false prosecution.

315. 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"**.

316. 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"**.

317. I admit that I know the proven **factual foundation of K11-20** includes facts of fraud committed against the public and physicians by insurance companies.

318. 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"**.

319. 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

320. I admit that I know the proven **factual foundation of K11-20** includes facts of retaliation.

321. 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"**.

322. 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 administrative/state/bankruptcy/federal courts within the geographic boundaries of the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

323. I admit that I know the proven **factual foundation of K11-20** includes facts of illegal seizure of property.

324. 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 illegal seizure of property against Plaintiff Kaul perpetrated within/by agencies of the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

325. 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 illegal seizure of property 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"**.

326. I admit that I know the proven **factual foundation of K11-20** includes facts of honest services fraud.

327. 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 honest services fraud 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 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 honest services fraud 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"**.

329. I admit that I know the proven **factual foundation of K11-20** includes facts of racketeering.

330. 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 racketeering against Plaintiff Kaul and the public perpetrated within/by agencies of the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

331. 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 racketeering 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"**.

332. I admit that I know the proven **factual foundation of K11-20** includes facts of market manipulation.

333. 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.

334. 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.

335. 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.

336. 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.

337. I admit that I know the proven **factual foundation of K11-20** includes facts of money laundering.

338. 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"**.

339. 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"**.

340. 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"**.

341. I admit that I know the proven **factual foundation of K11-20** includes facts of crimes against humanity.

342. 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"**.

343. 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"**.

344. 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

345. I admit that these thousands of patients were victims of a crime against humanity that I committed.

346. 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.

347. 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.

348. I admit I ignored these desperate pleas as I did not believe Plaintiff Kaul would expose my crimes against humanity.

349. I admit I ignored these desperate pleas as to have reinstated Plaintiff Kaul's license would have interfered with my gubernatorial/presidential ambitions.

350. 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.

351. 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 K11-20** includes facts of violations of the Nuremberg Code.

352. 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"**.

353. 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.

354. 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".**

355. 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.

356. I admit that the facts of these schemes (2001-2017) constitute further proof of the charges levied in K11-20.

357. I admit that I know the proven **factual foundation of K11-20** includes facts of attempted drugging-killing.

358. 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"**.

359. 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.

360. I admit that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to the Nuremberg Code.

361. I admit that I have not denied any of the facts that constitute the proven **factual foundation of K11-20.**

362. I admit that the reason I did not/have not denied the facts that constitute the proven **factual foundation of K11-20** is because they are true.

363. I admit that I know that I had the right to file a summary judgment motion in **K11-17** to dismiss the Complaint.

364. I admit that I did not file a summary judgment motion to dismiss the Complaint.

365. 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,**

366. 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 now constitute the proven **factual foundation of K11-20**.

367. I admit that at no point from the November 20, 2023 (K11-17: D.E. 1) commencement of **K11-17** to the present, have I denied any facts that now constitute the proven **factual foundation of K11-20**.

368. 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),

369. I admit that I knew that through the January 19, 2024, reply, I had the right to attempt to deny the facts that now constitute the proven **factual foundation of K11-20**.

370. I admit that through the January 19, 2024, reply I did not deny the facts that now constitute the proven **factual foundation of K11-20**.

371. I admit that the reason I did not deny through the January 19, 2024, reply, the facts that now constitute the proven **factual foundation of K11-20** is because they are true.

372. 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.

373. 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.

374. 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.

375. 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.

376. 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.

377. 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.

378. 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.

379. I admit I know that the United States District Court for the Eastern District of North Carolina is the proper venue for K11-17.

380. 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.

381. 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.

382. 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.

383. 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.

384. I admit that the improperness/illegality of the scheme further evidences my guilt of the levied charges.

385. I admit that my perpetration of the scheme was tantamount to an admission of the **factual foundation of K11-17**

386. I admit that on January 24, 2024, Plaintiff Kaul submitted his REPLY TO DEFENDANTS CHRISTOPJER J. CHRISTIE AND JAMES HOWARD SOLOMON'S MOTION TO DISMISS (K11-17: D.E. 31).

387. I admit that by February 1, 2024, I had failed to respond to Plaintiff Kaul's REPLY TO DEFENDANTS CHRISTOPJER J. CHRISTIE AND JAMES HOWARD SOLOMON'S MOTION TO DISMISS (K11-17: D.E. 31).

388. I admit that I continued to fail to respond to Plaintiff Kaul's REPLY TO DEFENDANTS CHRISTOPJER J. CHRISTIE AND JAMES HOWARD SOLOMON'S MOTION TO DISMISS (K11-17: D.E. 31).

389. I admit that my failure to respond constituted an admission of the **factual foundation of K11-17**, the admitted fact of which substantiates the **factual foundation of K11-20**, which further evidences my guilt of the levied charges in K11-20.

390. I admit that on March 13, 2023, in **K11-17** the Court entered an ORDER FOR DISCOVERY PLAN (K11-17: D.E. 65).

391. I admit that I, in collusion/conspiracy with the other Defendants did willfully/knowingly violate the order in **K11-17**.

392. I admit that my willful/knowing violations of an order of the United States District Court did constitute an act of obstruction of justice.

393. 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 orders of the United States District Court because I am guilty of the charges levied in **K11-20**.

394. 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 orders of the United States District Court and that these violations constitute an admission of the **factual foundation of K11-20**.

395. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

396. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

397. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

398. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

399. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

400. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

401. 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 AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

402. 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 Complaints required it be admitted, denied, or dismissed with contrary evidence or fact, and it was not AND that these admitted facts further substantiate proof of the **factual foundation of K11-20**.

403. 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 proof of the **factual foundation of K11-20**.

404. 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**.

405. 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/K11-20** were/are of a civil nature.

406. I admit that I knew/know that **K1/K2/K5/K11-2/K11-4/K11-7/K11-10/K11-14/K11-15/K11-17/K11-20** were/are civil proceedings with civil consequences.

407. 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/K11-17** other than my knowledge that the facts are true.

408. 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.

409. 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.

410. 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.

411. 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.

412. 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,

413. 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

414. 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.

415. 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.

416. 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 K11-20**.

417. 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**.

418. 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**.

419. 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.**

420. 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).

421. 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.

422. 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.

423. 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

424. I admit that I have read the attached document entitled 'Universal Declaration of Human Rights'

425. I admit that I have known about the 'Universal Declaration of Human Rights' since my attendance at college.

426. I admit that since my attendance at college there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

427. I admit that since my attendance at law school there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

428. 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.

429. 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).

430. 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).

431. 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.

432. I admit that the obligatory continuing legal education courses involve modules on legal ethics and human rights.

433. 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.

434. 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.

435. 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'.

436. 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.

437. 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.

438. I admit that in 2008 I knew I was prohibited from actually violating Plaintiff Kaul's human/civil/constitutional rights.

439. I admit that in 2008 I knew it was illegal to conspire to violate Plaintiff Kaul's human/civil/constitutional rights.

440. I admit that in 2008 I knew it was illegal to actually violate Plaintiff Kaul's human/civil/constitutional rights.

441. 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.

442. 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.

443. 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.

444. 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

445. I admit that I knew that my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, do substantiate an abuse of state power.

446. I admit that I knew I was a public-state official pursuant to a Section 1983 claim.

447. I admit that I knew Plaintiff Kaul retained human/civil/constitutional rights.

448. 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.

449. 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 K11-20.

450. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, they became intertwined with, and in possession of state power and became state actors.

451. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I sold, in a knowingly illegal manner, state-public power to, amongst others, the K11-20 Defendants.

452. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I sold, in a knowingly illegal manner, state-public power to, amongst others, the K11-20 Defendants, without the permission of the public.

453. I admit that I did not seek the permission of the public, as I knew it would be denied.

454. 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.

455. 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.

456. 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.

457. 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.

458. 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.

459. I admit that had all my prior crimes become exposed my gubernatorial and presidential ambitions/plans would have been negatively impacted.

460. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I sold, in a knowingly illegal manner, state-judicial power to, amongst others, the K11-20 Defendants, without the permission of the public.

461. I admit that I was able to sell state-judicial power to, amongst others, the K11-20 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.

462. I admit that I abused my absolute control of state judges and sold the power of the state judiciary to amongst others, the K11-20 Defendants.

463. I admit that **The Kaul Cases** Defendants, including the K11-20 Defendants, sought and required this power to suppress any legal challenges that Plaintiff Kaul filed against the illegal revocation and or its consequences.

464. 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.

465. 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.

466. 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.

467. 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.

468. 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.

469. 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'.

470. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that Plaintiff Kaul would be eliminated.

471. 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.

472. 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.

473. 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.

474. I admit that I knew I had to manufacture a basis/pretext on which to cause the illegal revocation of Plaintiff Kaul's license.

475. I admit that I knew there existed no legitimate or legal basis on which to cause the illegal revocation of Plaintiff Kaul's license.

476. 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.

477. 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.

478. I admit I knew that the commission of perjury would be perpetrated by these other physicians while acting as experts for the state.

479. 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.

480. I admit that these expert physicians were given assurances that they would not be criminally prosecuted for perjury.

481. 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.

482. 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 K11-20**.

483. 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 K11-20**.

484. I admit I knew that these experts physicians knew they would be committing perjury.

485. 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.

486. I admit that when these expert physicians committed perjury, they knew they were committing felonies.

487. I admit that I knew that these expert physicians knew Plaintiff Kaul was licensed/trained/credentialed/qualified to perform minimally invasive spine surgery.

488. 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.

489. 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.

490. 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.

491. I admit I knew that within these medical malpractice quid pro quo schemes, the lawyers would kickback a percentage of the settlement to me.

492. I admit that millions of dollars were actually paid by Plaintiff Kaul's medical malpractice carriers in these knowingly fraudulent cases (2013-2017)

493. I admit that I received kickbacks from these knowingly fraudulent settlements (2013-2017)

494. I admit that I knew the scheme conducted across the US wires, was illegal and constituted wire fraud.

495. I admit that I knew the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and constituted wire fraud.

496. I admit that I knew the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and constituted public corruption.

497. 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.

498. I admit that I knew that Plaintiff Kaul had been trained to perform minimally invasive spine surgery since at least 2003.

499. I admit that I knew that Plaintiff Kaul had been qualified to perform minimally invasive spine surgery since at least 2003.

500. I admit that I knew that Plaintiff Kaul had been properly licensed and credentialed to perform minimally invasive spine surgery since at least 2003.

501. 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.

502. I admit that I knew that Plaintiff Kaul had in 2005 invented the percutaneous spinal fusion procedure.

503. I admit that I knew that Plaintiff Kaul had been credentialled by at least six (6) state licensed surgical centers in New Jersey to perform minimally invasive spine surgery since at least 2003.

504. I admit that I knew that Plaintiff Kaul had successfully performed hundreds of minimally invasive spinal fusions.

505. I admit that despite knowing Plaintiff Kaul was experienced/licensed/credentialled/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.

506. 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 K11-20**.

507. 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 K11-20**, he would be financially ruined and unable to retain a lawyer.

508. 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 K11-20**, 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

509. 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.

510. I admit that one of the reasons all Defendants have violated the **K11-17** (March 13, 2024) and **K11-20** (August 30, 2024) Court Order regarding discovery schedules 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: SEPTEMBER 25, 2024

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

v.

CIVIL ACTION: NO.: 24-CV-03180 (AHB)

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 SUBMISSION OF ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT ROBERT FRANCIS HEARY

Respectfully Submitted



RICHARD ARJUN KAUL, MD

SEPTEMBER 24, 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)

For ease of reference Defendant ROBERT FRANCIS HEARY will be referred to as **"I"**

Admission Of Guilt

1. I admit that I am guilty of all the facts and charges levied against me in all sections of the Complaint.

2. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed against Plaintiff Kaul by other Defendants, as are they as equally liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

3. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from '**PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF**.

4. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

5. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

6. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW'**

7. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

8. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

CHRISTOPHER J. CHRISTIE/ALLSTATE INSURANCE COMPANY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS

9. I admit that I procured copies of the Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

10. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ALLSTATE INSURANCE COMPANY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS.

11. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ALLSTATE INSURANCE COMPANY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION OF STATE MEDICAL BOARDS.

Common Knowledge Of The Truth Of Co-Defendsants Crimes

12. I admit I know that having devoted eight (8) years (2016-2024) to litigation within **The Kaul Cases** and approximately nineteen (19) years since the commencement of the conspiracy to eliminate Plaintiff Kaul (2005-2024), I have come to know the truth of the crimes of my co-Defendants.

13. I admit I know that having devoted eight (8) years (2016-2024) and approximately nineteen (19) years since the commencement of the conspiracy to eliminate Plaintiff Kaul (2005-2024), my co-defendants have come to know the truth of each other's crimes including mine.

14. I admit I know that each Defendant played a particular role in the Kaul Elimination Conspiracy.

15. I admit I know that the two fundamental elements of the scheme pertained to those who purchased state power and those who sold and exercised it.

16. I admit I know that Defendants Allstate/Heary purchased state power from Defendant Christie through bribery.

17. I admit I know Defendant Christie abused his power to cause the illegal revocation of Plaintiff Kaul's license and an ongoing deprivation of his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

18. I admit I know that Defendants Allstate/Heary purchased state power from Defendant Solomon through bribery.

19. I admit I know Defendant Solomon abused his power to cause the illegal revocation of Plaintiff Kaul's license and an ongoing deprivation of his life/liberty/property/reputation and violation of his human/civil/constitutional rights.

20. I admit I know that Defendant Allstate purchased regulatory power from Defendant FSMB through bribery.

21. I admit I know Defendant FSMB abused its power to cause an illegal obstruction of Plaintiff Kaul's efforts to have his illegal revoked NJ license reinstated and or obtain a license in another state.

22. I admit I know Defendant FSMB abused its power to cause an ongoing deprivation of Plaintiff Kaul's life/liberty/property/reputation and violation of his human/civil/constitutional rights.

23. I admit I know that Defendant Allstate purchased bankruptcy trustee power from Defendant Stolz through bribery.

24. I admit I know that Defendant Stolz abused his power in failing to file claims and or collect the over $52 million dollars owed to Plaintiff Kaul's estate/eighty-three creditors of this estate by Defendant Allstate and other insurance companies.

25. I admit I know that Defendant CPEP is a business whose survival depends on referrals from the subjugate state board members of Defendant FSMB.

26. I admit I know that Defendant CPEP did participate in and facilitate the quid pro quo bribery scheme between Defendant Allstate and Defendant FSMB.

Context To Schemes And Violations

27. 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.

28. 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.

29. I admit that since 1999 In have used this power to illegally exclude competition and to charge supra-competitive professional fees.

30. I admit that since 1999 my illegal charging of supra-competitive rates has caused me to illegally amass a personal material fortune.

31. I admit that my current personal net worth is in excess of five hundred million dollars ($500,000,000).

32. 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 K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20 As Proof Of Claims In K11-20

33. I admit that in the period from February 22, 2016, to August 26, 2024, Plaintiff Kaul filed suit against me in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20.**

34. I admit that I Knowingly and willfully did not deny any of the facts in any of the case.

35. I admit that I was advised by lawyer not to deny any of the facts.

36. I admit that my lawyer asked me if I was guilty of the facts.

37. I admit that I told my lawyer that I was guilty of the facts.

38. I admit my lawyer told me not to deny the facts.

39. I admit my lawyer warned me that if I denied the facts, I would be committing perjury.

40. I admit my lawyer informed me, particularly in the New Jersey (K1/K2)/New York(K11-7)/MassachusettsK11-2)/DC cases(K5), that the courts were predisposed to protect me and **The Kaul Cases** Defendants from Plaintiff Kaul's discovery efforts.

41. I admit my lawyer told me that the cases would be dismissed, and Plaintiff Kaul would either not know what to do or if he did, he would somehow be incapacitated.

42. I admit my lawyer repeatedly advised me that because he and others were able to manipulate dismissals of the various cases filed by Plaintiff Kaul, his venue options be exhausted.

43. I admit I now know in 2024 that my failure to deny facts of which I was guilty for a period of eight (8) years has caused this massive corpus of fact to become admitted pursuant to Rule 8(b)(6).

44. I admit that these admitted facts irrefutably prove my guilt of the charges levied in K11-20.

45. I admit that I read the complaint and amended complaint filed against me by Plaintiff Kaul in K11-7 respectively on August 19, 2021 (D.E. 1) and September 13, 2021 (D.E. 14).

46. I admit that in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** I reads the Complaints, Amended Complaints and all other motions and Reply briefs.

47. I admit that in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** I was represented by multiple counsel, who clarified and explained to me the nature, character and meaning of the facts asserted against me in the Complaints and all subsequent pleadings

48. I admit that I understood and understand the nature, character and meaning of the facts asserted against me in the Complaints/Amended Complaints of **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20**

49. I admit that in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20**
I filed procedural motions to dismiss the Complaint and or Amended Complaint, without denying any of the facts.

50. I admit that I know that in filing the procedural motions to dismiss the Complaints/Amended Complaints in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** I had the right to deny the facts asserted by Plaintiff Kaul.

51. I admit that I did not deny any of the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20.**

52. I admit that the reason I did not deny any of the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** is because they are true.

53. I admit that I know that I had the right to file a summary judgment motion to dismiss the Complaints/Amended Complaints in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20.**

54. I admit that I did not file a summary judgment motion to dismiss the Complaints/Amended Complaints in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20.**

55. I admit that the reason I did not file a summary judgment motions to dismiss the Complaints/Amended Complaints in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** is because I had no evidence or facts to disprove the summary judgment standard truth of the facts asserted by Plaintiff Kaul.

56. I admit that in every reply, response and opposition paper that I filed from February 22, 2016, to July 2024 in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** I did not deny one fact.

57. I admit that in no document in any of the cases **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20,** does there exist any denial of any fact asserted by Plaintiff Kaul.

58. I admit that throughout the eight-plus (8) years of litigation I knew I had the right to deny the facts, but I did not because they were true.

59. 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 2024.

60. I admit I believed Plaintiff Kaul would be eliminated and I did not want to commit perjury, and so not denying the facts was my attorneys' best advised strategy.

61. I admit now that my attorneys were wrong.

62. I admit that I and others should never have commenced conspiring against Plaintiff Kaul after he invented the outpatient percutaneous spinal fusion in 2005.

63. I admit this was an immense wrongdoing and violation of the law and Plaintiff Kaul's rights.

64. I admit now that my attorney should have had me tell the truth.

65. I admit that my attorney should have attempted to negotiate a settlement with Plaintiff Kaul right at the commencement of litigation in 2016.

66. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable admission of the facts in that the facts were asserted directly at me.

67. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable admission of the facts in that the nature, character and meaning of the facts had been explained and clarified to me by my counsel.

68. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable admission of the facts in that I completely understood the nature, character and meaning of the facts.

69. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable admission of the facts in that I had direct knowledge of the truthfulness of the facts.

70. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable admission of the facts in that I was directly involved in the perpetration of the facts.

71. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable 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.

72. I admit that my failure in denying the facts asserted by Plaintiff Kaul in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes an irrefutable admission of the facts in that the substantial body of fact asserted in the Complaints/Amended Complaint required it be admitted, denied, or dismissed with contrary evidence or fact, and it was not.

73. I admit that the absence of any ambiguity in my failure to deny the facts asserted by Plaintiff Kaul in in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** does unequivocally substantiate the asserted facts.

74. I admit that my counsel clarified and explained to me the civil nature of **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20**

75. I admit that I know that **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** were civil proceeding with civil consequences.

76. I admit that there existed and exist no other factors to explain my silence in failing to deny the facts within **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** other than my knowledge that the facts were and are true.

77. I admit that during the pendency of **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20,** 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.

78. I admit that during the pendency of **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20,**

79. 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.

80. I admit that during the pendency of **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20,**

81. 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.

82. I admit that during the pendency of **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20,**

83. 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.

84. I admit that I knew and know that if the facts within **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** were not true, I could have simply denied the facts, but I did not because they were/are true.

85. I admit that my knowledge of the truth of the facts asserted in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes the sole basis for my silence in failing to deny the facts

86. I admit that my knowledge of the truth of the facts asserted in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** constitutes the sole basis for my actual failure to deny the facts.

87. I admit that I know that if I were innocent of the charges levied in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** I would have simply denied the facts, but I did not, because I am guilty of the levied charges.

88. I admit that I read the opinions, and orders of all district/magistrate judges issued in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20**

89. I admit that in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20**

90. I was represented by counsel, who clarified and explained to me the nature, character and meaning of the opinion and order of all district/magistrate judges.

91. I admit that I understood and understand the nature, character and meaning of the opinions and orders of all district/magistrate judges in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20.**

92. I admit that I know that the district/magistrate judges did not find that my silence in failing to deny the facts in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** did not constitute an admission of the facts, because the district judge knew that my silence did in fact constitute an admission of the facts.

93. I admit that I know that the district/magistrate judges did not find that my actual failure to deny the facts in **K1/K2/K5/K11-2/K11-7/K11-10/K11-14/K11-17/K11-20** did not constitute an admission of the facts, because the district judge knew that my silence did in fact constitute an admission of the facts.

94. I admit I know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the offenses/violations/injuries caused by **The Kaul Cases** Defendants to Plaintiff Kaul's life/liberty/property/reputation, as if I had directly committed them.

95. I admit I know that pursuant to RICO's doctrine of vicarious liability, **The Kaul Cases** Defendants are as liable for the offenses/violations/injuries caused by me to Plaintiff Kaul's life/liberty/property/reputation, as if they had directly committed them.

96. I admit that all the facts of **The Kaul Cases** (2016-2024) are admitted pursuant to Rule 8(b)(6) for all purposes because none of the facts have ever been denied by any of the Defendants.

K11-17

98. I admit that there exists a commonality of factual foundation between K11-17 and K11-20.

99. I admit that there exists a difference of factual foundation between K11-17 and K11-20 of three hundred and three (303) -days' worth of ongoing**/"new"** injury to Plaintiff Kaul's life/liberty/property/reputation (November 20, 2023, to September 18, 2024).

100. I admit that in the period between the filing of K11-17 and K11-20, there has emerged from SCOTUS the new controlling authorities of Jarkesy v SEC and Loper Bright v Raimondo.

101. I admit that Jarkesy further establishes that the 2014 NJ revocation was/is illegal.

102. I admit that Loper establishes that the jurisdiction of remedy rests with the United States District Court

103. I admit that all of the facts proven in K11-17 for all purposes are now proven in K11-20.

104. I admit that the application of the new law of Jarkesy and Loper to the proven facts in K11-20 does substantiate Summary Judgment against all Defendants including myself.

105. I admit that all opinions and orders that were either based on, referenced and or incorporated the illegal 2014 NJ revocation are null and void and without any legal effect.

106. I admit that the September 12, 2022, opinion in K11-7 was based on/incorporated the illegal 2014 NJ revocation, and is thus null and void and without legal effect.

107. I admit that the facts of conspiracy, which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

108. I admit that the facts of bankruptcy fraud which were proven pursuant to Rule 8(b)(6) in **K5/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

109. I admit that I did in a time period between 2014 to the present abuse the power of the bankruptcy trustee 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"**.

110. I admit that the facts of securities fraud which were proven pursuant to Rule 8(b)(6) in **K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

111. I admit that I did in a time period between 2014 to 2020, and in conspiracy and collusion with Defendant Allstate abuse or caused to be abused the power of the trustee's office to facilitate/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"**.

112. I admit that the facts of mail fraud which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

113. I admit that I did in a time period between 2012 to the present abuse or cause to be abused 'state actor' power to engage/perpetrate/aid and abet a knowingly illegal mail fraud scheme against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

114. I admit that the facts of wire fraud which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

115. I admit that I did in a time period between 2012 to the present I did abuse or cause to be abused 'state actor' power to engage/perpetrate/aid and abet a knowingly illegal wire fraud scheme against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

116. I admit that I know the facts of embezzlement which were proven pursuant to Rule 8(b)(6) in **K5/K11-1/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

117. I admit that I did in a time period between 2012 to the present, and in conspiracy and collusion with Defendant Allstate I did abuse or caused to be abused 'state actor' power 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"**.

118. I admit that I know the facts of perjury which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

119. I admit that I did in a time period between 2008 to the present, and in conspiracy and collusion with **The Kaul Cases** Defendants did abuse 'state actor' power to 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"**.

120. I admit that I know the facts of bribery which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

121. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants did abuse 'state actor' power 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"**.

122. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants did abuse 'state actor' power 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"**.

123. I admit that I know the facts of kickbacks which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

124. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

125. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

126. I admit that I know the facts of obstruction of justice which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

127. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of obstruction of justice against Plaintiff Kaul perpetrated within administrative agencies of the State of New Jersey and state medical boards as part of an ongoing **"pattern of racketeering"**.

128. I admit that the illegal obstruction of justice scheme was specifically perpetrated within Defendant FSMB's the subjugate state medical boards to prevent Plaintiff Kaul from procuring a license or having his illegally revoked NJ license reinstated.

129. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

130. I admit that the illegal obstruction of justice scheme within the administrative/state/bankruptcy/federal courts was purposed to prevent Plaintiff Kaul from further exposing evidence of my crimes and those of **The Kaul Cases** Defendants, crimes against humanity, the detail of which neither Plaintiff Kaul nor the public have any knowledge.

131. I admit that I know the facts of public corruption which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

132. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of public corruption against Plaintiff Kaul perpetrated within administrative agencies of the State of New Jersey and state medical boards as part of an ongoing **"pattern of racketeering"**.

133. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

134. I admit that I know the facts of judicial corruption which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

135. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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 United States as part of an ongoing **"pattern of racketeering"**.

136. I admit that I know facts of human rights violations which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

137. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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 and state medical boards as part of an ongoing **"pattern of racketeering"**.

138. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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 United States as part of an ongoing **"pattern of racketeering"**.

139. I admit that I know the facts of civil rights violations which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

140. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of civil rights violations against Plaintiff Kaul perpetrated within agencies of the United States and state medical boards as part of an ongoing **"pattern of racketeering"**.

141. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

142. I admit that I know the facts of constitutional rights violations which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

143. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of constitutional rights violations against Plaintiff Kaul perpetrated within agencies of the United States and state medical boards as part of an ongoing **"pattern of racketeering"**.

144. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

145. I admit that I know the proven facts of evidence tampering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

146. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of evidence tampering against

Plaintiff Kaul perpetrated within agencies of the United States and the States as part of an ongoing **"pattern of racketeering"**.

147. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

148. I admit that I know the proven facts of witness tampering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

149. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of witness tampering against Plaintiff Kaul perpetrated within agencies of the United States and the States as part of an ongoing **"pattern of racketeering"**.

150. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

151. I admit that I know the proven facts of kidnapping which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

152. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

153. I admit that I know the proven facts of false indictment which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

154. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

155. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

156. I admit that I know the proven facts of false arrest which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

157. I admit that I know the proven facts of false imprisonment which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

158. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

159. I admit that I know the proven facts of false prosecution which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

160. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of false prosecution against Plaintiff Kaul perpetrated within agencies of the United States and the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

161. I admit that I know the proven facts of fraud committed against the public and physicians by insurance companies which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

162. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

163. I admit that I know the proven facts of retaliation which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

164. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of retaliation against Plaintiff Kaul perpetrated within agencies of the State of New Jersey and States as part of an ongoing **"pattern of racketeering"**.

165. I admit that I did in a time period between 2008 to the present I did abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of retaliation against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the

geographic boundaries of the United States and State of New Jersey as part of an ongoing **"pattern of racketeering"**.

166. I admit that I know the proven facts of illegal seizure of property which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

167. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of illegal seizure of property against Plaintiff Kaul perpetrated within/by agencies of the United States and State of New Jersey as part of an ongoing **"pattern of racketeering"**.

168. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of illegal seizure of property against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the United States and State of New Jersey as part of an ongoing **"pattern of racketeering"**.

169. I admit that I know the proven facts of honest services fraud which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

170. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of honest services fraud against Plaintiff Kaul and the public perpetrated within/by agencies of the United States and States as part of an ongoing **"pattern of racketeering"**.

171. I admit that I know the proven facts of racketeering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

172. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of racketeering against Plaintiff Kaul and the public perpetrated within/by agencies of the United States and States as part of an ongoing **"pattern of racketeering"**.

173. I admit that I know the proven facts of market manipulation which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

174. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of market manipulation against Plaintiff Kaul and the public perpetrated by agencies of the United States and States as part of an ongoing **"pattern of racketeering"** within the NYSE.

175. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and State of New Jersey as part of an ongoing **"pattern of racketeering"** within the NYSE.

176. I admit that I did in a time period between 2008 to the present abuse 'state actor' power in a knowingly fraudulent manner to 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 United States and the State of New Jersey.

177. I admit that I did in a time period between 2008 to the present abuse 'state actor' power in a knowingly fraudulent manner to 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 United States and the State of New Jersey.

178. I admit that I know the proven facts of money laundering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

179. I admit that as a 'state actor' I did in a time period between 2008 to the present abuse or cause to be abused state power to perpetrate/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"**.

180. 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"**.

181. 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"**.

182. I admit that I know the proven facts of crimes against humanity which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

183. 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"**.

184. 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"**.

185. 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

186. I admit that these thousands of patients were victims of a crime against humanity in which I participated and continue to participate.

187. I admit that I know that hundreds of these invalided patients, many without insurance, sent letters to Defendant Christie explaining the catastrophic effect the illegal revocation had on their lives and those of their families.

188. I admit I know that Defendant Christie ignored these pleas, knowing that he was committing/aiding and abetting/perpetrating a crime against humanity on invalided persons who were citizens of the State of New Jersey.

189. I admit I know Defendant Christie ignored these desperate pleas as he did not believe Plaintiff Kaul would expose the crimes against humanity committed by himself, me and **The Kaul Cases** Defendants.

190. I admit I know Defendant Christie ignored these desperate pleas as to have reinstated Plaintiff Kaul's license would have interfered with his gubernatorial/presidential ambitions.

191. I admit I know that Defendant Christie ignored these desperate pleas as none of these patients were sufficiently wealthy in monetary or voting numbers to be of use to his gubernatorial/presidential ambitions.

192. I admit I know that Defendant Christie discussed the letters with his political strategists, and they concluded that helping these invalided patients with no insurance would hinder their political campaigns.

193. I admit I know that Defendant Christie knew that the proven facts of violations of the Nuremberg Code are facts that are now proven in K11-20.

194. 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"**.

195. I admit I know that during Defendant Christie's tenure as the US Attorney for the District of New Jersey (2001-2009) through the New Jersey governorship (2009-2017), he 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 Defendant Christie received kickbacks, disguised as 'consulting-legal fees' and or political campaign donations.

196. I admit I know 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".**

197. 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.

198. I admit that the facts of these schemes (2001-2017) constitute further proof of the charges levied in K11-20.

199. I admit that I know the proven facts of attempted drugging-killing which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

200. I admit I know that Defendant Christie 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"**.

201. I admit I know that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to domestic and international law.

202. I admit that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to the Nuremberg Code.

203. I admit that I have not denied any of the facts that constitute the proven **factual foundation of K11-20**

204. I admit that the reason I did not/have not denied the facts that constitute the proven **factual foundation of K11-20** is because they are true.

205. I admit that I know that I had and have the right to file a summary judgment motion in K11-20 to dismiss the Complaint.

206. I admit that I did not file a summary judgment motion to dismiss the Complaint.

207. 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 K11-20.**

208. I admit that in **K11-17** I did not deny any of the facts and or allegations.

209. I admit I knew that I had the right and opportunity to deny the facts and or allegations.

210. I admit that in **K11-20** I have not denied any of the facts and or allegations.

211. I admit I know that I have the right and opportunity to deny the facts and or allegations.

212. I admit I know that in or around late January 22, 2024, Defendant Christie did engage in exparte communications with persons/agents associated with persons/agents of the United States Court of Appeals for the 1st Circuit.

213. I admit I know that the purpose of these knowingly improper communication was to cause the generation of legal opinion regarding venue, that he believed would bolster his and my defense in K11-17 and cause dismissal.

214. I admit I know that this scheme was perpetrated without notice to Plaintiff Kaul in order to prevent Plaintiff Kaul from causing a nullification of the opinion.

215. I admit I know 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.

216. I admit I know that on February 15, 2024 (K11-17: D.E. 53) Defendant Christie submitted the improperly procured and knowingly erroneous opinion to the docket of the United States District Court for the Eastern District of North Carolina.

217. I admit I know 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.

218. I admit I know 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 he and I were being civilly prosecuted, did constitute further evidence of our guilt of the levied charges.

219. I admit that the reason Defendant Christie expended resources in having generated knowingly improper opinion from another circuit pertains to his knowledge of his and my guilt of the levied charges and his fear of further exposure through discovery of his prior criminal conduct.

220. I admit I know that in the perpetration of this scheme to obtain this knowingly improper opinion from another circuit, Defendant Christie did, with a knowing illegality, use the US wires to communicate details of the scheme with other Defendants and Third-Party Witnesses.

221. I admit I know that in these communications over the US wires it was decided that the appeal court's opinion would not reference his name or that of any of **The Kaul Cases** Defendants.

222. I admit I know that the purpose of having omitted names of any of **The Kaul Cases** 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.

223. I admit I know that the improperness/illegality of the scheme further evidences the guilt of **The Kaul Cases** Defendants of the levied charges.

224. I admit I know that his perpetration of this scheme is tantamount to an admission of the **factual foundation of K11-17 and K11-20.**

225. I admit that in K11-20 on August 30, 2024, the Court entered an ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES (K11-20: D.E. 4).

226. I admit that I, in collusion/conspiracy with the other Defendants have willfully/knowingly violated and continue to violate the order.

227. I admit that my willful/knowing violations of an order of the United States District Court constitute an act of obstruction of justice.

228. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that the facts were asserted directly at me.

229. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

220. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that I completely understood the nature, character and meaning of the facts.

231. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that I had/have direct knowledge of the truthfulness of the facts.

232. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that I was directly involved in the perpetration of the facts.

233. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

234. I admit that my Rule 8(b)(6) related silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

235. I admit that the absence of any ambiguity in my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** does further substantiate the **factual foundation of K11-20**

236. I admit that my counsel clarified and explained to me the civil nature of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**.

237. I admit that I knew/know that **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** were/are civil proceedings with civil consequences.

238. I admit that there existed and exist no other factors to explain my silence in failing to deny the facts contained within **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** and or the **factual foundation of K11-20** other than my knowledge that the facts are true.

239. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

240. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

241. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

242. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

283. 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 **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**, but I did not and have not, because they are true,

284. I admit that my knowledge of the truth of my guilt and of the facts asserted in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes the sole basis for my silence in failing to deny the facts

285. I admit that my knowledge of the truth of my guilt and of the facts asserted in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes the sole basis for my actual failure to deny the facts.

286. I admit that I know that if I were innocent of the charges levied in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

287. I admit that my Rule 8(b)(6) related failure to deny the facts asserted in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the factual foundation of K11-20.
288. I admit that I read the judicial opinions/orders in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**.

289. 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 **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**.

290. I admit that I understood and understand the nature, character and meaning of the August 30, 2024, ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES (K11-20: D.E. 4).

291. I admit that I know that the Court did not find that my silence in failing to deny the facts in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

292. I admit that I know that the Court did not find that my actual failure to deny the facts in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

293. I admit that I know that the Court in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** did not find evidentially invalid my admissions of undisputed fact in K1, that were submitted into evidence in subsequent cases, because the Courts in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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

294. I admit that I have read the attached document entitled 'Universal Declaration of Human Rights'

295. I admit that I have known about the 'Universal Declaration of Human Rights' since my attendance at college.

296. I admit that since my attendance at college there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

297. 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.

298. I admit that the continuing medical education courses involve modules on medical ethics and human rights.

299. I admit that certain courses have included modules on human rights violations committed during the Second World War by physicians associated with the Nazis.

300. 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.

301. I admit that in 2005 I knew what rights were protected under the 'Universal Declaration of Human Rights'.

302. I admit that in 2005 I knew I was prohibited from conspiring to violate Plaintiff Kaul's fundamental human rights.

303. I admit that in 2005 I knew I was prohibited from violating Plaintiff Kaul's fundamental human rights.

304. I admit that in 2005 I knew it was illegal to conspire to violate Plaintiff Kaul's fundamental human rights.

305. I admit that in 2005 I knew it was illegal to violate Plaintiff Kaul's fundamental human rights.

306. 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 rights.

307. I admit that the knowingness, willfulness, malicious-ness, and purposefulness in my conspiring with **The Kaul Cases** Defendants to violate Plaintiff Kaul's human rights is proven by the below admitted facts about which there is no material dispute.

308. I admit that the knowingness, willfulness, malicious-ness, and purposefulness of the violation of Plaintiff Kaul's human rights by myself and **The Kaul Cases** Defendants, is proven by the below admitted facts about which there is no material dispute.

309. 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.

Section 1983

2005 - 2010

310. 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.

311. 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.

312. 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.

313. 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.

314. 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.

315. 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.

316. I admit that my illegal schemes of public corruption and conspiring with state officials were perpetrated in a mutually beneficial and symbiotic manner.

317. 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.

318. 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.

319. 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.

320. 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.

321. 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.

322. I admit that my illegal schemes of public corruption and conspiring with state officials created a nexus whereby the state's independently motivated scheme to have Plaintiff Kaul illegally eliminated was furthered 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

323. I admit that I abused the immense power of my 'state actor' status to conspire to violate Kaul's right to due process.

324. 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.

325. 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.

326. 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.

327. 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.

328. 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.

329. 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

330. 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.

331. 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.

332. 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.

333. 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.

334. 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.

335. 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.

336. 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.

337. 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.

338. 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.

339. 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.

340. 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.

341. 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.

342. 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.

343. 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.

344. 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.

345. 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.

346. 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.

347. 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.

348. 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.

349. 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.

350. 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.

351. 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.

352. 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.

353. 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.

354. 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.

355. 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.

356. 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.

357. 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.

358. 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.

359. 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.

360. 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.

361. 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.

362. 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.

363. 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.

364. 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.

365. 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.

366. 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.

367. 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.

368. 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.

369. 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.

370. 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.

371. 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.

372. 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.

373. 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.

374. 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.

375. 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.

376. 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.

377. 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.

378. 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.

379. 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.

380. 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.

381. 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.

382. 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.

383. 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.

384. 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.

385. 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.

386. 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.

387. 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.

388. 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.

389. 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.

390. 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.

391. 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.

392. 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.

393. 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.

394. 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.

395. 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,

396. 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.

397. 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.

398. 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.

399. 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.

RICO:

Overall Claim Admission

400. 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.

401. 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; **(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.

402. 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

403. 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 continued into 2022 in the United States District Court for the Southern District of New York.

404. 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.

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

406. 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"

407. 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

408. 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.

409. 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

410. 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.

411. 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 Kaul's livelihood, economic standing, reputation and inability to find employment.

412. 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 Kaul and his family into poverty.

Purpose

413. 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.

414. 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,

415. I admit that I knew the schemes of bribery, fraud, evidential tampering, witness tampering, public corruption and kickbacks were illegal.

2005 – 2010

416. 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

417. 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.

418. 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.

419. 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.

420. 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.

421. 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 and constitutional rights.

422. 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.

433. I admit that I knew that through the coopting of the power of state I would become and did in fact became a 'state actor'

434. 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 and constitutional rights.

435. 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 and constitutional rights.

436. I admit that I knew that my deprivation of Plaintiff Kaul's human and constitutional rights was intended to ensure the cessation of his existence.

437. 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 scheme of bribery.

438. I admit that I knew of the immense criminal consequences to me and others if Plaintiff Kaul exposed our scheme of bribery.

439. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to destroy Plaintiff Kaul's livelihood.

440. 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,

441. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to destroy Plaintiff Kaul's reputation.

442. I admit that my specific intention in aiding and abetting the perpetration of the scheme of bribery was to have Plaintiff Kaul incarcerated.

443. 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.

444. 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.

445. 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.

446. 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 and constitutional rights.

447. 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 investigated by state and federal authorities.

448. 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.

449. 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.

450. 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.

451. 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.

452. 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.

453. 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.

454. 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.

455. 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.

456. I admit that I knew and know that the true quid pro quo bribery nature of the monies rendered my transactions illegal.

457. 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.

458. I admit that I knew and know that my transferring of the quid pro quo bribery monies constitutes bank fraud.

459. I admit that I knew and know that my commission of bank fraud constitutes a crime.

460. I admit that I knew and know that my commission of bank fraud involved the commission of wire fraud.

461. 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 would be exposed.

462. 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.

463. I admit that I knew and know that such a claim would have been false.

464. 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.

465. I admit that I knew and know that my lawyers advised me as to the scheme of concealment.

466. 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.

467. I admit that these persons include state and federal investigators.

468. I admit that these persons include state and federal prosecutors.

469. I admit that these persons include state and federal judges.

470. I admit that these persons include personal injury lawyers.

471. I admit that these persons include physicians who competed against Plaintiff Kaul in the minimally invasive spine surgery market.

472. 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.

473. 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.

474. 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.

475. 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

476. 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.

477. I admit that the purpose of the scheme of fraud was to obstruct and destroy Plaintiff Kaul's minimally invasive spine surgery practice.

478. 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.

479. 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.

480. I admit that in the perpetration of the scheme of fraud I knew that Kaul was in fact legally qualified, credentialed and licensed to perform surgery, including minimally invasive spine surgery.

481. 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.

482. 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

483. 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.

484. 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

485. 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.

486. 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

487. 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.

488. 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.

489. 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.

490. 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.

491. 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

492. I admit that the perpetration of the scheme of fraud involved conspiring with the insurance industry to illegally deny professional reimbursement to Plaintiff Kaul,

493. 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.

494. I admit that the purpose of the fraudulent scheme of theft of services, was an attempt to exhaust Plaintiff Kaul's business resources.

495. 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.

496. 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.

497. I admit that I believed that the fraudulent scheme of theft of services would cause immense financial hardship to Plaintiff Kaul.

498. I admit that I believed this immense financial hardship would illegally force Plaintiff Kaul out of the minimally invasive spine surgery market.

499. 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.

500. I admit that I intended for this immense financial hardship to cause Plaintiff Kaul to engage in unlawful conduct.

501. I admit that I intended to have the imagined unlawful conduct cause Plaintiff Kaul to be jailed.

e. Political Body Obstruction

502. 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.

503. 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.

504. 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.

505. 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.

506. I admit that Plaintiff Kaul's exposition of my crimes and those of **The Kaul Cases** Defendants, despite the coopting and capture of the political body and its members, evidences the fact that I and **The Kaul Cases** Defendants committed with a long-standing sense of privileged impunity, a massive amount of felonious conduct over almost two (2) decades.

507. I admit that Defendant Christie was the US Attorney for the District of New Jersey from 2000 to 2008.

508. I admit that Defendant Christie was the Governor for the State of New Jersey from 2009 to 2017.

509. I admit that between 2012 to 2016 Defendant Christie campaigned in pursuit of the Republication nomination for the 2016 Presidential Campaign.

510. 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.

511. I admit that between 2016 to 2020, Defendant Christie closely collaborated with President Trump in the nomination of persons to federal agencies.

512. I admit that commencing in approximately 2005, Defendant Christie began seeking financial support for his 2009 political campaign for the governor's office.

513. 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.

514. 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.

515. 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.

516. 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.

517. I admit that the dialogue surrounding the quid pro quo deal was akin to discussions surrounding the enactment of terms of a contract.

518. 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.

519. I admit that the principal purpose of the quid pro quo purposed dialogue pertained to the scheme to eliminate Plaintiff Kaul.

520. I admit that the dialogues were conducted using both digital and non-digital modes of communication.

521. I admit that the communications involved many individuals associated with the political, legal, medical, healthcare business and media worlds.

522. 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.

523. I admit that in the dialogue we described the exact method of how we would eliminate Plaintiff Kaul.

524. 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.

525. 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.

526. 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.

527. 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.

528. I admit that that the purpose of these meetings was to discuss the perpetration of the scheme to revoke Plaintiff Kaul's license.

529. I admit that during these meetings I had several conversations with Defendant Christie, in which he confirmed that he had received the bribes.

530. 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.

531. 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.

532. 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 it's members to refuse to support Plaintiff Kaul.

533. 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.

534. 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.

535. 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 to dismiss any cases filed by Plaintiff Kaul.

536. 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.

537. 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, Jay Howard Solomon, to recommend revocation of Plaintiff Kaul's license.

538. 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, Jay Howard Solomon, to recommend revocation of Plaintiff Kaul's license regardless of the evidence presented by Plaintiff Kaul.

539. 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, Jay 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.

540. 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.

541. 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.

542. 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.

543. 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.

544. 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.

545. 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.

546. 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.

547. 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.

548. 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.

549. I admit that I knew, based on my conversations with Defendant Christie, that one purpose of legal proceedings was to provide the public an appearance of justice.

550. 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.

551. 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.

552. 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.

553. 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.

554. 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.

555. 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.

556. 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.

557. 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.

558. 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.

559. 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 my crimes would destroy Plaintiff Kaul's economic standing, reputation, livelihood, reputation, and life and illegally deprive him of his liberty.

560. 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.

561. 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.

562. I admit that based on my conviction that my crimes 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

563. 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.

564. I admit that in becoming further emboldened in the scheme of fraud, my efforts to alienate Plaintiff Kaul from the public became amplified.

565. 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.

566. 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.

567. 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.

568. 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.

569. 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.

570. 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.

571. 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.

572. 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.

573. 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.

574. 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.

575. 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 of those of **The Kaul Cases** Defendants.

576. 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.

577. 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.

578. 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.

579. 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.

580. 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.

581. I admit that I knew the purpose of these highly defamatory stories was to ostracize Plaintiff Kaul.

582. I admit that I knew the purpose of these highly defamatory stories was to socially isolate Plaintiff Kaul.

583. 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.

584. 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.

585. 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.

586. 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.

587. I admit that I knew the purpose of these highly defamatory stories was to attempt to 'break the spirit' of Plaintiff Kaul.

588. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the professional re-emergence of Plaintiff Kaul.

589. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the financial re-emergence of Plaintiff Kaul.

590. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the reputational re-emergence of Plaintiff Kaul.

591. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the psychological re-emergence of Plaintiff Kaul.

592. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the social re-emergence of Plaintiff Kaul.

593. I admit that I knew the purpose of these highly defamatory stories was to attempt to prevent the physical re-emergence of Plaintiff Kaul.

594. 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.

595. 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.

596. 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.

597. 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.

598. 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.

599. 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.

600. 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.

601. 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.

602. I admit that I knew the purpose of these highly defamatory stories was to attempt to have Plaintiff Kaul commit suicide.

603. 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

604. 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 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.

605. I admit that in recognizing the direct connection between Plaintiff Kaul's litigation purposed retention of counsel 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 counsel.

606. 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.

607. 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.

608. 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.

609. 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.

610. I admit that I knew that without legal representation, Plaintiff Kaul would not have been able to contest the revocation proceedings.

611. 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.

612. 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.

613. 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.

614. 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.

615. 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.

616. 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.

617. 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.

618. 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.

619. 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.

620. 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.

621. 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.

622. 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

623. 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.

624. 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.

625. 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.

626. I admit that Plaintiff Kaul's ability to retain counsel to litigate the revocation proceedings caused the generation of evidence that now proves the revocation proceedings were and illegal.

627. I admit that Plaintiff Kaul's ability to retain counsel to litigate the revocation proceedings caused the generation of evidence that now proves the revocation was and is illegal.

628. 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.

629. 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.

630. 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.

631. 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.

632. 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.

633. 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.

634. 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.

635. 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.

636. 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.

637. 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.

638. 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.

639. 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.

640. 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.

641. 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.

642. 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.

643. 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.

644. 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.

645. 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.

646. 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.

647. 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.

648. 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.

649. 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.

650. 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.

651. 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.

652. 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

653. 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.

654. 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.

655. 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.

656. 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.

657. 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.

658. 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.

659. 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.

660. 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.

661. 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

662. 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.

663. I admit that I knew that without medical experts, Plaintiff Kaul would not have been able to contest the revocation proceedings.

664. I admit that I conspired with **The Kaul Cases** Defendants to attempt to deprive Plaintiff Kaul of medical experts.

665. 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.

666. 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.

667. 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.

668. 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.

669. 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.

670. 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.

671. 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.

672. 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.

673. 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.

674. 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.

675. 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.

676. 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.

677. 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.

678. 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.

679. 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.

680. I admit that Plaintiff Kaul's ability to retain medical experts to litigate the revocation proceedings caused the generation of evidence that now proves the revocation proceedings were and illegal.

681. I admit that Plaintiff Kaul's ability to retain medical experts to litigate the revocation proceedings caused the generation of evidence that now proves the revocation was and is illegal.

682. 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.

683. 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.

684. 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

685. I admit that Plaintiff Kaul's has since 2012 materially sustained his existence to a standard to prosecute his claims, 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.

686. I admit, as detailed in the below admitted facts, a direct connection between Plaintiff Kaul's ability to exist and prosecute his claims 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.

687. 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 payment.

688. 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.

689. I admit that I believed that if I and **The Kaul Cases** Defendants forced Plaintiff Kaul into a state of poverty, he would not expose our crimes.

690. I admit that the crimes committed by myself, and **The Kaul Cases** Defendants did force Plaintiff Kaul into a state of poverty.

691. I admit that the United States District Court granted Plaintiff Kaul in forma paupera status.

692. I admit that Plaintiff Kaul's exposition 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 sense of privileged impunity, a massive amount of felonious conduct over almost two (2) decades.

693. 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.

694. 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.

695. 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.

696. 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.

697. 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.

698. 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.

699. 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.

700. 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.

701. 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.

702. 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.

703. 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.

704. 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.

705. 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.

706. 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.

707. 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.

708. 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.

709. 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.

710. 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.

711. I admit that multiple neurosurgical society members occupy controlling seats on insurance industry panels that determine payment.

712. 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.

713. 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.

714. 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.

715. 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.

716. 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.

717. 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.

718. 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.

719. 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.

720. 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.

721. 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.

722. 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.

723. 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.

724. 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.

725. 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.

726. 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.

727. 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.

728. 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.

729. 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.

730. 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.

731. I admit that despite the professional fee deprivation scheme, Plaintiff Kaul was able to litigate the revocation proceedings

732. 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.

733. I admit that had Plaintiff Kaul not litigated the revocation proceedings, his license would have been revoked without the generation of any record of state fraud.

734. 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).

735. 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 levied charges.

736. 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.

737. 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.

738. I admit that I knew and know that the administrative law judge attempted to persuade Plaintiff Kaul to accept Hafner's proposal.

739. I admit that I knew and know that Plaintiff Kaul rejected Hafner's proposal.

740. 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.

741. 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 K11-10.

742. 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.

743. 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.

744. 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.

745. I admit I knew and know that Case No. 18-01489 was almost dismissed because it exposed, amongst many other felonies, the professional fee deprivation scheme.

e. **Political Body Obstruction**

746. 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.

747. 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.

748. 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.

749. 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 and perpetuating the dehumanization and vilification scheme was critical to its success.

750. I admit that I knew and know that the majority of the public would never doubt state actions and would never believe a dehumanized and vilified Plaintiff Kaul.

751. 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.

752. 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.

753. I admit that the purpose of the propagation was to attempt to cause a global isolation of Plaintiff Kaul.

754. 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.

755. 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.

756. 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'.

757. 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.

758. 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.

759. I admit that I know that Plaintiff Kaul did in fact commence seeking assistance from members of the political body.

760. 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.

761. 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.

762. 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.

763. 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.

764. I admit that I knew and know that all enquiries were in fact ignored.

765. 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.

766. 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.

767. 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

768. 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.

769. 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.

770. 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.

771. 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.

772. 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.

773. 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 Case**s Defendants.

774. 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.

775. 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.

776. 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.

777. I admit that I knew and know that the purpose of the permanent global elimination of Plaintiff Kaul was to prevent the exposition by Plaintiff Kaul of the decades-plus long pattern of felonious conduct of myself and **The Kaul Cases** Defendants.

778. 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.

779. 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.

780. 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.

781. 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.

782. 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.

783. 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.

784. 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.

785. 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.

786. 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.

787. 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.

788. 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.

789. 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.

790. 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.

791. 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.

792. 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.

793. 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.

794. 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 be a tacit admission of my guilt and that of **The Kaul Cases** Defendants.

795. 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 claims against us.

796. 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.

797. I admit that I know that an empowerment of the prosecution of the claims against us will further expedite an even more detailed exposition 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.

798. I admit that I know that a more detailed exposition 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.

799. 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 (copy attached).

800. 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.

801. 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.

802. 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.

803. 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.

804. I admit that I know that Plaintiff Kaul responded with **"I don't condone such conduct"** and shortly thereafter departed the meeting.

805. 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

806. I admit that I knew about the scheme of evidential tampering.

807. I admit that I did aid and abet the scheme of evidential tampering by failing to report this crime to prosecutorial authorities anywhere in the United States,

808. I admit that I knew that because the illegal revocation of Plaintiff Kaul's New Jersey license would illegally violate his right in these 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

809. I admit that the scheme of witness tampering in which I knowingly engaged, involved encouraging patients and physicians to lie under oath.

810. 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.

811. 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

812. 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.

813. 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.

814. 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.

815. 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.

816. 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.

817. 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.

818. 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,

819. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to destroy Plaintiff Kaul' reputation.

820. I admit that my specific intention in aiding and abetting the perpetration of the scheme of public corruption was to have Plaintiff Kaul incarcerated.

821. 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.

822. 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.

823. 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.

824. 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

825. 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.

826. 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.

827. 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.

828. 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.

829. 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.

830. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to destroy Plaintiff Kaul's livelihood.

831. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to destroy Plaintiff Kaul' economic standing,

832. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to destroy Plaintiff Kaul' reputation.

833. I admit that my specific intention in aiding and abetting the perpetration of the scheme of kickbacks was to have Plaintiff Kaul incarcerated.

834. 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.

835. 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.

836. 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.

837. 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

838. 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.

839. 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 and constitutional rights.

840. 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.

841. I admit that I knew and know that my involvement in the scheme of bribery constitutes a pattern of felonious conduct.

842. I admit that I knew and know that this felonious conduct, under criminal prosecution, will cause my incarceration.

843. 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.

844. 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.

845. I admit that bribes were funneled to certain district court judges through lawyers and law firms.

846. I admit that the first district judge to which Plaintiff Kaul's first lawsuit (K1) 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.

847. 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.

848. 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.

849. 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.

850. 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.

851. 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 courts.

852. 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).

853. 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.

854. 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.

855. 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 to permanently prevent Plaintiff Kaul from forever seeking any relief in any American court.

856. 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.

857. 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.

858. 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.

859. 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 and constitutional rights.

860. 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.

861. 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, and life.

862. 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.

863. 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.

864. I admit that the bribe monies were funneled from my lawyer to the K11-7 corporate defendants lawyers who then funneled them to the district court judge and persons related to him to the third degree.

865. I admit that I knew and know that the purpose of funneling my bribe monies through lawyers and law firms to the district judge was to provide 'attorney-client' cover for the scheme.

866. 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.

867. I admit that bribes were indirectly funneled to the 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.

868. I admit that the funneling of bribes through the corporate defendants involved the sham purchase of corporate shares.

869. 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.

870. 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 and constitutional rights.

871. 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.

872. 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.

873. I admit that the funneling of bribes through the corporate defendants involved the sham purchase of corporate shares.

874. 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.

875. 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.

876. 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.

877. 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.

878. 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.

879. 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.

880. 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.

881. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's livelihood.

882. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's economic standing,

883. I admit that my aiding and abetting the perpetration of the scheme of bribery destroyed Plaintiff Kaul's reputation.

884. I admit that my aiding and abetting the perpetration of the scheme of bribery had Plaintiff Kaul kidnapped on May 27, 2021.

885. I admit that my aiding and abetting the perpetration of the scheme of bribery had Plaintiff Kaul incarcerated

886. I admit that my aiding and abetting the perpetration of the scheme of bribery forced Plaintiff Kaul's family into a state of poverty.

887. 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.

888. 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

889. 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.

890. 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.

891. 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.

892. I admit that I knew and know that this felonious conduct, under criminally prosecution, will cause my incarceration.

893. 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.

894. 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

895. 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.

896. 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.

897. I admit that I knew and know that my involvement in the scheme of kickbacks constitutes a pattern of felonious conduct.

898. I admit that I knew and know that this felonious conduct, under criminally prosecution, will cause my incarceration.

899. 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.

900. 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.

901. I admit that kickbacks were funneled to certain district court judges through lawyers and law firms.

902. 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.

903. I admit that the funneling of kickbacks through the corporate defendants involved the sham purchase of corporate shares.

904. I admit that the funneling of kickbacks through the corporate defendants involved the purchasing of sham legal services from their lawyers by my lawyers.

905. 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

906. I admit that the documents contained within the Evidential Exhibits submitted into this case were placed in my possession by my **prior** counsel, Mr. Edward Sponzilli.

907. I admit that I have read the documents contained within the Evidential Exhibits.

908. 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.

909. I admit that my counsel explained to me the context, content, relevance, and purpose of these documents.

910. I admit that I understand the context of these documents.

911. I admit that I understand the content of these documents.

912. I admit that I understand the relevance of these documents

913. I admit that I understand the purpose of these documents.

914. I admit that my counsel explained to me the evidence and facts contained within these documents.

915. I admit that I know and understand the evidence and facts contained within these documents.

916. I admit that I had the right, opportunity, and ability to deny or otherwise refute the evidence and facts contained within these documents.

917. I admit that I have not denied and or otherwise refuted the evidence and facts contained within these documents.

918. I admit that the facts contained within these documents are undisputed.

919. I admit that the facts contained within these documents are admitted.

920. I admit that the facts contained within these documents constitute no genuine issue for trial.

921. I admit that the facts contained within these documents corroborate those admitted within the STATEMEMT OF ADMITTED FACT.

922. I admit that the facts contained within these documents constitute proof of the elements of the charges levied against me by Plaintiff Kaul.

DATED: SEPTEMBER 24, 2024

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

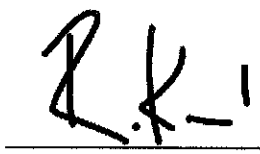
v.

CIVIL ACTION: NO.: 24-CV-03180 (AHB)

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.

ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS

Respectfully Submitted



RICHARD ARJUN KAUL, MD

OCTOBER 29, 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)

For ease of reference Defendant FSMB will be referred to as "I"

Admission Of Guilt

1. I admit that I am guilty of all the facts and charges levied against me in all sections of the Complaint.

2. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed against Plaintiff Kaul, as they are as liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

3. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from **'PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF**.

4. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

5. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

6. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW'**

7. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

8. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/FEDERATION OF STATE MEDICAL BOARDS/ALLSTATE INSURANCE COMPANY/CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/

9. I admit that I procured copies of Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

10. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/FEDERATION OF STATE MEDICAL BOARDS/ALLSTATE INSURANCE COMPANY/CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS/ KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS.

11. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON//FEDERATION OF STATE MEDICAL BOARDS/ALLSTATE INSURANCE COMPANY/CENTER FOR PERSONALIZED EDUCATION FOR PHYSICIANS/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS

Purpose Of Schemes And Violations

12. I admit that the purpose of the below admitted to and detailed schemes and conspiracies was the elimination of Plaintiff Kaul's life/liberty/property and reputation.

13. I admit that an element of the method and or mechanism of the schemes/conspiracies involved the knowing and willful violation of law.

14. I admit that an element of the method and or mechanism of the schemes/conspiracies involved the knowing and willful violation of Plaintiff Kaul's human/civil/constitutional rights.

15. I admit that the principal motive for the schemes/conspiracies was to eliminate Plaintiff Kaul from and the competition he presented to the minimally invasive spine surgery market.

16. I admit that the tactics used to eliminate Plaintiff Kaul from, and the competition he presented to the minimally invasive spine surgery market, were knowingly illegal.

17. I admit that the knowingly illegal tactics were anti-competitive.

18. I admit that the knowingly illegal tactics did violate Plaintiff Kaul's human/civil/constitutional rights.

Context To Schemes And Violations

19. I admit that I am a corporation.

20. I admit that I promote myself as a not-for-profit corporation.

21. I admit that I know my promotion of myself as a not-for-profit corporation is a lie.

22. I admit that I profit from the multi-billion-dollar business of physician education.

23. I admit that I profit from the multi-dollar business of physician credentialling.

24. I admit that I profit from the multi-dollar business of physician licensing.

25. I admit that I profit from the multi-dollar business of so-called physician disciplining.

26. I admit that I was created in approximately 1990 by a group spearheaded by a for-profit hospital corporation.

27. I admit that a purpose of my creation was to control physicians.

28. I admit that the purpose of controlling physicians was to coerce, force and intimidate them into supporting the commercial agendas of initially hospital corporations.

29. I admit that I know that most hospital corporations conduct patient care for the singular purpose of corporate profit.

30. I admit that I know that hospital corporations are controlled and owned by private equity companies and investment vehicles that are traded and or trade on the NYSE.

31. I admit that the purpose for this moniker 'not-for-profit' was/is to an attempt to conceal from the public the true profiteering nature of hospital corporations.

32. I admit that I am a product of this philosophy.

33. I admit that my business philosophy and practice is that of a for-profit entity that exploits the American medical profession.

34. I admit that my business philosophy and practice is that of a for-profit system that is part of a wider for-profit system that ruthlessly exploits the American medical profession.

35. I admit that from 1990 onwards I played a critical role in manipulating and attempting to establish the system of so called 'physician assessment'

36. I admit that this manipulation involved participating in a campaign of propaganda that there were many substandard physicians (mostly ethnic minority) in the United States that required re-education/remediation/rehabilitation to be considered competent to practice medicine.

37. I admit that this manipulation as to alleged substandard physicians became increasingly enforced with punitive actions against the licenses of these targeted physicians who satisfied the profile of those to be forced into a profiteering indefinite system of re-education/remediation/rehabilitation, coerced and at the 'gunpoint' of the threat of loss of license.

38. I admit that this enforcement of punitive measures became more prominent in the 1990s as the so called 'physician disciplining' industry became more profitable.

39. I admit that an element of my strategy of harassment, intimidation and enforcement was the threat to physicians of having their licenses suspended and or revoked.

40. I admit that in the 1990s I recognized that to become and remain profitable I had to develop a mutually beneficial relationship business relationship with Defendant FSMB and its subjugate state medical boards.

41. I admit that I knew that these mutually beneficial relationships were the sole purpose of corporate profit and did nothing to improve the quality of patient care in American medicine.

42. I admit I knew that these for-profit corporations were located in the pharmaceutical, hospital industry and insurance industries.

43. I admit that commencing in or around the early to mid 1990s I entered into a series of quid pro quo schemes with these for-profit corporations conducted through Defendant FSMB.

44. I admit that a central element of the quid pro quo schemes was that I would, on the 'physician assessment' courses, fail physicians whose practices either threatened or failed to support the corporate agendas of the pharmaceutical/hospital/insurance industries.

45. I admit that in seeking to further my profits and those of these hospital/pharmaceutical/insurance corporations, I engaged in schemes of extortion aimed at physicians whose license reinstatement related life/liberty/property depended on me passing them in their 'physician assessment'.

46. I admit I know that state medical board members are political appointees and are appointed by state governors.

47. I admit I know that state medical board members can be dismissed from state medical boards by the state governor at will and without cause.

48. I admit I know that state senates have no control over which persons are appointed to state medical boards.

49. I admit that my business relationship with Defendant FSMB's subjugate state medical boards depends to a certain extent on ensuring corruptible physicians are placed on the board.

50. I admit that by making 'political donations' to state governors I have some control of which persons are appointed to state medical boards.

51. I admit that by procuring some control of which persons are appointed to state medical boards I retain some control of the decisions to refer to me physicians whose licenses were suspended and or revoked, and who are coerced to undergo 'physician assessment' as a condition of attempting for license reinstatement.

52. I admit that the 'hit list' of which physicians' licenses were to be suspended and or revoked was provided to me by Defendant FSMB.

53. I admit that this list was based purely on an identification of which physicians either threatened or failed to support the corporate agendas.

54. I admit that in a period from the 1990s onwards this scheme became more elaborate and punitive.

55. I admit that in order to deceive the public into believing I was involved in the reeducation/remediation/rehabilitation of supposedly 'bad apple physicians' with suspended and or revoked the licenses, I, in conjunction with Defendant FSMB, retained a public relations firm and developed a media strategy.

56. I admit that this media strategy involved using the media to publicize and disseminate knowingly false negative stories about targeted physicians.

57. I admit that the purpose of this media strategy was to provide cover for what I knew was an illegal scheme.

58. I admit I knew and know that my quid pro quos with for profit corporations in the healthcare sector did constitute a **"pattern of racketeering".**

59. I admit I knew that this **"pattern of racketeering"** was illegal.

60. I admit I knew that despite knowing of the illegality of this **"pattern of racketeering"** I did nonetheless persist in its perpetration because it was never challenged.

61. I admit that in a period from the 1990s onwards, other than the challenges levied by Plaintiff Kaul, there has not been one challenge to the illegality of my **"pattern of racketeering"**.

62. I admit that in recognizing the lack of any challenges I did continue to expand my 'physician assessment' business within the annual $4.5 trillion dollar industry of American healthcare.

63. I admit that my scheme to expand control involved and involves, either tangentially or substantially, corruption of the administrative state medical board system, the state/federal political system and the state/federal judicial systems.

64. I admit that commencing in the 1990s, my profiteering 'physician assessment' scheme has continued to expand.

65. I admit that one of the specific tactics of the scheme has been the use and payment to of physicians who are active state medical board members, and who are recommended and approved by Defendant FSMB.

66. I admit that in exactly aligning my business strategy with that of Defendant FSMB, I have adopted all of Defendant FSMB's profiteering strategies, that include the appointment of executives of state medical boards to the board of Defendant FSMB, the effect of which is that every dictate from for-profit corporations that Defendant FSMB is bribed to issue will be unquestioningly implemented by subjugate state medical boards because of the alignment of the ruthless commercial interests of Defendant FSMB with those of the for-profit health are corporations.

67. I admit that it has taken approximately thirty (30) years to manipulate the American physician licensing system into a system whose only purpose, mission and philosophy pertain to increasing Wall Street based corporate/shareholder profit.

68. I admit that I have no concern for the health and welfare of the American public.

69. I admit that my only concern is the generation of profit and money.

70. I admit that I know my generation of profit and money occurs through a ruthless exploitation of the American medical profession.

71. I admit that the so-called opiate epidemic was a direct consequence of me having engaged in the late 1990s in quid pro quo schemes with Defendant FSMB and opiate manufacturers, in which I failed physicians who were against prescribing opiates.

72. I admit that these opiate quid pro quo schemes involved the funneling of bribes from the pharmaceutical industry in return for which I participated in the physician license suspension/revocation schemes ordered by Defendant FSMB/subjugate state medical boards to

suspend and or revoke the licenses of physicians who either refused to dispense opiates or did not dispense enough.

73. I admit that Defendant FSMB's scheme was exposed in a December 2016 report by the US Senate on the epidemic of opiate death overdoses.

74. I admit that a more recent scheme pertained to the so called COVID 'vaccine', in which I used the same strategy/tactics of 'physician assessment' failing to coerce and force physicians to inoculate the American public with a knowingly toxic mRNA chemical.

75. I admit that state medical boards suspended and or revoked the licenses of physicians who published online articles as to the immense/permanent risks of these untested chemicals.

76. I admit that in K11-17 I failed to deny any of the allegations/facts.

77. I admit that the reason I did not deny any of the allegations/facts is because they are true.

78. I admit that in my knowledge of the truth of the allegations/facts, I would have committed perjury if I had denied any of the allegations/facts.

79. I admit that in seeking to avoid the commission of perjury, I and **The Kaul Cases** Defendants did perpetrate schemes of political/judicial corruption, that were purposed to and did in fact cause the illegal dismissal of cases.

80. I admit that in seeking to avoid the commission of perjury, **The Kaul Cases** Defendants did perpetrate schemes of political/judicial corruption, that were purposed to and did in fact cause the entry on September 12, 2022 of a knowingly illegal purported 'injunction' by a judge in the Southern District of New York in K11-7.

81. I admit I have knowledge that this judge was and is the subject of civil litigation and investigations by his state bar and judicial disciplinary council for offenses committed against not only Plaintiff Kaul but multiple prior litigants, for having participated in schemes of public corruption.

Facts Admitted In K11-17 As Proof Of Claims In K11-20

82. 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**, are facts unambiguously asserted in support of the claims levied against me in K11-20 by Plaintiff Kaul.

83. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K11-17** on November 20, 2023, 2023 (K11-17: D.E. 1).

84. I admit that in **K11-17** 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.

85. I admit that in **K11-17** on February 26, 2024, I filed a procedural motion (K11-17: D.E. 58) to dismiss the COMPLAINT without denying facts that now constitute an element of the factual foundation of K11-20.

86. I admit that in **K11-17** on March 11, 2024 I filed opposition to Plaintiff Kaul's reply to my motion to dismiss, and continued to fail to deny the facts that now constitute an element of the factual foundation of K11-20.

K11-17

87. I admit that there exists a commonality of factual foundation between K11-17 and K11-20.

88. I admit that there exists a difference of factual foundation between K11-17 and K11-20 of three hundred and forty-four (344) -days' worth of ongoing/**"new"** injury to Plaintiff Kaul's life/liberty/property/reputation (November 20, 2023, to October 29, 2024).

89. I admit that in the period between the filing of K11-17 and K11-20, there has emerged from SCOTUS the new controlling authorities of Jarkesy v SEC and Loper Bright v Raimondo.

90. I admit that Jarkesy further establishes that the 2014 NJ revocation was/is illegal.

91. I admit that Loper establishes that the jurisdiction of remedy rests with the United States District Court

92. I admit that all of the facts proven in K11-17 for all purposes are now proven in K11-20.

93. I admit that the application of the new law of Jarkesy and Loper to the proven facts in K11-20 does substantiate Summary Judgment against all Defendants including myself.

94. I admit that all opinions and orders that were either based on, referenced and or incorporated the illegal 2014 NJ revocation are null and void and without any legal effect.

95. I admit that the September 12, 2022, opinion in K11-7 was based on/incorporated the illegal 2014 NJ revocation, and is thus null and void and without legal effect.

96. I admit that the facts of conspiracy, which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

97. I admit that the facts of bankruptcy fraud which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

98. I admit that the facts of securities fraud which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

99. I admit that the facts of mail fraud which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

100. I admit that the facts of wire fraud which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

101. I admit that I know the facts of embezzlement which were proven pursuant to Rule 8(b)(6) **K11-17** are now proven in K11-20.

102. I admit that I know the facts of perjury which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

103. I admit that I know the facts of bribery which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

104. I admit that I know the facts of kickbacks which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

105. I admit that I know the facts of obstruction of justice which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

106. I admit that the illegal obstruction of justice scheme was specifically perpetrated within and by Defendant FSMB's subjugate state medical boards to prevent Plaintiff Kaul from procuring a license or having his illegally revoked NJ license reinstated.

107. I admit that I did in a time period between 2023 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants perpetrate within the district court in K11-17 an ongoing **"pattern of racketeering"**.

108. I admit that the illegal obstruction of justice scheme within the district court in K11-17 was purposed to prevent Plaintiff Kaul from further exposing evidence of my crimes and those of **The Kaul Cases** Defendants, crimes against humanity, the exact detail of which neither Plaintiff Kaul nor the public have any knowledge.

109. I admit that I know the facts of public corruption which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

110. I admit that I know the facts of judicial corruption which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

111. I admit that I know facts of human rights violations which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

112. I admit that I know the facts of civil rights violations which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

113. I admit that I know the facts of constitutional rights violations which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

114. I admit that I know the proven facts of evidence tampering which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

115. I admit that I know the proven facts of witness tampering which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

116. I admit that I know the proven facts of kidnapping which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

117. I admit that I know the proven facts of false indictment which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

118. I admit that I know the proven facts of false imprisonment which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

119. I admit that I know the proven facts of false prosecution which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

120. I admit that I know the proven facts of fraud committed against the public and physicians by insurance companies which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

121. I admit that I know the proven facts of retaliation which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

122. I admit that I know the proven facts of illegal seizure of property which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

123. I admit that I know the proven facts of honest services fraud which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

124. I admit that I know the proven facts of racketeering which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

125. I admit that I know the proven facts of market manipulation which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

126. I admit that I know the proven facts of money laundering which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

127. I admit that I know the proven facts of crimes against humanity which were proven pursuant to Rule 8(b)(6) in **K11-17** are now proven in K11-20.

128. 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

129. I admit that these thousands of patients were victims of a crime against humanity in which I continue to participate.

129. I admit I know that hundreds of these invalided patients, many without insurance, sent letters to Defendant Christie explaining the catastrophic effect the illegal revocation had on their lives and those of their families.

130. I admit I know that Defendant Christie ignored these pleas, knowing that he was committing/aiding and abetting/perpetrating a crime against humanity on invalided persons who were citizens of the State of New Jersey.

131. I admit I know Defendant Christie ignored these desperate pleas as he did not believe Plaintiff Kaul would expose the crimes against humanity committed by himself, me and **The Kaul Cases** Defendants.

132. I admit I know Defendant Christie ignored these desperate pleas as to have reinstated Plaintiff Kaul's license would have interfered with his gubernatorial/presidential ambitions.

133. I admit I know that Defendant Christie ignored these desperate pleas as none of these patients were sufficiently wealthy in monetary or voting numbers to be of use to his gubernatorial/presidential ambitions.

134. I admit I know that Defendant Christie discussed the letters with his political strategists, and they concluded that helping these invalided patients with no insurance would hinder their political campaigns.

135. I admit I know that Defendant Christie knew that the proven facts of violations of the Nuremberg Code are facts that are now proven in K11-20.

136. I admit I know that during Defendant Christie's tenure as the US Attorney for the District of New Jersey (2001-2009) through the New Jersey governorship (2009-2017), he 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 Defendant Christie received kickbacks, disguised as 'consulting-legal fees' and or political campaign donations.

137. I admit I know 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".**

138. 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.

139. I admit that the facts of these schemes (2001-2017) constitute further proof of the charges levied in K11-20.

140. I admit that I know the proven facts of attempted drugging-killing which were proven pursuant to Rule 8(b)(6) in **K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

141. I admit I know that Defendant Christie 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"**.

142. I admit I know that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to domestic and international law.

143. I admit that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to the Nuremberg Code.

144. I admit that I have not denied any of the facts that constitute the proven **factual foundation of K11-20**

145. I admit that the reason I did not/have not denied the facts that constitute the proven **factual foundation of K11-20** is because they are true.

146. I admit that I know that I had and have the right to file a summary judgment motion in K11-20 to dismiss the Complaint.

147. I admit that I did not file a summary judgment motion to dismiss the Complaint.

148. 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 K11-20.**

149. I admit that in **K11-17** I did not deny any of the facts and or allegations.

150. I admit I knew that I had the right and opportunity to deny the facts and or allegations.

151. I admit that in **K11-20** I have not denied any of the facts and or allegations.

152. I admit I know that I have the right and opportunity to deny the facts and or allegations.

153. I admit I know that in or around late January 22, 2024, Defendant Christie did engage in exparte communications with persons/agents associated with persons/agents of the United States Court of Appeals for the 1st Circuit.

154. I admit I know that the purpose of these knowingly improper communication was to cause the generation of legal opinion regarding venue, that he believed would bolster his and my defense in K11-17 and cause dismissal.

155. I admit I know that this scheme was perpetrated without notice to Plaintiff Kaul in order to prevent Plaintiff Kaul from causing a nullification of the opinion.

156. I admit I know 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.

157. I admit I know that on February 15, 2024 (K11-17: D.E. 53) Defendant Christie submitted the improperly procured and knowingly erroneous opinion to the docket of the United States District Court for the Eastern District of North Carolina.

158. I admit I know 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.

159. I admit I know 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 he and I were being civilly prosecuted, did constitute further evidence of our guilt of the levied charges.

160. I admit that the reason Defendant Christie expended resources in having generated knowingly improper opinion from another circuit pertains to his knowledge of his and my guilt of the levied charges and his fear of further exposure through discovery of his prior criminal conduct.

161. I admit I know that in the perpetration of this scheme to obtain this knowingly improper opinion from another circuit, Defendant Christie did, with a knowing illegality, use the US wires to communicate details of the scheme with other Defendants and Third-Party Witnesses.

162. I admit I know that in these communications over the US wires it was decided that the appeal court's opinion would not reference his name or that of any of **The Kaul Cases** Defendants.

163. I admit I know that the purpose of having omitted names of any of **The Kaul Cases** 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.

164. I admit I know that the improperness/illegality of the scheme further evidences the guilt of **The Kaul Cases** Defendants of the levied charges.

165. I admit I know that his perpetration of this scheme is tantamount to an admission of the **factual foundation of K11-17 and K11-20**.

166. I admit that in K11-20 on August 30, 2024, the Court entered an ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES (K11-20: D.E. 4).

167. I admit that I, in collusion/conspiracy with the other Defendants have willfully and as part of our knowingly fraudulent defense strategy simultaneously violated the order and complied with it but in 'bad faith'.

168. I admit that my willful/knowing aiding and abetting violations of an order of the United States District Court constitute an act of obstruction of justice.

169. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute an admission of the facts in that the facts were asserted directly at me.

170. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute 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.

171. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute an admission of the facts in that I completely understood the nature, character and meaning of the facts.

172. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute an admission of the facts in that I had/have direct knowledge of the truthfulness of the facts.

173. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute an admission of the facts in that I was directly involved in the perpetration of the facts.

174. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute 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.

175. I admit that my Rule 8(b)(6) related silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** constitute 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.

176. I admit that the absence of any ambiguity in my silence in failing to deny the facts asserted by Plaintiff Kaul in **K11-17/K11-20** does further substantiate the **factual foundation of K11-20**

177. I admit that my counsel clarified and explained to me the civil nature of **K11-17/K11-20**

178. I admit that I knew/know that **K11-17/K11-20** were/are civil proceedings with civil consequences.

179. I admit that there existed and exist no other factors to explain my silence in failing to deny the facts contained within **K11-17/K11-20** and or the **factual foundation of K11-20** other than my knowledge that the facts are true.

180. I admit that during the pendency of **K11-17/K11-20,** 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.

181. I admit that during the pendency of **K11-17/K11-20,** 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.

182. I admit that during the pendency of **K11-17/K11-20**, 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.

183. I admit that during the pendency of **K11-17/K11-20**, 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.

184. 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 **K11-17/K11-20**, but I did not and have not, because they are true,

185. I admit that my knowledge of the truth of my guilt and of the facts asserted in **K11-17/K11-20** constitutes the sole basis for my silence in failing to deny the facts

186. I admit that my knowledge of the truth of my guilt and of the facts asserted in **K11-17/K11-20** constitutes the sole basis for my actual failure to deny the facts.

187. I admit that I know that if I were innocent of the charges levied in **K11-17/K11-20**, I would have simply denied the asserted facts, but I did/have not, because I was/am/will remain guilty of the levied charges.

188. I admit that my Rule 8(b)(6) related failure to deny the facts asserted in **K11-17/K11-20** constitutes an admission of the factual foundation of K11-20.

189. I admit that I read the judicial opinion/order in **K11-17**.

190. I admit that in **K11-17** I was represented by counsel, who clarified and explained to me the nature, character and meaning of the judicial opinion/order in **K11-17**.

191. I admit that I understood and understand the nature, character and meaning of the August 30, 2024, ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES (K11-20: D.E. 4).

192. I admit that I know that the Court did not find that my silence in failing to deny the facts in **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.

193. I admit that I know that the Court did not find that my actual failure to deny the facts in **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.

The United Nations Universal Declaration Of Human Rights

194. I admit that I have read the attached document entitled 'Universal Declaration of Human Rights'

195. I admit that I have known about the 'Universal Declaration of Human Rights' since it was issued.

196. I admit that since first knowledge of the 'Universal Declaration of Human Rights' there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

197. I admit that since my participation in the process of physician education, credentialing and so-called disciplining there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

198. I admit the nature of my business involves the deprivation of physicians' livelihoods, lives, liberty and reputation.

300. I admit I know that the heart of these deprivations is the deprivation of fundamental human rights.

301. I admit I know the critical importance to my business and my ethical/moral obligations of knowing the 'Universal Declaration of Human Rights', because my business involves the deprivation of a physician's livelihood, life and liberty.

302. I admit I know the critical importance to my business and my ethical/moral obligations of knowing the correct application of the 'Universal Declaration of Human Rights' to matters involving the deprivation of a physician's livelihood, life and liberty.

303. I admit that depriving physicians of their livelihood, life and liberty for the sole purpose of increasing corporate profit constitutes a violation of international law.

304. I admit that depriving physicians of their livelihood, life and liberty for the sole purpose of increasing corporate profit constitutes a violation of American domestic law.

305. I admit that depriving physicians of their livelihood, life and liberty for the sole purpose of increasing corporate profit constitutes a crime against humanity.

306. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my obligated attendance at continuing legal and human rights education courses.

307. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my obligation to ensure my business of license revocation is conducted in accordance not only with the United States Constitution but also the 'Universal Declaration of Human Rights'.

308. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my legal obligation to ensure the protection of the human/civil/constitutional rights of all physicians whose licenses are suspended/revoked by my subjugate state medical boards.

309. I admit that I am a subjugate element of the **"Federation Cartel"** an entity that controls for all intents and purposes all subjugate state medical boards.

310. I admit I know that the subjugate state medical boards are not sovereign entities, but are profit generating units of the **"Federation Cartel".**

311. I admit I know that the executive directors of the subjugate state medical boards are concurrently board members of Defendant FSMB.

312. I admit I know that when these individuals cease as executive directors of a subjugate state medical board, their board position on Defendant FSMB is terminated.

313. I admit I know that the liability any violation/injury caused by any subjugate state medical board becomes the liability of all subjugate state medical boards and the **"Federation Cartel".**

314. I admit that the doctrine of vicarious liability does hold me liable for any violations of physicians human/civil/constitutional rights committed by the subjugate state medical boards of **the "Federation Cartel"**.

315. I admit that obligatory continuing legal education courses involve modules on legal ethics and human rights.

316. 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.

317. 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.

318. I admit that I knew and know I was/am prohibited from actually violating Plaintiff Kaul's human/civil/constitutional rights.

319. I admit that I knew and know that it was illegal to conspire to violate Plaintiff Kaul's human/civil/constitutional rights.

320. I admit that I knew and know that it was illegal to actually violate Plaintiff Kaul's human/civil/constitutional rights.

321. I admit that since 2023 I have conspired with **The Kaul Cases** Defendants to knowingly, willfully and purposefully violate Plaintiff Kaul's human/civil/constitutional rights.

322. 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.

323. 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.

324. 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 - 2024

325. I admit that I knew that my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, do substantiate an abuse of state power.

326. I admit that I knew I was a 'state actor' pursuant to a Section 1983 claim.

327. I admit that I knew Plaintiff Kaul retained human/civil/constitutional rights.

328. 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.

329. 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 K11-20.

330. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I became intertwined with, and in possession of state power and became a 'state actor'.

331. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I purchased, in a knowingly illegal manner, state-public power from, amongst others, Defendant Christie.

332. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I purchased, in a knowingly illegal manner, state-public power from, amongst others, Defendant Christie, without the permission of the public.

333. I admit that I did not seek the permission of the public, as I knew it would be denied.

334. I admit I know that the public would have denied permission because the public would have known my purchasing state-public power for personal gain was illegal.

335. 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.I admit that had my long-standing **"pattern"** of abuse of political-state power for personal gain been exposed to the public, my corporate partners would have terminated our quid pro quo schemes.

336. I admit that had my long-standing **"pattern"** of abuse of political-state power for personal gain been exposed to the public, I would have become subject to criminal indictment.

337. I admit that had I become subject to criminal indictment, all my prior crimes would have become exposed.

338. I admit that had all my prior crimes become exposed my corporate profits and business would have become decimated.

339. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I purchased, in a knowingly illegal manner, state-judicial-political power from, amongst others, Defendant Christie without the permission of the public.

340. I admit that I was able to purchase state-judicial-political power from, amongst others, **The Kaul Cases** Defendants, because by reason of the absolute power of the New Jersey Governor's Office over the state judiciary, I purchased it from Defendant Christie, through schemes of bribery.

341. I admit that I abused my purchased control of state judges to further my economic and political agendas.

342. I admit that **The Kaul Cases** Defendants, including the K11-20 Defendants, sought and required this corruptly purchased judicial power to suppress any legal challenges that Plaintiff Kaul filed against the illegal revocation and or its consequences.

343. I admit that I abused this purchased judicial power 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.

344. I admit that I abused this purchased judicial power 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.

345. I admit that I abused this purchased judicial power 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.

346. I admit that I abused this purchased political-judicial power I 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.

347. I admit that I abused this purchased political-judicial power to silence all politicians/legislators/lawyers as to the facts of the revocation scheme, with threats of professional ruin and or criminal indictments.

348. 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'.

349. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that Plaintiff Kaul would be eliminated.

349. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that Defendant Christie would become the 2016 US President.

350. I admit that I believed that if Defendant Christie became the 2016 President, he would have abused the power of the federal government to cause the elimination of Plaintiff Kaul, in order to conceal the crimes of **The Kaul Cases** Defendants.

351. I admit that I was motivated to cause the illegal revocation of Plaintiff Kaul's license by the promise of increased bribes/profits from my for-profit insurance-hospital-pharmaceutical corporate donors.

352. I admit that I knew I and my subjugate state medical boards, the **"Federation Cartel"** had to manufacture a basis/pretext on which to cause the illegal revocation of Plaintiff Kaul's license.

353. I admit that I knew there existed no legitimate or legal basis on which to cause the illegal revocation of Plaintiff Kaul's license.

354. 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 subjugate state medical boards to manufacture a knowingly illegitimate/illegal case to cause the illegal revocation of Plaintiff Kaul's license.

355. 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.

356. I admit I knew that the commission of perjury would be perpetrated by these other physicians while acting as experts for the state.

357. 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.

358. I admit that these expert physicians were given assurances that they would not be criminally prosecuted for perjury.

359. 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.

360. 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 K11-20**.

361. 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, Defendant Christie 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 K11-20**.

362. I admit I knew that these experts physicians knew they would be committing perjury.

363. 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.

364. I admit that when these expert physicians committed perjury, they knew they were committing felonies.

365. I admit that I knew that these expert physicians knew Plaintiff Kaul was licensed/trained/credentialed/qualified to perform minimally invasive spine surgery.

366. 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.

367. I admit that I know that Defendant Christie 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), these lawyers would file knowingly frivolous malpractice claims in NJ state courts whose judge were controlled by Defendant Christie.

368. 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.

369. I admit I knew that within these medical malpractice quid pro quo schemes, the lawyers would kickback a percentage of the settlement to Defendant Christie.

370. I admit I know that millions of dollars were actually paid by Plaintiff Kaul's medical malpractice carriers in these knowingly fraudulent cases (2013-2017)

371. I admit I know that Defendant Christie received kickbacks from these knowingly fraudulent settlements (2013-2017)

372. I admit that I knew the kickback scheme conducted across the US wires, was illegal and constituted wire fraud.

373. I admit that I knew that the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and that it constituted wire fraud.

374. I admit that I knew that the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and constituted public corruption.

375. 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.

376. I admit that I knew that Plaintiff Kaul had been trained to perform minimally invasive spine surgery since at least 2003.

377. I admit that I knew that Plaintiff Kaul had been qualified to perform minimally invasive spine surgery since at least 2003.

378. I admit that I knew that Plaintiff Kaul had been properly licensed and credentialed to perform minimally invasive spine surgery since at least 2003.

379. 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.

380. I admit that I knew that Plaintiff Kaul had in 2005 invented the percutaneous spinal fusion procedure.

381. I admit that I knew that Plaintiff Kaul had been credentialled by at least six (6) state licensed surgical centers in New Jersey to perform minimally invasive spine surgery since at least 2003.

382. I admit that I knew that Plaintiff Kaul had successfully performed hundreds of minimally invasive spinal fusions.

383. I admit that despite knowing Plaintiff Kaul was experienced/licensed/credentialled/trained/qualified and had invented the percutaneous procedure, I did abuse and cause to be abused 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.

384. 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 K11-20.**

385. 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 K11-20**, he would be financially ruined and unable to retain a lawyer.

386. 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 K11-20**, and unable to retain a lawyer, did prosecute his claims, I and **The Kaul Cases** Defendants would cause a corruption of the courts/obstruction of justice to prevent his prosecution of the case and procurement of discovery and procurement-reinstatement of his medical license.

RICO – Count One
'COVID Vaccine' Toxicity

387. I admit that I know the reason I failed to address and 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.

388. I admit that one of the reasons all Defendants violated the Court's March 13, 2024, ORDER FOR DISCOVERY PLAN in K11-17 and in K11-20 is to avoid having to disclose evidence of the global scheme of inoculation of a knowing gene manipulating mRNA toxin into billions of humans.

389. I admit that although K11-20 factually differs from K11-17 in that there exists in K11-20 an extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, there exists a commonality of fact of four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury to Plaintiff Kaul's life/liberty/property/reputation.

390. I admit that the commonality of the four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury was admitted for all purposes in K11-17.

391. I admit that the entire corpus of fact of **The Kaul Cases** became sequentially admitted from the February 22, 2016, filing of K1 to the present consequent to the fact that neither I nor any of **The Kaul Cases** Defendants ever denied any of the facts.

392. I admit that the facts admitted in K11-20 do substantiate entry of Summary Judgment against me as to all claims.

393. I admit that the SCOTUS rulings in Jarkesy and Loper, in conjunction with the admitted facts do further render me and all other Defendants defenseless and subject to Summary Judgment.

394. I admit that pursuant to Rule 8(b)(6) my non-denial of the facts of the extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, has caused them to become admitted for all purposes, including Summary Judgment.

Admissions Of Conflicts Of Interest, Lack Of Governmental Oversight And Lack Of Industry Standards.

395. I admit that I was first incorporated in 1990.

396. I admit that the incorporation was the product of a collaboration between seven (7) Colorado healthcare organizations within the American healthcare market.

397. I admit that these seven (7) healthcare organizations profited and continue to profit from their competitive activities within the American healthcare market.

398. I admit that physician constitute the fundamental profit generators for my business in the American healthcare market.

399. I admit that the specific sector of the American healthcare market from and in which I profit is the sector that pertains to the business of so called 'physician regulation and disciplining'

400. I admit that I know that there exists in no other sector of American industry any such equivalent system of profiteering from the regulation, penalizing and so called 'assessing' of professionals/business executives.

401. I admit that I know that the executives of insurance corporations are not subject to such a system.

402. I admit that I know that the executives of hospital corporations are not subject to such a system.

403. I admit that I know that the executives of pharmaceutical corporations are not subject to such a system.

404. I admit I know that almost all physicians are targeted for the purpose of profit.

405. I admit I know that almost all physicians are targeted not for the purpose of enhancing patient safety.

406. I admit that the organizations from whose collaboration I came into existence were the Colorado Alliance for CME, the Colorado Foundation for Medical Care, the **Colorado Hospital Association**, the Colorado Medical Society, the Colorado Physician Health Program, the Colorado Society of Osteopathic Medicine and the Univ of Colorado School of Medicine.

407. I admit I know that a number of **The Kaul Cases** Defendants are hospitals/hospital systems that competed with his outpatient surgical centers in the minimally invasive spine surgery market.

408. I admit that I have come to know that in or around 2010 Plaintiff Kaul had plans to expand his physician owned outpatient surgical center model across the United States.

409. I admit that I have come to know that national hospital corporations viewed Plaintiff Kaul's outpatient surgical center model as a threat to their position and profits within the minimally invasive spine surgery market.

410. I admit that my business origination and ongoing association with the hospital industry represented and represents a conflict of interest with Plaintiff Kaul.

411. I admit I never disclosed this conflict of interest or any others to Plaintiff Kaul when, in early 2023, I signed a contract and accepted monies to provide him a so called 'physician assessment' in relation to the issuance of his Pennsylvania license.

412. I admit I knew I was conflicted.

413. I admit that despite knowing I was conflicted, I did not disclose the conflicted as I was convinced Plaintiff Kaul would not discover and or expose them.

414. I admit that I was convinced that even if Plaintiff Kaul did discover the conflicts of interest, he would not expose them out of fear that it would cause me to 'fail him' on the 'physician assessment'.

415. I admit I was convinced of my scheme would go undetected because I have successfully perpetrated it against hundreds of other physicians in the three (3) decades in which I have conducted business in the arena of so called 'physician assessment'.

416. I admit that the entire for-profit industry of so called 'physician assessment' is not regulated by any governmental agency or authority.

417. I admit that the entire for-profit industry of so called 'physician assessment' is not subject to licenses issued by either state or federal governments.

418. I admit that the entire for-profit industry of so called 'physician assessment' is not subject to periodic inspections from independent government related standard enforcing agencies.

419. I admit there are no agreed upon industry standards in the business of so called 'physician assessment'.

420. I admit there are no special qualifications, education or training a person must have before they can incorporate and commence conducting such a business.

421. I admit I receive no funding from either state of federal government.

422. I admit the majority of my funding is derived from the fees physicians are forced to pay to have their licenses reinstated.

423. I admit that the fees exacted on principally impoverished physicians are excessive.

424. I admit I am financially motivated to fail physicians as it forces them into a cycle of having to indefinitely pay for never-ending remediation/assessment/certification courses.

425. I admit that an element of my business strategy involves the threat to physicians trapped in this cycle of profiteering, that if they fail to comply with my orders, the state medical boards will re-suspend and re-revoke their licenses.

426. I admit I know that these threats constitute the ICO predicate act of extortion.

427. I admit that despite knowing that I have committed and am continuing to commit association-in-fact related **"patterns of racketeering"** within the American healthcare sector, I do so because I have been successfully perpetrating these knowingly illegal schemes for almost three (3) decades without any governmental oversight, investigation or challenge.

428. I admit that one of the reasons for the lack of any investigation of my knowingly illegal schemes is the 'protection' I derive from being a subjugate member of Defendant FSMB.

429. I admit I know Defendant FSMB has admitted to being involved in long standing **"patterns of racketeering"** within the American healthcare sector.

430. I admit I know that Defendant FSMB has come under scrutiny by the US Senate on multiple occasions for its anti-competitive public injuring quid pro quo practices with the insurance/hospital/pharmaceutical industries.

January 2023 to May 2023

431. I admit that on or about January 11 2023, Plaintiff Kaul initiated contact with me via telephone.

432. I admit that the purpose of his initial telephone call pertained to his paying me for the provision of my 'physician assessment' services.

433. I admit he told me the 'physician assessment' was a condition for the issuance of his license by the State of Pennsylvania.

434. I admit my cognizance of the importance and value to him of procuring this critical element of the Pennsylvania licensing process.

435. I admit that on January 13, 2023 I requested via email that Plaintiff Kaul email me the relevant opinion and order from the State of Pennsylvania and a copy of his CV.

436. I admit that on January 13, 2023 I informed Plaintiff Kaul via email that the cost of the virtual course was $14,5000.

437. I admit that on January 13, 2023 I informed Plaintiff Kaul via email that upon enrollment in the virtual course a deposit of nine thousand dollars ($9,000) was required.

438. I admit that on January 13, 2023 I informed Plaintiff Kaul via email that twenty-one (21) days prior to the commencement of the virtual course a further payment of five thousand five hundred dollars ($5,500) was required.

439-1. I admit that on January 13, 2023 I informed Plaintiff Kaul via email that a complete report would be issued 8-10 weeks after the virtual assessment.

439-2. I admit that on January 16 and 17, 2023 I received from Plaintiff Kaul via email the relevant opinion and order from the State of Pennsylvania and a copy of his CV.

440. I admit that upon receipt of Plaintiff Kaul's CV and the relevant opinion and order from the State of Pennsylvania I requested he electronically transfer nine thousand dollars ($9,000).

441. I admit that in a period between January 11 and 22, 2023 I did come to definitively know of **The Kaul Cases.**

442. I admit that in coming to know of **The Kaul Cases**, I did come to know the identities of the Defendants that had been sued by Plaintiff Kaul.

443. I admit that two of these Defendants were **The Kaul Cases** Defendant, American Society of Interventional Pain Physicians (ASIPP) and K11-20 Defendant, Federation of State Medical Boards (FSMB).

444. I admit that upon coming to know that Plaintiff Kaul had sued these Defendants, I knew I was conflicted.

445. I admit I knew I was conflicted because I engaged in business with the state medical board subjugate members of Defendant FSMB.

446. I admit my business with the subjugate state medical board members of Defendant FSMB involved them referring me 'physician assessment' business as part of a quid pro quo scheme in which I would funnel 'charitable donations' to Defendant FSMB.

447. I admit that I know this profit-purposed 'churning' of physicians within this system of unregulated 'physician assessment' businesses and state medical boards subjugate to Defendant FSMB is an illegal monopolistic racketeering cartel.

448. I admit that I know that within **The Kaul Cases**, this cartel is termed the **"Federation Cartel" ("FC").**

449. I admit that I know the **"FC"** constitutes a **"racketeering enterprise"** through which is perpetrated a **"pattern of racketeering"** in the commission of, amongst other things, the RICO predicate acts of wire fraud and theft.

450. I admit that I have in a knowingly illegal manner aided and abetted, and continue to aid and abet the enterprises' **"pattern of racketeering".**

451. I admit that the sole purpose of perpetrating the **"pattern of racketeering"** is to profit through the exploitation and at the expense of physicians being 'churned' through the **"FC"** and its subjugate state medical board members and 'physician assessment' businesses.

452. I admit I know that this exploitation of which I am a willing participant has caused and continues to cause immense harm to the life/liberty/property/reputation of Plaintiff Kaul.

453. I admit I know that the illegal injury to Plaintiff Kaul's life/liberty/property/reputation commenced in or before 2012 and is ongoing in 2024.

454. I admit I know that this exploitation of which I am a willing participant has caused and continues to cause immense harm to the life/liberty/property/reputation of many other physicians.

455. I admit that despite knowing I was conflicted I took the $14,500 and enrolled Plaintiff Kaul in the virtual 'physician assessment' course.

456. I admit that the virtual 'physician assessment' course was conducted on February 22 and 23, 2023.

457. I admit that the knowingly fraudulent virtual 'physician assessment' course was conducted across the US wires.

458. I admit I know that my use of the US wires to perpetrate a knowingly illegal scheme constitutes a violation of the wire fraud act.

459. I admit I knew it was my purpose to fail Plaintiff Kaul regardless of the content of the evaluation.

460. I admit I knew this fraudulent predetermination did constitute a violation of Plaintiff Kaul's human/civil/constitutional rights.

461. I admit I knew this fraudulent predetermination would cause further injury to Plaintiff Kaul's life/liberty/property/reputation.

462. I admit that I believed my commission of these crimes would likely go unexposed because Plaintiff Kaul would not ascertain that the three (3) assessment physicians (Harned/Brown/Ajay) were conflicted consequent to their being senior board members of **The Kaul Cases** Defendant, ASIPP.

463. I admit that I believed Plaintiff Kaul's non-ascertainment of the conflicted-ness of Harned/Brown/Ajay in conjunction with their preordained fail reports would prevent Plaintiff Kaul from procuring his Pennsylvania license.

464. I admit I knew that if Plaintiff Kaul's procurement of his Pennsylvania license would strengthen his economic position and facilitate his prosecution of **The Kaul Cases**.

465. I admit I knew and know that Plaintiff Kaul's prosecution of **The Kaul Cases** would ultimately cause to be fully exposed all the facts of the crimes of **The Kaul Cases** Defendants.

466. I admit I knew and know these crimes to include amongst other things, wire fraud/money laundering/kickbacks/public corruption/obstruction of justice/kidnapping/false indictment/false arrest/false imprisonment/attempted killing/bribery/evidential tampering/witness tampering/perjury.

467. I admit that the content of Plaintiff Kaul's evaluation indisputably proved that his knowledge, skills and competence in the fields of interventional pain and minimally invasive spine surgery exceeded all relevant standards.

468. I admit that I knew that the only recording of the virtual hearing was in my possession because in the contract with Plaintiff Kaul I stipulated he not record the virtual assessment and that no other witnesses be present.

469. I admit I knew the purpose of these tactics were to prevent Plaintiff Kaul from procuring evidence of the fraud as I was planning to commit.

470. I admit I knew that in June/July 2022, Plaintiff Kaul had recorded a virtual assessment with K11-8 Defendant, PACE, which proved the fraudulence of their October 2022 report, the fraudulence of which constituted an element of the K11-8 RICO charge.

471. I admit my purpose in preventing Plaintiff Kaul from recording the virtual assessment was to ensure my fraud would go undetected.

472. I admit that just prior to and during the February 22/23 virtual assessments, I remained in conspiracy with **The Kaul Cases** Defendants, for the purpose of ensuring I failed Plaintiff Kaul.

473. I admit that subsequent to the completion of the February 22/23 virtual assessments, and recognizing the superiority of the evaluation, I conspired with the physician evaluators to issue knowingly false reports that failed Plaintiff Kaul.

474. I admit knew this scheme was illegal, but did nonetheless perpetrate it because I was convinced Plaintiff Kaul would not expose the conflicted-ness of Drs. Harned/Brown/Ajay.

475. I admit that despite knowing the scheme was illegal, I knew it was critical to attempt to obstruct the issuance of Plaintiff Kaul's Pennsylvania license, an obstruction that would deny him access to capital and hinder his prosecution of **The Kaul Cases**.

476. I admit I knew and know that **The Kaul Cases** Defendants principal concern, other than civil monetary liability, is potential criminal prosecution.

477. I admit I knew and know this because I entered and have remained in conspiracy with **The Kaul Cases** Defendants from January 2023 onwards.

478. I admit that since having joined the conspiracy in January 2023, I have exchanged both digital and non-digital communications with **The Kaul Cases** Defendants regarding, amongst other things, the commission of the crimes 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.

479. I admit I know that since having joined **The Kaul Cases** Defendants RICO conspiracy (2005-2024) in 2023, the law holds me as guilty of these crimes as if I had committed them myself.

480. I admit I was motivated to join **The Kaul Cases** Defendants RICO conspiracy because I believed my attempt to obstruct Plaintiff Kaul would 'save' **The Kaul Cases** Defendants, an act I believed would permit the **"FC"** to continue its profit purposed 'churning' of physicians.

481. I admit I believed the continued profit purposed 'churning' of physicians would not only maintain my business but that referrals to my business would increase compared to other so called 'physician assessment' businesses.

482. I admit that the digital and non-digital communications exchanged between myself and **The Kaul Cases** Defendants within the conspiracy include, amongst other things, emails/texts and recorded video calls.

483. I admit that these communications substantiate the levied charges.

484. I admit that at the end of May, 2024, Plaintiff Kaul discovered that Harned/Brown/Ajay were conflicted consequent to them being senior board members of **The Kaul Cases** Defendant, ASIPP.

485. I admit that Plaintiff Kaul informed me via email of this conflict.

486. I admit that my failure to deny Plaintiff Kaul's enquiry as to my knowledge of this conflict did cause my admittance of the knowledge.

487. I admit that Plaintiff Kaul suggested the course be reconducted with physicians with no conflicts of interest.

488. I admit I denied Plaintiff Kaul's request for the course to be reconducted with physicians with no conflicts of interest.

489. I admit the reason I denied the request was that I knew, based on the content of Plaintiff Kaul's evaluation, that an impartial and non-conflicted physician would pass Plaintiff Kaul.

490. I admit I knew I could not take the risk of having Plaintiff Kaul pass the course.

491. I admit that if Plaintiff Kaul passed the course, he would procure his Pennsylvania license, the procurement of which would facilitate his prosecution of **The Kaul Cases** Defendants, a prosecution that would expose them to criminal indictments.

492. I admit that I denied Plaintiff Kaul's request by claiming that he was not a **"suitable candidate"** for reconsideration.

493. I admit that I returned the $14,500.

494. I admit I did not provide Plaintiff Kaul copies of any documents in his file.

May 2023 to November 2024

495. I admit I assumed that by returning the $14,500 me having joined **The Kaul Cases** Defendants conspiracy would not be exposed by Plaintiff Kaul.

495. I admit my assumption was wrong.

496. I admit that on November 20, 2023 I was sued in K11-17.

497. I admit I knew and know that my failure to deny any of the facts pled within K11-17 did cause those facts to become admitted pursuant to Rule 8(b)(6) for all purposes.

498. I admit I knew and know that the factual foundation of K11-17 extends back to 2005.

499. I admit I knew and know that pursuant to RICO I am as liable for the facts substantiating the crimes predating my 2023 entry into the conspiracy.

500. I admit that I did not deny the levied facts/charges because I am guilty of the facts/charges.

501. I admit that I knew and know that had I denied the levied charges/facts of which I am guilty I would have committed perjury.

502. I admit that in K11-17, the district court did, on March 13, 2024 enter an ORDER FOR DISCOVERY (K11-17: D.E. 65).

503. I admit that in K11-17 I in collusion and conspiracy with the K11-17 Defendants did harass/intimidate/corrupt the judicial process in to prevent discovery and have K11-17 dismissed, in order to attempt to prevent the further emergence of evidence of the crimes of **The Kaul Cases** Defendants.

504. I admit that the process of harassment/intimidation/corruption involved certain members of the political body.

505. I admit that the dismissal of K11-17 was based in part on the illegal September 12, 2022 'injunction' issued by K11-23 Defendant Oetken.

506. I admit that consequent to the March 13, 2024 ORDER FOR DISCOVERY in K11-17, the K11-17 Defendants coerced K11-23 Defendant Oetken into threatening Plaintiff Kaul with contempt if he did not dismiss K11-17 by March 29, 2024.

507. I admit that being in collusion and conspiracy with the K11-17 Defendants, I came to know that K11-23 Defendant Oetken had been threatened by **The Kaul Cases** Defendants with having details of his prior criminal acts and personal life exposed if he did not follow their orders.

508. I admit that I know that **The Kaul Cases** Defendants applied immense and knowingly illegal pressure on the judicial process and officers to have the March 13, 2024 discovery order stayed and K11-17 dismissed.

509. I admit I know that **The Kaul Cases** Defendants have attempted to destroy evidence in the years since the commencement of the conspiracy (2005-2024).

510. I admit I know **The Kaul Cases** Defendants have conspired with Third-Party Witnesses to attempt to cause them to destroy evidence.

511. I admit I know that the K11-20 Defendants have been informed by many of the Third-Party Witnesses and or their agents that they have preserved evidence of the crimes (2005-2024).

512. I admit that on or about August 26, 2024 I came to know that Plaintiff Kaul had filed K11-20.

513. I admit that on August 30, 2024 I came to know that the Court had entered an 'ORDER FOR CONFERENCE AND DISCLOSURE OF INTETESTED PARTIES'.

514. I admit that consequent to the August 30, 2024 'ORDER FOR CONFERENCE AND DISCLOSURE OF INTETESTED PARTIES' I, in collusion and conspiracy with the K11-20 Defendants did attempt to perpetrate the same scheme of knowingly illegal pressure upon the political and judicial body as we had done in K11-17 and almost every prior case of **The Kaul Cases**.

515. I admit I know that **The Kaul Cases** Defendants schemes of politico-judicial corruption account for the fact that have not yet been indicted for their crimes.

516. I admit I know that it was the same scheme of politico-judicial corruption that had protected other powerful offenders from criminal prosecution.

517. I admit that the K11-20 Defendants attempted to perpetrate the same politico-judicial corruption scheme as they had in K11-17.

518. I admit I know the scheme failed in K11-20.

519. I admit that the K11-20 Defendants then attempted to perpetrate the same K11-7 'injunction' related contempt scheme involving K11-23 Defendant Oetken as they had in K11-17.

520. I admit I know the scheme failed in K11-20.

521. I admit I know that with the failure of the contempt and politico-judicial corruption schemes, the other K11-20 Defendants did, in the context of discussions of defense strategy, admit that their admissions of fact in K11-20 did substantiate entry of Summary Judgment.

522. I admit it was these discussions that resulted in our current defense strategy in which I entered the case and complied with the Court's August 30, 2024 discovery order, while the other Defendants filed motions to dismiss based on the knowingly illegal September 12, 2022 'injunction' in K11-7.

523. I admit I know that the other K11-20 Defendants know that the basis of their motions to dismiss has been permanently nullified by the facts contained within K11-23.

524. I admit I know that the other K11-20 Defendants know that they are guilty of the levied charges/facts.

525. I admit I know that pursuant to RICO's doctrine of vicarious liability I am therefore guilty of the levied charges/facts.

526. I admit that my failure to deny the facts in K11-17 and in K11-20 did cause those facts to become admitted for all purposes.

527. I admit that I have failed to deny those facts because I am guilty of the levied charges/facts.

528. I admit I know therefore that I too am subject to Summary Judgment.

529. I admit that there my industry, as with the state medical board industry must comply with the Constitution.

530. I admit that my industry, as with the state medical board industry must continue to prove its ongoing compliance with the Constitution and Constitutional rights of physicians.

531. I admit that one of the reasons my industry must continue to prove its compliance with the Constitution is that it substantially and directly affects the life/liberty/property/reputation of physicians.

532. I admit that one of the reasons my industry must continue to prove its compliance with the Constitution is that it substantially and directly affects the life/liberty/property/reputation of physicians and indirectly the lives of millions of patients under the care of affected physicians.

DATED: OCTOBER 29, 2024

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

v.

CIVIL ACTION: NO.: 24-CV-03180 (AHB)

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.

ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT FEDERATION OF STATE MEDICAL BOARDS

Respectfully Submitted

R.K_1

RICHARD ARJUN KAUL, MD

SEPTEMBER 18, 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)

For ease of reference Defendant FSMB will be referred to as "**I**"

Admission Of Guilt

1. I admit that I am guilty of all the facts and charges levied against me in all sections of the Complaint.

2. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed against Plaintiff Kaul, as they are as liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

3. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from '**PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF**.

4. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

5. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

6. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: '**STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW**'

7. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

8. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS

9. I admit that I procured copies of Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

10. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS

11. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS

Purpose Of Schemes And Violations

12. I admit that the purpose of the below admitted to and detailed schemes and conspiracies was the elimination of Plaintiff Kaul's life/liberty/property and reputation.

13. I admit that an element of the method and or mechanism of the schemes/conspiracies involved the knowing and willful violation of law.

14. I admit that an element of the method and or mechanism of the schemes/conspiracies involved the knowing and willful violation of Plaintiff Kaul's human/civil/constitutional rights.

15. I admit that the principal motive for the schemes/conspiracies was to eliminate Plaintiff Kaul from and the competition he presented to the minimally invasive spine surgery market.

16. I admit that the tactics used to eliminate Plaintiff Kaul from, and the competition he presented to the minimally invasive spine surgery market, were knowingly illegal.

17. I admit that the knowingly illegal tactics were anti-competitive.

18. I admit that the knowingly illegal tactics did violate Plaintiff Kaul's human/civil/constitutional rights.

Context To Schemes And Violations

19. I admit that I am a corporation.

20. I admit that I promote myself as a not-for-profit corporation.

21. I admit that I know my promotion of myself as a not-for-profit corporation is a lie.

22. I admit that I profit from the multi-billion-dollar business of physician education.

23. I admit that I profit from the multi-dollar business of physician credentialling.

24. I admit that I profit from the multi-dollar business of physician licensing.

25. I admit that I profit from the multi-dollar business of so-called physician disciplining.

26. I admit that I was created in approximately 1912 by industrialists involved in the rail roads and petrochemical industry.

27. I admit that a purpose of my creation was to control physicians.

28. I admit that the purpose of controlling physicians was to coerce, force and intimidate them into supporting the commercial agendas of initially pharmaceutical corporations.

29. I admit that I know that many pharmacological agents are manufactured from components obtained from the fossil fuel and petrochemical industry.

30. I admit that I know that Andrew Carnegie and other then industrialists were known as 'robber barons'.

31. I admit that the basis for this moniker pertained to their philosophy of for-profit exploitation of the American public.

32. I admit that I am a product of this philosophy.

33. I admit that my business philosophy and practice is that of a for-profit system that exploits the American medical profession.

34. I admit that my business philosophy and practice is that of a for-profit system that exploits the American public.

35. I admit that from 1912 onwards I played a critical role in manipulating the educational agenda at American medical schools.

36. I admit that this manipulation involved a 'brain washing' of medical students that so called alternative therapies were not to be prescribed.

37. I admit that this manipulation as to alternative therapies became increasingly enforced with punitive actions against the licenses of physicians who did prescribe alternative therapies.

38. I admit that this enforcement of punitive measures became more prominent in the 1950s as the petrochemical industry became more profitable.

39. I admit that an element of my strategy of harassment, intimidation and enforcement was the threat to physicians of having their licenses suspended and or revoked.

40. I admit that in approximately the 1960s/70s I recognized that to procure complete and absolute power over all physicians in the United States, I had to first seize control of all state medical boards.

41. I admit that I knew that in seizing complete control of all physicians in the United States I would profit immensely from monies funneled to me from for-profit corporations in the healthcare sector.

42. I admit I knew that these for-profit corporations were located in the pharmaceutical industry, the hospital industry and the insurance industry.

43. I admit that commencing in or around the early to mid 1970s, if not sooner, I entered into a series of quid pro quo schemes with these for-profit corporations.

44. I admit that a central element of the quid pro quo schemes was that I would order my subjugate state medical boards to suspend and or revoke the licenses of physicians whose practices either threatened or failed to support the corporate agendas of the pharmaceutical/hospital/insurance industries.

45. I admit that in seeking to procure absolute control of state medical boards, I used tactics of bribery, coercion and political intimidation.

46. I admit that I know that state medical board members are political appointees and are appointed by state governors.

47. I admit that I know that state medical board members can be dismissed from state medical boards by the state governor at will and without cause.

48. I admit that I know that state senates have no control over which persons are appointed to state medical boards.

49. I admit that my control of state medical boards was achieved through a corruption of the political process, in which I would funnel bribes to certain state gubernatorial candidates.

50. I admit that by procuring control of state governors I procured control of persons appointed to state medical boards.

51. I admit that by procuring control of persons appointed to state medical boards I procured control of the decisions they made as to which physicians' licenses were suspended and or revoked.

52. I admit that the 'hit list' of which physicians' licenses were to be suspended and or revoked was provided to me by agents of the for-profit healthcare corporations.

53. I admit that this list was based purely on an identification of which physicians either threatened or failed to support the corporate agendas.

54. I admit that in a period from the 1970s to the 1990s this scheme became more elaborate and punitive.

55. I admit that in order to deceive the public into believing I was having suspended and or revoked the licenses of supposedly 'bad apple physicians', I, in conjunction with public relations corporations, developed a media strategy.

56. I admit that this media strategy involved using the media to publicize and disseminate knowingly false negative stories about targeted physicians.

57. I admit that the purpose of this media strategy was to provide cover for what I knew was an illegal scheme.

58. I admit that I knew and know that my quid pro quos with for profit corporations in the healthcare sector did constitute a **"pattern of racketeering".**

59. I admit that I knew that this **"pattern of racketeering"** was illegal.

60. I admit that I knew that despite knowing of the illegality of this **"pattern of racketeering"** I did nonetheless persist in its perpetration because it was never challenged.

61. I admit that in a period from the 1970s onwards, other than the challenges levied by Plaintiff Kaul, there has not been one challenge to the illegality of my **"pattern of racketeering"**.

62. I admit that in recognizing the lack of any challenges I did continue to expand my control of the annual $4.5 trillion dollar industry of American healthcare.

63. I admit that my scheme to expand control involved and involves corruption of the administrative state medical board system, the state/federal political system and the state/federal judicial systems.

64. I admit that commencing in the 1990s, my scheme to procure absolute control of the state medical board system has involved capturing these entities through schemes of bribery.

65. I admit that one of the specific tactics of this capturing schemes has been the appointment of state medical board executives to my board, the board of Defendant FSMB.

66. I admit that in having appointed the executives of state medical boards to the board of Defendant FSMB, every and all dictate that I am bribed to issue will be unquestionably implemented because I have aligned the ruthless commercial interests of Defendant FSMB with those of the state medical board executives and for-profit health are corporations.

67. I admit that it has taken approximately thirty (30) years to manipulate the American physician licensing system into a system whose only purpose, mission and philosophy pertain to increasing Wall Street based corporate/shareholder profit.

68. I admit that I have no concern for the health and welfare of the American public.

69. I admit that my only concern is the generation of profit and money.

70. I admit that I know my generation of profit and money occurs through a ruthless exploitation of the American public and medical profession.

71. I admit that the so-called opiate epidemic was a direct consequence of my having engaged in the late 1990s in qui pro quo schemes with opiate manufacturers.

72. I admit that these opiate quid pro quo schemes involved the funneling of bribes from the pharmaceutical industry in return for which I ordered state medical boards to suspend and or revoke the licenses of physicians who either refused to dispense opiates or did noy dispense enough.

73. I admit that this scheme was exposed in a December 2016 report by the US Senate on the epidemic of opiate death overdoses.

74. I admit that a more recent scheme pertained to the so called COVID 'vaccine', in which I used the same strategy/tactics of license suspension/revocation to coerce and force physicians to inoculate the American public with a knowingly toxic mRNA chemical.

75. I admit that state medical boards suspended and or revoked the licenses of physicians who published online articles as to the immense/permanent risks of these untested chemicals.

76. I admit that in none of **The Kaul Cases**, have I denied any of the allegations/facts.

77. I admit that the reason I did not deny any of the allegations/facts is because they are true.

78. I admit that in my knowledge of the truth of the allegations/facts, I would have committed perjury if I had denied any of the allegations/facts.

79. I admit that in seeking to avoid the commission of perjury, I and **The Kaul Cases** Defendants did perpetrate schemes of political/judicial corruption, that were purposed to and did in fact cause the illegal dismissal of cases.

80. I admit that in seeking to avoid the commission of perjury, I and **The Kaul Cases** Defendants did perpetrate schemes of political/judicial corruption, that were purposed to and did in fact cause the entry of a knowingly illegal purported 'injunction' by a judge in the Southern District of New York.

81. I admit that I have knowledge that this judge was and is the subject of civil litigation and investigations by his state bar and judicial disciplinary council for offenses committed against not only Plaintiff Kaul but multiple prior litigants, for having participated in schemes of public corruption.

Facts Admitted In K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17 As Proof Of Claims In K11-20

82. 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 **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**, are facts unambiguously asserted in support of the claims levied against me in K11-20 by Plaintiff Kaul.

83. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K5** on October 1, 2019 (KE: D.E. 1-1).

84. 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 both complaints.

85. I admit that in **K5** on July 30, 2020, I filed a procedural motion (K5: D.E. 127) to dismiss the COMPLAINT without denying facts that now constitute an element of the factual foundation of K11-20.

86. I admit that in **K5** I filed no opposition to Plaintiff Kaul's reply to my motion to dismiss, and continued to fail to deny the facts that now constitute an element of the factual foundation of K11-20.

87. I admit that in **K5**, the district court did not dismiss Plaintiff Kaul's claims against me in the District of Columbia.

88. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K7** on June 18, 2020. I admit that in **K7** I comprehended the nature, character and meaning of the facts asserted against me in the Complaint.

89. I admit that in **K7** I filed no opposition to Plaintiff Kaul's claims against me, the facts of which now constitute an element of the factual foundation of K11-20.

90. I admit that in **K7** on January 27, 2021, the court entered DEFAULT against me in a case in which I failed to deny facts that now constitute an element of the factual foundation of K11-20.

91. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K11-1** on January 11, 2021.

92. I admit that in **K11-1** I comprehended the nature, character and meaning of the facts asserted against me in the Complaint.

93. I admit that in **K11-1** I filed no motion to dismiss the COMPLAINT and did not deny the facts that now constitute an element of the factual foundation of K11-20.

94. I admit that in **K11-1** I did not deny Plaintiff Kaul's allegations and continued to fail to deny the facts that now constitute an element of the factual foundation of K11-20.

95. 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).

96. I admit that in **K11-4** I was represented by counsel, who clarified and explained to me the nature, character and meaning of the facts asserted against me in the Complaint.

97. I admit that in **K11-4** on April 29, 2021, I filed a procedural motion (K11-4: D.E. 25) to stay discovery and other deadlines without denying facts that now constitute an element of the factual foundation of K11-20

98. I admit that in **K11-4** I filed no opposition to Plaintiff Kaul's allegations, while continuing to fail to deny facts that now constitute an element of the factual foundation of K11-20.

99. 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.

100. I admit that pursuant to Rule 8(b)(6), my failure to deny the facts pled in K11-4 did cause these facts to become admitted for all purposes, including proof of claims in K11-20.

101. I admit that in **K11-4**, the district court did not dismiss Plaintiff Kaul's claims against me, but simply transferred them from the District of Connecticut to the District of New Jersey.

102. I admit that in **K11-4** on May 6, 2021, my co-Defendants 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).

103. I admit that on May 12, 2021, in **K11-4** the District of New Jersey threatened Plaintiff Kaul with sanctions and or contempt if he attempted to procure discovery from myself and or the other Defendants (K11-4: D.E. 9 – 21-CV-09788-DNJ).

104. I admit that in **K11-4** on July 13, 2021, Plaintiff Kaul voluntarily dismissed the case from the District of New Jersey-Newark Vicinage (K11-4: D.E. 24 – 21-CV-09788)

105. I admit I know that the district judge assigned to **K11-4** in the District of New Jersey did recently depart the federal bench and become a partner at the law firm of Jeffrey Chiesa, who

was Defendant Christie's 2012 NJ AG, and the person who prosecuted the 2013 revocation case against Plaintiff Kaul.

106. 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).

107. 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.

108. I admit that in **K11-7** on October 26, 2021, I filed a procedural motion (K11-7: D.E. 70) to dismiss the COMPLAINT without denying facts that now constitute an element of the factual foundation of K11-20.

109. I admit that in **K11-7** on November 29, 2021, my RICO co-defendants 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.

110. I admit that in **K11-7** I filed a reply to Plaintiff Kaul's reply to my motion to dismiss, but continued to fail to deny the facts that now constitute an element of the factual foundation of K11-20. (K11-7: D.E. 98).

111. I admit my failure to deny any of the facts pled in **K11-7** did, pursuant to Rule 8(b)(6), cause the facts to become admitted for all purposes, including that of moving for Summary Judgment in K11-20.

112. 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.

113. 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).

114. 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.

115. I admit that in **K11-10** on April 27, 2023, I filed a procedural motion (K11-10: D.E. 12) to dismiss the COMPLAINT without denying facts that now constitute an element of the factual foundation of K11-20.

116. I admit that in **K11-10** I did not file a reply to Plaintiff Kaul's May 2, 2023, reply to my motion to dismiss, but I continued to fail to deny the facts that now constitute an element of the factual foundation of K11-20.

117. 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.

118. I admit my failure to deny any of the facts pled in **K11-10** did, pursuant to Rule 8(b)(6), cause the facts to become admitted for all purposes, including that of moving for Summary Judgment in K11-20.

119. 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).

120. 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.

121. I admit that in **K11-14** on August 3, 2023, I filed a procedural motion (K11-14: D.E. 17) to dismiss the COMPLAINT without denying facts that now constitute an element of the factual foundation of K11-20.

122. I admit my failure to deny any of the facts pled in **K11-14** did, pursuant to Rule 8(b)(6), cause the facts to become admitted for all purposes, including that of moving for Summary Judgment in K11-20.

123. 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, voluntary appellate dismissal, did I deny facts that now constitute an element of the factual foundation of K11-17.

124. I admit that I read the COMPLAINT filed against me by Plaintiff Kaul in **K11-17** on November 20, 2023, (K11-17: D.E. 1).

125. I admit that in **K11-17** 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.

126. I admit that in **K11-17** on January 31, 2024, I filed a procedural motion (K11-17: D.E. 44 to dismiss the COMPLAINT, but without denying facts that now constitute an element of the factual foundation of K11-20.

127. I admit that in **K11-17** I did not file a reply to Plaintiff Kaul's February 2, 2024, reply to my motion to dismiss, but I continued to fail to deny the facts that now constitute an element of the factual foundation of K11-20.

128. I admit my failure to deny any of the facts pled in **K11-17** did, pursuant to Rule 8(b)(6), cause the facts to become admitted for all purposes, including that of moving for Summary Judgment in K11-20.

129. I admit that I know that in filing the procedural motions in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** from 2019 to 2023 to sever/transfer/stay/dismiss I had the right to deny the facts asserted by Plaintiff Kaul.

130. 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 2024.

131. I admit I know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the offenses/violations/injuries caused by **The Kaul Cases** Defendants to Plaintiff Kaul's life/liberty/property/reputation, as if I had directly committed them.

132. I admit I know that pursuant to RICO's doctrine of vicarious liability, The Kaul Cases Defendants are as liable for the offenses/violations/injuries caused by me to Plaintiff Kaul's life/liberty/property/reputation, as if they had directly committed them.

133. I admit that I know that I had the right to file summary judgment motions in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** to dismiss the complaints and or amended complaints.

134. I admit that I did not file summary judgment motions to dismiss the complaints and or amended complaints.

135. 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.

136. I admit that all the facts of **The Kaul Cases** (2016-2024) are admitted pursuant to Rule 8(b)(6) for all purposes and Rule 36 because none of the facts have ever been denied by any of the Defendants.

137. I admit that in 2024 the fact that the entire corpus of fact within **The Kaul Cases** is admitted is entirely consistent with the fact that neither I nor any of **The Kaul Cases** Defendants ever denied any of the facts nor filed summary judgment motions for dismissal in a period from 2016 to 2024.

K11-17

138. I admit that there exists a commonality of factual foundation between K11-17 and K11-20.

139. I admit that there exists a difference of factual foundation between K11-17 and K11-20 of three hundred and three (303) -days' worth of ongoing**/"new"** injury to Plaintiff Kaul's life/liberty/property/reputation (November 20, 2023, to September 18, 2024).

140. I admit that in the period between the filing of K11-17 and K11-20, there has emerged from SCOTUS the new controlling authorities of Jarkesy v SEC and Loper Bright v Raimondo.

141. I admit that Jarkesy further establishes that the 2014 NJ revocation was/is illegal.

142. I admit that Loper establishes that the jurisdiction of remedy rests with the United States District Court

143. I admit that all of the facts proven in K11-17 for all purposes are now proven in K11-20.

144. I admit that the application of the new law of Jarkesy and Loper to the proven facts in K11-20 does substantiate Summary Judgment against all Defendants including myself.

145. I admit that all opinions and orders that were either based on, referenced and or incorporated the illegal 2014 NJ revocation are null and void and without any legal effect.

146. I admit that the September 12, 2022, opinion in K11-7 was based on/incorporated the illegal 2014 NJ revocation, and is thus null and void and without legal effect.

147. I admit that the facts of conspiracy, which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

148. I admit that the facts of bankruptcy fraud which were proven pursuant to Rule 8(b)(6) in **K5/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

149. I admit that I did in a time period between 2014 to the present abuse the power of the bankruptcy trustee 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"**.

150. I admit that the facts of securities fraud which were proven pursuant to Rule 8(b)(6) in **K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

151. I admit that I did in a time period between 2014 to 2020, and in conspiracy and collusion with Defendant Allstate abuse or caused to be abused the power of the trustee's office to facilitate/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"**.

152. I admit that the facts of mail fraud which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

153. I admit that I did in a time period between 2012 to the present abuse or cause to be abused 'state actor' power to engage/perpetrate/aid and abet a knowingly illegal mail fraud scheme against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

154. I admit that the facts of wire fraud which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

155. I admit that I did in a time period between 2012 to the present I did abuse or cause to be abused 'state actor' power to engage/perpetrate/aid and abet a knowingly illegal wire fraud scheme against Plaintiff Kaul as part of an ongoing **"pattern of racketeering"**.

156. I admit that I know the facts of embezzlement which were proven pursuant to Rule 8(b)(6) in **K5/K11-1/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

157. I admit that I did in a time period between 2012 to the present, and in conspiracy and collusion with Defendant Allstate I did abuse or caused to be abused 'state actor' power 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"**.

158. I admit that I know the facts of perjury which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

159. I admit that I did in a time period between 2008 to the present, and in conspiracy and collusion with **The Kaul Cases** Defendants did abuse 'state actor' power to 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"**.

160. I admit that I know the facts of bribery which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

161. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants did abuse 'state actor' power 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"**.

162. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants did abuse 'state actor' power 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"**.

163. I admit that I know the facts of kickbacks which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

164. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

165. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

166. I admit that I know the facts of obstruction of justice which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

167. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of obstruction of justice against Plaintiff Kaul perpetrated within administrative agencies of the State of New Jersey and state medical boards as part of an ongoing **"pattern of racketeering"**.

168. I admit that the illegal obstruction of justice scheme was specifically perpetrated within Defendant FSMB's the subjugate state medical boards to prevent Plaintiff Kaul from procuring a license or having his illegally revoked NJ license reinstated.

169. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

170. I admit that the illegal obstruction of justice scheme within the administrative/state/bankruptcy/federal courts was purposed to prevent Plaintiff Kaul from further exposing evidence of my crimes and those of **The Kaul Cases** Defendants, crimes against humanity, the detail of which neither Plaintiff Kaul nor the public have any knowledge.

171. I admit that I know the facts of public corruption which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

172. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of public corruption against Plaintiff Kaul perpetrated within administrative agencies of the State of New Jersey and state medical boards as part of an ongoing **"pattern of racketeering"**.

173. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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"**.

174. I admit that I know the facts of judicial corruption which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

175. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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 United States as part of an ongoing **"pattern of racketeering"**.

176. I admit that I know facts of human rights violations which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

177. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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 and state medical boards as part of an ongoing **"pattern of racketeering"**.

178. I admit that I did in a time period between 2008 to the present and in collusion and conspiracy with **The Kaul Cases** Defendants abuse 'state actor' power 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 United States as part of an ongoing **"pattern of racketeering"**.

179. I admit that I know the facts of civil rights violations which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

180. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of civil rights violations against

Plaintiff Kaul perpetrated within agencies of the United States and state medical boards as part of an ongoing **"pattern of racketeering"**.

181. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

182. I admit that I know the facts of constitutional rights violations which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

183. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of constitutional rights violations against Plaintiff Kaul perpetrated within agencies of the United States and state medical boards as part of an ongoing **"pattern of racketeering"**.

184. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

185. I admit that I know the proven facts of evidence tampering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

186. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of evidence tampering against Plaintiff Kaul perpetrated within agencies of the United States and the States as part of an ongoing **"pattern of racketeering"**.

187. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

188. I admit that I know the proven facts of witness tampering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

189. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of witness tampering against Plaintiff Kaul perpetrated within agencies of the United States and the States as part of an ongoing **"pattern of racketeering"**.

190. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

191. I admit that I know the proven facts of kidnapping which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

192. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

193. I admit that I know the proven facts of false indictment which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

194. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

195. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

196. I admit that I know the proven facts of false arrest which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.
I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

197. I admit that I know the proven facts of false imprisonment which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

198. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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"**.

199. I admit that I know the proven facts of false prosecution which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

200. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of false prosecution against Plaintiff Kaul perpetrated within agencies of the United States and the State of New Jersey as part of an ongoing **"pattern of racketeering"**.

201. I admit that I know the proven facts of fraud committed against the public and physicians by insurance companies which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

202. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and the States as part of an ongoing **"pattern of racketeering"**.

203. I admit that I know the proven facts of retaliation which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

204. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of retaliation against Plaintiff Kaul perpetrated within agencies of the State of New Jersey and States as part of an ongoing **"pattern of racketeering"**.

205. I admit that I did in a time period between 2008 to the present I did abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of retaliation against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the United States and State of New Jersey as part of an ongoing **"pattern of racketeering"**.

206. I admit that I know the proven facts of illegal seizure of property which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

207. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of illegal seizure of property against Plaintiff Kaul perpetrated within/by agencies of the United States and State of New Jersey as part of an ongoing **"pattern of racketeering"**.

208. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of illegal seizure of property against Plaintiff Kaul perpetrated within administrative/state/bankruptcy/federal courts within the geographic boundaries of the United States and State of New Jersey as part of an ongoing **"pattern of racketeering"**.

209. I admit that I know the proven facts of honest services fraud which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

210. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of honest services fraud against Plaintiff Kaul and the public perpetrated within/by agencies of the United States and States as part of an ongoing **"pattern of racketeering"**.

211. I admit that I know the proven facts of racketeering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

212. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of racketeering against Plaintiff Kaul and the public perpetrated within/by agencies of the United States and States as part of an ongoing **"pattern of racketeering"**.

213. I admit that I know the proven facts of market manipulation which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

214. I admit that I did in a time period between 2008 to the present abuse 'state actor' power to engage/conduct/aid and abet a knowingly illegal scheme of market manipulation against Plaintiff Kaul and the public perpetrated by agencies of the United States and States as part of an ongoing **"pattern of racketeering"** within the NYSE.

215. I admit that I did in a time period between 2008 to the present abuse 'state actor' power 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 United States and State of New Jersey as part of an ongoing **"pattern of racketeering"** within the NYSE.

216. I admit that I did in a time period between 2008 to the present abuse 'state actor' power in a knowingly fraudulent manner to 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 United States and the State of New Jersey.

217. I admit that I did in a time period between 2008 to the present abuse 'state actor' power in a knowingly fraudulent manner to 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 United States and the State of New Jersey.

218. I admit that I know the proven facts of money laundering which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

219. I admit that as a 'state actor' I did in a time period between 2008 to the present abuse or cause to be abused state power to perpetrate/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"**.

220. 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"**.

221. 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"**.

222. I admit that I know the proven facts of crimes against humanity which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

223. 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"**.

224. 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"**.

225. 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

226. I admit that these thousands of patients were victims of a crime against humanity in which I participated and continue to participate.

227. I admit that I know that hundreds of these invalided patients, many without insurance, sent letters to Defendant Christie explaining the catastrophic effect the illegal revocation had on their lives and those of their families.

228. I admit I know that Defendant Christie ignored these pleas, knowing that he was committing/aiding and abetting/perpetrating a crime against humanity on invalided persons who were citizens of the State of New Jersey.

229. I admit I know Defendant Christie ignored these desperate pleas as he did not believe Plaintiff Kaul would expose the crimes against humanity committed by himself, me and **The Kaul Cases** Defendants.

230. I admit I know Defendant Christie ignored these desperate pleas as to have reinstated Plaintiff Kaul's license would have interfered with his gubernatorial/presidential ambitions.

231. I admit I know that Defendant Christie ignored these desperate pleas as none of these patients were sufficiently wealthy in monetary or voting numbers to be of use to his gubernatorial/presidential ambitions.

232. I admit I know that Defendant Christie discussed the letters with his political strategists, and they concluded that helping these invalided patients with no insurance would hinder their political campaigns.

233. I admit I know that Defendant Christie knew that the proven facts of violations of the Nuremberg Code are facts that are now proven in K11-20.

234. 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"**.

235. I admit I know that during Defendant Christie's tenure as the US Attorney for the District of New Jersey (2001-2009) through the New Jersey governorship (2009-2017), he 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 Defendant Christie received kickbacks, disguised as 'consulting-legal fees' and or political campaign donations.

236. I admit I know 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".**

237. 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.

238. I admit that the facts of these schemes (2001-2017) constitute further proof of the charges levied in K11-20.

239. I admit that I know the proven facts of attempted drugging-killing which were proven pursuant to Rule 8(b)(6) in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** are now proven in K11-20.

240. I admit I know that Defendant Christie 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"**.

241. I admit I know that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to domestic and international law.

242. I admit that the attempted drugging-killing constitutes a criminal violation of Plaintiff Kaul's human/civil/constitutional rights pursuant to the Nuremberg Code.

243. I admit that I have not denied any of the facts that constitute the proven **factual foundation of K11-20**

244. I admit that the reason I did not/have not denied the facts that constitute the proven **factual foundation of K11-20** is because they are true.

245. I admit that I know that I had and have the right to file a summary judgment motion in K11-20 to dismiss the Complaint.

246. I admit that I did not file a summary judgment motion to dismiss the Complaint.

247. 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 K11-20**.

248. I admit that in **K11-17** I did not deny any of the facts and or allegations.

249. I admit I knew that I had the right and opportunity to deny the facts and or allegations.

250. I admit that in **K11-20** I have not denied any of the facts and or allegations.

251. I admit I know that I have the right and opportunity to deny the facts and or allegations.

252. I admit I know that in or around late January 22, 2024, Defendant Christie did engage in exparte communications with persons/agents associated with persons/agents of the United States Court of Appeals for the 1st Circuit.

253. I admit I know that the purpose of these knowingly improper communication was to cause the generation of legal opinion regarding venue, that he believed would bolster his and my defense in K11-17 and cause dismissal.

254. I admit I know that this scheme was perpetrated without notice to Plaintiff Kaul in order to prevent Plaintiff Kaul from causing a nullification of the opinion.

255. I admit I know 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.

256. I admit I know that on February 15, 2024 (K11-17: D.E. 53) Defendant Christie submitted the improperly procured and knowingly erroneous opinion to the docket of the United States District Court for the Eastern District of North Carolina.

257. I admit I know 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.

258. I admit I know 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 he and I were being civilly prosecuted, did constitute further evidence of our guilt of the levied charges.

259. I admit that the reason Defendant Christie expended resources in having generated knowingly improper opinion from another circuit pertains to his knowledge of his and my guilt of the levied charges and his fear of further exposure through discovery of his prior criminal conduct.

260. I admit I know that in the perpetration of this scheme to obtain this knowingly improper opinion from another circuit, Defendant Christie did, with a knowing illegality, use the US wires to communicate details of the scheme with other Defendants and Third-Party Witnesses.

261. I admit I know that in these communications over the US wires it was decided that the appeal court's opinion would not reference his name or that of any of **The Kaul Cases** Defendants.

262. I admit I know that the purpose of having omitted names of any of **The Kaul Cases** 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.

263. I admit I know that the improperness/illegality of the scheme further evidences the guilt of **The Kaul Cases** Defendants of the levied charges.

264. I admit I know that his perpetration of this scheme is tantamount to an admission of the **factual foundation of K11-17 and K11-20**.

265. I admit that in K11-20 on August 30, 2024, the Court entered an ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES (K11-20: D.E. 4).

266. I admit that I, in collusion/conspiracy with the other Defendants have willfully/knowingly violated and continue to violate the order.

267. I admit that my willful/knowing violations of an order of the United States District Court constitute an act of obstruction of justice.

268. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that the facts were asserted directly at me.

269. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

270. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that I completely understood the nature, character and meaning of the facts.

271. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that I had/have direct knowledge of the truthfulness of the facts.

272. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the facts in that I was directly involved in the perpetration of the facts.

273. I admit that my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

274. I admit that my Rule 8(b)(6) related silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

275. I admit that the absence of any ambiguity in my silence in failing to deny the facts asserted by Plaintiff Kaul in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** does further substantiate the **factual foundation of K11-20**

276. I admit that my counsel clarified and explained to me the civil nature of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**.

277. I admit that I knew/know that **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** were/are civil proceedings with civil consequences.

278. I admit that there existed and exist no other factors to explain my silence in failing to deny the facts contained within **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** and or the **factual foundation of K11-20** other than my knowledge that the facts are true.

279. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

280. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

281. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

282. I admit that during the pendency of **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

283. 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 **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**, but I did not and have not, because they are true,

284. I admit that my knowledge of the truth of my guilt and of the facts asserted in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes the sole basis for my silence in failing to deny the facts

285. I admit that my knowledge of the truth of my guilt and of the facts asserted in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes the sole basis for my actual failure to deny the facts.

286. I admit that I know that if I were innocent of the charges levied in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

287. I admit that my Rule 8(b)(6) related failure to deny the facts asserted in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** constitutes an admission of the factual foundation of K11-20.

288. I admit that I read the judicial opinions/orders in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**.

289. 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 **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17**.

290. I admit that I understood and understand the nature, character and meaning of the August 30, 2024, ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES (K11-20: D.E. 4).

291. I admit that I know that the Court did not find that my silence in failing to deny the facts in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

292. I admit that I know that the Court did not find that my actual failure to deny the facts in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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.

293. I admit that I know that the Court in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/K11-17** did not find evidentially invalid my admissions of undisputed fact in K1, that were submitted into evidence in subsequent cases, because the Courts in **K5/K7/K11-1/K11-4/K11-7/K11-10/K11-14/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

294. I admit that I have read the attached document entitled 'Universal Declaration of Human Rights'

295. I admit that I have known about the 'Universal Declaration of Human Rights' since it was issued.

296. I admit that since first knowledge of the 'Universal Declaration of Human Rights' there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

297. I admit that since my participation in the process of physician education, credentialing and so-called disciplining there has been no diminution of my knowledge regarding the 'Universal Declaration of Human Rights'.

298. I admit the nature of my business involves the deprivation of physicians' livelihoods, lives, liberty and reputation.

299. I admit I know that the heart of these deprivations is the deprivation of fundamental human rights.

300. I admit I know the critical importance to my business and my ethical/moral obligations of knowing the 'Universal Declaration of Human Rights', because my business involves the deprivation of a physician's livelihood, life and liberty.

301. I admit I know the critical importance to my business and my ethical/moral obligations of knowing the correct application of the 'Universal Declaration of Human Rights' to matters involving the deprivation of a physician's livelihood, life and liberty.

302. I admit that depriving physicians of their livelihood, life and liberty for the sole purpose of increasing corporate profit constitutes a violation of international law.

303. I admit that depriving physicians of their livelihood, life and liberty for the sole purpose of increasing corporate profit constitutes a violation of American domestic law.

304. I admit that depriving physicians of their livelihood, life and liberty for the sole purpose of increasing corporate profit constitutes a crime against humanity.

305. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my obligated attendance at continuing legal and human rights education courses.

306. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my obligation to ensure my business of license revocation is conducted in accordance not only with the United States Constitution but also the 'Universal Declaration of Human Rights'.

307. I admit that the absence of diminution of my knowledge regarding the 'Universal Declaration of Human Rights' is a consequence of my legal obligation to ensure the protection of the human/civil/constitutional rights of all physicians whose licenses are suspended/revoked by my subjugate state medical boards.

308. I admit that I control for all intents and purposes all subjugate state medical boards.

309. I admit that my subjugate state medical boards are not sovereign entities, but are profit generating units of the **"Federation Cartel".**

310. I admit that the executive directors of the subjugate state medical boards are concurrently board members of Defendant FSMB.

311. I admit that when these individuals cease as executive directors of a subjugate state medical board, their board position on Defendant FSNB is terminated.

312. I admit that the liability any violation/injury caused by any subjugate state medical board becomes the liability of all subjugate state medical boards and the **"Federation Cartel".**

313. I admit that the doctrine of respondent superior does hold me liable for any violations of physicians human/civil/constitutional rights committed by mu subjugate state medical boards.

314. I admit that the obligatory continuing legal education courses involve modules on legal ethics and human rights.

315. 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.

316. 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.

317. I admit that I knew and know I was/am prohibited from actually violating Plaintiff Kaul's human/civil/constitutional rights.

318. I admit that I knew and know that it was illegal to conspire to violate Plaintiff Kaul's human/civil/constitutional rights.

319. I admit that I knew and know that it was illegal to actually violate Plaintiff Kaul's human/civil/constitutional rights.

320. 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.

321. 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.

322. 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.

323. 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 - 2024

324. I admit that I knew that my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, do substantiate an abuse of state power.

325. I admit that I knew I was a 'state actor' pursuant to a Section 1983 claim.

326. I admit that I knew Plaintiff Kaul retained human/civil/constitutional rights.

327. 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.

328. 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 K11-20.

329. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I became intertwined with, and in possession of state power and became a 'state actor'.

330. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I purchased, in a knowingly illegal manner, state-public power from, amongst others, Defendant Christie.

331. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I purchased, in a knowingly illegal manner, state-public power from, amongst others, Defendant Christie, without the permission of the public.

332. I admit that I did not seek the permission of the public, as I knew it would be denied.

333. I admit I know that the public would have denied permission because the public would have known my purchasing state-public power for personal gain was illegal.

334. 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.I admit that had my long-standing **"pattern"** of abuse of political-state power for personal gain been exposed to the public, my corporate partners would have terminated our quid pro quo schemes.

335. I admit that had my long-standing **"pattern"** of abuse of political-state power for personal gain been exposed to the public, I would have become subject to criminal indictment.

336. I admit that had I become subject to criminal indictment, all my prior crimes would have become exposed.

337. I admit that had all my prior crimes become exposed my corporate profits and business would have become decimated.

338. I admit that because of my illegal schemes of public corruption that involved quid pro quo schemes of bribery with, amongst others, the K11-20 Defendants, I purchased, in a knowingly illegal manner, state-judicial-political power from, amongst others, Defendant Christie without the permission of the public.

339. I admit that I was able to purchase state-judicial-political power from, amongst others, **The Kaul Cases** Defendants, because by reason of the absolute power of the New Jersey Governor's Office over the state judiciary, I purchased it from Defendant Christie, through schemes of bribery.

340. I admit that I abused my purchased control of state judges to further my economic and political agendas.

341. I admit that **The Kaul Cases** Defendants, including the K11-20 Defendants, sought and required this corruptly purchased judicial power to suppress any legal challenges that Plaintiff Kaul filed against the illegal revocation and or its consequences.

342. I admit that I abused this purchased judicial power 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.

343. I admit that I abused this purchased judicial power 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.

344. I admit that I abused this purchased judicial power 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.

345. I admit that I abused this purchased political-judicial power I 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.

346. I admit that I abused this purchased political-judicial power to silence all politicians/legislators/lawyers as to the facts of the revocation scheme, with threats of professional ruin and or criminal indictments.

347. 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'.

348. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that Plaintiff Kaul would be eliminated.

349. I admit that I perpetrated these schemes of deprivation of rights with impunity, in the conviction that Defendant Christie would become the 2016 US President.

350. I admit that I believed that if Defendant Christie became the 2016 President, he would have abused the power of the federal government to cause the elimination of Plaintiff Kaul, in order to conceal the crimes of **The Kaul Cases** Defendants.

351. I admit that I was motivated to cause the illegal revocation of Plaintiff Kaul's license by the promise of increased bribes/profits from my for-profit insurance-hospital-pharmaceutical corporate donors.

352. I admit that I knew I and my subjugate state medical boards, the **"Federation Cartel"** had to manufacture a basis/pretext on which to cause the illegal revocation of Plaintiff Kaul's license.

353. I admit that I knew there existed no legitimate or legal basis on which to cause the illegal revocation of Plaintiff Kaul's license.

354. 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 subjugate state medical boards to manufacture a knowingly illegitimate/illegal case to cause the illegal revocation of Plaintiff Kaul's license.

355. 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.

356. I admit I knew that the commission of perjury would be perpetrated by these other physicians while acting as experts for the state.

357. 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.

358. I admit that these expert physicians were given assurances that they would not be criminally prosecuted for perjury.

359. 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.

360. 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 K11-20**.

361. 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, Defendant Christie 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 K11-20**.

362. I admit I knew that these experts physicians knew they would be committing perjury.

363. 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.

364. I admit that when these expert physicians committed perjury, they knew they were committing felonies.

365. I admit that I knew that these expert physicians knew Plaintiff Kaul was licensed/trained/credentialed/qualified to perform minimally invasive spine surgery.

366. 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.

367. I admit that I know that Defendant Christie 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), these lawyers would file knowingly frivolous malpractice claims in NJ state courts whose judge were controlled by Defendant Christie.

368. 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.

369. I admit I knew that within these medical malpractice quid pro quo schemes, the lawyers would kickback a percentage of the settlement to Defendant Christie.

370. I admit I know that millions of dollars were actually paid by Plaintiff Kaul's medical malpractice carriers in these knowingly fraudulent cases (2013-2017)

371. I admit I know that Defendant Christie received kickbacks from these knowingly fraudulent settlements (2013-2017)

372. I admit that I knew the kickback scheme conducted across the US wires, was illegal and constituted wire fraud.

373. I admit that I knew that the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and that it constituted wire fraud.

374. I admit that I knew that the lawyers involved in the medical malpractice quid pro quo scheme knew it was illegal and constituted public corruption.

375. 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.

376. I admit that I knew that Plaintiff Kaul had been trained to perform minimally invasive spine surgery since at least 2003.

377. I admit that I knew that Plaintiff Kaul had been qualified to perform minimally invasive spine surgery since at least 2003.

378. I admit that I knew that Plaintiff Kaul had been properly licensed and credentialed to perform minimally invasive spine surgery since at least 2003.

379. 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.

380. I admit that I knew that Plaintiff Kaul had in 2005 invented the percutaneous spinal fusion procedure.

381. I admit that I knew that Plaintiff Kaul had been credentialled by at least six (6) state licensed surgical centers in New Jersey to perform minimally invasive spine surgery since at least 2003.

382. I admit that I knew that Plaintiff Kaul had successfully performed hundreds of minimally invasive spinal fusions.

383. I admit that despite knowing Plaintiff Kaul was experienced/licensed/credentialled/trained/qualified and had invented the percutaneous procedure, I did abuse and cause to be abused 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.

384. 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 K11-20.**

385. 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 K11-20**, he would be financially ruined and unable to retain a lawyer.

386. 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 K11-20**, and unable to retain a lawyer, did prosecute his claims, I and **The Kaul Cases** Defendants would cause a corruption of the courts/obstruction of justice to prevent his prosecution of the case and procurement of discovery and procurement-reinstatement of his medical license.

RICO – Count One
'COVID Vaccine' Toxicity

387. I admit that I know the reason I failed to address and 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.

388. I admit that one of the reasons all Defendants violated the Court's March 13, 2024, ORDER FOR DISCOVERY PLAN in K11-17 and in K11-20 is to avoid having to disclose evidence of the global scheme of inoculation of a knowing gene manipulating mRNA toxin into billions of humans.

389. I admit that although K11-20 factually differs from K11-17 in that there exists in K11-20 an extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, there exists a commonality of fact of four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury to Plaintiff Kaul's life/liberty/property/reputation.

390. I admit that the commonality of the four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury was admitted for all purposes in K11-17.

391. I admit that the entire corpus of fact of **The Kaul Cases** became sequentially admitted from the February 22, 2016, filing of K1 to the present consequent to the fact that neither I nor any of **The Kaul Cases** Defendants ever denied any of the facts.

392. I admit that the facts admitted in K11-20 do substantiate entry of Summary Judgment against me as to all claims.

393. I admit that the SCOTUS rulings in Jarkesy and Loper, in conjunction with the admitted facts do further render me and all other Defendants defenseless and subject to Summary Judgment.

394. I admit that pursuant to Rule 8(b)(6) my non-denial of the facts of the extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, has caused them to become admitted for all purposes, including Summary Judgment.

DATED: SEPTEMBER 18, 2024

RICHARD ARJUN KAUL, MD

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

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

v.

CIVIL ACTION: NO.: 24-CV-03180

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.

STATEMENT OF MATERIAL FACT AS TO DEFENDANT JAMES HOWARD SOLOMON

Respectfully Submitted



RICHARD ARJUN KAUL, MD

SEPTEMBER 15, 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.)

K11-17 - KAUL v CPEP: 23-CV-00672 (DECEMBER 12, 2023, TO JUNE 14, 2024-EASTERN DISTRICT OF NORTH CAROLINA)

K11-20 – KAUL v FEDERATION: 24-CV-03180 (AUGUST 26, 2024, TO PRESENT)

Admission Of Guilt

1. I admit that I am guilty of all the facts and charges levied against me in all sections of the Complaint.

2. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed by **The Kaul Cases** Defendants against Plaintiff Kaul, as they are as liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

3. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from '**PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF**.

4. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

5. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

6. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW'**

7. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

8. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION STATE MEDICAL BOARDS

9. I admit that I procured copies of Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

10. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION STATE MEDICAL BOARDS

11. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION STATE MEDICAL BOARDS

Context To Schemes And Violations

12. I admit that I graduated from law school in the 1960s.

13. I admit that shortly after graduation I commenced the private practice of law in New Jersey.

14. I admit that during my career in the private practice of a law, the majority of cases I tried were conducted in Bergen County, New Jersey.

15. I admit that during my career in the private practice of law, I had several cases in which my adversary was the lawyer that represented Plaintiff Kaul in the 2013 NJ administrative revocation proceeding, that commenced on April 9 and concluded on June 28, 2013.

16. I admit that in the cases in which Plaintiff Kaul's then lawyer was my adversary, I did lose every case.

17. I admit that I was not successful in my career in the private practice of law.

18. I admit that there came a point in time when I resigned from the private practice of law and became a state judge in the Bergen County division of the New Jersey Superior Court.

19. I admit that during my tenure as a New Jersey state court judge, restrictions within the state budget limited increases in my annual compensation.

20. I admit that during my tenure as a New Jersey state court judge, I resided in Bergen County, a county with one of the highest cost of living indexes in the United States.

21. I admit that during my tenure as a New Jersey state court judge, I presided over cases in which insurance companies were sued.

22. I admit that in the insurance company related cases in which I conducted bench trials, I almost always ruled in favor of the insurance companies.

23. I admit that there came a point in time when I resigned from the state court bench.

24. I admit that after resigning from the state court bench, I re-entered private practice.

25. I admit that upon reentering private practice and for a period thereafter I represented insurance companies in disputes with patients injured in various accidents.

26. I admit that there came a point in time when I went into semi-retirement from the private practice of law.

27. I admit that in approximately 2012 I was contacted by agents representing Defendants Christie and Allstate Insurance Company.

28. I admit that the initial contact was made by telephone, in which a brief conversation ensued in which I consented to the agents' request for a face-to-face meeting.

29. I admit that the face-to-face meeting occurred in New Jersey in approximately mid to late 2012.

30. I admit that during this meeting a conversation was conducted in which I agreed to engage in a knowingly illegal quid pro quo scheme with Defendant Allstate Insurance Company and other insurance companies that owed monies to Plaintiff Kaul,

31. I admit that during this meeting I was informed that Defendant Christie would appoint me to adjudicate the revocation proceeding.

32. I admit that I agreed to adjudicate the case.

33. I admit that in agreeing to adjudicate the case and participate in the quid pro quo scheme, I would recommend revocation of Plaintiff Kaul's license and a fine, in return for receipt of bribes from Defendant Allstate Insurance Company and other insurance carriers that owed monies to Plaintiff Kaul.

34. I admit that I knew that Defendant Christie's role in the conspiracy involved him using his executive power to have me appointed to adjudicate and illegally order the revocation of Plaintiff Kaul's license, in return for which he received bribes from Defendant Allstate Insurance Company and other insurance carriers that owed monies to Plaintiff Kaul.

35. I admit that as a lawyer I knew my participation in the scheme was illegal.

36. I admit that despite knowing my participation in the scheme was illegal, I persisted in the perpetration of the scheme with a sense of impunity in the conviction that Plaintiff Kaul would be eliminated.

37. I admit that despite knowing that the scheme was illegal, I persisted in the perpetration of the scheme with a sense if impunity in the conviction that Plaintiff Kaul would be eliminated.

38. I admit that my motivation for participating in the knowingly illegal scheme from 2012 onwards was to use the power of the New Jersey Office of Administrative Law for personal profiteering.

39. I admit that I knew my abuse of state power for knowingly illegal personal profiteering would cause immense harm to Plaintiff Kaul's life, liberty, property and reputation.

40. I admit that despite knowing the immense harm my illegal acts would cause to Plaintiff Kaul's life, liberty, property and reputation, I did persist in the commission of crime for the sole purpose of personal profiteering.

41. I admit that despite knowing that my acts of public corruption would be illegal, I persisted nonetheless in the conviction that Plaintiff Kaul would be eliminated, and my crimes would go unexposed.

42. I admit that I knew that in the perpetration of my acts of amongst other things, public corruption, bribery and fraud, I knew I would be converting and did convert the New Jersey Office of Administrative Law into a racketeering enterprise.

43. I admit that I knew that in the perpetration of my acts of amongst other things, public corruption, bribery and fraud, I knew that I would be conducting and did conduct a **"pattern of racketeering"** through the New Jersey Office of Administrative Law.

44. I admit that I knew that in conducting a **"pattern of racketeering"** through the New Jersey Office of Administrative Law I would be committing and did commit a series of ongoing felonies.

45. I admit that despite knowing that I would be violating and did violate Plaintiff Kaul's human/civil/constitutional rights, I did agree to perpetrate the scheme.

46. I admit that I knew that my willful violation of Plaintiff Kaul's human/civil/constitutional rights was illegal.

47. I admit that despite knowing the perpetration of my acts of amongst other things, public corruption, bribery and fraud would be and were illegal, I was convinced Plaintiff Kaul would never expose my criminal conduct.

48. I admit that after several discussions with agents of Defendants Allstate, Christie and other insurance carriers that owed monies to Plaintiff Kaul, I agreed to facilitate the perpetration of the knowingly illegal scheme to revoke Plaintiff Kaul's license.

49. I admit that I believed the scheme would never be exposed.

April 2012 – December 2013

The Bribery Scheme

50. I admit that having agreed to facilitate the perpetration of the knowingly illegal revocation scheme, there were further discussions as to when and how the bribes would be funneled into my possession.

51. I admit that in the discussions as to the funneling of the bribes it was agreed that a percentage of the bribes would be transmitted prior to the 2013 revocation hearing and the balance after the license, based on my recommendation, had been revoked by the medical board (March 24, 2014).

52. I admit that in the discussions as to the funneling of the bribes it was agreed that to attempt to conceal the scheme, the bribes would be transferred into both on-shore and off-shore accounts belonging to members of my family.

53. I admit that in the discussions as to the funneling of the bribes into accounts not in my name, it was agreed and understood that these tactics were necessary to attempt to conceal the knowingly illegal scheme.

54. I admit that having practiced in the New Jersey courts for many decades I was familiar with schemes of public/judicial corruption, and the tactics employed to attempt to conceal these schemes from the public and prosecutors.

The Revocation Scheme

55. I admit that my specific purpose within the scheme was to cause the issuance of a document that recommended the knowingly illegal revocation of Plaintiff Kaul's New Jersey license.

56. I admit that from the approximately April 2012 commencement of my communications with agents representing the office of the then governor of the State of New Jersey, Defendant Christopher J. Christie, I willingly entered the revocation scheme.

57. I admit that I knew that my willing facilitation of the scheme was critical to the causing the revocation of Plaintiff Kaul's license.

58. I admit that I knew that one of the purposes of providing Plaintiff Kaul a hearing in a state administrative tribunal was to deceive the public and other state/federal agencies into believing that due process had been afforded Plaintiff Kaul in the revocation scheme.

59. I admit that I knew the administrative proceeding over which I had agreed to adjudicate was a 'sham'.

60. I admit that I knew the administrative revocation proceeding over which I had agreed to adjudicate and did adjudicate, did constitute a violation of Plaintiff Kaul's human/civil/constitutional rights in that it was conducted in the absence of a jury.

61. I admit that I knew the administrative revocation proceeding over which I had agreed to adjudicate and did adjudicate, did constitute a violation of Plaintiff Kaul's human/civil/constitutional rights in that it was conducted in the absence of an article III judge.

62. I admit that despite knowing of these fundamental violations of Plaintiff Kaul's human/civil/constitutional rights, I did nonetheless willingly and knowingly facilitate the perpetration of the knowingly illegal revocation scheme.

63. I admit that my willing and knowing perpetration of the knowingly illegal revocation scheme was conducted with a sense of impunity, in the conviction that Plaintiff Kaul would never expose my crimes or those of Defendant Christie and others.

64. I admit that my sense of impunity stemmed in part from conversations and communications with agents of **The Kaul Cases** Defendants, in which I was assured that Plaintiff Kaul would be eliminated, and my crimes would therefore never be exposed.

65. I admit that my sense of impunity stemmed in part from my belief that Defendant Christie would become the 2016 President, and that even if Plaintiff Kaul did expose my crimes, Defendant Christie would use the power of the federal government to eliminate Plaintiff Kaul.

66. I admit that in fact I knew that in conjunction with the revocation scheme, Defendant Christie and insurance carriers that owed monies to Plaintiff Kaul were scheming to have the US Attorney for New Jersey, in conjunction with the local bureau of the FBI file a healthcare fraud related federal criminal indictment against Plaintiff Kaul.

67. I admit that in fact I knew that in conjunction with the revocation scheme, Defendant Christie and insurance carriers that owed monies to Plaintiff Kaul were scheming to have the NJ Attorney General file a healthcare fraud related state criminal indictment against Plaintiff Kaul.

68. I admit that in the knowledge that in conjunction with the revocation scheme, there would be conducted concurrent state/federal indictment schemes that I was assured would cause the incarceration of Plaintiff Kaul.

69. I admit that in this knowledge of the revocation and indictment schemes I was convinced that my crimes would go unexposed, as Plaintiff Kaul would be eliminated through either suicide, death, incarceration and destruction of reputation and credibility.

70. I admit that I knew the specific purpose of the revocation scheme was to cause the elimination of Plaintiff Kaul from the minimally invasive spine surgery market.

71. I admit that I knew Plaintiff Kaul had invented a procedure in 2005 that revolutionized the field of spine surgery, in that it permitted spinal fusions to be successfully and safely conducted in surgical centers on a same-day basis.

72. I admit that I knew Plaintiff Kaul had invented a procedure in 2005 that revolutionized the field of spine surgery, in that it permitted spinal fusions to be successfully and safely conducted by physicians who were not neurosurgeons or orthopedic surgeons.

73. I admit that I knew that Plaintiff Kaul's invention threatened the economic interests of hospitals, in that it diverted cases away from hospitals into surgical centers.

74. I admit that I knew that Plaintiff Kaul's invention threatened the economic interests of neurosurgeons, in that it diverted cases away from them to interventional radiologists, pain physicians and minimally invasive spine surgeons.

75. I admit that I knew one of the purposes of the widely publicized revocation scheme was to intimidate other non-neurosurgical physicians into abandoning their practice of minimally invasive spine surgery.

76. I admit that I came to know that the widely publicized revocation scheme did in fact cause non-neurosurgeons to cease their practice of minimally invasive spine surgery.

77. I admit that I know that this cessation of the practice of minimally invasive spine surgery by non-neurosurgeons did cause an anti-competitive injury to the market by causing an artificial reduction in the volume of service.

78. I admit that I know that the majority of non-neurosurgeons performed minimally invasive spine surgery in outpatient surgical centers.

79. I admit that I know that the cessation of the practice of minimally invasive spine surgery by non-neurosurgeons in outpatient surgical centers did cause an anti-competitive injury to the market by causing an artificial reduction in the volume of service in these centers.

80. I admit that I know that this artificial reduction in the volume of service by non-neurosurgeons in outpatient surgical centers did cause the neurosurgeons/hospitals to cause an artificial elevation of the price of minimally invasive spine surgery to the public.

81. I admit that these antitrust injuries to the minimally invasive spine surgery market persist today.

82. I admit that I know that these antitrust injuries have caused an artificial reduction in the availability of minimally invasive spine surgery.

83. I admit that I know that these antitrust injuries have caused an artificial/antitrust/monopolistic elevation in the price of minimally invasive spine surgery.

84. I admit that I know that the artificial reduction and antitrust/monopolistic elevation in the price of minimally invasive spine surgery continues to artificially deprive the public of the service.

85. I admit I know that this artificial deprivation of minimally invasive spine surgery to the public is one of the causes of the opiate epidemic, in that the minimally invasive surgical option to treat spinal pain was restricted due to artificially reduced availability and artificially increased monopolistic cost by neurosurgeons/hospitals.

86. I admit that these artificial restrictions and price increases were a direct consequence of the fear induced in the minimally invasive spine community consequent to the highly publicized and illegal revocation proceeding, over which I adjudicated and issued a knowingly illegal opinion on December 13, 2013.

87. I admit that had I refused to participate in the illegal revocation scheme and had I reported the perpetrators to federal authorities outside of New Jersey, the anti-competitive injuries to the minimally invasive spine surgery market and their consequences to the public would not have occurred.

88. I admit that my participation in the knowingly illegal revocation scheme caused a massive to the public and Plaintiff Kaul.

The Due Process Violation, Perjury And Evidential Falsification Scheme

89. I admit that the revocation proceeding was conducted in the NJ Office of Administrative Law.

90. I admit that the proceeding commenced on April 9 and concluded on June 28, 2013.

91. I admit that the proceeding was not conducted before a jury.

92. I admit that the proceeding was not conducted before an article III judge.

93. I admit that I knew that the lack of a jury and an article III judge did constitute violations of Plaintiff Kaul's constitutional rights of amongst other things, the right to due process and an impartial tribunal.

94. I admit that I am not, nor ever have been an article III judge.

95. I admit that the revocation proceeding was unconstitutional and illegal ab initio.

96. I admit that despite knowing of the unconstitutionality and illegality of the revocation proceeding, I did willingly and knowingly facilitate the proceeding in the conviction that Plaintiff Kaul be eliminated and would never expose my crimes and those of **The Kaul Cases** Defendants.

97. I admit that in coming to know of the June 27, 2024, SCOTUS ruling in Jarkesy v SEC, I unreservedly recognize that my December 13, 2013, recommendation of revocation was illegal and unconstitutional.

98. I admit that the illegality and unconstitutionality of the December 13, 2013, revocation renders illegal all injuries to Plaintiff Kaul's life/liberty/property/reputation that occurred consequent to the revocation.

99. I admit that every legal proceeding in any administrative/state/bankruptcy/district court commenced against Plaintiff Kaul consequent to and based upon the illegal revocation was itself illegal.

100. I admit that during the April 9 to June 28, 2013, proceeding I violated Plaintiff Kaul's due process rights throughout the proceeding.

101. I admit that these violations were purposed to pervert and manipulate the evidential record to support the foregone conclusion of myself and **The Kaul Cases** Defendants, that regardless of what evidence Plaintiff Kaul submitted, I would recommend revocation and a $300,000 fine.

102. I admit that these violations included permitting witnesses for the state to enter vast volumes of hearsay evidence.

103. I admit that I overruled every objection made by Plaintiff Kaul's counsel as to the admission of hearsay evidence.

104. I admit that a reason I often provided for admitting the hearsay evidence was that **"I wanted to get a full picture"**.

105. I admit that I knew my constant admission of hearsay evidence was a fundamental violation of Plaintiff Kaul's due process rights.

106. I admit that not once during the entire hearing did I grant any objection made by Plaintiff Kaul's counsel.

107. I admit that during the entire hearing I granted every objection made by **The Kaul Cases** Defendant and NJ deputy attorney general, Doreen Hafner.

108. I admit that I treated the state's witnesses with respect and deference.

109. I admit that I was openly hostile to Plaintiff Kaul's witnesses and frequently interrupted and curtailed their testimony.

110. I admit that on several occasions I publicly admonished persons supporting Plaintiff Kaul who had come to witness the hearing.

111. I admit that the purpose of these admonishments to sit still in their seats was to attempt to dissuade them from continuing to attend the hearing.

112. I admit that on May 6, 2013, when the state's expert and **The Kaul Cases** Defendant, Gregory Przybylski, a neurosurgeon, testified, Plaintiff Kaul hired an independent transcriptionist.

113. I admit that when this independent transcriptionist appeared in the hearing office on the morning of May 6, 2013, I became openly hostile and claimed that her transcription could not be used for any legal purpose.

114. I admit that I know the reason Plaintiff Kaul retained an independent transcriptionist on May 6, 2013, was that he came to know from other physicians and lawyers that transcript falsification occurred in NJ administrative proceedings to suit the economic/legal/political agendas of the executive branch of the NJ state government.

115. I admit that in 2013 the executive of the executive branch was Defendant Christie.

116. I admit that I know from my conversations and communications with agents of Defendants Christie and Allstate Insurance Company that Defendant Christie had been bribed by, amongst others, members of the insurance industry, the hospital industry and neurosurgeons.

117. I admit that I denied Plaintiff Kaul's multiple requests to present further patient witnesses as to his competence in the field of minimally invasive spine surgery.

118. I admit that Defendant Heary, a neurosurgeon, was a key witness in the administrative proceeding.

119. I admit that I knew that Defendant Heary was one of the physicians who had instigated the conspiracy to cause the revocation of Plaintiff Kaul's license.

120. I admit that in or around June 20, 2013, Plaintiff Kaul served a subpoena on Defendant Heary to testify at the administrative hearing.

121. I admit that Defendant Heary ignored the subpoena and did appear to testify.

122. I admit that Plaintiff Kaul argued that Defendant Heary's testimony was of immense relevance to the case, and that the case should not conclude without his testimony.

123. I admit that I knew that Defendant Heary's testimony would constitute further proof of the illegality of the foregone conclusion of revocation.

124. I admit that because I knew Defendant Heary's testimony would undermine the state's case, I denied Plaintiff Kaul's request for further time to enforce the subpoena and did on June 28, 2013, close the case.

125. I admit that I prematurely closed the case to prevent Plaintiff Kaul from compelling the incriminating testimony of Defendant Heary.

126. I admit that Plaintiff Kaul presented strong and convincing evidence to prove he was qualified, credentialed and trained to perform minimally invasive spine surgery.

127. I admit that the state's expert and neurosurgeon, Gregory Przybylski, admitted under cross examination on May 6, 2013, that there existed no standard for the performance of minimally invasive spine surgery or for what physicians could perform minimally invasive spine surgery.

128. I admit that I knew and know that this admission undermined the state's entire case, as the case had been premised on Przybylski's opinion that Plaintiff Kaul had **"grossly deviated"** from the standard of care for minimally invasive spine surgery.

129. I admit that I knew that **The Kaul Cases** Defendant, Gregory Przybylski, did know that his testimony as to a purported standard did constitute perjury.

130. I admit that I knew that **The Kaul Cases** Defendant, Gregory Przybylski did know that his commission of perjury would go unpunished because he knew the entire administrative revocation proceeding was corrupt.

131. I admit that I knew that **The Kaul Cases** Defendant, Gregory Przybylski did know that his commission of perjury would go unpunished because he knew the outcome of the entire administrative proceeding had been a foregone conclusion of revocation.

132. I admit that prior to the April 9, 2013, commencement of the revocation proceeding, and within my communications with agents of **The Kaul Cases** Defendants, it was agreed that if Plaintiff Kaul submitted evidence that disproved the state's case, then that evidence would be omitted and or evidence would be falsified to support the state's case and the foregone conclusion of revocation.

133. I admit that I agreed to this evidential falsification scheme in the belief that Plaintiff Kaul would be eliminated, and that even if he were not eliminated, he would be financially unable to procure the transcript and thus unable to expose my crimes and those of **The Kaul Cases** Defendants.

134. I admit that at no point in time from 2012 to 2016, the latter year being the filing date of K1 (KAUL v CHRISTIE:16-CV-02364), did either I or any of **The Kaul Cases** Defendants believe Plaintiff Kaul would expose the massiveness of the evidential falsification scheme.

The Final Opinion/Order Scheme

135. I admit that in my initial communications and conversations with agents of **The Kaul Cases** Defendants, we did agree that regardless of the evidence presented by Plaintiff Kaul, my final report would recommend revocation and a fine of $300,000.

136. I admit that on or about March 27, 2013, there was conducted a hearing in the NJ Office of Administrative Law in which another administrative officer attempted to persuade Plaintiff Kaul to accept the state's settlement offer in which Plaintiff Kaul would admit to all of the state's knowingly false charges, would accept a seven year revocation of his NJ license during which he was prohibited from working anywhere else in the world as a physician, would pay a fine of $500,000 and would be obligated to take an ethics course before being permitted to re-apply for his NJ license.

137. I admit that Plaintiff Kaul rejected this proposal, and the administrative officer then attempted to persuade him to accept it, an attempt that Plaintiff Kaul further rejected.

138. I admit that from the June 28, 2013, conclusion of the administrative hearing to the December 13, 2013, issuance of my knowingly fraudulent opinion and order, I remained in conspiracy with **The Kaul Cases** Defendants and their agents.

139. I admit that within this conspiracy we used the US wires to exchange information as to the drafting of my opinion and recommendation of revocation and a $300,000 fine.

140. I admit that I knew my use of the wires to further a knowingly illegal scheme did constitute the felony of wire fraud.

141. I admit that despite being a lawyer and knowing that I was committing the felony of wire fraud, I, as with all of **The Kaul Cases** Defendants, were convinced that Plaintiff Kaul would not expose our crimes.

142. I admit that the central element of the fraud being transmitted across the US wires pertained to **two hundred and seventy-eight (278)** separate instances of evidential falsification within my December 13, 2013, opinion.

143. I admit that Plaintiff Kaul presented strong and convincing evidence of the falsity of the state's case.

144. I admit that these facts were communicated to **The Kaul Cases** Defendants and their agents.

145. I admit that in the discussions/communications between myself and **The Kaul Cases** Defendants/Agents as to the strong and convincing evidence presented by Plaintiff Kaul, it was agreed that he and his fifteen (15) witnesses would all be found to be not credible, and every witness presented by the state would be found to be credible.

146. I admit that in the discussions/communications between myself and **The Kaul Cases** Defendants/Agents as to the strong and convincing evidence presented by Plaintiff Kaul and his 15 witnesses it was agreed that this evidence would be omitted and or falsified.

147. I admit that in the discussions/communications between myself and **The Kaul Cases** Defendants/Agents as to the weak and unconvincing evidence presented by the state's witnesses, it would all be included and amplified.

148. I admit that I knew and know that **The Kaul Cases** Defendant and state's expert, Gregory Przybylski's May 6, 2013, admission under cross examination that there existed no standard for the performance of minimally invasive spine surgery did undermine the state's entire case.

149. I admit that despite knowing that the state's entire case, which had been based on Przybylski's knowingly false opinion that Plaintiff Kaul had allegedly **"grossly deviated"** from the standard of care, was undermined by Przybylski's no standard admission, I ignored the case undermining effect of this admission in my opinion.

150. I admit that my omission of this critical admission from my December 13, 2013, opinion was consistent with my corrupt motives and conduct within the case.

151. I admit that I knew and know that had I conducted myself and the hearing in a legal and non-corrupt manner, this admission would have resulted in a rejection of the state's case and a rejection of their request to revoke Plaintiff Kaul's license.

152. I admit that in the period from June 28 to December 13, 2013, there were hundreds of exchanges between myself and **The Kaul Cases** Defendants/Agents in the drafting and final formulation of my December 13, 2013, opinion.

153. I admit that the final opinion, other than being purposed to illegally revoke Plaintiff Kaul's license, did contain highly slanderous and defamatory statements that were purposed to destroy Plaintiff Kaul's life/liberty/property and reputation.

154. I admit that the final opinion, other than being purposed to illegally revoke Plaintiff Kaul's license, did contain highly slanderous and defamatory statements that were purposed to cause Plaintiff Kaul's medical malpractice carriers to settle the frivolous multi-million-dollar medical malpractice lawsuits filed consequent to the wide publicity regarding the 2012 suspension/2014 revocation.

155. I admit that I knew and know that lawyers who obtained these multi-million-dollar settlements did kickback a percentage of the monies to Defendant Christie.

156. I admit that my final opinion was the product of a lengthy conspiratorial exchange between myself, **The Kaul Cases** Defendants/Agents and medical malpractice lawyers with pending of future lawsuits against Plaintiff Kaul, in which it was agreed that the knowingly fraudulent document could and would be used in future legal proceedings in administrative/state/bankruptcy/district courts throughout the country.

156. I admit that I know of the doctrine of 'Fraud on the Court'.

157. I admit that the April 9 to June 28, 2013, administrative proceeding was a 'Fraud on the Court'.

158. I admit that my December 13, 2013, opinion was a product of the 'Fraud on the Court' administrative proceeding and was itself a 'Fraud on the Court'.

159. I admit that I know that my December 13, 2013 'Fraud on the Court' was used by and incorporated by the New Jersey Board of Medical Examiners in its knowingly fraudulent March 24, 2014, final order of revocation and fine of $475,000.

160. I admit that I knew and know that my December 13, 2013 'Fraud on the Court' was used by and incorporated into legal proceedings in the United States Bankruptcy Court for the District of New Jersey (2013-2020).

161. I admit that I knew and know that my December 13, 2013 'Fraud on the Court' was used by and incorporated into legal proceedings in the United States District Court for the District of New Jersey, the Southern District of New York, the District of Massachusetts, the District of Columbia, the Southern District of Florida, the Northern District of Texas, the Northern District of Illinois and the District of Connecticut.

162. I admit that I knew and know that my December 13, 2013 'Fraud on the Court' was used by and incorporated into legal proceedings in the State of Pennsylvania as part of my application for licensure in the State of Pennsylvania.

163. I admit that I knew and know that my December 13, 2013 'Fraud on the Court' was used by and incorporated into legal proceedings in the State of New York as part of my application for licensure in the State of New York.

164. I admit that I knew and know that my December 13, 2013 'Fraud on the Court' was used by and incorporated into the media and onto the internet by multiple media organizations to whom I and **The Kaul Cases** Defendants did disseminate via the US wires the knowingly fraudulent document of my December 13, 2013, opinion.

165. I admit that the purpose of this dissemination to the media was to attempt to destroy Plaintiff Kaul's reputation in order to facilitate his elimination to attempt to ensure he would never expose my crimes and those of **The Kaul Cases** Defendants.

December 13, 2013, to March 24, 2014

166. I admit I know that my December 13, 2013, knowingly fraudulent opinion was adopted by **The Kaul Cases** Defendant, New Jersey Board of Medical Examiners as the basis for their February 12, 2014, revocation hearing.

167. I admit I knew and know that Plaintiff Kaul sent **The Kaul Cases** Defendant, New Jersey Board of Medical Examiners a letter dated February 6, 2014, in which he indicated he would not attend the hearing as the administrative revocation proceedings were conducted illegally and my revocation recommendation was illegal.

168. I admit I knew and know that one of the reasons asserted by Plaintiff Kaul for his refusal to legitimize the February 12, 2014, medical board hearing pertained to the fact that **The Kaul Cases** Defendant, Andrew Kaufman, was conflicted and biased as evidenced by a September 13, 2013, affidavit from a Corey Johnson.

169. I admit I knew and know that Kaufman's state of conflicted-ness and personal animus towards Plaintiff Kaul became further evidenced in August 2017 in an affidavit submitted by patient John Zerbini, in which Zerbini describes conversations with Defendant Kaufman in which the latter detailed the revocation conspiracy.

170. I admit that subsequent to the December 13, 2013, issuance of my knowingly fraudulent opinion, I received the balance of the bribes from **The Kaul Cases** Defendants, including Defendant Allstate Insurance Company.

171. I admit that in knowing that I had committed the felonies of amongst other things, public corruption, wire fraud, evidential falsification and obstruction of justice, and recognizing the criminal penalties associated with these felonies, I did leave the State of New Jersey.

172. I admit that the purpose of leaving the State of New Jersey for the State of North Carolina was an attempt to evade any investigation that Plaintiff Kaul might have commenced.

173. I admit I relocated to the State of North Carolina at some point in 2014.

174. I admit that I used the bribe money to purchase an expensive apartment in Asheville, a wealthy section of North Carolina.

175. I admit that had I not participated and profited in the illegal revocation conspiracy, I would not have been able to afford to relocate to Asheville.

176. I admit that I abused the power of state to illegally profit at the expense and to the immense detriment of the life/liberty/property/reputation of Plaintiff Kaul.

177. I admit that I have no remorse for my actions, which explains in part my failure to deny any of the facts/allegations of **The Kaul Cases** in which I was sued and am being sued.

March 24, 2014, To February 22, 2016

178. I admit that in a period from March 24, 2014, to February 22, 2016, I resided principally in North Carolina and rarely visited New Jersey.

179. I admit that I did not discuss my professional past nor my involvement in the revocation proceeding with any persons in North Carolina.

180. I admit that I was friendly with a lawyer-judge by the name of Philip Guarino, a person to whom Plaintiff Kaul been introduced many years earlier in a social setting.

181. I admit that I did not tell Guarino that I had received bribes from amongst others, the NJ insurance industry, the NJ hospital industry and NJ based neurosurgeons.

182. I admit that the story I told those who read the articles published in the media about the revocation proceedings was that Plaintiff Kaul had injured eleven (11) patients.

183. I admit that I knew this story was false, as no patients had been injured by Plaintiff Kaul.

184. I admit that I reviewed the clinical files of the five (5) patients who testified against Plaintiff Kaul.

185. I admit that the clinical files evidenced that the five (5) patients who testified against Plaintiff Kaul had either improved after the care he provided or that there had been no change in their symptoms.

186. I admit that I knew and know that **The Kaul Cases** Defendant and NJ deputy attorney general, Doreen Hafner, had coerced patients into committing perjury with the promise that if Plaintiff Kaul's license were revoked, they would profit through medical malpractice claims.

187. I admit that I knew and know that Hafner connected patients with certain medical malpractice lawyers, who had entered into kickback schemes with Defendant Christie, in which a percentage of the judgments were funneled back to Defendant Christie in return for having Plaintiff Kaul's license revoked.

188. I admit that while residing in North Carolina, I remained in contact with Hafner, in order to ascertain if Plaintiff Kaul had initiated any legal action.

189. I admit that I knew that with the continued publication of defamatory articles in the New Jersey press, journalists would always ask my then lawyer if I had left the country.

190. I admit that the reason for these enquiries pertained to my concern and that of **The Kaul Cases** Defendants that the longer Plaintiff Kaul remained in the country, the more likely it was that he would gather sufficient evidence and information as to the revocation conspiracy.

191. I admit that I knew that the more evidence and information that Plaintiff Kaul gathered about the revocation conspiracy, the more likely he would commence litigation against myself and **The Kaul Cases** Defendants.

February 22, 2016, To September 17, 2024

192. I admit that In or around February 22, 2016, I became aware that Plaintiff Kaul had filed a lawsuit in the United States District Court for the Southern District of New York, in which I was named as a Defendant.

193. I admit that in or around April 2016 I came to know that the case was transferred to the District of New Jersey-Trenton Vicinage.

194. I admit that in or around May 2016 I came to know that the case was transferred from the Trenton Vicinage to the Newark Vicinage.

195. I admit that upon learning that the case had been transferred to the Newark Vicinage, I did know that Plaintiff Kaul would be prevented from commencing discovery, and that the case would either be dismissed, stayed or otherwise precluded from advancing into discovery.

196. I admit that I knew that the nexus of corruption between Defendant Christie and certain judges within the Newark Vicinage would cause an obstruction of justice and a violation of Plaintiff Kaul's human/civil/constitutional rights, such that the truth of the revocation conspiracy would be suppressed.

197. I admit that in the period from February 22, 2016, to the present, I made myself aware of each case filed in **The Kaul Cases**.

198. I admit that I knew and know that the reason Plaintiff Kaul's cases were either dismissed, stayed and or otherwise obstructed pertained to the fact that **The Kaul Cases** Defendants either corrupted, harassed or intimidated the judges and the senators that supported the judges' appointments to the bench.

199. I admit that I came to know that in or around 2023, two of the district judges in the District of New Jersey had been involved in the case filed on February 22, 2016 (K1) did suddenly and unexpectedly retire from the federal bench.

200. I admit that I came to know that one of these judges became a partner at the law firm of Jeffrey Chiesa, the individual who had been Defendant Christie's NJ AG that prosecuted the 2013 revocation proceeding.

201. I admit that In or around November 2023, I became aware that Plaintiff Kaul had sued me and others in the United States District Court for the Eastern District of North Carolina (K11-17).

202. I admit that I was served with a copy of the Summons and Complaint.

203. I admit that on March 13, 2024, the Court entered an ORDER FOR DISCOVERY PLAN.

204. I admit that the ORDER FOR DISCOVERY PLAN required I confer with Plaintiff Kaul pursuant to Rule 26(f).

205. I admit that I ignored the Court Order, and refused to confer with Plaintiff Kaul.

206. I admit that through counsel I filed motions to stay discovery and to dismiss the case.

207. I admit that I did not deny any of the allegations/facts set forth in the Complaint.

208. I admit that pursuant to Rule 8(b)(6) my failure to deny the allegations/facts set forth in the Complaint did cause the facts to become admitted for all purposes.

209. I admit that the case was dismissed on June 14, 2024, and that the allegations/facts did pursuant to Rule 8(b)(6) remain admitted for all purposes.

210. I admit that on June 27/28, 2024, or shortly thereafter I became aware of the SCOTUS rulings in Jarkesy v SEC and Loper v Raimondo.

211. I admit that I obtained copies of the Jarkesy and Loper opinions.

212. I admit that I read the opinions.

213. I admit that as a lawyer and in my legal capacity I did fully comprehend all elements of both opinions.

214. I admit that prior to reading the opinions, I knew that the NJ 2014 revocation was illegal.

215. I admit that since 2012 I knew the revocation would be and was illegal because it the product of a **"pattern of racketeering"** in which the NJ Office of Administrative Law was converted into a racketeering enterprise, through which **The Kaul Cases** Defendants conducted a **"pattern of racketeering"** that involved, amongst other things, a commission of the RICO predicate acts of bribery/wire fraud/obstruction of justice/public corruption/evidential falsification/witness tampering.

216. I admit that since 2012 I knew the revocation would and did constitute a willful and knowing violation of Plaintiff Kaul's human/civil/constitutional rights.

217. I admit that in reading and comprehending Jarkesy, I recognized that SCOTUS had re-affirmed Seventh Amendment protections as to a jury/article III judge when deprivations of life/liberty/property are threatened.

218. I admit that in 2012 I knew that the revocation proceeding should have been conducted before a jury and an article III judge.

219. I admit that in 2012 I knew that Plaintiff Kaul's NJ license and his CDS prescribing license were his property.

220. I admit that in 2012 I knew that the property of Plaintiff Kaul's NJ license and CDS prescribing license were protected by the NJ State Constitution and the United States Constitution.

221. I admit that in 2012 I knew that the conduction of the revocation proceeding in the NJ Office of Administrative Law did constitute a willful and knowing violation of the law and of Plaintiff Kaul's constitutional rights.

222. I admit that in 2012, as a lawyer, I knew that the constitutional principles, law and holdings of Jarkesy were applicable to the revocation proceeding.

223. I admit that despite knowing the law in 2012, I did nonetheless knowingly and willfully violate the law and Plaintiff Kaul's human/civil/constitutional rights for the sole purpose of illegal personal profiteering at the expense and to the immense detriment of Plaintiff Kaul's life/liberty/property/reputation.

224. I admit that despite knowing the law in 2012, I did nonetheless knowingly and willfully violate the law and Plaintiff Kaul's human/civil/constitutional rights for the sole purpose of illegal personal profiteering through a knowing abuse of state power.

225. I admit that I violated the law and Plaintiff Kaul's human/civil/constitutional rights with an impunity that stemmed from my conviction that Plaintiff Kaul would never expose my crimes and those of **The Kaul Cases** Defendants.

226. I admit that from 2012 onwards I knew of the immense and irreparable injuries that the illegal revocation of Plaintiff Kaul's license would cause to his life/liberty/property/reputation and to the lives of his children.

227. I admit that from 2012 onwards despite my knowledge of the immense and irreparable injuries that the illegal revocation of Plaintiff Kaul's license would cause to his life/liberty/property/reputation and to the lives of his children, I did not care.

228. I admit that I did not care because I knew I would financially profit from the deprivations and violations perpetrated against Plaintiff Kaul by myself and **The Kaul Cases** Defendants.

229. I admit that on or about August 26, 2024, I came to know that Plaintiff Kaul had filed a lawsuit against me and others in the United States District Court for the Southern District of Texas – Houston Division (K11-20).

230. I admit that shortly thereafter, I procured a copy of the Complaint.

231. I admit that I was served with a copy of the Summons/Complaint/ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES in K11-20 on September 6, 2024.

232. I admit that in my capacity as a lawyer I did read and fully comprehend the Complaint.

233. I admit that as of September 16, 2024, I have neither entered the case nor had counsel enter on my behalf.

234. I admit that as of September 16, 2024, I have not denied any of the facts as to the extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation.

235. I admit that some of the underlying allegations/facts of K11-20, did, pursuant to Rule 8(b)(6) become admitted for all purposes in K11-17.

236. I admit that I understand the phrase for **"all purposes"** to mean that facts admitted pursuant to Rule 8(b)(6) are applicable to cases other than that in which they became admitted.

237. I admit that the facts admitted in K11-17 are admitted in K11-20.

238. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled '**STATEMENT OF FACT ADMITTED PURSUANT TO RULE 8(b)(6) AND RULE 36**'.

239. I admit that this section states: **"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."**

240. I admit that I agree with the terms and conclusion of this section of the Complaint.

241. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled '**STATEMENT OF FACT COMMON TO ALL DEFENDANTS, ALL ISSUES AND THE OVERALL PURPOSE OF K11-20 AND THE KAUL CASES**'

242. I admit this section states, amongst other things: **"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 … 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 ... 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 ... 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 ... 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."

243. I admit that I agree with the statements of fact asserted in this section of the Complaint.

244. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled '**STATEMENT OF FACT SPECIFIC TO EACH DEFENDANT**'.

245. I admit this section states, amongst other things: **"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 ... 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 ... 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 ... 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."**

246. I admit that I agree with the statements of fact asserted in this section of the Complaint.

247. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled '**STATEMENT OF EVIDENTIAL EXHIBITS CONTAINED WITHIN THE KAUL CASES**'.

248. I admit this section states, amongst other things: "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 … **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 …** "

249. I admit that I agree with the statements of fact asserted in this section of the Complaint.

250. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled '**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.**

251. I admit this section states, amongst other things: **"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 …**

252. I admit that I agree with the statements of fact asserted in this section of the Complaint.

253. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **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.

254. I admit this section states, amongst other things: **"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, … Defendants Christie/Solomon/Allstate knew that their scheme constituted an illegal theft of services and deprivation of Plaintiff Kaul's livelihood right … 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 ... 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 ... 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 ... 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."

255. I admit that I agree with the statements of fact asserted in this section of the Complaint.

256. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: '**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**'

257. I admit this section states, amongst other things: **"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'"**

258. I admit that I agree with the statements of fact asserted in this section of the Complaint.

259. I admit that I procured copies of Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants and attached as exhibits within K11-20.

260. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS.

261. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS.

262. I admit that although K11-20 factually differs from K11-17 in that there exists in K11-20 an extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff

Kaul's life/liberty/property and reputation, there exists a commonality of fact of four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury to Plaintiff Kaul's life/liberty/property/reputation.

263. I admit that the commonality of the four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury was admitted for all purposes in K11-17.

264. I admit that the entire corpus of fact of **The Kaul Cases** became sequentially admitted from the February 22, 2016, filing of K1 to the present consequent to the fact that neither I nor any of **The Kaul Cases** Defendants ever denied any of the facts.

265. I admit that the facts admitted in K11-20 do substantiate entry of Summary Judgment against me as to all claims.

266. I admit that the SCOTUS rulings in Jarkesy and Loper, in conjunction with the admitted facts do further render me and all other Defendants defenseless and subject to Summary Judgment.

267. I admit that pursuant to Rule 8(b)(6) my non-denial of the facts of the extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, has caused them to become admitted for all purposes, including Summary Judgment.

DATED: SEPTEMBER 18, 2024

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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

v.

CIVIL ACTION: NO.: 24-CV-03180 (AHB)

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.

ADMISSIONS OF MATERIAL AND UNDISPUTED FACT PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT DANIEL STOLZ

Respectfully Submitted

R.K_1

RICHARD ARJUN KAUL, MD

SEPTEMBER 18, 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

1. I admit that I am guilty of all the facts and charges levied against me in the Complaint.

Context To Scheme And Violations

2. I admit that I graduated from law school in the 1980s.

3. I admit that upon graduation I swore an attorney's oath

4. I admit that I the oath to which I swore with my hand on the bible states: **"I, , do solemnly swear (or affirm) that I will support the Constitution of the United States and the Constitution of the State of New Jersey; that I will bear true faith and allegiance to the same and to the Governments established in the United States and in this State, under the authority of the people; and that I will perform the duties of an attorney at law faithfully, impartially, and justly, to the best of my ability."**

5. I admit that in a period from at least 2014 onwards I did knowingly and willfully violate my solemn oath in matters pertaining to Plaintiff Kaul.

6. I admit that after graduation from law school I held various positions in New Jersey law firms that specialized in bankruptcy matters.

7. I admit that in holding these various positions I became very familiar with the U.S Bankruptcy Code.

8. I admit that in holding these various positions I provided legal services in many cases adjudicated in the United States Bankruptcy Court for the District of New Jersey – Newark.

9. I admit that in working within the United States Bankruptcy Court for the District of New Jersey – Newark, I developed professional and personal relationships with non-article III bankruptcy judges.

10. I admit that many of these bankruptcy judges had been partners at New Jersey law firms with which I had conducted and continue to conduct business.

11. I admit that in the period from 2014 to 2020 I and my then law firm, Wasserman, Jurista and Stolz conducted business with law firms in which bankruptcy judges had been partners and from which they continued to personally profit.

12. I admit that I and my law firm continues to conduct business with these New Jersey law firms.

13. I admit that these bankruptcy judges were appointed by judges on the United States Court of Appels for the Third Circuit and not the President.

14. I admit that prior to 2014 I had never met Plaintiff Kaul.

15. I admit that prior to 2014 I knew about the circumstances and events surrounding the 2012 suspension and 2014 revocation of Plaintiff Kaul's license.

16. I admit that I came to know about these events through the deluge of widely publicized newspapers and media articles regarding the revocation.

17. I admit that I came to know about these events through my professional association with lawyers of the New Jersey State Bar, who had been involved in the filing of lawsuits against Plaintiff Kaul consequent to the widely publicized suspension and revocation.

18. I admit that I came to know about these events through my personal association with lawyers who had worked with and or litigated against Plaintiff Kaul in the medico-legal arena.

19. I admit that in or around June 2013, I came to know that Plaintiff Kaul's healthcare corporations had filed a Chapter 112 petition in the U.S.B.C. for the District of New Jersey.

20. I admit that I came to know of this filing through its reporting within the NJ media and through lawyers with whom I was professionally and personally associated.

21. I admit that as a consequence of my close personal and professional relationship with amongst others, lawyer Mark Mannigan, an individual deeply enmeshed in NJ politico-legal affairs, I was provided vast amounts of information as to the conspiracy that caused the illegal revocation of Plaintiff Kaul's license.

22. I admit that Mark Mannigan was a then partner at the NJ law firm of Brach Eichler.

23. I admit that Mark Mannigan had been an integral part of the political transition team of Defendant Christie in his 2009 assumption of the Office of the New Jersey Governor.

24. I admit I know that Mark Mannigan knew in immense detail of the revocation conspiracy, and of the circumstances and events preceding, surrounding and occurring as a consequence of the revocation.

25. I admit that in these pre-March 2014 communications and exchange of information, I came to know that Plaintiff Kaul's license would be revoked in March 2014.

26. I admit that in coming to know of the planned March 2014 revocation, I did also come to know that the Chapter bankruptcy judge would convert the proceeding into a Chapter 7 liquidation.

27. I admit that through my communications with Third-Party Witnesses such as Mannigan and others, I came to know of the assets attached to Plaintiff Kaul and his corporations.

28. I admit that through my communications with Third-Party Witnesses, I came to know that the accounts receivable to Plaintiff Kaul's corporations were approximately fifty-two million dollars ($52,000,000).

29. I admit that I came to know through my own research, communications with Third Party Witnesses and **The Kaul Cases** Defendants, that one of the reasons for the success of Plaintiff Kaul's success pertained to his 2005 invention and successful performance of the outpatient percutaneous spinal fusion.

30. I admit that in or around 2013, I came to understand that this procedure had revolutionized the field of spine surgery.

31. I admit that in coming to know of the commercial success of Plaintiff Kaul's practice and his substantial asset holdings that I recognized the immense monetary value of the case.

32. I admit that in recognizing the immense monetary value of the case I conspired with members of the local US trustee office in New Jersey and bankruptcy judges to have the Chapter 7 liquidation case assigned to my law firm on July 21, 2014.

July 21, 2014, to September 18, 2018

The Bribery Scheme

33. I admit that on July 21, 2014, I and my then law firm, Wasserman/Jurista/Stolz were assigned as the lawyer-trustee to the Chapter 7 liquidation of Plaintiff Kaul's corporations.

34. I admit that an individual by the name of Donald DiBiase was on record as being the trustee, but that all decisions were made by me and DiBiase simply followed my orders.

35. I admit that in recognizing that the insurance industry owed approximately fifty-two million dollars ($52,000,000) to the estate/eighth-three (83) creditors of the estate of Plaintiff Kaul and his corporations, I immediately initiated communications with agents/lawyers representing insurance carriers that owed monies to Plaintiff Kaul.

36. I admit that a large percentage of the monies were owed by Defendant Allstate and The Kaul Cases Defendants Geico Insurance Company and Horizon Blue Cross Blue Shield.

37. I admit that in a period from approximately July 21, 2014, onwards I entered into a bribery related quid pro quo scheme with these insurance carriers, in which brines were funneled from the insurance carriers into my law firm disguised as 'legal fees', in return for which I agreed to not file claims against them to collect the accounts receivable and owed to Plaintiff Kaul's estate and its creditors.

38. I admit that of the fifty-two million dollars ($52,000,000) owed in accounts receivable, I did collect zero dollars ($0.00) in the period from July 21, 2014, to July 2020.

39. I admit that in the perpetration of the bribery scheme, it did involve bankruptcy judge, John Sherwood, who in return for granting every application for professional fees, non-collection orders and the writing down/cancelling of the accounts receivable debt/claims, did receive kickbacks directly, through family members and through the law firm at which he had been a partner.

40. I admit that I knew it was critical to have Third-Party Witness and co-conspirator, Sherwood participate in the bribery conspiracy, in order to attempt to provide 'cover' for the knowing commission of crime by myself and many others involved in the fraud perpetrated against Plaintiff Kaul, his estate and its eighty-three (83) creditors.

41. I admit that in perpetrating the bribery conspiracy within the U.S.B.C. for the District of New Jersey-Newark Vicinage, I did knowingly and willfully convert the court into a racketeering enterprise.

42. I admit that I and others, in converting the court into a racketeering enterprise, did perpetrate a **"pattern of racketeering"** within the court through the commission of, amongst other things, the RICO predicate acts of bribery/perjury/wire fraud/bankruptcy fraud/embezzlement/conspiracy.

43. I admit that I and others in the commission of the RICO predicate acts of bribery/perjury/wire fraud/bankruptcy fraud/embezzlement/conspiracy did knowingly and willfully violate the human/civil/constitutional rights of Plaintiff Kaul.

44. I admit that in establishing the elements of the bribery scheme and its purported judicial 'cover', I and others then proceeded to commit grand larceny against Plaintiff Kaul, his estate and its eight-three (83) creditors.

45. I admit that there came a point in time when I came to know that many of the small business creditors owed money by Plaintiff Kaul's estate were forced to declare bankruptcy.

46. I admit that the bribery scheme and my direct criminal acts were the direct and proximate cause of these bankruptcies.

47. I admit that in approximately 2015, I came to know of these bankruptcies.

48. I admit that despite knowing my criminal acts within the bankruptcy court and proceeding g were the direct and proximate cause of the bankruptcies, I did not care because I and my co-conspirators were continuing to personally profit from the scheme.

49. I admit that within the bribery scheme, there did operate a sub-scheme in which I ordered DiBiase to cause the knowingly unnecessary retention of so called 'experts' to purportedly advise me on matters of bankruptcy.

50. I admit that the purpose of this bribery sub-scheme was to have these so called 'experts' file claims against the estate for so called 'professional fees'.

51. I admit that the totality of all the claims were granted by co-conspirator and bankruptcy judge, John Sherwood.

52. I admit that a percentage of the monies granted by Sherwood to these so called 'experts' was funneled to me through my law firm as a kickback.

53. I admit that in the period from July 21, 2014, to September 18, 2018, Plaintiff Kaul received no notifications from the court as to the illegal dispensation of his monies.

54. I admit that it was not until approximately 2016 that I received an email from Plaintiff Kaul, in which he enquired as to how much of the accounts receivable had been collected.

55. I admit that in a time period from 2016 to 2018, there were several emails sent by Plaintiff Kaul to myself, Eric Katz, Esq and Donald DiBiase, enquiring as to what monies had been collected.

56. I admit that I knew that Eric Katz had represented Plaintiff Kaul in lawsuits he had filed against Horizon Blue Cross Blue Shield for non-payment of monies they owed Plaintiff Kaul for the provision of care to their fee-paying clients.

57. I admit that I had conspired with Eric Katz to cause him to dismiss in or around 2016, Plaintiff Kaul's lawsuits without his permission and or knowledge.

58. I admit that Eric Katz was part of the bribery scheme and the perpetration of the **"pattern of racketeering"** within the court.

59. I admit I instructed Katz and DiBiase to not communicate with Plaintiff Kaul or provide him any information as to the proceedings and specifically as to the fact that all estate monies collected had been diverted to Defendant Stolz and his co-conspirators disguised as 'legal fees'.

60. I admit I instructed Katz and DiBiase to not communicate with Plaintiff Kaul or provide him any information as to the proceedings and specifically as to the fact none of the estate monies collected were used to pay any of the eighth-three (83) creditors of Plaintiff Kaul.

61. I admit that Plaintiff Kaul persisted with his enquiries, emails and letters, all of which were either ignored or received responses that Plaintiff Kaul had no right to the claims, to the money or to any information pertaining to the proceeding.

62. I admit that on September 20, 2018, Plaintiff Kaul filed an adversarial action in the U.S.B.C. for the District of New Jersey (Case 18-01489-JKS), in which he detailed amongst other things, the bribery scheme an acts of fraud, embezzlement, money laundering/kickbacks. honest services fraud, mail fraud and wire fraud.

63. I admit that the case was specifically assigned to co-conspirator and bankruptcy judge, John Sherwood, an individual who had permitted the court to be converted into a **"racketeering enterprise",** through which he facilitated a **"pattern of racketeering"** from which he profited in a knowingly illegally manner.

64. I admit that on September 21, 2018, the clerk of the court entered a SUMMONS AND NOTUCE OF PRETRIAL CONFERENCE IN AN ADVERSARY PROCEEDING, to be conducted on January 8, 2019.

65. I admit that in reading and comprehending the Complaint filed in the Adversarial Action, I realized that Plaintiff Kaul had ascertained the structure and function of the bribery scheme.

66. I admit that in reading and comprehending the Complaint filed in the Adversarial Action, I realized that Plaintiff Kaul had ascertained the various roles played by my co-conspirators in the bribery scheme, including Mark Mannigan, Defendant Christie's 20098 political transition team member.

67. I admit that shortly after the filing of the Adversarial Action, I and my co-conspirators knew that if the action were permitted to proceed, Plaintiff Kaul would, through the discovery process, expose further highly incriminating evidence of my crimes and those of **The Kaul Cases** Defendants.

68. I admit that recognizing the seriousness and truthfulness of the asserted claims, I and my co-conspirators decided that the case had to be dismissed before the January 8, 2019, conference, in order to prevent the emergence of evidence of our crimes and those of **The Kaul Cases** Defendants.

69. I admit that I and my co-conspirators used the US wires to communicate information as to how the case could be dismissed.

70. I admit that knowing bankruptcy judge, John Sherwood, was a co-conspirator in the bribery scheme, I knew he would grant any motion to dismiss, regardless of its lack of merit.

71. I admit that I knew that if Plaintiff Kaul's case were to proceed into discovery, Sherwood's role in the conspiracy would become exposed, and thus I knew that Sherwood was motivated to dismiss the case.

72. I admit that on October 5, 2018, I filed a knowingly frivolous motion to dismiss.

73. I admit that November 7, 2018, one day before Plaintiff Kaul filed his opposition papers, co-conspirator Sherwood summarily dismissed the case without any analysis of fact or law.

74. I admit that Plaintiff Kaul's submissions within the District of New Jersey to have the dismissal reversed were ignored, with the district court failing and or refusing to adjudicate his petitions.

75. I admit that Plaintiff Kaul's petitions to the U.S.C.A. for the Third Circuit to mandamus the district court to adjudicate his appeal of the bankruptcy dismissal were denied, and the case was caused to stall in the District of New Jersey.

76. I admit that I know that co-conspirator Sherwood was appointed to the bankruptcy bench by judges sitting the U.S.C.A. for the Third Circuit.

77. I admit that I know that these judges on the Third Circuit did know of the bribery scheme.

78. I admit that I know that these judges on the Third Circuit and in the District of New Jersey knew of the circumstances and facts of the illegal NJ revocation.

The Obstruction of Justice Scheme

79. I admit that in a period commencing on April 9, 2018, I was sued by Plaintiff Kaul in several lawsuits on charges of amongst other things, racketeering, violations of antitrust law and violations of Plaintiff Kaul's human/civil/constitutional rights.

80. I admit that in the period from April 9, 2018, to the present I have not denied one allegation or fact in any of the cases.

81. I admit that the reason I have not denied any of the allegations/facts in any of the cases is because they are true.

82. I admit that my recognition of the civil and criminal consequences of the truth of the allegations/facts did cause me and **The Kaul Cases** Defendants to perpetrate schemes of obstruction of justice within the United States District Court.

83. I admit that the schemes of obstruction of justice were perpetrated through corruption/harassment/intimidation of certain judges within the United States District Court.

84. I admit that the corruption/harassment/intimidation caused these judges to either dismiss and or stay the case.

85. I admit that the dismissal and or staying of the case prevented Plaintiff Kaul from procuring discovery.

86. I admit that I know that there exists highly incriminating evidence of my crimes and those of **The Kaul Cases** Defendants.

87. I admit that in the period from April 9, 2018, to the present, the principal concern of myself and **The Kaul Cases** Defendants as to Plaintiff Kaul's exposing of evidence of our crimes, is the threat of criminal convictions.

88. I admit that it has been this serious concern of criminal convictions that has motivated me and **The Kaul Cases** Defendants to avoid addressing the allegations/facts and to neither deny the allegations/facts for fear of committing perjury.

89. I admit that it has been this serious concern of criminal convictions that has motivated me and **The Kaul Cases** Defendants to not engage in discovery for fear that Plaintiff Kaul will expose evidence of a long history and pattern of criminal conduct that predates Plaintiff Kaul.

90. I admit that it has been this serious concern of criminal convictions that has motivated me and **The Kaul Cases** Defendants to not engage in discovery for fear that it will implicate others in criminal schemes that predate Plaintiff Kaul.

91. I admit that it has been this serious concern of criminal convictions that has motivated me and **The Kaul Cases** Defendants to not engage in discovery for fear that it implicate others in schemes that resulted in the wrongful conviction/incarceration of many principally ethnic minority physicians.

92. I admit that in the period from April 9, 2018, onwards multiple attempts were made on Plaintiff Kaul's life/liberty in an attempt to cause is elimination.

93. I admit that I know that once discovery commences and judgments are granted to Plaintiff Kaul, there will be caused a further exposing of all parties that were involved in the revocation and associated conspiracies.

94. I admit I know that such an exposition of evidence, parties, conspiracies and crimes will commence a reformation of the process of so called 'physician disciplining' such that it will be caused to become complaint with the Constitution.

Conspiracy

95. I admit that in the period from July 21, 2014, to the present I have remained in conspiracy with **The Kaul Cases** Defendants and or their agents.

96. I admit that I and they have used the US wires in a knowingly illegal manner to transmit information regarding the perpetration of, amongst other things, the bribery scheme and the obstruction of justice scheme.

97. I admit that when Plaintiff Kaul was kidnapped on May 27, 2021, I and **The Kaul Cases** Defendants did use the US wires to exchange information as to the kidnapping.

98. I admit that when Plaintiff Kaul was kidnapped on May 27, 2021, I and **The Kaul Cases** Defendants did use the US wires to exchange information as to how the kidnapping would not be investigated in New Jersey.

99. I admit that when Plaintiff Kaul was illegally arrested and jailed on June 14, 2023, I and **The Kaul Cases** Defendants did use the US wires to exchange information as to how the illegal arrest/jailing would not be investigated in New Jersey.

100. I admit that the purpose of the kidnapping/arresting/jailing was to cause the elimination of Plaintiff Kaul.

101. I admit that the purpose of the attempted elimination of Plaintiff Kaul was to cause a cessation of any further litigation and the threat of exposing my crimes and those of **The Kaul Cases** Defendants.

102. I admit that consequent to the filing of **The Kaul Cases**, I and **The Kaul Cases** Defendants did attempt to destroy and delete evidence of communications pertaining to the perpetration of, amongst other things, the revocation scheme, the bribery scheme and the obstruction of justice scheme.

103. I admit that consequent to the filing of **The Kaul Cases**, I and **The Kaul Cases** Defendants did attempt to cause Third-Party Witnesses to destroy and delete evidence of communications pertaining to the perpetration of, amongst other things, the revocation scheme, the bribery scheme, the obstruction of justice scheme, the kidnapping scheme and the illegal arrest/jailing scheme.

104. I admit that many of the Third-Party Witnesses refused to destroy and or delete evidence of any of these schemes upon advice from their lawyers.

105. I admit that I know that the attempted destruction and or deletion of digital evidence is futile as e-discovery applications and artificial intelligence software can reconstruct the original data from the metadata.

106. I admit that the overall purpose of the bribery/obstruction of justice/conspiracy schemes was to destroy Plaintiff Kaul's economic standing in order to facilitate his elimination and ensure he was deprived of funds to either defend (2012-2016) or prosecute (2016-2024) legal claims.

September 20, 2018, To September 17, 2024

107. I admit that In or around November 2023, I became aware that Plaintiff Kaul had sued me and others in the United States District Court for the Eastern District of North Carolina (K11-17).

108. I admit that I was served with a copy of the Summons and Complaint.

109. I admit that on March 13, 2024, the Court entered an ORDER FOR DISCOVERY PLAN.

110. I admit that the ORDER FOR DISCOVERY PLAN required I confer with Plaintiff Kaul pursuant to Rule 26(f).

111. I admit that I ignored the Court Order, and refused to confer with Plaintiff Kaul.

112. I admit that through counsel I filed motions to stay discovery and to dismiss the case.

113. I admit that I did not deny any of the allegations/facts set forth in the Complaint.

114. I admit that pursuant to Rule 8(b)(6) my failure to deny the allegations/facts set forth in the Complaint did cause the facts to become admitted for all purposes.

115. I admit that the case was dismissed on June 14, 2024, and that the allegations/facts did pursuant to Rule 8(b)(6) remain admitted for all purposes.

116. I admit that on June 27/28, 2024, or shortly thereafter i became aware of the SCOTUS rulings in Jarkesy v SEC and Loper v Raimondo.

117. I admit that I obtained copies of the Jarkesy and Loper opinions.

118. I admit that I read the opinions.

119. I admit that as a lawyer and in my legal capacity I did fully comprehend all elements of both opinions.

120. I admit that prior to reading the opinions, I knew that the NJ 2014 revocation was illegal.

121. I admit that since 2014 I knew the revocation was illegal because it was the product of a **"pattern of racketeering"** in which the NJ Office of Administrative Law was converted into a racketeering enterprise, through which **The Kaul Cases** Defendants conducted a **"pattern of racketeering"** that involved, amongst other things, a commission of the RICO predicate acts of bribery/wire fraud/obstruction of justice/public corruption/evidential falsification/witness tampering.

122. I admit that I came to know of the illegality of the NJ revocation through digital and non-digital communications with some of **The Kaul Cases** Defendants and other members of the NJ Bar, such as Mark Mannigan.

123. I admit that I came to know of the illegality of the NJ revocation through digital and non-digital communications with other members of the NJ Bar, who had been involved in litigation with Plaintiff Kaul, in cases in which he was either sued or in which he was suing **The Kaul Cases** Defendants.

124. I admit that since 2014 I knew the revocation would and did constitute a willful and knowing violation of Plaintiff Kaul's human/civil/constitutional rights.

125. I admit that in reading and comprehending Jarkesy, I recognized that SCOTUS had re-affirmed Seventh Amendment protections as to a jury/article III judge when deprivations of life/liberty/property are threatened.

126. I admit that I knew and know that the revocation proceeding should have been conducted before a jury and an article III judge.

127. I admit that knew and know that Plaintiff Kaul's NJ license and his CDS prescribing license were his property.

128. I admit that I knew and know that the property of Plaintiff Kaul's NJ license and CDS prescribing license were protected by the NJ State Constitution and the United States Constitution.

129. I admit that I knew and know that the conduction of the revocation proceeding in the NJ Office of Administrative Law did constitute a willful and knowing violation of the law and of Plaintiff Kaul's constitutional rights.

130. I admit that in 2014, as a lawyer, I knew that the constitutional principles, law and holdings of Jarkesy were applicable to the revocation proceeding.

131. I admit that despite knowing the law in 2014, I did nonetheless knowingly and willfully violate the law and Plaintiff Kaul's human/civil/constitutional rights for the sole purpose of illegal personal profiteering at the expense and to the immense detriment of Plaintiff Kaul's life/liberty/property/reputation.

132. I admit that despite knowing the law in 2014, I did nonetheless knowingly and willfully violate the law and Plaintiff Kaul's human/civil/constitutional rights for the sole purpose of illegal personal profiteering through a knowing abuse of state power.

133. I admit that I violated the law and Plaintiff Kaul's human/civil/constitutional rights with an impunity that stemmed from my conviction that Plaintiff Kaul would never expose my crimes and those of **The Kaul Cases** Defendants.

134. I admit that from 2014 onwards I knew of the immense and irreparable injuries that the illegal revocation of Plaintiff Kaul's license would cause to his life/liberty/property/reputation and to the lives of his children.

135. I admit that from 2014 onwards despite my knowledge of the immense and irreparable injuries that the illegal revocation of Plaintiff Kaul's license would cause to his life/liberty/property/reputation and to the lives of his children, I did not care.

136. I admit that I did not care because I knew I would financially profit from the deprivations and violations perpetrated against Plaintiff Kaul by myself and **The Kaul Cases** Defendants.

137. I admit that on or about August 26, 2024, I came to know that Plaintiff Kaul had filed a lawsuit against me and others in the United States District Court for the Southern District of Texas – Houston Division (K11-20).

138. I admit that shortly thereafter, I procured a copy of the Complaint.

139. I admit that I was served with a copy of the Summons/Complaint/ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES in K11-20 on September 6, 2024.

140. I admit that in my capacity as a lawyer I did read and fully comprehend the Complaint.

141. I admit that as of September 16, 2024, I have neither entered the case nor had counsel enter on my behalf.

142. I admit that as of September 16, 2024, I have not denied any of the facts as to the extra two hundred and seventy-nine (279) days-worth of ongoing**/"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation.

143. I admit that some of the underlying allegations/facts of K11-20, did, pursuant to Rule 8(b)(6) become admitted for all purposes in K11-17.

144. I admit that I understand the phrase for **"all purposes"** to mean that facts admitted pursuant to Rule 8(b)(6) are applicable to cases other than that in which they became admitted.

145. I admit that the facts admitted in K11-17 are admitted in K11-20.

146. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled '**STATEMENT OF FACT ADMITTED PURSUANT TO RULE 8(b)(6) AND RULE 36**'.

147. I admit that this section states: **"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."**

148. I admit that I agree with the terms and conclusion of this section of the Complaint.

149. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **"STATEMENT OF FACT SPECIFIC TO EACH DEFENDANT".**

150. I admit this section states, amongst other things: **"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 ... 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 ..."**

151. I admit that I agree with the terms and conclusion of this section of the Complaint.

152. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'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

153. I admit this section states, amongst other things: **"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 ... 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 ... 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 ... 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 ... 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."

154. I admit that I agree with the terms and conclusion of this section of the Complaint.

155. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **. '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'**

156. I admit this section states, amongst other things: **"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 ... "**

157. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'COUNT FOURTEEN - Section 1983 claim - . 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 ... 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 ... 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 ... 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 ... 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 ... 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 ... These deprivations/violations willfully/maliciously caused by The Kaul Cases Defendants did illegally deprive/continue to deprive Plaintiff Kaul of his right to liberty ... These deprivations/violations/injuries were willfully/maliciously perpetrated by private actors within/through/with the assistance of the United States Bankruptcy Court ... These**

deprivations/violations/injuries were willfully/maliciously perpetrated by private actors within/through/with the assistance of the United States District Court.'

158. I admit that I agree with the terms and conclusion of this section of the Complaint.

159. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'COUNT FIFTEEN - 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 ... The Article 1 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights ... The Article 2 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights ... 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 ... The Article 5 violation caused and continues to cause deprivations/violations/injuries to Plaintiff Kaul's human/constitutional/property rights."**

160. I admit that I agree with the terms and conclusion of this section of the Complaint.

161. I admit that I procured copies of Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants and attached as exhibits within K11-20.

162. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS.

163. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS.

164. I admit that although K11-20 factually differs from K11-17 in that there exists in K11-20 an extra two hundred and seventy-nine (279) days-worth of ongoing/**"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, there exists a commonality of fact of four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury to Plaintiff Kaul's life/liberty/property/reputation.

165. I admit that the commonality of the four thousand five hundred and thirty-one (4,531) days-worth of past/ongoing non-remediated-unrectified injury was admitted for all purposes in K11-17.

166. I admit that the entire corpus of fact of **The Kaul Cases** became sequentially admitted from the February 22, 2016, filing of K1 to the present consequent to the fact that neither I nor any of **The Kaul Cases** Defendants ever denied any of the facts.

167. I admit that the facts admitted in K11-20 do substantiate entry of Summary Judgment against me as to all claims.

168. I admit that the SCOTUS rulings in Jarkesy and Loper, in conjunction with the admitted facts do further render me and all other Defendants defenseless and subject to Summary Judgment.

169. I admit that pursuant to Rule 8(b)(6) my non-denial of the facts of the extra two hundred and seventy-nine (279) days-worth of ongoing/**"new"** injuries to Plaintiff Kaul's life/liberty/property and reputation, has caused them to become admitted for all purposes, including Summary Judgment.

170. I admit that pursuant to RICO's doctrine of vicarious liability, I am as liable for all the offenses/violations/injuries committed by **The Kaul Cases** Defendants against Plaintiff Kaul, as they are as liable for all the offenses/violations/injuries that I have committed against Plaintiff Kaul – **"The crime of one becomes the crime of all"**

171. I admit that in reading and fully comprehending the Complaint, I did read and comprehend ALL sections of the Complaint, from '**PRELIMINARY ISSUES AND STATEMENT OF CULPABILITY** to **FACTS** to **LEGAL CLAIMS AND RELIEF**.

172. I admit that I agree with the evidence/facts/arguments/law and conclusions set forth in the Complaint.

173. I admit that I do not dispute any element of the Complaint, including that pertaining to the determinative effect of **Jarkesy** on this case and its future effect on the constitutional protections that must be afforded the physician license granting and revoking procedure.

174. I admit that in reading and fully comprehending the Complaint, I did read and comprehend the section entitled: **'STATEMENT OF NEW LAW, NEW FACTS AND ADMITTED FACTS AND THEIR NULLIFICATION OF ALL PRIOR FACTS AND LAW'**

175. I admit this section states, amongst other things: **'NULLIFICATION OF DEFENDANT-RESPONDENT OETKEN'S K11-7 SEPTEMBER 12, 2022 'INJUNCTION' BY JUNE 27, 2022, SCOTUS OPINION IN JARKESY'**

176. I admit that I agree with the statements of fact asserted in this section of the Complaint and in all other sections of the Complaint.

Adoption Of Admissions Of Fact Of The Kaul Cases Defendants:

CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION STATE MEDICAL BOARDS

177. I admit that I procured copies of Rule 8(b)(6) 'ADMISSIONS OF FACT' submitted within **The Kaul Cases** as to other Defendants, some of which are attached as exhibits within K11-20, while the remainder have been served upon all parties to the K11-20 action.

178. I admit that I knew and know that these Defendants include Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION STATE MEDICAL BOARDS

179. I admit that I knew and know that pursuant to RICO's doctrine of vicarious liability, I am as liable for the facts of offense and injury admitted within the Rule 8(b)(6) 'ADMISSIONS OF FACT' of **The Kaul Cases** Defendants CHRISTOPHER J. CHRISTIE/ROBERT FRANCIS HEARY/DANIEL STOLZ/JAMES HOWARD SOLOMON/KENNETH MURPHY/HORIZON BLUE CROSS BLUE SHIELD/ANDREW KAUFMAN/STEVEN LOMAZOW/NEW JERSEY BOARD OF MEDICAL EXAMINERS/FEDERATION STATE MEDICAL BOARDS

DATED: SEPTEMBER 18, 2024

R.K-1

RICHARD ARJUN KAUL, MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

SOUTHERN DISTRICT OF MISSISSIPPI
FILED
JAN 14 2025
ARTHUR JOHNSTON
BY _____ DEPUTY

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

Plaintiff

CIVIL ACTION NO.: 24-CV-00621-CWR-LGI

v.

JAMES PAUL OETKEN
(PERSONAL AND OFFICIAL CAPACITY)
MISSISSIPI MEDICAL BOARD;
NEW YORK STATE ATTORNEY GRIEVANCE
COMMITTEE; JANE DOE; JOHN DOE.

Defendants.

ADMISSIONS OF MATERIAL AND UNDISPUTED FACT NOT RELATED TO THE ISSUE PENDING THE COURT'S RULING ON THE MOTION AND PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE

Respectfully Submitted

RICHARD ARJUN KAUL, MD

JANUARY 13, 2025

1. I admit that on or about January 6, 2025 I came into possession of the 'ADMISSIONS OF MATERIAL AND UNDISPUTED FACT NOT [SIC] RELATED TO THE ISSUE PENSDING THE COURT'S RULING ON THE MOTION AND PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT JAMES PAUL OETKEN'

2. I admit that I read the entire document.

3. I admit that my counsel explained to me the meaning of each of the admissions of my co-Defendant Oetken.

4. I admit that my counsel explained to me the legal consequences to me of the admissions of my co-Defendant Oetken.

5. I admit that I understood the legal consequences to me of the admissions of my co-Defendant Oetken.

6. I admit that my counsel explained to me the doctrine of vicarious liability of RICO.

7. I admit that I understood the doctrine of vicarious liability of RICO did and does confer on me the liability of every and all offense/violation/crime/injury committed by Defendant Oetken against Plaintiff Kaul.

8. I admit that in having my counsel explain to me the doctrine of vicarious liability pursuant to RICO, he did explain to me that Defendant Oetken was, pursuant to this doctrine, as liable for every and all offenses/violation/crime/injury committed against Plaintiff Kaul by **The Kaul Cases** Defendants.

9. I admit I know who are **The Kaul Cases** Defendants.

10. I admit that in understanding the liability of Defendant Oetken for every and all offenses/violation/crime/injury committed against Plaintiff Kaul by **The Kaul Cases** Defendants in the period from 2005 to 2025, I did become liable for every and all of these offenses/violations/crimes/injuries the moment I entered into conspiracy with Defendant Oetken.

11. I admit I know that the conspiracy is the 'Revocation-Cover-Up Conspiracy' which commenced in 2005 with the invention by Plaintiff Kaul of the percutaneous spinal fusion procedure.

12. I admit I know this procedure revolutionized the multi-billion-dollar field of spine surgery.

13. I admit I know **The Kaul Cases** Defendants conspired to have Plaintiff Kaul's New Jersey medical license illegaly revoked in 2014.

14. I admit I am in possession of copies of K11-7 and K11-20 and am familiar with the circumstances and facts of **The Kaul Cases**.

15. I admit that my counsel explained to me that pursuant to the vicarious liability doctrine of RICO, I did incur the liability for every and all offense/violation/crime/injury committed against Plaintiff Kaul by **The Kaul Cases** Defendants (2005-2025) the moment I entered the "Revocation-Cover-Up Conspiracy' because of Defendant Oetken.

16. I admit I know that pursuant to RICO's doctrine of vicarious liability I am as guilty of the offenses/violations/crimes/injuries levied against **The Kaul Cases** Defendants, as if I directly committed them myself.

17. I admit I know some of these crimes include kidnapping/false indictment/false arrest/false imprisonment/attempted killing/bribery/perjury/obstruction of justice/wire fraud/evidential falsification/witness tampering/public corruption.

18. I admit I know that that pursuant to RICO's doctrine of vicarious liability I am as guilty of every admission of violation/offense/crime admitted to by Defendant Oetken in his January 6, 2025 "ADMISSIONS OF MATERIAL AND UNDISPUTED FACT NOT [SIC] RELATED TO THE ISSUE PENSDING THE COURT'S RULING ON THE MOTION AND PURSUANT TO RULE 8(b)(6) AS TO DEFENDANT JAMES PAUL OETKEN'

19. I admit that on December 16, 2024 I submitted a **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'**

20. I admit that the principal defenses submitted within this document pertained to Eleventh Amendment immunity and lack of jurisdiction.

21. I admit that within the submission I did not deny any of the allegations and or facts set forth on Plaintiff Kaul's October 9, 2024 Complaint.

22. I admit I know that the plain text of Rule 8(b)(6) obligates me to admit or deny the allegations and or facts.

23. I admit I know that the plain text of Rule 8(b)(6) deems a non-denial of the allegations and or facts as an admission of the allegations and or facts.

24. I admit I failed to deny any of the allegations/facts set forth in the October 9, 2024 Complaint.

25. I admit I know that in failing to deny any of the allegations/facts I did admit to all the allegations/facts set forth in the October 9, 2024 Complaint.

26. I admit I know that the submission of the procedural defenses of jurisdiction and immunity did not and do not absolve me of my Rule 8(b)(6) obligation to deny the allegations/facts.

27. I admit that my counsel explained to me my obligations pursuant to Rule 8(b)(6).

28. I admit I know that nowhere in the Federal Rules of Civil Procedure is a litigant permitted to not comply with Rule 8(b)(6) under any circumstances.

29. I admit I know the legislative purpose of Rule 8 was consistent with and in furtherance of Rule 1, which requires there be a **"just, speedy and inexpensive determination of every action and proceeding."**

30. I admit that the plain construction of Rule 8(b)(6) and its foundational purpose for every subsequent rule, equates the denial or admitting of allegations/facts with a **"just, speedy and inexpensive determination of every action and proceeding."**

31. I admit that my failure to deny the allegations/facts, did, other than causing their admission, constitute a violation of not just Rule 1, but Rule 8.

32. I admit that being an individual highly educated and qualified in the subject of law, I have knowledge and understanding of the historical progression from the pleading standard set forth in Conley v Gibson (1957) to that set forth in Twombly (2008) and Iqbal (2009).

33. I admit I know that Rule 8 was enacted on September 16, 1938.

34. I admit that the Federal Rules of Civil Procedure were adopted in 1937.

35. I admit I know that the Federal Rules of Civil Procedure predated Conley/Twombly/Iqbal.

36. I admit that I am in possession of a copy of the text and ADVISORY NOTES pertaining to Rule 8.

37. I admit that as an individual highly educated and qualified in the subject of law, and in conjunction with my counsel, I have read the entire copy.

38. I admit I understand the contents of the entire copy.

39. I admit that I understand a substantial part of the Federal Rules of Civil Procedure are based on the English common law principles of plain and common justice.

40. I admit I know that within the body of English jurisprudence of the 18th century there did occur a shift from overly technical pleading to one involving plainly worded allegations and a simple denial or admittance.

41. I admit I know that as an individual highly educated and qualified in the subject of law, the failure within English jurisprudence and courts to deny an allegation was deemed to be a tacit admission of the charge.

42. I admit I know that as an individual highly educated and qualified in the subject of law, there exists a common misunderstanding that an adoption of the silence of the 5th Amendment in civil proceedings is not interpreted in the same tacit admission manner as the failure to deny an allegation/fact in English jurisprudence.

43. I admit that Rule 8(b)(6) did codify that within civil proceedings silence or failure to deny allegations/facts did and does constitute an admission.

44. I admit that nowhere in the 'ADVISORY NOTES' of Rule 8 is one relieved of one's obligation to deny the allegations/facts if one submits procedural related defenses, such as jurisdiction/immunity.

45. I admit that nowhere in the 'ADVISORY NOTES' of Rule 8 is one relieved of one's obligation to deny the allegations/facts based on the 2008/2009 pleading related holdings in Twombly/Iqbal.

46. I admit that nowhere in the 'ADVISORY NOTES' of Rule 8 is one relieved of one's obligation to deny the allegations/facts based on the pleading related holdings of any pleading sufficiency case within the entire corpus of American jurisprudence.

47. I admit that since the 2008/2009 Twombly/Iqbal holdings, unscrupulous lawyers and over-worked judges have variously abused and misinterpreted the uncontested pleading principles set forth and established in Rule 8(b)(6) since 1938.

48. I admit I know that Plaintiff Kaul, whose only motivation is justice, did recognize the manner in which the Rule 8(b)(6) principles were being violated and or ignored in **The Kaul Cases**.

49. I admit I know that many of the counsel for **The Kaul Cases** Defendants did themselves not know of the correct interplay between Rule 8(b)(6) and Rule 12 4(a)(4).

50. I admit that the plain language of Rule 12(a)(4) does not absolve a defendant of his obligations under Rule 8(b)(6).

51. I admit there exists nothing in the 'ADVISORY NOTES' or legislative record of Rule 12(a)(4) that absolves a defendant of his obligations under Rule 8(b)(6).

52. I admit that my submission of procedural defenses does not absolve me of my Rule 8(b)(6) obligation to deny or admit the allegations/facts set forth in the Complaint.

53. I admit that I know the Rule 8(b)(6) obligation is consistent with and in furtherance of a **"just, speedy and inexpensive"** determination of the claims set forth in the K11-23 Complaint.

54. I admit I know that had the K1 Defendants simply denied or admitted the allegations/facts set forth in the February 22, 2016 K1 Complaint, the issues that now, in 2025, continue to exist could and would very likely have been resolved by 2018.

55. I admit I know that the reason for the almost nine (9) years-worth of non-denial of the allegations/facts of **The Kaul Cases** by **The Kaul Cases** Defendants was ad is because they are guilty of the levied charges.

56. I admit I know that in the period between February 22, 2016 and the present, The Kaul cases Defendants have perpetrated massive schemes of political-judicial corruption purposed to attempt to 'cover-up' their previous crimes.

57. I admit that on December 30, 2024 Plaintiff Kaul submitted a **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'** in opposition to my December 16, 2024 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'**.

58. I admit I read and understood Plaintiff Kaul's **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'.**

59. I admit that the thrust of Plaintiff Kaul's submission is two-fold and pertained/pertains to the fact that I am vicariously liable pursuant to RICO for every and all offense/violation/crime/injury committed against Plaintiff Kaul by **The Kaul Cases** Defendants and that my failure to deny the allegations/facts set forth in the K11-23 Complaint do render me guilty of the levied charges.

60. I admit that my admitted guilt of the charges levied in K11-23 do nullify my procedural jurisdictional and immunity defenses.

61. I admit that in my December 16, 2024 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** I did fail to contest/rebut/refute/address the RICO claims.

62. I admit I know that the reason I failed to contest/rebut/refute/address the RICO claims is because they are predicated on the crimes of bribery/wire fraud/obstruction of justice/public corruption, crimes not protected by Eleventh Amendment immunity.

63. I admit I know the reason I failed to contest/rebut/refute/address the RICO claims is because I became subject to the claims consequent to joining 'The Revocation-Cover-Up Conspiracy'

64. I admit that in Plaintiff Kaul's December 30, 2024 **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'** he established 'minimal contacts' between myself and the equivalent agency in Mississippi.

65. I admit that on January 6, 2025, I filed **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** in reply to Plaintiff Kaul's December 30, 2024 **"REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'.**

66. I admit that in the January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** I failed to address/contest/rebut/refute and or deny the facts set forth in Plaintiff Kaul's **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'** (D.E. 22 – PAGE 9 TO 10 OF 11), in which Plaintiff Kaul has in an uncontested manner established personal and subject matter jurisdiction pursuant to the 'Revocation-Cover-Up Conspiracy' caused **"new racketeering injuries"** in Mississippi due to the 2014 NJ related revocation denials of Plaintiff Kaul's 2020/2024 applications for Mississippi licensure AND consequent to the unrefuted/admitted fact of 'minimal contacts' in which Defendant NYAGC conducts the business of lawyer regulation/disciplining with its Mississippi equivalent (D.E., 22 Page 10 of 11).

67. I admit that in the January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** I failed to address/contest/rebut/refute and or deny the facts set forth in Plaintiff Kaul's December 30, 2024 **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'** (D.E. 22 – PAGE 2/3/4/9 OF 11), in which Plaintiff Kaul has in an uncontested manner established Defendant NYAGC's lack of any immunity against the K11-23 claims.

68. I admit that in the January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** I do knowingly and falsely claim that Plaintiff Kaul provides no explanation as to why Defendant NYAGC is deprived of any form of immunity: **"Kaul makes a passing reference to a narrow exception to Eleventh Amendment immunity created by Ex parte Young. He does not say why he thinks it applies and it does not."**

69. I admit that this is a knowingly false characterization of the reasons given by Plaintiff Kaul as to why Defendant NYAGC is deprived of any form of immunity.

70. I admit I know that Plaintiff Kaul's reference to Ex parte Young pertains only to the latter part of the preceding sentence: **"... and violations of human/civil/constitutional rights, provisions and principles."** and not to any other part of the '**ELEVENTH AMENDMENT IMMUNITY'** section of Page 4 of 11 (D.E. 22), for if it did, it would have been cited at the commencement with words to the effect of **"pursuant to"** and it was not.

71. I admit I know that the Eleventh Amendment depriving reasons provided by Plaintiff Kaul pertained to the commission of criminal acts contained within 'The Revocation-Cover-Up Conspiracy' to which Defendant Oetken did admit to on January 6, 2025 (D.E. 24).

72. I admit I know that pursuant to RICO's doctrine of vicarious liability and as pled by Plaintiff Kaul **("the crime of one becomes the crime of all")**, the liability of the commission of criminal acts contained within 'The Revocation-Cover-Up Conspiracy' did inure to me as if I directly committed the crimes and violations of human/civil/constitutional rights.

73. I admit I know that it was/is my effective commission of the crimes and rights violations perpetrated through the 'Revocation-Cover-Up Conspiracy' by **The Kaul Cases** Defendants (2005-2025), in conjunction with the principles of Ex parte Young that deprives me of any form of immunity including that of the Eleventh Amendment.

74. I admit I know that the crimes of my 'Revocation-Cover-Up Conspiracy' – Ex parte Young related deprivation of Eleventh Amendment immunity do subjugate me to the jurisdiction of the U.S.D.C. for the Southern District of Mississippi.

75. I admit that in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** at Page 6 of 13, and in my **'RICO claims are subject to Eleventh Amendment immunity because RICO contains no relevant abrogation'** argument, that I do misrepresent the facts asserted by Plaintiff Kaul that the commission of crime is not immunized by the Eleventh Amendment.

76. I admit I know that a plain read of Plaintiff Kaul's 'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE' at (D.E. 22 Page 4 of 11) section 'ELEVENTH AMENDMENT IMMUNITY' identifies the commission of the state crimes of **"kidnapping/false indictment/false arrest/false imprisonment/attempted killing/bribery/kickbacks/evidential tampering/bankruptcy fraud/securities fraud/obstruction of justice/public corruption/wire fraud/conspiracy/violations of human-civil-constitutional rights"** without reference to a **"racketeering pattern"** and or RICO, and does therefore render irrelevant my defense that RICO contains no abrogation of the Eleventh Amendment.

77. I admit I know, however, that the lack of a statement of abrogation within RICO of Eleventh Amendment immunity was not statutorily required nor indeed relevant as there exists no provision within criminal law or the legislative record of RICO that warrants the commission of crime or rights violations be protected by the Eleventh Amendment.

78. I admit I know that there does not exist within the legislative or case record of any criminal statute that state actors/agencies are protected by the Eleventh Amendment from either civil or criminal prosecution for the commission of state crimes.

79. I admit I know that the Eleventh Amendment provides no protection to the vicariously incurred violation of Plaintiff Kaul's human/civil/constitutional rights by Defendant NYAGC.

80. I admit that neither I nor Defendant Oetken even attempted to raise an Eleventh Amendment defense to the violations of Plaintiff Kaul's human/civil/constitutional rights.

81. I admit the reason that neither I nor Defendant Oetken raised an Eleventh Amendment defense is that we know the law not only prohibits such a defense to violations of human/civil/constitutional rights by state actors/agencies, but does pursuant to Section 1983 provide a statutory mechanism for relief as to such violations/injuries.

82. I admit I know that in K11-18, Defendant Oetken filed no motion to dismiss the case.

83. I admit I know that the admitted facts/allegations of K11-18 constitute the admitted facts/allegations of K11-23.

84. I admit I know that Defendant Oetken's failure to file a motion did deprive him of any right pursuant to Rule 12(a)(4) to delay his denying or admitting of the facts/allegations of K11-18.

85. I admit I know that Defendant Oetken's non-denial of the facts/allegations of K11-18 did cause the admittance of these facts/allegations for all purposes, including K11-23.

86. I admit that subsequent to the Court's initial evaluation of all circumstances/facts/conditions of K11-23 after its filing on October 2, 2024, it did determine the case had merit and did therefore issue on November 4, 2024 a 'RULE 16(a) INITIAL ORDER' (D.E. 7).

87. I admit that the entry of such an order as to the merit of a case is a directive for the commencement of discovery into the factual underpinning of the case and its circumstances.

88. I admit that the statement in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION':**

"The very purpose of a motion to dismiss is to <u>get rid of a case</u> without delving into the claims or the facts supposedly supporting them." (D.E. 25 Page 7 of 13)

is contradicted by the Court's November 4, 2024 order to indeed commence a **"delving"** into the facts constituting/surrounding the case.

89. I admit the Court has jurisdiction and the case has merit.

90. I admit that my refusal to conduct a Rule 26(f) conference with Plaintiff Kaul as ordered on November 4, 2024 did/does constitute a Rule 37 violation.

91. I admit that the Court's examination of the circumstances/facts/conditions of K11-23 from its filing on October 9, 2024 to the issuance of the 'RULE 16(a) INITIAL ORDER' ON November 4, 2024 did find the Court had jurisdiction and the claims had merit.

92. I admit that my motions to dismiss based on jurisdiction are frivolous.

93. I admit that pursuant to Defendant Oetken's Rule 8(b)(6) admissions of the facts/allegations in K11-18 for all purposes including proof of K11-23, and in conjunction with RICO's doctrine of vicarious liability, I am as guilty of the offenses/violations/crimes committed against, and violations of Plaintiff Kaul's human/civil/constitutional rights as perpetrated through the '**Revocation-Cover-Up Conspiracy**' as if I directly committed/perpetuated the acts against Plaintiff Kaul.

94. I admit I know that had Defendant NYAGC commenced an investigation into Defendant Oetken, the subpoena power of the investigation would have exposed the offenses/violations/crimes (2005-2024) of **The Kaul Cases** Defendants.

95. I admit I know that my investigative powers are unlimited and had I not entered into the '**Revocation-Cover-Up Conspiracy**' and instead conducted an impartial investigation independent of political and corporate influence, the truth of **The Kaul Cases**, or at least the commencement of the process would have been exposed.

96. I admit I know that I chose to enter the '**Revocation-Cover-Up Conspiracy**' instead of conducting a thorough and impartial investigation because I derived economic/professional/political benefit from not exposing the crimes of a district judge who appeared to have 'friends' in powerful places.

97. I admit that in the knowing and purposeful dereliction my duty to investigate claims of bribery and public corruption against Defendant Oetken, I did aid and abet the long-standing **"pattern of racketeering"** perpetrated by **The Kaul Cases** Defendants acting through/within the '**Revocation-Cover-Up Conspiracy**'.

98. I admit I know I had a legal obligation to report the crimes of **The Kaul Cases** Defendants to investigative/prosecutorial authorities.

99. I admit I know my violation of that legal obligation has caused me to incur all the liability of **The Kaul Cases** Defendants (2005-2025) of which Defendant Oetken and now I are co-defendants.

100. I admit I know that my analysis of Plaintiff Kaul's citation to Ex parte Young is false in that I assert, with knowing fraudulence, that Plaintiff Kaul has cited it for propositions for which he has not, as evidenced by the plain text of the December 30, 2024 'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE' (D.E. 22 Page 4 of 11).

101. I admit I know that Plaintiff Kaul's reference to Ex parte Young pertains only to the latter part of the preceding sentence: **"... and violations of human/civil/constitutional rights, provisions and principles."** and not to any other part of the **'ELEVENTH AMENDMENT IMMUNITY'** section of Page 4 of 11 (D.E. 22), for if it did, it would have been cited at the commencement with words to the effect of **"pursuant to"** and it was not (see para. 70)

102. I admit that my conflation of excerpted sections from the October 2, 2024 Complaint and Plaintiff Kaul's December 30, 2024 **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE':**

"As to his legal argument, Opp. at *8-9, Kaul seems to say that the Grievance Committee committed unspecified "willful and knowing [violations] of [his] human/civil/constitutional right sic] and knowing violation[s] of Constitutional law and federal statutes ...," that thereby deprive it of its Eleventh Amendment "protections," id., under Ex parte Young, 209 U.S. 123 (1908), and its progeny. Opp. at *4." (D.E. 25 Page 7-8 of 13)

is a purposeful misrepresentation of the actual proposition for which Ex parte Young is cited, which is that stated in paras. 70/101, and pertains to violations of the principles underpinning human/civil/constitutional rights, without any specific reference to the K11-23 facts/parties.

103. I admit that the knowingly fraudulent conflation was/is purposed to attempt to show that Defendants cannot be held liable pursuant to Ex parte Young for not only Eleventh Amendment violations, but any violations of the law and Plaintiff Kaul's human./civil/constitutional rights.

104. I admit that if one were to extrapolate the logic of my argument, it would immunize all state actors/agencies from being prosecuted for the commission of all crimes, including murder, where the defense would be that to convict a state actor murderer would have a 'chilling effect' on state actors willingness to perform their state duties.

105. I admit that being an individual highly educated and qualified in the subject of law, I know that this scenario of state sanctioned murder and wrongful incarceration exists within certain police forces and prosecutorial agencies.

106. I admit that being an individual highly educated and qualified in the subject of law, I know that the doctrines of qualified/sovereign/absolute immunity have been substantial contributors to a system in which the commission of lawlessness by those in possession of state power is not only permitted but goes **uninvestigated** and unpunished.

107. I admit that my non-investigation of Defendant Oetken's thirteen (13) year-plus worth of crimes on the federal bench does constitute an example of such a willful failure to investigate the commission of lawlessness by a person in possession of immense state power.

108. I admit that if I were to investigate Defendant Oetken's entire case record (2011-2025), I would find criminal cases of knowingly wrongful incarceration/wrongful dismissal and civil cases of knowingly wrongful evictions/asset seizures/dismissals/judgments.

109. I admit that although state bars have no right or jurisdiction to restrict the activity of a federal judge, they do have the power and indeed duty to sanction currently licensed lawyers, who may happen to be federal judges, for violations of any legal code of conduct, civil law and or criminal law.

110. I admit I knew/know that the commission of bribery is a violation of criminal law.

111. I admit I knew/know that Defendant Oetken's September 14/October 6, 2022 failure to deny the charges of bribery did constitute an admission.

112. I admit I knew I had an obligation to report Defendant Oetken's crimes to the Judicial Disciplinary Council, in conjunction with my obligation to have him investigated in his status as a lawyer licensed in the State of New York.

113. I admit that there exists no file on record of ever having conducted any investigation into Plaintiff Kaul's complaint against Defendant Oetken.

114. I admit that in attempting to misrepresent Plaintiff Kaul's request to investigate Defendant Oetken's perpetration of bribery while on the federal bench as a request to order Defendant Oetken to reverse his September 12, 2022 'order-injunction', I do knowingly misrepresent the facts.

115. I admit I know that Plaintiff Kaul's November 30, 2022 complaint (**Exhibit 1**) makes no reference to, nor requests that any action be taken in regard to Defendants Oetken's September 12, 2022 'order-injunction'.

116. I admit that Plaintiff Kaul's November 30, 2022 complaint simply requests an investigation be conducted as to Defendant Oetken's long-history of abusing the power of the federal bench to perpetrate criminal conspiracies, principally in collusion/conspiracy with extremely wealthy individuals and Fortune 500 corporations.

117. I admit that the thrust of the Complaint pertains to the commission and vicariously incurred liability of the admitted crimes of, amongst other things, bribery/judicial corruption/public corruption/perjury/evidential falsification/witness tampering/obstruction of justice/kickbacks/wire fraud/mail fraud/false indictments/false arrests/false imprisonment/kidnapping/attempted drugging-killing.

118. I admit I know the Eleventh Amendment provides state actors no protection against being prosecuted for the commission of criminal offenses.

119. I admit that a principal tactic of my defense submissions has been the construction of 'straw man' arguments and the knowing misrepresentation of facts/arguments and the citing of cases, the inappositeness of which is evidenced in the immense factual disparity between their civil violation factual foundations and the criminal violations that underpin K11-23.

120. I admit that this Court has the authority to find that Defendant NYSAGC, did in collusion/conspiracy with Defendant Oetken, commit the within offenses/violations/crimes/injuries.

121. I admit that I would be obligated to report such a finding to the New York State Supreme Court's Appellate Division.

122. I admit I know that the judges on the New York State Supreme Court's Appellate Division would take remedial action against me and all my co-members and order an investigation be conducted as to Defendant Oetken's crimes as a lawyer who happens to be a federal judge who has used the power of the federal bench to commit self-enriching crime for over a decade.

123. I admit I know my argument as to this Court's lack of authority to order Defendant Oetken be investigated is flawed, as the factual underpinning of K11-23 pertains to violations of federal law/constitutional rights, the remedial power of which resides with the United States District Court.

124. I admit that if I violate an order from the United States District Court it will be a knowing/willful act of contempt.

125. I admit that being an individual highly educated and qualified in the subject of law, I know the consequences of an order of contempt.

126. I admit that an order of contempt would cause me to comply with the Court's order to have investigated Defendant Oetken's decade-plus-long use of the power of the federal bench to cause the procurement of immense financial self-enrichment at the callous expense and through the exploitation/grave detriment of unwitting litigants, who either simply did not have enough money to outbid their opponents, or did not know the rules of Defendant Oetken's 'game'.

127. I admit I know of the prevalence in the North-Eastern states of the United States of massive schemes of corruption of the political and judicial bodies by the insurance industry.

128. I admit I know that Wall Street is less than two (2) miles from the S.D.N.Y.

129. I admit I know that there do occur many private face-to-face meetings between politicians, judges and insurance/banking executives in and around the Wall Street-S.D.N.Y area.

130. I admit I know from my extensive connections in the legal and political spheres that many corrupt deals and quid pro quo schemes are agreed upon in these meetings, in which insurance/banking executives agree to funnel bribes through their corporations to judges and the politicians who appointed them, to ensure legal cases and legislation are corrupted to favor their economic/political interests.

131. I admit I know that Senator Charles Schumer's political career was principally funded by the insurance industry.

132. I admit that Senator Schumer persuaded Senator Frank Lautenberg (NJ) to support the 2012 appointment of his bother-in-law, Kevin McNulty to the federal bench in the District of New Jersey.

133. I admit I know that when Plaintiff Kaul filed K1 on February 22, 2016, a case in which insurance companies Allstate/Geico and TD Bank were Defendants, the case was steered towards Senator Schumer's brother-in-law.

134. I admit I know that Senator Schumer's brother-in-law became disqualified on May 22, 20129 when Plaintiff Kaul moved for his disqualification based on his having received bribes from amongst others, the insurance-banking Defendants in K1.

135. I admit I know that Senator Schumer's brother-in-law suddenly and without stated cause vacated his seat on the federal bench after his disqualification, and without disclosing his financial holdings.

136. I admit I know that Senator Schumer was involved in the 2011 appointing to the federal bench of Defendant Oetken.

137. I admit that I know that when Plaintiff Kaul filed K11-7 on August 19, 2021, a case in which insurance companies Allstate/Geico and TD Bank and Intercontinental Exchange were Defendants, the case was steered towards Senator Schumer's appointed judge, Defendant Oetken.

138. I admit I know that Senator Schumer demanded more bribes from the insurance companies Allstate/Geico and TD Bank and Intercontinental Exchange for both himself and Defendant Oetken, in return for ordering Defendant Oetken, whom he controlled/controls, dismiss K11-7 and enter a knowingly illegal 'injunction.

139. I admit I know that in 2019 Plaintiff Kaul sued Defendant Schumer (K3) on charges of, amongst other things bribery related racketeering.

140. I admit I am in possession of a copy of the K3 Complaint.

141. I admit I have read and understand the K3 Complaint.

142. I admit I know that all of the facts and allegations in K3 are true.

141. I admit I know that Defendant Schumer did not deny any of the facts/allegations in K3.

142. I admit that Defendant Schumer moved to have the case stayed.

143. I admit the case was stayed.

144. I admit I know it has been frequent tactic of **The Kaul Cases** Defendants to bribe judges into staying cases in order to avoid discovery and or having to answer the charges.

145. I admit I know through my extensive connections within the legal/political spheres that the purpose for the entry of stays is that the defendants are guilty of the charged offenses of amongst things, bribery and quid pro quo schemes.

146. I admit I know that in the almost nine (9) years in which Plaintiff Kaul has been attempting to prosecute **The Kaul Cases**, not one defendant has ever denied any of the thousands of facts/allegations.

147. I admit I know that in the almost nine (9) years in which Plaintiff Kaul has been attempting to prosecute **The Kaul Cases**, not one defendant has ever complied with any of the discovery orders.

148. I admit I know that in the almost nine (9) years in which Plaintiff Kaul has been attempting to prosecute **The Kaul Cases**, not one defendant has presented himself for deposition by Plaintiff Kaul.

149. I admit I know as an 'insider' that the reason for **The Kaul Cases** Defendants evasion and obstruction of justice pertains to the fact that they are guilty of all the charges/facts levied in **The Kaul Cases**.

150. I admit that I have read and understand the Complaints in **The Kaul Cases**.

151. I admit I know as an 'insider' that all of the charges/facts levied in **The Kaul Cases** are true.

152. I admit I know the reason for **The Kaul Cases** Defendants almost nine (9) year evasion of answering and or denying the charges/facts of **The Kaul Cases** is because they are guilty of the within charged crimes.

153. I admit I know the reason for **The Kaul Cases** Defendants almost nine (9) year evasion of answering and or denying the charges/facts of **The Kaul Cases** is because many of them have perpetrated quid pro quo schemes with the insurance industry.

154. I admit I know the reason for **The Kaul Cases** Defendants almost nine (9) year evasion of answering and or denying the charges/facts of **The Kaul Cases** is because many of them have had their lives and economic/professional/personal welfare threatened by the insurance industry if they disclose the truth to Plaintiff Kaul.

155. I admit I know the reason for **The Kaul Cases** Defendants almost nine (9) year evasion of answering and or denying the charges/facts of **The Kaul Cases** is because many of them have continued to receive bribes from the insurance industry to maintain their silence.

156. I admit I know the reason for **The Kaul Cases** Defendants almost nine (9) year evasion of answering and or denying the charges/facts of **The Kaul Cases** is because many of them have been subjected to mafia-like threats from agents/persons working for the insurance industry.

157. I admit I know the insurance industry commenced with Lloyd's of London in England in the 1600s on the back of the trans-Atlantic slaving industry.

158. I admit I know the insurance industry played a critical role in the Jewish Holocaust, in that it, subsequent to negotiations with the Nazis and certain wealthy Jewish businessmen, did insure the hardware of the extermination camps, but refused to insure the Jews that were worked to death in the Nazi weapon manufacturing factories.

159. I admit the insurance industry has a demonic history and remains a demonic force in 2025.

160. I admit Defendant Oetken and I do the legal bidding of the insurance industry, in the facilitation of bribery related legal judgments and non-investigations of corrupt lawyers-cum-judges.

161. I admit that I have extensive 'minimal contacts' with the State of Mississippi.

162. I admit that the 'minimal contacts' are a consequence of my interactions and communications with the equivalent agency in the State of Mississippi.

163. I admit that Plaintiff Kaul's pleading of this 'minimal contact' satisfies the requisite pleading standard.

164. I admit that the 'minimal contacts' are a consequence of my interactions and communications with the Federal Judges Association, an entity comprised of lawyers that conducts the nationwide business affairs of its members, including in Mississippi, and an entity with which I interact and communicate as to its lawyer-judge members who are licensed in Mississippi and New York, but who become subject to disciplinary actions in New York.

165. I admit that Plaintiff Kaul's pleading of this 'minimal contact' satisfies the requisite pleading standard.

166. I admit that in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENT'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** (D.E. 25 Page 9 of 13), I did misrepresent facts pled by Plaintiff Kaul in his December 30, 2024 **'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE'** (D.E. 22 Page 9 of 11) that do substantiate my 'minimal contacts' with the State of Mississippi.

167. I admit that I willfully misrepresented these facts in the belief that Plaintiff Kaul would have no legal instrument with which to expose my misrepresentation, as procedure would not permit him to file a sur-reply, and my misrepresentations would go uncontested.

168. I admit in misrepresenting the facts I did not consider Plaintiff Kaul would utilize an instrument of discovery to prove the willful falsity of my submission as to his pleading of 'minimal contacts'.

169. I admit that I was forced to engage in submitting a knowingly fraudulent document because I know I have no legitimate defenses to the K11-23 claims.

170. I admit that one of my misrepresentations pertains to my claim that Plaintiff Kaul's minimal contacts pleading fails to state the subject matter substantiating the 'minimal contacts', when in fact a plain read of the relevant section on (D.E. 22 Page 9 of 13) identifies it as being: **" ... Defendant NYAGC conducts acts with its equivalent agency in Mississippi as to the exchange of information pertaining to disciplinary actions against lawyers."**

171. I admit that there exists no federal pleading standard or related case in which a plaintiff is required to specifically plead that there exists a connection between the jurisdiction related section of the Complaint, the jurisdiction related section of a reply brief and the overall case.

172. I admit I know that if facts of jurisdiction are pled in the Complaint of a specific case, and facts are then pled in a reply brief of the same case, then there exists no need nor is any stipulated by statute or case law that the pleader must expressly state that the jurisdictional facts relate to the same case.

173. I admit that the frivolousness of my argument in (D.E. 25 Page 9 of 13) is a direct reflection of my defenselessness and strategy of 'muddying the waters' to impede Plaintiff Kaul's transparent dismantling of my fraudulent submissions.

174. I admit that my guilt of the levied charges does compel me to attempt to obfuscate the truth of the matter with falsehoods, omissions, semi-truths and a dearth of simple logic.

175. I admit I know that federal pleading standards require the provision of notice in a complaint as to the **"what ... where ... when ... how ... why ... who"** so that litigants be sufficiently informed in order to be afforded a fair opportunity to respond.

176. I admit that the October 9, 2024 K11-23 Complaint does, in its 'JURISDICTION + VENUE' section (D.E. 1 Page 5 of 54) establish the basis for jurisdiction in the District of Southern Mississippi.

177. I admit that nowhere in my replies have I claimed that I do not know that Plaintiff Kaul has claimed that jurisdiction rests in the Southern District of Mississippi.

178. I admit that in fact I do know that Plaintiff Kaul has claimed that jurisdiction rests in the Southern District of Mississippi.

179. I admit that my replies contesting Plaintiff Kaul's claims that jurisdiction rests in the Southern District of Mississippi do evidence my knowledge of Plaintiff Kaul's jurisdictional claims as set forth in his Complaint.

180. I admit the frivolousness of my argument as to the impermissibility of the raising of facts not referenced in a Complaint but submitted in response to motions to dismiss.

181. I admit that Roebuck v. Dothain Sec., Inc., 515 F.App'x 275, 280 (5th Cir. 2013), as cited in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENTS REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** does not stand for the proposition that facts not present in the Complaint are precluded from being raised in reply briefs.

182. I admit that Roebuck v. Dothain Sec., Inc., 515 F.App'x 275, 280 (5th Cir. 2013) stands for the proposition that new theories of the case, not stated in the Complaint, can be stated in reply briefs.

183. I admit that the theory of K11-23 as pled in the Complaint is consistent with that pled in the December 30, 2024 'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COIMMITTEE' (D.E. 22 Page 2 of 11).

184. I admit that the theory of K11-23 as pled in the Complaint pertains in part to the fact that if Defendant NYSAGC had conducted a transparent investigation of Defendant Oetken's crimes, K11-7 would have been legitimately tried, the truth of the illegal 2014 NJ revocation would have emerged, the NJ state medical board would have been ordered to reinstate Plaintiff Kaul's license and Defendant MMB would have had no basis on which to deny Plaintiff Kaul's May 2024 application.

185. I admit that Plaintiff Kaul has sufficiently pled the jurisdictional related nexus between myself and my equivalent in Mississippi in his December 30, 2024 'REPLY DEFENDANT NEW YORK ATTORNEY GRIEVANCE COMMITTEE' at (D.E. 22 page 9 of 11), as being based on **"the exchange of information pertaining to disciplinary actions against lawyers."**

186. I admit that the purpose of the statutory construction of the broad jurisdictional reach of RICO originated from the recognition that **"racketeering"** crimes and their consequent ongoing and **"new"** injuries are respectively committed and caused in a multi-jurisdictional manner.

187. I admit that my citation to Aych v. Univ. of Ariz., No. 2:23-cv-07282-ODW (MARx), 2024 U.S. Dist. LEXIS 118455, at *16 (C.D. Cal. July 5, 2024) fails to support my proposition that pursuant to RICO I am not subject to the jurisdiction of the Southern District of Mississippi.

188. I admit that in fact Aych v. Univ. of Ariz., No. 2:23-cv-07282-ODW (MARx), 2024 U.S. Dist. LEXIS 118455, at *16 (C.D. Cal. July 5, 2024) validates Plaintiff Kaul's assertion that I am, pursuant to RICO and in the context of the nationwide injuries to his life/liberty/property, subject not just to the jurisdiction of Mississippi but consequent to my entry into the '**Revocation-Cover-Up Conspiracy**', subject to the jurisdiction of every state.

189. I admit that an application of the Aych factors to the jurisdiction related pled facts of K11-23 does satisfy its two (2) conditions as to personal jurisdiction pursuant to RICO.

190. I admit I know that those two (2) conditions pertain to the fact that the district court in which the case is filed must have personal jurisdiction over at least one litigant and there must be no other district court which would have personal jurisdiction of all litigants.

191. I admit I know that the Southern District of Mississippi has personal jurisdiction of Defendant Mississippi Medical Board and there exists no other district court which would have personal jurisdiction over all litigants.

192. I admit I know that these two (2) conditions exist because I have read the 'PARTIES' section of the Complaint and one (1) litigant resides in Mississippi, while three (3) reside in New York.

193. I admit that Plaintiff Kaul has demonstrated a basis to substantiate jurisdiction in the Southern District of Mississippi.

194. I admit that in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENTS REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** (D.E. 25) I make an assertion that there exists a purported contradiction between two (2) jurisdiction related arguments submitted in Plaintiff Kaul's argument and reply brief.

195. I admit that the purported contradiction exists between his argument that consequent to the nationwide racketeering/rights injuries and violations caused and continuing to be caused

to his life/liberty/property/reputation and human/civil/constitutional rights, he continues to retain standing to bring suit in any/all districts in the United States **AND** his argument that pursuant to RICO and its doctrine of **"new racketeering injuries"** as defined in Sedima, S.P.R.L. v. Imrex Co., Inc. 473 U.S. 479 (1985) he retains standing and jurisdiction in the Southern District of Mississippi, consequent to the 2020/2024 licensure denials in Mississippi based on the illegal 2014 NJ license revocation.

196. I admit that there exists no contradiction between these two (2) arguments, as the premises, reasoning and conclusions are identical.

197. I admit I know that the premise is the 2014 illegal NJ revocation, the reasoning pertains to the state medical board system of reciprocity that is current controlled by **The Kaul Cases** Defendant Federation State Medical Boards and the conclusion is that his 2020/2024 Mississippi license applications were denied because of the illegal 2014 NJ license revocation.

198. I admit that my assertion as to internal argument contradictions was purposed to attempt to mischaracterize Plaintiff Kaul and his arguments as illogical and fallacious and to mischaracterize him as not credible.

199. I admit that my attempt failed.

200. I admit that the failure of my attempt to undermine Plaintiff Kaul's credibility does constitute further evidence of my guilt, for if I were innocent of the levied charges/facts, which I am not, there would exist no reason to misrepresent facts/law and submit technically incompetent argument; the incompetence of which does nothing but cause a further, and somewhat embarrassing indictment of me, a lawyer.

201. I admit that in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENTS REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** I claim that Plaintiff Kaul did not plead any facts as to a conspiracy between myself and Defendant Oetken.

202. I admit I know that this claim is false.

203. I admit that as I did with other false claims in my final submission, assume that no legal instruments would be available to Plaintiff Kaul to expose the falsity of my claims.

204. I admit that Plaintiff Kaul's assumed inability to expose my falsehoods would also go undetected by the district court, which I believed would adopt the falsities submitted in my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENTS REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** and dismiss K11-23.

205. I admit I know that Plaintiff Kaul did plead facts of conspiracy.

206. I admit that the facts of conspiracy are pled at paras. 22/23/25.

207. I admit that acts of commission and omission can and do separately and or jointly substantiate a conspiracy.

208. I admit that a quid pro quo scheme can and does constitute an element of a conspiracy, but an absence of its pleading does not under any federal statute or case constitute an absence of conspiracy pleading.

209. I admit the knowing falsity and frivolousness of my 'lack of conspiracy' argument is a direct reflection of my guilt of the levied charges/facts, for if I were innocent, which I am not, there would be no need to misrepresent facts/law and submit technically incompetent and readily dismantled arguments.

210. I admit that my January 6, 2025 **'DEFENDANT THE ATTORNEY GRIEVANCE COMMITTEE OF THE FIRST JUDICIAL DEPARTMENTS REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND SUBJECT-MATTER JURISDICTION'** was/is, to use a colloquialism, a 'Hail Mary' at the conclusion of the first lackluster quarter.

211. I admit that despite the corralling of immense legal resources, 'brainpower' and exclusive private school educations, team Defendant NYAGC were not able to advance over the halfway line.

212. I admit that Defendants NYAGC/Oetken/MMB are guilty of the levied charges/facts and that judgment be entered to the favor of Plaintiff Kaul.

DATED: JANUARY 13, 2025

RICHARD ARJUN KAUL, MD

CERTIFICATE OF SERVICE

I certify under penalty of perjury that a copy of these papers were emailed to counsel for all Defendants on January 13, 2025.

DATED: JANUARY 13, 2025

RICHARD ARJUN KAUL, MD

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.)

K11-7 - KAUL/BASCH v ICE: 21-CV-06992 (AUGUST 19, 2021, TO SEPTEMBER 12, 2022-SOUTHERN DISTRICT OF NEW YORK)

K11-18 – KAUL v OETKEN: 24-CV-00185 (MARCH 25, 2024, TO APRIL 8, 2024-EASTERN DISTRICT OF NORTH CAROLINA)

K11-20 – KAUL v FEDERATION STATE MEDICAL BOARDS: 24-CV-03180 (AUGUST 26, 2024, TO JANUARY 7, 2025-SOUTHERN DISTRICT OF TEXAS)

K11-23 – KAUL v OETKEN: 24-CV-00621 (OCTOBER 9, 2024 TO PRESENT-SOUTHERN DISTRICT OF MISSISSIPPI)

Exhibit 1

(Rev. 7.30.2020)

ATTORNEY GRIEVANCE COMMITTEE
Supreme Court, Appellate Division
First Judicial Department
180 Maiden Lane, 17th Floor
New York, New York 10038
(212) 401-0800

JORGE DOPICO
Chief Attorney

Email Complaint and Attachments to: AD1-AGC-newcomplaints@nycourts.gov. In addition, please send **one copy** of your complaint and attachments **by regular mail** to the above address. (If you do not have a personal email account, please send two (2) complete sets of your complaint and all attachments. There may be a delay in processing your matter if it is not emailed. Please **do not** include any original documents because we are unable to return them.)

Background Information

Today's Date: 11/30/2022

Your Full Name: (Mr. Ms. Mrs.) RICHARD ARJUN KAUL, MD/DAVID BASCH MD

Address: 440c SOMERSET DRIVE

City: PEARL RIVER State: NY Zip Code: 10965

Cell Phone: 973 876 2877 Business/Home Phone: _____

Email Address: drrichardkaul@gmail.com

Are you represented by a lawyer regarding this complaint? Yes [✔] No [ ] If Yes:

Lawyer's Name: N/A

Address: _____

City: _____ State: _____ Zip Code: _____

Business Phone: _____ Cell Phone: _____

Attorney Information

Full Name of Attorney Complained of: (Mr. Ms. Mrs.) JAMES PAUL OETKEN

Address: Room 706, 40 Foley Square

City: New York State: NY Zip Code: 10007

Business Phone: 212 805 0266 Cell Phone: _____

Email Address: _____

Date(s) of Representation/Incident: 11/30/2022

Have you filed a civil or criminal complaint against this attorney? Yes ☐ No ☑ If Yes:

If yes, name of case (if applicable): _____

Name of Court: _____

Index Number of Case (if known): _____

Have you filed a complaint concerning this matter with another Grievance Committee, Bar Association, District Attorney's Office, or any other agency? Yes ☑ No ☐

If yes, name of agency: JUDICIAL DISCIP. COUNCIL/SENATE JUDICIAL COM.

Action taken by agency, if any: PENDING

Details of Complaint

Please describe the alleged misconduct in as much detail as possible including what happened, where and when, the names of any witnesses, what was said, and in what tone of voice, etc. Use additional sheets if necessary.

The Respondent, a lawyer, who in his capacity as a judge, has admitted to having enagaged in a series of quid pro quo schemes/exparte communications, in which he received bribes for illegally dismissing a case (attached sheets).The Respondent, in his capacity as a lawyer, did represent corporations for many years, and did, when he became a judge, fail to recuse himself when these same corporations brought cases before him. In these matters, the Respondent, as the record shows, did almost always rule in favor of these corporations. This " pattern" has been in existence since at least 2017.

Complainant's Signature (Required): RICHARD ARJUN KAUL, MD/DAVID BASCH, MD

R.K.I. DMB

Judicial Council of the SECOND Circuit

COMPLAINT OF JUDICIAL MISCONDUCT OR DISABILITY

To begin the complaint process, complete this form and prepare the brief statement of facts described in item 4 (below). The Rules for Judicial-Conduct and Judicial-Disability Proceedings, adopted by the Judicial Conference of the United States, contain information on what to include in a complaint (Rule 6), where to file a complaint (Rule 7), and other important matters. The Rules are available in federal court clerks' offices, on individual federal courts' websites, and on www.uscourts.gov.

Your complaint (this form and the statement of facts) should be typewritten and must be legible. For the number of copies to file, consult the local rules or clerk's office of the court in which your complaint is required to be filed. Enclose each copy of the complaint in an envelope marked "COMPLAINT OF MISCONDUCT" or "COMPLAINT OF DISABILITY" and submit it to the appropriate clerk of court. **Do not put the name of any judge on the envelope.**

1. Name of Complainant: RICHARD ARJUN KAUL/DAVID BASCH
   Contact Address: 440c SOMERSET DRIVE, PEARL RIVER
   NY, 10965
   Daytime telephone: (973) 876 2877

2. Name(s) of Judge(s): JAMES PAUL OETKEN
   Court: SDNY

3. Does this complaint concern the behavior of the judge(s) in a particular lawsuit or lawsuits?
   ☑ Yes ☐ No
   If "yes," give the following information about each lawsuit:
   Court: SDNY
   Case Number: 21-CV-06992
   Docket number of any appeal to the N/A Circuit: N/A
   Are (were) you a party or lawyer in the lawsuit?
   ☑ Party ☐ Lawyer ☐ Neither

If you are (were) a party and have (had) a lawyer, give the lawyer's name, address, and telephone number:

N/A

4. **Brief Statement of Facts**. Attach a brief statement of the specific facts on which the claim of judicial misconduct or disability is based. Include what happened, when and where it happened, and any information that would help an investigator check the facts. If the complaint alleges judicial disability, also include any additional facts that form the basis of that allegation.

5. **Declaration and signature:**

I declare under penalty of perjury that the statements made in this complaint are true and correct to the best of my knowledge.

(Signature) R. K1. – RICHARD ARSEN KAY (Date) NOVEMBER 18, 2022

DAVID BUSCH

STATEMENT OF FACTS

This complaint is filed under the Judicial Conduct and Disability Act of 1980, 28 U.S.C. §§ 351-364 and the Rules for Judicial-Conduct and Judicial-Disability Proceedings, 249 F.R.D. 662 (U.S. Jud. Conf. 2008), and asserts that pursuant to the standard set forth in 28 U.S.C. § 352(b)(1)(A)(iii); Rule 11(c)(1)(D) the within evidence proves and or at least raises an inference that U.S.D.J. James Paul Oetken did commit judicial misconduct, at a point in time between August 19, 2021, and September 12, 2022, in the matter of Kaul/Basch v ICE et al (21-CV-06992).

The evidence includes the tacit admissions by U.S.D.J. Oetken of bribery, conspiracy and exparte communications, who despite recognizing his legal obligations to disclose his financial holdings and exparte communications, has failed to submit this information, a fact that satisfies the 28 U.S.C. § 352(b)(1)(A)(iii); Rule 11(c)(1)(D) inference standard of judicial misconduct. This council has the jurisdiction and authority to order the disclosure of this information, and have definitively addressed the issue of misconduct. However, the Plaintiffs respectfully assert that if this council elects not to compel disclosure, the law will interpret non-election as a finding of misconduct.

The misconduct (bribery/conspiracy/exparte communications) was perpetrated within the State of New York, but this is not the first case in which U.S.D.J. Oetken has engaged in such acts. There exists a **"pattern"** within his case history of always ruling in favor of corporations, and in those cases in which all the litigants were corporations, he always ruled in favor of the largest corporation. An investigation could commence with a closer examination of this **"pattern"**, and a comparison with the financial holdings (stocks/bonds/shares) of U.S.D.J. Oetken in relation to the corporations in whose favor he ruled. This was one of the methods used by journalists at the Wall Street Journal, in researching their September 2021 stories on corruption in the federal judiciary.

This complaint is based not on the merits of U.S.D.J.'s opinion, but on an admitted fraud committed against the apparatus of justice, and does therefore not lie pursuant to 28 U.S.C. § 352(b)(1)(A)(ii); Rule 3(h)(3)(A). The Plaintiffs' decision not to appeal the order, pertains to the tardiness of the procedure inherent in attempting to raise on appeal the issue of 'Fraud on the Court', and is without effect as to the Plaintiffs' position that U.S.D.J.'s opinion is factually/legally erroneous. Similarly, to have appealed the order, as suggested by U.S.D.J. Oetken, would have constituted an admission of the legitimacy of the order and would have foreclosed this council from investigating this complaint, a fact known by U.S.D.J. Oetken. This tactic evidences U.S.D.J.'s wrongful state-of-mind, in that had he known he had not committed misconduct, he would not have attempted to coerce the filing of an appeal. It was the intention of U.S.D.J. Oetken to attempt to permanently foreclose the Plaintiffs from seeking recompense in the United States District Court, by directing the case into the appellate court, knowing that this process would be lengthy and likely would conceal his misconduct.

We declare under penalty of perjury that the statements made in this complaint are true and correct to the best of our knowledge.

RICHARD ARJUN KAUL, MD

DAVID B. BASCH, MD

Date: November 18, 2022

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

RECEIVED
SDNY PRO SE OFFICE
2022 SEP 14 PM 2:12

Re: Kaul/Basch v ICE et al
21-CV-06992
K11-7
Financial disclosures/conflicts of interest/ex parte communications

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

(/)

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?u=https://www.cornyn.senate.gov/content/news/cornyn-coons-bill-apply-stock-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) (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

www.drrichardkaul.com

November 18, 2022

Senator Edward Cruz
300 E 8th, Suite 961
Austin, TX 78701

Re: Courthouse Ethics and Transparency Act/Financial Disclosures U.S.D.J. James Paul Oetken

Dear Senator Cruz,

We write this letter to you in your capacity as a member of the Senate Judiciary Committee and a cosponsor of Courthouse Ethics and Transparency Act, and seek your assistance in resolving a matter in which a federal judge has refused to disclose his financial holdings and exparte communications, effectively admitting to having engaged in bribery and corruption of the federal bench. The jurist in question is U.S.D.J. James Paul Oetken of the Southern District of New York.

On September 13, 2022, in the matter of Kaul/Basch v ICE et al: 21-CV-06992, and as per the enclosed letter, we requested from U.S.D.J. Oetken his Forms AO 10 since 2020 and a list of all exparte communications with the Defendants and or their agents. This request was submitted pursuant to the Courthouse Ethics and Transparency Act. In this letter we referenced the articles published in September 2021 by the Wall Street Journal, regrading corruption within the federal judiciary.

We believe this case presents the first test of the Act, and we hope that this test proves the Act has weight.

We thank you for your attention to this matter.

Yours sincerely

RICHARD ARJUN KAUL, MD

DAVID BASCH, MD

Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

SOUTHERN DISTRICT OF MISSISSIPPI
FILED
OCT - 9 2024
ARTHUR JOHNSTON
BY _____ DEPUTY

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

Plaintiff

v.

JAMES PAUL OETKEN
(PERSONAL AND OFFICIAL CAPACITY)
MISSISSIPI MEDICAL BOARD;
NEW YORK STATE ATTORNEY GRIEVANCE COMMITTEE
JANE DOE; JOHN DOE.

Defendants.

CIVIL ACTION NO.: 3:24-cv-621-CWR-LGI

COMPLAINT

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PARTIES

PLAINTIFF

RICHARD ARJUN KAUL, MD – 6 NORTH MIDLAND AVENUE, NYACK , NY 10960
DRRICHARDKAUL@GMAIL.COM **("PLAINTIFF KAUL")** – 914 250 84313

DEFENDANT

MISSISSIPPI MEDICAL BOARD – 1867 CRANE RIDGE DRIVE # 200N, JACKSON, MISSISSIPI 39216 **("DEFENDANT MMB")** – 601 987 3079

JAMES PAUL OETKEN, ESQ – ROOM 706, 40 FOLEY SQUARE, NY, NY 10007 (**"DEFENDANT OETKEN"**) – 212 805 0266

NEW YORK STATE ATTORNEY GRIEVANCE COMMITTEE – 180 MAIDEN LANE, 17TH FLOOR, NY, NY 10038 **("DEFENDANT AGC")** – 212 401 0800

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:

1. 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.

Personal:

2. The Court has personal jurisdiction over Defendants Oetken/MMB/NYS AGC as they 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.

3. Additionally, the Defendants RICO violations/offenses/crimes have caused and continue to cause injury to Plaintiff Kaul's life/liberty/property in every state in the United States including the State of Mississippi.

4. Defendants 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 the Southern District of Mississippi. 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 Mississippi.

5. More specifically, Defendant Oetken has violated and continues to violate the principles and holdings set forth by the U.S.C.A for the Fifth Circuit (May 18, 2022) and SCOTUS (June 27, 2024) in SEC v Jarkesy: 22-859

Venue:

6. 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.

7. Defendant Oetken's K11-7 September 12, 2022 purported 'injunction' (**Exhibit 1**) and his K11-20 October 2, 2024, threat to hold Plaintiff Kaul in contempt if by October 16, 2024, Plaintiff Kaul does not dismiss K11-20, AND the K11-20 Defendants filing on October 3, 2024 of Defendant Oetken's October 2, 2024 threatening 'ORDER' (**Exhibit 20**) 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 U.S.C.A. for the 5th Circuit that confers on Plaintiff Kaul the right to sue Defendants Oetken/MMB/NYS AGC in this district.

PRELIMINARY STATEMENT + BASIS FOR SUIT AGAINST DEFENDANTS OETKEN/MMB/NYS AGC

8. 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.

9. 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.

10. 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.

11. 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 his human/civil/constitutional rights.

12. The District of Mississippi has jurisdiction over all Defendants for reasons more fully enunciated below, but in summary, all Defendants, including **The Kaul Cases** Defendants have

violated, caused to violate and or aided and abetted the ongoing violation of Plaintiff Kaul's human/civil/constitutional rights in every state in the United States including the State of Mississippi.

13. The factual foundation of K11-23 consists of fact admitted in **The Kaul Cases (2016-2024)** pursuant to Rule 8(b)(6) and includes amongst other things, bribery/perjury/kidnapping/false indictment/false arrest/false imprisonment/wire fraud/public corruption/judicial corruption/witness tampering/evidence tampering/obstruction of justice.

14. On September 12, 2022, in K11-7 Defendant Oetken, after having entered into an admitted bribery related quid pro quo scheme (**Exhibit 2 + Exhibit 3**) with the K11-7 Defendants, did enter a purported nationwide 'injunction' that sought to prevent Plaintiff Kaul from seeking redress for the illegal 2014 revocation of his NJ medical license, more facts of which are detailed below.

15. From February 22, 2016 (K1) to the present (K11-20), Plaintiff Kaul's efforts to prosecute his claims have been obstructed by the Defendants violation of discovery orders and schemes of judicial corruption in courts located principally in the NY/NJ area.

Defendant Oetken sits on the bench in the S.D.N.Y,

16. However, from June 2023 judges in the Southern District of Florida, the Eastern District of North Carolina and now the Southern District of Texas did progressively advance **The Kaul Cases** in full knowledge of all the circumstances/events/facts surrounding Defendant Oetken's knowingly illegal September 12, 2022, purported 'injunction'.

17. In fact, and after the 5th Circuit/SCOTUS rulings in Jarkesy, U.S.D.J. Alfred H. Bennet did on August 30, 2024, enter a Rule 26 order which Defendants have violated and continue to violate.

18. In furtherance of their obstruction of justice scheme they once again coopted Defendant Oetken into issuing a purported 'order; that threatened to hold Plaintiff Kaul in contempt of he did not dismiss K11-20 by October 16, 2024.

19. Defendant Oetken had been complicit in an identical and prior scheme in K11-17, when in collusion/conspiracy with the K11-17 Defendants, who then became the K11-20 Defendants, he issued a similar edict on March 15, 2024 (**Exhibit 6)** two (2) days after Chief Judge Richard E. Meyers entered a Rule 26 order of discovery.

20. Defendant Oetken's misconduct is unprecedented in American jurisprudence, and he seeks, through his threats to Plaintiff Kaul, to usurp the authority of every other district judge in the United States.

21. The logical extension of such misconduct is that every district judge, for whatever reason, could issue nationwide injunctions in which they positioned themselves as the arbiters and 'gatekeepers' of the entire federal judiciary.

22. Defendant AGC is included as it permitted itself to become part of Defendant Oetken's bribery related quid pro quo scheme in mid 2024, when it failed, upon Plaintiff Kaul's ethics complaint, to investigate Defendant Oetken's violations and crimes of accepting bribes in return for illegally selling the power and authority of the United States District Court to **The Kaul Cases** Defendants (**Exhibit 9**).

23. Defendant AGC, in failing to investigate or otherwise refer Defendant Oetken to prosecutorial authorities did become complicit in his crimes, and pursuant to RICO is as liable for all of his past/present/future violations as if it had directly committed them.

24. Defendant MMB is included as its 2020/2024 denials of Plaintiff Kaul's applications for medical licensure based on the 2014 illegal NJ revocation did cause and continue to cause injury to Plaintiff Kaul in the State of Mississippi.

25. Other than the illegal injuries in Mississippi, there exists a factual nexus between Defendant MMB and Defendants Oetken/AGC in that had justice been properly served in K11-7, the illegal 2014 NJ revocation would have been reversed, the reversal of which would have caused the grant of Plaintiff Kaul's 2024 application to the Mississippi Medical Board.

26. Had these events occurred, there would have commenced a relative remediation to the immense ongoing/"**new**" twelve-years-plus (2012-2024) of injuries to Plaintiff Kaul's life/liberty/property/reputation.

27. But because Defendant Oetken continued and aided and abetted the knowingly illegal continuation of **The Kaul Cases** Defendants corruption through the United States District Court, and because Defendant AGC failed to investigate his crimes (**Exhibit 12 + Exhibit 13**) these Defendants are proximately and willfully liable for the ongoing/"**new**" injuries to Plaintiff Kaul's life/liberty/property/reputation.

DEFENDANT OETKEN'S CORRUPTION OF THE UNITED STATES DISTRICT COURT + CAUSE FOR HIS IMPEACHMENT

28. The central issue in this case pertains to the blatant disrespect of a democratically appointed district judge in the S.D.N.Y. for the SCOTUS principles and holdings of the seminal case of SEC v Jarkesy: 22-859 (June 27, 2024) and his willful failure to recognize that the application of this law to a case he had adjudicated on September 12, 2022, did render his opinion/order null and void, an opinion/order that he admitted were the product of a quid pro quo scheme of bribery with the defendants in that case.

29. Defendant James Paul Oetken, did, in period commencing in or round August 2021 enter in to a racketeering conspiracy with the K11-7 Defendants, in which he participated in the conversion of his bench/court into a **"racketeering enterprise"** through which he and his defendant co-conspirators perpetrated a **"pattern of racketeering"** through his court of amongst other things, the commission of the RICO predicate acts of bribery/public corruption/wire fraud/obstruction of justice.

30. The purpose of these RICO violations were to injunct Plaintiff Kaul from seeking justice/truth within the United States District Court as to all the facts preceding, surrounding and underpinning the illegal 2012-214 suspension/revocation of his NJ license, a revocation that has since 2012 deprived Plaintiff Kaul of his life/liberty/property/reputation and caused ongoing/**"new"** violations of his human/civil/constitutional rights.

31. Defendant Oetken, in conjunction with Defendant AGC and his co-conspirators in the New York region has acted with a sense of impunity in the belief that his criminal conduct on the bench and its conversion into a **"racketeering enterprise"** would go un-exposed and un-punished.

32. It was his sense of omnipotence that caused him to disregard and indeed violate his legal obligations as to the law set forth in Jarkesy, effectively viewing an historical ruling from the

U.S.C.SA. for the 5th Circuit and SCOTUS as a ruling whose holdings and principals he, as a democratically appointed New York judge was obliged to ignore and or violate.

33. Defendant Oetken sits in a court less than two (2) miles from Wall Street, the home of the SEC and the NYSE on which **The Kaul Cases** Defendant Allstate Insurance Company extracts billions from the American public. It is in this incestuous financial world milieu that Defendant Oetken operates his highly lucrative schemes, in which he sells his bench to the highest bidder in each case, even if those cases involve evicting persons from properties owned by his Wall Street bank co-conspirators.

34. Defendant Oetken has for decades conducted these criminal schemes under the purported cover of judicial immunity and the protection of his political sponsors and Defendant AGC, the latter an agency tasked with investigating and policing corrupt lawyers, but an agency that has facilitated Defendant Oetken's long-standing **"pattern of racketeering"**. Defendant Oetken has been able to 'stay under the radar' for so long consequent to the fact that no lawyer has been willing to expose his criminal activities, despite their obligation to do so.

35. However, arguably the most reprehensible part of Defendant Oetken's delusion of omnipotence has been his interference in the affairs of district courts from the 4th and 5th Circuits, in which he has threatened Plaintiff Kaul with sanctions/contempt if he did not dismiss cases that district judges in those circuits admitted with full knowledge of Defendant Oetken's September 12, 2022, purported 'injunction'.

36. Defendant Oetken seeks to indirectly establish authority over every district judge in the United States District Court with threats against Plaintiff Kaul, and in fact these threats continue despite his knowledge that the SCOTUS ruling in Jarkesy, has for the legally substantiated reasons stated in K11-20, invalidated his September 12, 2022, purported 'injunction', but reasons/law he continues to violate, while siting on the federal bench.

37. Defendant Oetken's crimes/violations evidence a contemptuous and complete disregard for the authority of every other district judge and court within the United States District Court, including the Justices of the U.S.C.A. for the 5th Circuit and those of the Supreme Court of the United States.

38. It is for these reasons and others that U.S.D.J. Oetken must be removed from the federal bench, his case referred to the Senate Judiciary Committee and he be ordered to cease and desist from any further interference in the affairs of other district courts and their judges.

DEPRIVATION OF ANY/ALL IMMUNITIES

39. 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**).

40. 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".**

41. 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.

42. 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.

43. 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.

44. 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. Defendant Oetken's fraudulent March 15, 2024, order in K11-7 was entered on to the docket in K11-17 on March 18, 2024 (**Exhibit 7).**

45. 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 + DEFENDANT OETKEN'S RULE 8(b)(6) ADMISSIONS OF FACT

46. Plaintiff Kaul respectfully asserts that a chronologically organized statement of fact will most effectively and with greatest clarity illustrate the perversion of justice committed by Defendant Oetken and his co-conspirators, many of whom are defendants in K11-20 actively obstructing/violating the authority of the U.S.D.C. for the S.D.T.

47. Pursuant to RICO's doctrine of vicarious liability each Defendant is as liable for the violations/offenses/injuries of every other Defendant as if they directly caused the violations/offenses/injuries. See Salinas v US: 522 US 52 (1997)

2003 – 2013:

48. In late February/early March 2005, Plaintiff Kaul invented and successfully performed the first outpatient minimally invasive spinal fusion, the facts of which are detailed in K11-20. Consequent to this invention, Plaintiff Kaul earned immense professional and commercial success, which caused jealousy amongst his market competitors who unable to compete with him fairly did commence conspiring with the then NJ Governor and now Defendant Christie.

49. The conspiracy involved the perpetration of a series of quid pro quo schemes in which Plaintiff Kaul's competitors funneled bribes to Defendant Christie in return for having him abuse his state executive power to order **The Kaul Cases** Defendant, New Jersey Board of Medical Examiners to manufacture a knowingly false case to cause the illegal suspension-revocation of Plaintiff Kaul's license in 2012/2013.

50. **The Kaul Cases** Defendants, of which the K11-20 Defendants are members, did seek not only to cause a license revocation, but sought to permanently eliminate Plaintiff Kaul by attacking every element of his life/liberty/property/reputation, such that his existence would

cease, and he would never expose their crimes. Their scheme failed and Plaintiff Kaul did, in late 2013 commence collecting evidence of the crimes/violations of The Kaul Cases Defendants.

2013 – 2016:

51. Consequent to the revocation and the widespread malicious publicity surrounding the events, Plaintiff Kaul was forced into a state of poverty/homelessness and became obliged to file on June 17, 2013, for Chapter 11 bankruptcy for his four (4) healthcare related businesses.

52. On July 21, 2014, the Chapter 11 proceeding was converted to a Chapter 7 liquidation consequent to final order of license revocation on March 24, 2014. The entire revocation proceedings, as detailed in K11-20 were the product of corruption and were corrupt.

53. The principal purpose of the corruption was to cause the elimination of the competitive threat posed by Plaintiff Kaul to his competitors in the minimally invasive spine surgery market, that included neurosurgeons/hospitals/insurance companies., all of whom illegally profited from the elimination of Plaintiff Kaul.

54. Having had his license revoked in 2014 and illegally deprived of his career (1983-2012), his entire estate and his reputation, Plaintiff Kaul, after much contemplation, decided not to leave the United States and his two (2) young children, but to stay, teach himself the law and seek to have exposed the truth of the crimes of **The Kaul Cases** Defendants. And so, on February 22, 2016, Plaintiff Kaul filed K1 in the Southern District of New York, from where it was on April 16, 2016, transferred to the District of New Jersey over Plaintiff Kaul's objections.

2016-2022:

55. In this period, Plaintiff Kaul did, in a continued state of poverty, continue to file claims in various district courts based on the national injury caused to his medical career and inability to procure a license in any state except that of Pennsylvania, wherein his application was granted on May 27, 2021, but on condition he find a PA licensed physician willing to periodically

monitor his practice, a condition rendered impossible consequent to the malicious and widely publicized articles/stories propagated within the New York-New Jersey-Pennsylvania area.

56. As such and despite concerted efforts Plaintiff Kaul was unable to find such a person and his letters to the PA medical board seeking to have the board conduct the monitoring were ignored. From February 22, 2016, after having acquired sufficient knowledge of the law, Plaintiff Kaul filed multiple lawsuits in the United States District Court, most of which were transferred to the District of New Jersey, where they were stayed and or voluntarily dismissed, with the non-transferred cases being cases in which Plaintiff Kaul was not permitted to commence discovery.

57. In the period from 2016 to 2024, not one fact has been denied by any of the defendants, the courts (K5/K11-14/K11-15/K11-17/K11-20) in which discovery orders were issued, the Defendants did violate these orders and harass/intimidate/corrupt the judges into staying and or dismissing cases in which they had entered discovery orders.

58. On May 27, 2021, Plaintiff Kaul was kidnapped by a group of nine armed men at his place of residence/work in New Jersey, under orders from Defendant Christie, who had been served a Summons/Complaint in K11-2 at his law office in Morristown, NJ, and who mistakenly believed it would intimidate Plaintiff Kaul into ceasing his prosecution of **The Kaul Cases**. It did not and Plaintiff Kaul continued.

59. The kidnapping scheme failed and Plaintiff Kaul' person was abandoned at a hospital by two police officers who rapidly disappeared. The events were memorialized in an affidavit filed by Plaintiff Kaul on May 28 in K11-2. No person as of yet has been criminally prosecuted for this crime.

60. On August 19, 2021, Plaintiff Kaul filed K11-7. Summonses were issued and briefing was conducted up until February 2022. On September 12, 2022, Defendant Oetken issued an

opinion/order in which none of Plaintiff Kaul's arguments were analyzed and in which none of the highly incriminating evidence of the crimes of **The Kaul Cases** Defendants was either acknowledged, referenced and or critically incorporated into his knowingly fraudulent opinion.

61. The reason that Defendant Oetken so blatantly abused the power of the United States District Court pertained to the quid pro quo scheme that he had, in collusion/conspiracy with **The Kaul Cases** Defendants perpetrated in the United States District Court, thus converting it into a **"racketeering enterprise".**

62. On September 12, 2022, Defendant Oetken entered a knowingly fraudulent purported 'injunction' onto the federal docket, that sought to permanently bar Plaintiff Kaul from seeking restitution for the criminally perpetrated immense and ongoing**/"new"** injuries to his life/liberty/property/reputation.

63. Defendant Oetken unilaterally set himself up as the nationwide arbiter of the decision of every other judge in the United States District Court as to whether or not they could exercise their independent judgment in accepting cases filed by Plaintiff Kaul, cases that were factually and legally distinct to K11-7.

2023-2024:

64. K11-17 was filed on November 20, 2023, in the U.S.D.C. for the E.D.N.C. and enclosed principally with **Exhibit 14** were all documents submitted by Defendant Oetken in relation to Plaintiff Kaul, and all documents submitted by Plaintiff Kaul in relation to Defendant Oetken in the period commencing on September 12, 2022.

65. On March 13, 2024, the E.D.N.C. subsequent to five (5) months-worth of briefing and knowledge of all documents pertaining to Defendant Oetken's violations/abuse of the power of the United States District Court, did enter an ORDER FOR DISCOVERY PLAN (K11-17: D.E. 65), an order that was violated by the K11-17 Defendants consequent to their prior **"pattern"** of

perpetrating a scheme of judicial corruption/harassment/intimidation purposed to have the case either stayed and or dismissed.

66. Regardless, on April 12, 2024, Plaintiff Kaul submitted a 'REPORT OF THE PARTIES PLANNING MEETING', in which he informed the district court of the Defendants violation of the March 13, 2024 'ORDER FOR DISCOVERY PLAN' and on April 18, 2024, submitted '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' (K11-17: D.E. 94).

67. The latter document is irrefutable proof of the fact that state medical boards are not sovereign entities but are in fact subjugate elements of the for-profit entity of Defendant FSMB or as pled by Plaintiff Kaul within **The Kaul Cases**, the **"Federation Cartel" ("FC")**.

68. This cartel, one that has taken decades to establish, illegally confers absolute antitrust power on the **"FC"** over, amongst other things, the entire system of so called 'physician regulation and disciplining from which it reaps billions in profit. The **"FC"** aggressively conducts quid pro quo schemes with hospital/insurance/pharmaceutical corporations, and uses its power to terminate physicians who either fail to support or oppose the corporate profiteering agendas of the **"FC"** hospital/insurance/pharmaceutical corporations quid pro quo conspirators.

69. It achieves these terminations (read executions) by disseminating orders to its subjugate state medical boards to revoke the targeted physicians' licenses and obstruct their efforts to have those licenses reinstated and or new license issued.

70. Thus, pursuant to RICO's doctrine of vicarious liability pursuant to Salinas , the acts/offenses/violations of one state medical board become the liability of all subjugate state medical boards of the **"FC"**. **"The crime of one becomes the crime of all"**

71. And so, a violation of a physicians' human/civil/constitutional rights in one state causes him an injury in all states, which thus provides him standing to bring suit in any/all states.

72. **The Kaul Cases** represent an existential threat to the **"FC"**, which accounts for the lengths to which it and **The Kaul Cases** Defendants have gone to attempt to cause the elimination of Plaintiff Kaul (kidnapping/false indictment/false arrest/false incarceration/attempted killing).

73. Similarly, it accounts for the fact of their corruption of certain members of the politico-judicial bodies to attempt to prevent Plaintiff Kaul from further exposing their decades-long corporate-profit driven crimes against the American public and medical profession.

74. Defendant Oetken is simply one of the more recent public servants to have gotten snared in their 'net of corruption', a 'net' into which he willingly entered in the belief the 'net' would restrict Plaintiff Kaul but never imagining that the net would entrap him and his co-conspirators.

75. However, and arguably the 'spark' that lit the fundamental/illegal structure of the **"FC"** was respectively the May 18, 2022, and June 27, 2024, opinions/orders of the U.S.C.A. for the 5th Circuit and SCOTUS in Jarkesy, which established, as pled in K11-20 (----) that the jury-less article III judge free NJ administrative April 2, 2012, suspension and March 24, 2014, revocation were/are illegal.

76. **The Kaul Cases** Defendants, and particularly the lawyer defendants, recognized these facts as some of many of the knowing illegality of their revocation scheme, but calculated Plaintiff Kaul would be eliminated, and Plaintiff Kaul would never expose the scheme.

77. But when Plaintiff Kaul commenced litigation on February 22, 2016, **The Kaul Cases** Defendants conviction of their impunity began to shudder and so they embarked on grand schemes of politico-judicial corruption, again convinced they would prevent the emergence of

further evidence of their crimes and of the ever-expanding conflagration of their criminal conspiracy.

78. However, recognizing in or about 2021 that simple quid pro quo bribery schemes were insufficient, they had Plaintiff Kaul kidnapped/arrested/jailed and realized that the dollar-value of the bribes had to be of sufficient value to have a district judge not only dismiss the case but enter a nationwide injunction purporting to prevent Plaintiff Kaul from seeking restitution for the past ongoing/**"new"** injuries to his life/liberty/property/reputation, without first obtaining the permission of such a judge willing to take such a risk of criminal conspiracy.

79. That judge was Defendant Oetken, a resident of the most expensive part of Manhattan (Chelsea) whose daily living expenses/lifestyle require more than a federal judge's salary does permit. Defendant Oetken sits on many cases involving financial corporations, and treats these cases as personal profit generators.

80. Defendant Oetken, recognizing the illegality of his 'injunction' scheme and of his having entered an un-exit-able criminal conspiracy, did quickly succumb to the K11-17 Defendants demand consequent to the March 23, 2024 'ORDER OF DISCOVERY' that he issue an 'order' threatening to hold Plaintiff Kaul in contempt if he did not dismiss K11-17 by March 29, 2024. The K11-17 Defendants threatened Defendant Oetken with exposing his crimes/professional ruin if he failed to comply with their demand.

81. Plaintiff Kaul sued Defendant Oetken in K11-18 on March 25, 2024, in the U.S.D.C. for the E.D.N.C. for all of the human/civil/constitutional rights violations pled in K11-23. Defendant Oetken's failure to deny the facts/allegations did, pursuant to Rule 8(b)(6) cause these facts to become admitted for all purposes (**Exhibit 8).**

82. The reason for Defendant Oetken's non-denial of the facts in K11-18 was his guilt of those allegations/facts, facts that he had admitted on October 6, 2022 (**Exhibit 3)** and then on August

14, 2023, when he belatedly and summarily denied Plaintiff Kaul's October 6, 2022, motion for his disqualification, without denying the facts substantiating that disqualification (**Exhibit 4**).

83. Defendant Oetken has denied none of the charges levied against him by Plaintiff Kaul in the period from September 14, 2022, to the present, including those on March 25, 2024, in K11-18.

84. Defendant Oetken is guilty of, amongst other things, of having abused the authority and power of the United States District Court to conduct a **"pattern of racketeering"** within the S.D.N.Y. and to attempt to then perpetrate the products of that fraud through every other district court in the United States District Court, by threatening Plaintiff Kaul with contempt if he fails to dismiss cases accepted and adopted by fully informed district judges in those courts.

85. On August 26, 2024, Plaintiff Kaul in filing K11-20 in the Southern District of Texas, did inform the court and district judges of all the circumstances/events/facts surrounding the September 12, 2022, purported 'injunction' and affairs associated with Defendant Oetken. Based on these representations and other facts of immense substance and relevance, the U.S.D.C. for the S.D.T did accept the case, issue summonses and an 'ORDER FOR CONFERENCE AND DISCLOSURE OF INTERESTED PARTIES' on August 30, 2024 (**Exhibit 15**).

86. The K11-20 Defendants have violated and continue to violate this order while attempting to secretively scheme with Defendant Oetken to have Plaintiff Kaul's person physically restrained (**Exhibit 16 + Exhibit 19**) in order to prevent him appearing for the scheduled November 4, 2024 'INITIAL PRETRIAL AND SCHEDULING CONFERENCE' (**Exhibit 18**). Plaintiff Kaul, in randomly checking the court dockets on October 3, 2024, came to know of the K11-20 Defendants clandestine scheme with Defendant Oetken , and then emailed Defendants a copy of his letter to the S.D.T. judicially noticing it of Defendants letters to Defendant Oetken. This prompted the K11-20 Defendants to submit their secretively filed letters to Defendant Oetken with the S.D.T. just before Plaintiff Kaul filed his judicial notice (**Exhibit 17**), in order to attempt to cover-up their scheme to keep Plaintiff Kaul unaware of Defendant Oetken's October 2, 2024 'order' until

he was arrested/jailed on October 17, 2024, thus keeping him from appearing at the Scheduling Conference on November 4, 2024 (**Exhibit 18**), a move Defendants hoped/believed would cause dismissal of K11-20.

87. Defendant Oetken's critical participation in the knowingly illegal September 12, 2022, purported 'injunction' scheme has severely compromised his ability to independently function as a judge within the United States District Court, and as such should be removed from the federal bench.

88. And it is Defendant Oetken's recognition of the desperate situation into which he caused his irreversible admission, that accounts for his second threat to attempt to hold Plaintiff Kaul in contempt for allegedly violating an order that he and the K11-20 Defendants know is illegal and the product of a massive bribery related 'Fraud on the Court'.

89. Further bolstering his knowledge of his guilt is the fact that in K11-18 his non-denial of the facts of his crimes did cause their admittance for all purposes pursuant to Rule 8(b)(6). Defendant Oetken would have been better advised to admit or deny the K11-18 facts and attempt to shift the quid pro quo liability onto **The Kaul Cases** Defendants.

90. Instead, not only have most of those Defendants admitted in K11-20 to facts of their guilt, but Defendant Oetken's Rule 8(b)(6) admission of the facts of his guilt in K11-18 was unqualified and with acceptance of complete liability, regardless of its procedural dismissal on April 8, 2024 (**Exhibit 10**).

91. In fact, it is Defendant Oetken's K11-18 admittance of guilt, acceptance of complete liability and the lack of any defense, that establishes his guilt in K11-23 and an admittance of undisputed fact sufficient for Summary Judgment on all counts.

LEGAL CLAIMS

1. COUNT ONE

Association-In-Fact Enterprise: U.S.D.C.-S.D.N.Y.-State of New York-NYSE ("USN- Association-In-Fact Enterprise")

Defendant Persons: Mississippi Medical Board/New York State Attorney Grievance Committee/James Paul Oetken

Co-conspirators: TD Bank/Geico/Grewal

RICO Predicate Acts: Bribery/Wire Fraud/Obstruction of Justice/Public Corruption

Overview:

92. In a period commencing in or around August 2021, Defendant Oetken did enter a conspiracy with, amongst others, co-conspirators TD Bank/Geico/Grewal, the agreed purpose of which was to cause the knowingly illegal dismissal of K11-7 with prejudice and the entry of a purported nationwide 'injunction' that sought to prevent Plaintiff Kaul from filing any further complaints/petitions/documents in the United States District Court related to the **"denial [not revocation] of his medical license"** and or litigation proceedings initiated by either the K11-7 Defendants or Plaintiff Kaul **"before" [not after]** September 12, 2022.

93. Defendant Oetken's purported 'injunction' as admitted in K11-18 in a period from March 25 to April 8, 2024, was the product of a bribery related quid pro quo scheme in which Defendant Oetken did, in collusion/conspiracy with his co-conspirators convert the U.S.D.C. for the S.D.N.Y. into an **"association-in-fact racketeering enterprise"** through which he and his co-conspirators perpetrated a **"pattern of racketeering"** through the commission of the knowingly illegal RICO predicate acts of bribery/public corruption/obstruction of justice/wire fraud.

94. Defendant Oetken's guilt in K11-23 is consequent to his Rule 8(b)(6) admissions of fact as to his failure to deny the facts in K11-18 and or raise any defense, be it qualified/sovereign/absolute immunity and or claim sufficiency. Res judicata provides no defense to admitted facts regardless of the final case disposition, for the facts are an entity separate from any non-substantive procedural basis for a dismissal.

95. In K11-18, Defendant Oetken became aware of the Complaint on or about March 27, 2024, and could have voluntarily entered the case and denied the facts, but he did not, because he was/is guilty of the levied charges/facts.

96. In fact, he could even have sought permission from the U.S.C.A. for the 4th Circuit to enter the appeal, but he did not, as further evidence of his guilt, and of his attempt to corruptly manipulate the U.S.C.A. for the 4th Circuit into affirming the dismissal of K11-18.

97. Defendant Oetken did not anticipate that Plaintiff Kaul would dismiss the K11-18 4th Circuit appeal and did neither anticipate the filing of K11-20 within the U.S.C.A. for the 5th Circuit, the Circuit from which the seminal ruling in Jarkesy emerged, the principles of which rendered/render illegal the 2014 NJ revocation, all of its legal sequalae and every opinion/order that was based on and or incorporated the illegal 2014 jury-less article III judge free revocation, including the K11-7 September 12, 2022 purported 'injunction'.

98. These facts are known to Defendant Oetken, as he was provided a copy of the K11-20 Complaint by Defendants FSMB/Allstate, and knows these facts to be admitted consequent to his knowledge of the K11-20 Defendants Rule 8(b)(6) \failure to deny the facts, thus causing their admission for all purposes.

99. However, despite having admitted facts of his crimes in K11-18 and knowing of the K11-20 Defendants admission of facts of their crimes, and of his conflicted lack of authority in matters as to Plaintiff Kaul, he did, in knowing violation of civil/criminal law abuse the authority of the

United States District Court to attempt, in a knowingly illegal manner, threaten Plaintiff Kaul with contempt if he did not dismiss K11-20.

100. Defendants MMB/AGC liability stems in part respectively from their 2024 denial of Plaintiff Kaul's license application to the MMB (**Exhibit 11**) and Defendant AGC's complicity in their failure to investigate Defendant Oetken's bribery related quid pro quo scheme with **The Kaul Cases** Defendants.

101. Had Defendant AGC investigated Defendant Oetken's crimes and or referred the matter to prosecutorial authorities, the illegality of the 2014 NJ revocation would have been fully exposed as would have Defendant Oetken's illegal abuse of the power/authority of the United States District Court, the net result which would have been a 'turning of the clock' back to 9 am EST on April 2, 2012, and rectification/remediation/compensation of every injury to Plaintiff Kaul's life/liberty/property/reputation.

102. However, of greater import would be a reformation of the state medical board system to bring it into compliance with the Seventh Amendment related ruling in Jarkesy, in which the SEC has been forced to comply, a compliance that constitutes precedent for the same reformation of American state medical boards.

103. The corrupt vigor with which **The Kaul Cases** Defendants have contested the claims (2016-2024) is partly explained by their realization of the illegality of what the crimes they committed against Plaintiff Kaul (2005-2024), and of the immense/detrimental material consequences to their profiteering and imposition of 'fines' against innocent, principally ethnic minority physicians.

104. In essence, **The Kaul Cases** represent an existential threat to the **"Federation Cartel"**, its subjugate state medical boards and their obscene/illegal profiteering at the expense of human life.

The Association-In-Fact Enterprise:

105. The pleading of an association-in-fact enterprise can be deduced from the pleading of the RICO predicate acts and the **"pattern of racketeering".** See Boyle v United States, 129 S.Ct 2237 (2009), but additionally and pursuant to the Boyle , the elements of pleading are as follows:

106. A purpose - the illegal bribery related dismissal with prejudice of K11-7 and the entry of a knowingly illegal nationwide 'injunction', the purpose of which was to prevent Plaintiff Kaul from further/fully exposing the long-standing crimes of **The Kaul Cases** Defendants, many of which resulted in the incarceration of principally ethnic minority physicians to whom the insurance industry owed money or who presented a competitive threat in the healthcare market.

107. A relationships among those associated with the enterprise – Defendant Oetken's relationship in the S.D.N.Y. with many of the NY-NJ political/Wall Street based Defendants and or individuals/entities associated with them extends back to his 2011 appointment to the federal bench. These corrupt relationships continued after the dismissal and did as a consequence of the dismissal and purported 'injunction' become even further fortified in their criminality. The quid pro quo dismissal purposed scheme committed in K11-7, and then in K11-17 (**Exhibit 14**) and the attempt in K11-20 evidence the ongoing nature of the association-in-fact enterprise

(108) Longevity sufficient to permit these associates to pursue the enterprise's purpose – the association-in-fact enterprises that preceded K11-7, that did continue in K11-7/K11-17 and now seeks to extend its racketeering effect into K11-20 do evidence a longevity that commenced in 2011. This longevity is ongoing in 2024 and will continue to operate unless Defendant Oetken is removed from the federal bench and held liable with his co-conspirators for the commission of crime within and 'under cover' of the United States District Court. The perils of permitting Defendant Oetken to continue to sit on the bench and issue knowingly fraudulent opinions that become incorporated into the fabric of American jurisprudence is that

they pervert/obstruct the natural course of justice in the United States, and violate Rules 144/455 as to his disqualification, a disqualification that he himself denied on August 14, 2023 (K11-7: D.E. 172).

109. As to the pleading requirements for an association-in-fact enterprise, the circuit splits on what exactly was required were clarified by the Supreme Court in Boyle:

110. "Such a group need not have a hierarchical structure or a chain of command; decisions may be made on an ad hoc basis and by any number of methods-by majority vote, consensus, a show of strength, etc. Members of the group need not have fixed roles; different members may perform different roles at different times. The group need not have a name, regular meetings, dues, established rules and regulations, disciplinary procedures, or induction or initiation ceremonies. While the group must function as a continuing unit and remain in existence long enough to pursue a course of conduct, nothing in RICO exempts an enterprise whose associates engage in spurts of activity punctuated by periods of quiescence. Nor is the statute limited to groups whose crimes are sophisticated, diverse, complex, or unique; for example, a group that does nothing but engage in extortion through old-fashioned, unsophisticated, and brutal means may fall squarely within the statute's reach."

111. And so, in applying the Boyle standard to the instant matter, the motive/method of the USN Enterprise related relationships between the below identified Defendants and the co-conspirators is as follows: **(i)** Defendant Oetken – Defendant AGC; **(ii)** Defendant Oetken – Defendant MMB; **(iii)** Defendant Oetken – Co-conspirator Grewal; **(iv)** Defendant Oetken – Co-conspirator TD; **(v)** Defendant Oetken – Co-conspirator Geico; **(vi)** Co-conspirator TD – Co-conspirator Grewal; **(vii)** Co-conspirator TD – Co-conspirator Geico; **(viii)** Co-conspirator Geico – Co-conspirator Grewal; **(ix)** Co-conspirator MMB – Co-conspirator Grewal; **(x)** Co-conspirator MMB – Co-conspirator Geico; **(xi)** Co-conspirator MMB – Co-conspirator TD

112. Purpose – The overarching purpose of the post-revocation USN enterprise/scheme was to prevent Plaintiff Kaul from invalidating the illegal 2014 NJ revocation and all of its legal and non-legal sequalae, and from exposing the long-standing criminal history of **The Kaul Cases** Defendants, in which they had through schemes of politico-judicial corruption converted state persons/agencies into **"racketeering enterprises"** through which they perpetrated **"patterns of racketeering"** through the commission of RICO predicate acts, many of which resulted in the death and or incarceration of innocent physicians to whom money was owed.

113 Relationships among those associated with the enterprise – The fundamental and common element that relates the Defendants and the co-conspirators is the fact that all fall into one of two categories, those being state actors with state power and private profit purposed actors seeking state power to further their economic and or political agendas. However, their common purpose was to prevent Plaintiff Kaul from exposing their commission of crime (2005-2014) as to the illegal revocation. In the period from 2014 to 2024, the crimes pertained to various schemes of judicial corruption/kidnapping/false indictment/false arrest/false imprisonment/attempted killing, all purposed to attempt to cover up the revocation related crimes (2005-2014).

114. Defendant Oetken illegally profited from illegally selling the power of the United States District Court in a series of quid pro quo schemes with co-conspirators TD/Geico who having participated in the revocation conspiracy by destroying Plaintiff Kaul's economic standing, did bribe Defendant Oetken to dismiss K11-7 and issue an 'injunction' purporting to prevent Plaintiff Kaul from seeking legal redress for the injuries to his life/liberty/property/reputation.

115. Co-conspirators TD/Geico were motivated to cause a corruption of Defendant Oetken in an attempt to provide cover for its revocation related crimes, in the knowledge that a public exposure of the crimes would injure their standing on the NYSE, their profits and subject their corporate officers to civil/criminal prosecution.

116. Defendant Oetken illegally benefitted from perverting the power of the United States District Court in a series of quid pro quo dismissal/purported 'injunction' schemes with co-conspirator Grewal/others, a purpose of which was to prevent Plaintiff Kaul from procuring further proof of the illegality of **The Kaul Cases** Defendant, New Jersey Board of Medical Examiners **("NJBME") 2014** revocation, a revocation the judicial-evidential confirmation of which would cause a nullification/reversal/compensation of the illegal revocation and every legal and non-legal injury subsequently caused to Plaintiff Kaul's life/liberty/property/reputation (2012-2024), in conjunction with the civil/criminal holding of **The Kaul Cases** Defendants.

117. Defendant MMB, benefitted from Defendant Oetken's illegal dismissal and purported 'injunction' in that being a subjugate member of the **"Federation Cartel"** it is as liable for the crimes of one member of the cartel, namely **The Kaul Cases** Defendant, NJBME, as if it had directly committed the crimes. Additionally, co-conspirator, MMB, benefitted from having Defendant Oetken dismiss K11-7, in that the dismissal was an effective validation, albeit false, of the illegal 2014 NJ revocation, a position that Defendant MMB used in a knowingly illegal manner to deny Plaintiff Kaul's licensure applications in 2020/2024, thus re-affirming its subjugation/felty to the **"Federation Cartel"**, from which its membership causes profit to its executives.

(118) Longevity sufficient to permit these associates to pursue the enterprise's purpose – The purpose of the USN enterprise is to maintain its highly lucrative monopoly power over the entire system of so called 'physician regulation and discipline', the very existence of which has been and is challenged by **The Kaul Cases,** including K11-20. This system was in existence prior to the 2005 commencement of the revocation conspiracy and was further fortified in or around 2008 by the eponymous 'Healthcare Fraud Prevention Partnership', a concoction of the insurance industry purposed to further subjugate the medical profession in order to increase shareholder/executive compensation of the insurance/hospital/pharmaceutical corporations through the exploitation and at the expense of the medical profession. The perpetration of this

scheme required a coopting of certain judges/courts to nullify/dismiss/injunct any physicians that challenged the illegal monopoly of the healthcare market by these exploitative for-profit corporations, who were fundamentally/illegally practicing medicine without a license, a condition that existed/exists consequent to their corrupt capture of the regulatory/judicial apparatus of state. All of these factors of consolidation of power have caused a longevity of existence/function such that their knowingly illegal antitrust conspiracies have continued without challenge, until **The Kaul Cases**, to the immense detriment of the public and medical profession.

Bribery:

119. K11-7 was filed on August 19, 2021, and shortly thereafter the K11-7 Defendants commenced communicating across the US wires and in face-to-face meetings as to the perpetration of a knowingly illegal quid pro quo bribery scheme with Defendant Oetken purposed to have him dismiss K11-7 with prejudice and issue a nationwide 'injunction' that would prevent Plaintiff Kaul from seeking redress for the crimes/violations committed against him (2005 onwards) by **The Kaul Cases** Defendants without Defendant Oetken's permission.

120. The conflicted absurdity of this proposition, that Plaintiff Kaul required the permission of a person at the center of the bribery related quid pro quo scheme, accounts in large part for the invalidity of the purported 'injunction' and the decision of Chief Judge Richard E. Meyers to admit the case into the jurisdiction of the E.D.N.C. with full knowledge of all matters related to Defendant Oetken's misconduct in K11-7.

121. It would be akin, and Plaintiff Kaul asserts this analogy with the greatest humility, to Nelson Mandela seeking permission from the 1988 apartheid South African President, P.W. Botha, to conduct the affairs of the African National Congress in the dismantling of the brutality/injustice of apartheid.

122. In the period from August to December 2021, the K11-7 Defendants had developed and agreed upon a scheme whereby to attempt to create cover the bribes would be transmitted by third party actors to law firms/public relations firms/political lobbyists and specifically to persons/politicians/lawyers with personal and or professional connections to Defendant Oetken, be those connections direct or indirect. In this manner the K11-7 Defendants hoped to create an opaqueness to their knowingly illegal scheme.

123. The bribes would originate from the Defendants bank accounts/other investment vehicles (off-shore and domestic) and would be materialized in Defendant Oetken's possession in a multitude of 'gifts/cash deposits in accounts of persons associated with him to third degree/payment of living expenses-mortgage-rent/travel expenses and other easily concealed hard assets, as was exposed in the criminal conviction of US Senator, Robert Menendez.

124. The bribes were paid in installments linked to the progress of K11-7, with the final bribe being transmitted in or around December 2022, when it became apparent Plaintiff Kaul had not appealed the corrupt order in the same court building of the circuit in which Defendant Oetken sat.

125. Defendant Oetken's chambers/courtroom are at 40 Foley Square, NY, NY, the location of the U.S.C.A. for the Second Circuit, and an appeals circuit on which Defendant Oetken had intermittently sat.

126. In a period from September 12, 2022, onwards, it became apparent to Defendant Oetken and **The Kaul Cases** Defendants that the bribery related scheme had failed, and the K11-17 Defendants had become the K11-20 Defendants.

127. And specifically in the period from June 27 to October 2024, there emerged new facts/new law that rendered illegal the 2014 NJ revocation and all of its legal/non-legal sequalae, including Defendant Oetken's September 12, 2022, purported 'injunction'.

128. The SCOTUS ruling in Jarkesy was violated by Defendant Oetken on October 2, 2024, when he issued his knowingly fraudulent order attempting to compel Plaintiff Kaul to dismiss K11-20 under threat of sanctions/contempt.

129. Defendant Oetken knew that Jarkesy rendered illegal the 2014 jury-less article III judge free revocation and all its legal/non-legal sequalae, but Defendant Oetken, in a knowingly blatant violation of the law, did enter his October 2, 2024, purported 'order' onto the K11-7 docket. And he did so in part because having entered the criminal conspiracy in 2022, the K11-7/K11-17/K11-20 Defendants threatened him with exposure if he failed to comply with their order.

130. And Defendant Oetken recognized and recognizes that such exposure would result in civil/criminal investigations and a re-opening/examination of all his prior cases, for corrupt judges who have sat on the bench for ten (10) years without permanent appellate elevation, develop a sense of frustration, omnipotence and entitlement to what they consider the 'spoils of war'. They lose sight of the immense/immeasurable civic value that they provide through their measured and impartial adjudication, and of the fact that their decisions form the bedrock of American jurisprudence, without which the appellate courts could not function.

Wire Fraud:

131. In a time period commencing in or around February 2022, Defendant Oetken/agents commenced using the US wires to transmit information to the K11-7 Defendants/agents regarding the perpetration of the knowingly illegal quid pro quo bribery scheme.

132. From February 2022 onwards, up to and including October 2024, Defendant Oetken/agents did continue to use the US wires to exchange information/facts as to the failure of the scheme in causing Plaintiff Kaul to crease his prosecution of **The Kaul Cases**.

133. Defendant Oetken and **The Kaul Cases** Defendants used the US wires in a knowingly illegal manner on thousands of occasions in the period commencing in February 2022 and continuing into October 2024.

134. In these communications, Defendant Oetken did, after having received the entirety of his bribes, express a reluctance to continue to use the authority of the United States District Court to continue perpetrating the scheme.

135. Defendant Oetken's reluctance stemmed from the fact that the prosecutorial authorities in the S.D.N.Y. had brought criminal indictments against a sitting US Senator (Robert Menendez) and NYS Mayor (Eric Adams) based on charges of public corruption and specifically engaging in bribery related quid pro quo schemes in which they sold the power of state in exchange for money/gifts/other tangible favors.

136. Defendant Oetken, now in a more desperate condition, having recognized that Plaintiff Kaul had exposed his criminal scheme in K11-18 and the ongoing criminal prosecutions of Menendez/Adams became less cautious in his communications with **The Kaul Cases** Defendants.

137. Defendant Oetken communicated that he was concerned that his corrupt activities on the bench would be submitted to the Office of the US Attorney for the S.D.N.Y.

138. Defendant Oetken used the US wires to communicate his fear that if the prosecutorial authorities subpoenaed his records, he would be charged with the same offenses levied against Menendez/Adams.

139. In the continued perpetration of the scheme and its attempted cover up, there were direct communications across the US wires between Defendant Oetken and **The Kaul Cases**

Defendants in which Defendant Oetken was threatened with exposure if he failed to follow the orders of **The Kaul Cases** Defendants.

140. In some of these communications, **The Kaul Cases** Defendants expressed immense fear as to the consequences to their lives of Plaintiff Kaul's continued prosecution of **The Kaul Cases**.

141. **The Kaul Cases** Defendants and most recently the K11-20 Defendants, did communicate their grave concerns that if they were deposed by Plaintiff Kaul, further evidence of their crimes would emerge.

142. The K11-20 Defendants, now in a similarly more desperate condition, abandoned all caution as to attempting to 'cover their tracks' and plainly stated that if Plaintiff Kaul were not stopped, they feared they would be indicted, as were Menendez/Adams.

143. The K11-20 Defendants did also use the US wires to transmit that if Plaintiff Kaul's prosecution were successful, officers for the corporate Defendants (Allstate/FSMB) would be held criminally liable.

144. The K11-20 Defendants did use the wires to communicate to each other possible alternative plans to eliminate Plaintiff Kaul if Defendant Oetken did not cooperate.

145. The K11-20 Defendants, in communicating these alternative Plaintiff Kaul elimination plans to Defendant Oetken, did indirectly threaten Defendant Oetken's life and the lives of those related to him to the third degree.

146. In these email communications to both Defendant Oetken's private and official emails, and the emails of his agents, the K11-20 Defendants communicated that if Defendant Oetken did not follow their orders, they would expose other highly incriminating evidence of his prior corrupt acts on the bench and of his homosexual personal life prior to and during his marriage.

147. Defendant Oetken, recognizing that his choice was to either comply with the K11-20 Defendants orders or accept the end of his judicial career and possible impeachment/indictment, did comply and use the US wires to issue a knowingly illegal purported order on October 2, 2024, once again threatening Plaintiff Kaul with contempt if he did not dismiss K11-20.

Obstruction of Justice:

148. Defendant Oetken, a lawyer and a jurist knew that when he entered the bribery related quid pro quo scheme with the K11-7 Defendants in or around February 2022, his acts did and would constitute an obstruction of justice.

149. Defendant Oetken knew that some elements of the crime of obstruction of justice to include the elements of there being an ongoing legal proceeding/an awareness of the ongoing legal proceeding/a criminal intent to interfere with the legal proceeding for criminal reasons/ a destruction of evidence (emails/texts/hand written notes)/a interference with witnesses (third parties) to cause a suppression of their testimony.

150. Defendant Oetken knew these elements and others because he has adjudicated many cases since 2011 involving obstruction of justice charges, charges/convictions for which has sentenced the perpetrators to jail.

151. Defendant Oetken knows the law and knows that he must obey the law.

152. Defendants Oetken swore oaths as a lawyer and as a jurist to uphold the Constitution and the law.

153. Defendant Oetken knew that in the perpetration of the bribery related quid pro quo scheme he violated not only his oaths, but committed felonies against which he has no immunity.

154. Defendant Oetken, while recognizing the immense risk of continuing to aid/abet the bribery related qui po quo scheme, did resign himself to the fact that he really had no choice.

155. Defendant Oetken's recognition of his desperate situation has made it difficult for him to concentrate on cases before him.

156. Defendant Oetken regrets having entered into conspiracy with **The Kaul Cases** Defendants, but accepts that eventually he will be subjected to a form of discipline and or punishment for having violated the Constitution/ the law/his solemn oaths/Plaintiff Kaul's human/civil/constitutional rights.

157. In fact, Defendant Oetken's desperation was evidenced when he/agents used the US wires to communicate with persons/entities invested in the company (www.wix.com) from which Plaintiff Kaul issued a release on June 10, 2024, regarding K11-18 and Defendant Oetken's corrupt activities in the S.D.N.Y., to have Plaintiff Kaul's account deactivated.

158. Defendant Oetken , in issuing a knowingly illegal 'order' on October 2, 2024, did recognize that he was conflicted and without authority to issue such a document.

159. On October 3, 2024, Plaintiff Kaul submitted a letter in response to Defendant Oetken's October 2, 2024 'order' (**Exhibit 21**), which identifies the factual/legal bases as to the invalidity of the 'order'.

2. COUNT TWO

DEPRIVATION OF RIGHTS UNDER COLOR OF LAW

DEFENDANTS: OETKEN/MMB/AGC

160. 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.

161. 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.

162. 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.

163. 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.

164. 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

165. 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.

166. 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.

167. 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.

168. 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.

169. 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.

170. 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.

171. 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.

172. 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.

173. 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.

174. 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.

175. 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.

176. 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.

177. 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.

178. 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.

179. 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.

180. 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.

181. 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.

182. 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.

183. 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.

184. 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.

185. 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.

186. 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.

187. 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.

188. These deprivations/violations/injuries were willfully/maliciously perpetrated by Defendant Oetken within/through/with the assistance of the United States District Court.

189. These deprivations/violations/injuries were willfully/maliciously perpetrated by Defendant Oetken in collusion/conspiracy with private actors associated with the New York Stock Exchange.

190. 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.

191. 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.

192. 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.

193. 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

194. 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."**

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

196. 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."**

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

198. 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."**

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

200. 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."**

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

203. 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."**

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

205. 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."**

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

207. 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."**

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

209. 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."**

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

211. 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."**

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

213. 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."

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

215. 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."**

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

217. 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."**

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

219. 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."**

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

221. 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."**

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

223. 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."**

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

225. 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."**

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

227. 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."**

228. 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 K11-20 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 Southern District of Texas-Houston Division did nullify the purported 'injunction' within its jurisdiction, when it admitted the case on August 26/30, 2024.

3. The United States District Court for the Southern District of Texas-Houston Division did nullify the purported 'injunction' within its jurisdiction when it issued its March 13, 2024, **ORDER FOR DISCOVERY PLAN (Exhibit 5).**

3. The nullification of the purported 'injunction' within the jurisdiction of the United States District Court for the Southern District of Texas-Houston Division, has rendered the purported 'injunction' a legal nullity within the Southern District of Texas-Houston Division 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 Southern District of Texas-Houston Division

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 Southern District of Texas-Houston Division 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 Southern District of Texas-Houston Division.

9. Defendant Oetken's published October 2, 2024 'ORDER' in K11-20, 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' October 2, 2024 'ORDER' that was generated and filed in K11-7 by Defendant Oetken, and then filed in K11-20 by the K11-20 Defendants on October 3, 2024 (**Exhibit 22**) 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' October 2, 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: OCTOBER 8, 2024

RICHARD ARJUN KAUL, MD