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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RICHARD ARJUN KAUL, MD

Plaintiff

v.

ALLSTATE INSURANCE COMPANY, ET AL

Defendants

Civil Case:

21cv736

Judge Sara L. Ellis

Magistrate Judge Jeffrey T. Gilbert

Complaint

I, the Propria Persona Plaintiff, Richard Arjun Kaul, of full age do hereby submit this Complaint on January 27, 2021 seeking the within referenced relief

Dated: January 27, 2021



Richard Arjun Kaul, MD

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RICHARD ARJUN KAUL, MD

Civil Case:

Plaintiff

v.

CERTIFICATE OF SERVICE
ON ALL DEFENDANTS

ALLSTATE INSURANCE COMPANY, ET AL

Defendants

I, Richard Arjun Kaul, MD, do hereby certify the following:

1. I have submitted an application for IFP status, and respectfully request that the U.S.M.S. do serve the Summons/Complaint on the Defendants.
2. In order to preserve the Court's resources, I did, on January 27, 2021 request that by February 2, 2021, the Defendants sign Form AO 399 9(WAIVER OF THE SERVICE OF SUMMONS).
3. A copy of this Complaint will be forwarded to American/British state/federal investigative/prosecutorial authorities, due to the criminal nature of the charges.
4. A copy of this Complaint will be submitted to the European Court of Human Rights, due to the Defendants violations of international human rights.

I do certify that on February 3, 2021, I will submit to the Court a list of those Defendants who have refused to waive service, and respectfully repeat my request that service be effectuated by the U.S.M.S. and the Defendants be penalized with the associated costs/sanctions.

Handwritten signature of Richard Arjun Kaul, consisting of stylized initials 'R' and 'K' followed by a small '1'.

Dated: January 27, 2021

Richard Arjun Kaul, MD

cc: All Defendants

Jurisdiction + Venue

U.S.C. section 1331 because Plaintiff's claims arise under federal law, and under 18 U.S.C. section 1964(c) because this action alleges violations of RICO, 18, U.S.C. section 1962., This Court has subject matter jurisdiction pursuant to 28 U.S.C. sections 1343(3) and 1331 because this action alleges violations of section 1983. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. section 1332(d)(2)(A)(4) because Plaintiff is a citizen of a different state to the Defendants and the aggregate amount in controversy exceeds seventy-five thousand (\$75,000) dollars. This Court also has jurisdiction because the District of New Jersey is both a defendant, and an adversary in the United States of District Court for the Northern District of Texas, and because the Defendants include all district/magistrate judges in Defendant District of New Jersey-Newark.

Personal Jurisdiction: This Court has personal jurisdiction over each Defendant. Each Defendant has transacted business, maintained substantial contacts and or committed overt acts using the US mail/wires in furtherance of the illegal scheme and conspiracy throughout the United States, including this district. This Court also has personal jurisdiction over all Defendants pursuant to Fed. R. Civ. P. 4(k)(1)(A) because they would be subject to the jurisdiction of a court of general jurisdiction in the Northern District of Illinois (720 ILCS 5/Art. 33 - ARTICLE 33. OFFICIAL MISCONDUCT).

Venue: Venue is appropriate in this District for the Plaintiff's claims pursuant to 28 U.S.C. section 1391(b)(1)(2) and 18 U.S.C. section 1965(a).

The law prohibits the United States District Court for the District of New Jersey and any non-defendant judge in that district from performing any administrative/ministerial/adjudicative function in regards to any aspect of K11-3 or indeed any of **The Kaul Cases**.

Parties

Plaintiff:

Richard Arjun Kaul, MD:
440c Somerset Drive, Pearl River NY 10965
862 881 9703
drrichardkaul@gmail.com

Defendants:

1. Allstate Insurance Company - Attention Thomas Wilson, 2775 Sanders Road, Northbrook, Illinois 60062
2. Geico Insurance Company - 5260 Western Avenue, Chevy Chase, MD 20815
3. Northern Trust - Attention Michael O'Grady, President/CEO, 50 South La Salle Street, Chicago, IL 60603
4. Madeline Cox Arleo - Court Room MLK 4A, 50 Walnut Street, Newark, NJ 07102
5. Claire C. Cecchi - Courtroom MLK 5B, 50 Walnut Street, Newark, NJ 07102
6. Stanley R. Chester - Court Room PO No.2, 50 Walnut Street, Newark, NJ 07102
7. James B. Clark - Courtroom MLK 2A, 50 Walnut Street, Newark, NJ 07102
8. Joseph A. Dickson - Court Room MLK 2D
9. Mark Falk - Courtroom PO 09, 50 Walnut Street, Newark, NJ 07102
10. Michael A. Hammer - Courtroom MLK 2C, 50 Walnut Street, Newark, NJ 07102
11. Brian Martinotti - Courtroom MLK 2C, 50 Walnut Street, Newark, NJ 07102
12. Edward S. Kiel - Court PO 08, 50 Walnut Street, Newark, NJ 07102
13. Steven C. Mannion - Courtroom MLK 2B, 50 Walnut Street, Newark, NJ 07102
14. John Sherwood - Courtroom 3D, 50 Walnut Street, Newark, NJ 07102
15. Kevin McNulty - Court PO 04, 50 Walnut Street, Newark, NJ 07102
16. Esther Salas - Courtroom MLK 5A, 50 Walnut Street, Newark, NJ 07102
17. John Michael Vazquez - Courtroom PO 03, 50 Walnut Street, Newark, NJ 07102
18. Cathy L. Waldor - Courtroom MLK 4D, 50 Walnut Street, Newark, NJ 07102
19. Leda Dunn Wettre - Courtroom MLK 3C, 50 Walnut Street, Newark, NJ 07102
20. Susan D. Wigenton - Courtroom MLK 5C, 50 Walnut Street, Newark, NJ 07102
21. Freda Wolfson - Courtroom 5E, 50 Walnut Street, Newark, NJ 07102
22. Stewart Leviss - Law Firm of Berkowitz/Lichstein/Kuritsky/Giasullo - 75 Livingston Avenue, Roseland, NJ 07068
23. Jose Linares - Law Firm of English/McCarter - Four Gateway Center, 100 Mulberry Street, Newark, NJ 07102 - jlinares@mccarter.com

In COUNT FOUR-DEPRIVATION OF RIGHT UNDER COLOR OF LAW, the following Defendants 4/5/6/7/9/10/12/14/16/18/19/20/ are collectively referred to as “**AA**”, the Aiders/Abettors.

Preliminary Statement

This case is about the most pernicious variant of corruption, that of judicial corruption, a crime that corrodes the fabric of democratic society, and threatens the good order of civilization and society (**Exhibit 1**). Judicial corruption is a crime the Defendants have been committing since at least 1999. At the core of this case is a coterie of white collar crooks who continue to launder the proceeds of their crimes through the legal/judicial machinery of the United States District Court for the District of New Jersey (“**DNJ-N**”). The Defendants have conspired and continue to conspire to both launder these proceeds and provide ostensibly legitimate ‘legal cover’ for a series of massive crimes they have committed through administrative/medical board/state/bankruptcy/federal/appellate courts within the physical and legal boundaries of New Jersey. These crimes, ones committed under color of law and perpetrated with/through the politico-legal machinations of state commenced in 2006 and are ongoing and include:

The Crimes:

(1) Racketeering; (2) Perjury; (3) Fraud; (4) Evidence/Witness Tampering; (5) Obstruction of Justice; (6) Public Corruption; (7) Judicial Corruption; (8) Bribery; (9) Kickbacks; (10) Manslaughter; (11) Conspiracy.

The Main Crime Scene:

The United States District Court for the District of New Jersey-Newark (“**DNJ-N**”).

The originatinating motivation for the crimes (2006 to 2021) was professional jealousy/political corruption/fraud/greed, amongst the Defendants identified in **The Kaul Cases**. In 2021, these crimes, as Kaul has previously described, commenced as would an illegal camp-fire in a northern California forest, but one that the winds of truth have converted into a raging inferno that now covers several states.

The Kaul Cases expose how corruption of the judicial/legislative/political veins of American society by ruthless for-profit corporations is responsible for the so called “**opiate epidemic**”, the world’s highest COVID-19 related death rate, the world’s highest rate of human incarceration and now what is being referred to as the “**pain epidemic**”. The latter plague is a consequence of a set of guidelines negligently implemented by the CDC, under instruction from persons/corporations seeking to further their political/economic agendas. America incarcerates more physicians per capita than any other country in the world, and pulling the strings of this physician pogrom is the health insurance industry, of which Defendants Allstate/Geico are controlling members.

The Kaul Cases seek, amongst other things: (1) **“Reformation of American Medical Boards” (“RAMBO”)**; (2) The relief as set forth in K1 (D.E. 1 page 200) (**Exhibit 1**), which includes political campaign finance reform.

This case, K11-2, strikes at the heart of the cancer of corruption that has metastasized and taken control of the Defendant judges. The lives of many innocent Americans have been destroyed by these Defendants, criminals disguised as judges, who have abused their power, their discretion and sold their souls for money/professional favor/political advantage. Innocent humans have been trafficked into for-profit correctional facilities from which the insurance industry profits. Families destroyed. Children left destitute. Suicides and an unimaginable degree of psychological/emotional/physical carnage, perpetrated by the Defendants, individuals to whom the public looks for truth and justice, but individuals who have, because of their lethal greed, looked the other way, while effectively signing death warrants. Economic incarceration, social incarceration, psychological incarceration and physical incarceration. Corrupt judges in collusion and conspiracy with soulless for profit corporations/executives have made America a very sick place. The COVID-19 pandemic has exposed the massiveness of its sickness. Fewer people are emigrating to America. Fewer foreign corporations are investing in America. Its wealth divide is the highest in the western world, and there are many parts of America where poverty levels exceed those seen in many so called third world countries. The Defendants have contributed and continue to contribute to these national maladies and if not stopped, the inhumane suffering of America and Americans will continue.

The motivations/mechanisms/modes of judicial corruption are thoroughly described in a 2009 article in THE YALE LAW JOURNAL (**Exhibit 2**):

“ ... judges who were exposed in an expansive investigation by the PIN (Public Integrity Section-US DOJ), dubbed “Operation Greylord,” into corruption within the Cook County Court of Chicago, Illinois ... cases of corruption involving multiple and prestigious judges, large stakes, and egregious corruption, since such cases’s scope and ramifications are more likely to grab the attention of the PIN and the major media.”

The **“stakes”** for the Defendants in this case are **“large”**. Their crimes are **“egregious”**. However, the benefits to the American public of civil/criminal convictions are immense, both in terms of restoring confidence in the institutions that are the bedrock of American democracy, those of the political/legal bodies.

The information in this Complaint is organized in accordance with, and meets the pleading standards set forth in Rules 8/9 of the F.R.C.P. and those pursuant to Twombly/Iqbal. This initial Complaint, which will be amended as and when criminal investigations expose further wrongdoing, provides fair notice to this Court and the Defendants of the charges levied against them.

K11-3 can be summed up with the following statement:

To increase corporate/executive profit and share price, corporations traded on the NYSE perpetrate massive schemes of bribery/public corruption/judicial corruption:

- 1. Corruption of the Courts: The bribes are covertly funneled from the pockets of the corporations into the pockets of lawyers/law firms/political lobbyists/public relation firms, with whom corrupt judges/families are commercial beneficiaries. The quid pro quo is that judges enter judgments in favor of the corporations when they are the plaintiff, and enter judgments in favor of the corporations when they are defendants. Either way the American public loses.**
- 2. Corruption of Congress/State Legislatures: The corporations use the same avenues of bribery as for Corruption of the Courts. The quid pro quo is that all legislation favorable to corporate/executive/shareholder profits is enacted, while all legislation not favorable to these profits is not enacted. Either way the American public loses.**
- 3. Corruption of the Executive Branch of Federal/State Government: Bills favorable to corporate/executive/shareholder profits are signed by State Governors/President, while all bills not favorable are not signed. Either way the American public loses.**
- 4. Corruption of the media: The corporations hold substantial minority stakes in the majority of media outlets, including Google. News favorable to their commercial agendas is propagated, while news not favorable is suppressed. Either way the American public loses.**

The below paragraphs, although not technically an element of the Complaint's legal framework, frame the mechanism by which corruption in America is leading to its global demise as the world's super-power:

Beginning in the 1970s for-profit corporations have made the United States of America the "United States of Corruption", in which the victims are the good people of this country, the common man. Part of the corporations' strategy has been to subdue the population with just enough

food/housing/clothing/mind-numbing media to subvert any thoughts of revolution.

By 2025, China will be the world's superpower. In China, corruption of judges/politicians/legislatures is punishable by death. However, corruption of foreign governments is encouraged, as the Chinese recognize that the cancer of corruption erodes national power. China has purchased/controls large swathes of the American political establishment. Military might is a diminishing mode of the procurement/propagation of power, replaced by so called "soft power", that which includes skills such as the writing of computer code. Over 75% of the world's programmers are Indians and Chinese. American corporations/government servers are hacked more frequently than those in China or India. The reason is that the code for the protective fire-walls is sold by corrupt American officials to foreigners. American Public Relation Companies, such as Mercury Public Relations ("MPR") have played defining roles in these schemes. MPR is mentioned on several occasions in the report from special counsel, Robert Mueller re: election interference in 2016.

The Evidence + Statement of Fact

The evidence that proves the elements of the claims is contained within the following exhibits, excerpts from which are included in this Complaint:

1. March 30, 2016 (K1-D.E. 14) (Exhibit 1): **“The federal court for this district has proven itself to be most sympathetic to the state government ... defamatory conduct is also alleged to have occurred, Washington, DC and Chicago are the location of defendants CNS [also Defendant Allstate] ... I firmly believe that if the court transfers the matter to the District of New Jersey I will be prejudiced.”**
2. June 27, 2016 (K1-D.E. 66) (Exhibit 2): **“The defendant has attempted to obstruct justice by violating her duty to avoid the unnecessary expenses of service ...”**
3. July 14, 2016 (K1-U.S.C.A. for the Second Circuit-D.E. 41) (Exhibit 3): **“The District of New Jersey will be strained to deliver impartial justice because of the politico-legal nexus between its judiciary and the defendant-appellees ... The defendant-appellee state committed fraud on the court when it used forged documents to procure judgment against the plaintiff-appellant...”**
4. August 22, 2016 (K1-D.E. 96) (Exhibit 4): **“I am not clear as to what motive Ms. Bellin would have in stating the obvious, other than to prematurely and improperly suggest a position she would wish the court to take.”**
5. August 22, 2016 (K1-D.E. 97) (Exhibit 5): **“The outcome of this case has enormous consequences for many parties ...”**
6. August 23, 2016 (K1-D.E. 101) (Exhibit 6): **“ ... I would ask that she now provide a complete list of all individuals who are “employees”, with a brief description of their connection to the “ matters” of the subpoena.”**
7. September 6, 2016 (K1-D.E. 107) (Exhibit 7): **“ ... I am of the opinion that the issue of venue, in this matter, is critical. I would, therefore, like to know when the next case management conference will occur, and when the motion to retransfer the matter to the S.D.,N.,Y. Will be considered.”** - The motion was ignored and never adjudicated.

8. October 7, 2016 (K1-D.E. 118) (Exhibit 8): **“I write this letter to bring the court’s attention a number of state-orchestrated acts that I believe have been instigated in retaliation for the above matter ... On September 21, 2016 at approximately 1:30 am eight armed police officers from the Somerset County Sheriff’s Office arrested me at my residence on a warrant for non-payment of child support ... It is significant that the complaint was only filed AFTER I had filed the federal complaint, and the assistant prosecutor has not returned my calls.”**
9. December 20, 2016 (K1-D.E. 139) (Exhibit 9): **“The new complaint will maintain the counts and allegations against the same defendants from the First Amended Complaint, but accounts for the significant and factual procedural developments that have occurred since the original complaint was filed ... state’s retaliatory actions ... state was complicit in violations of the European Data Protection Act and HIPAA, that caused harm to the plaintiff and approximately three thousand of his patients.”**
10. June 29, 2017 (K1-D.E. 198) (Exhibit 10): **“Opposition to Defendants’ application to stay Court’s Letter Order of Joint Discovery Plan ... Please accept this letter as my opposition to a letter, dated June 19, 2017, from Marc D. Haefner (ECH# 195), the advocate for defendant Hackensack University Medical Center, in which he seeks, on behalf of all defendants, a stay of the discovery order you entered on June 9, 2017 (ECF #190).”** - In K5, order D.E. 155 for a Joint Discovery Plan (conference scheduled January 26, 2021) was illegally stayed by Defendant Dickson.
11. June 29, 2017 (K1-D.E. 197) (Exhibit 11): **“ ... an order the Court entered on June 9, 2017 (ECF #190), that requires the parties to submit proposals for a Joint Discovery Plan.”** - Defendant Mannion illegally stayed the order and obstructed justice.
12. June 29, 2017 (K1-D.E. 198) (Exhibit 12): **“Because of the unique circumstances and facts surrounding this case, that involve a politician/lawyer defendant with connections to all parts of the New Jersey legal apparatus , it is not unreasonable to conclude that he will use his influence to pervert the course of justice.”**

This Complaint is supported by one hundred and eight (108) Exhibits of evidence in support of the claims against the Defendants. Within each exhibit exists evidence probative to claim proof. The Bates Number of each Exhibit is indicated on the

document entitled “**EXHIBITS BATES NUMBER**”, which also includes further excerpts from the highly incriminating corpus of evidence.

The Schemes + The Tactics

The tactics used by the Defendants to Obstruct Justice and obstruct Kaul's prosecution of **The Kaul Cases** include, but are not limited to: (1) conspire with clerical court employees to divert/lose/not publish to the docket paper filings submitted by Kaul to the 'late-drop-box' and the office of the filing clerk; (2) conspire with clerical court employees to omit critical pages from published documents; (3) conspire to delay/ignore adjudication of motions filed by Kaul; (4) conspire to deny and deny all motions filed by Kaul for discovery; (5) conspire to deny and deny all motions filed by Kaul for Default Judgment; (6) conspire to deny and deny all motions filed by Kaul for Summary Judgment; (7) conspire to deny and deny all motions filed by Kaul for case management conferences; (8) conspire to grant and grant every motion filed by the **The Kaul Cases** Defendants to stay Kaul's prosecution of the cases; (9) conspire to grant and grant all motions filed by **The Kaul Cases** Defendants to dismiss Kaul's claims; (10) conspire to transfer and transfer all of **The Kaul Cases** to the Defendant DNJ-N; (11) conspire to transfer and transfer all cases to, amongst others, Defendants McNulty/Mannion/Vazquez/Dickson; (12) conspire to falsify and falsify legal opinions/orders by knowingly citing inapposite cases/omitting critical evidence; (13) conspire to and actually engage in massive ongoing schemes of ex parte communications with **The Kaul Cases** Defendants, in both digital/non-digital formats, including face-to-face meetings in court chambers/bar association meetings/legal conferences; (14) knowingly illegal use of the US mail and wires to perpetrate the overall scheme to obstruct the prosecution of **The Kaul Cases**; (15) aiding and abetting the Defendants crimes by failing to report the crimes to investigatory/prosecutorial state/federal authorities; (16) use of law firms in which the Defendant judges remain commercial beneficiaries to funnel bribes from **The Kaul Cases** Defendants as part of a series of quid pro quo schemes purposed to obstruct Kaul's prosecution of **The Kaul Cases** and provide 'cover' for their crimes (2006 to 2021); (17) use of public relation firms to funnel bribes from **The Kaul Cases** Defendants into off-shore banks/trusts purposed to attempt to avoid detection/evade paying taxes; (18) conspire with certain members of the U.S.C.A. for the Third Circuit to enter orders purposed to manipulate the procedural posture of K1 in order to intentionally deprive the appellate court of jurisdiction, have the case remanded to Defendant DNJ-N and then continue the tactics of obstructing Kaul's prosecution of **The Kaul Cases** i.e. creating a 'legal merry-go-round' or the legal equivalent of the precept of Jean-Paul Satre's "**No Exit**"; (19) Exerting influence on U.S.D.J. in other districts to transfer cases to the District of New Jersey; (20) conspiring with **The Kaul Cases** Defendants and state/federal politicians to have bribes funneled through law firms/public relation/political lobbying firms in or over which the politicians had or have a controlling interest or stake; (21) conspiring with **The Kaul Cases** Defendants to condition partial payment of the bribes

on particular legal milestones in the case e.g. denial of discovery; (22) conspiring with NJ state investigatory/prosecutorial authorities to have them ignore Kaul's requests for investigation of the Defendants crimes of judicial corruption; (23) conspiring with certain members of the Judicial Disciplinary Committee of the Third Circuit to quash and not have investigated Kau's complaints of the Defendants crimes; (24) conspiring with certain members of the NJ field office of the FBI to quash and not have investigated Kaul's complaints regarding the Defendants crimes; (25) conspiring with certain members of the NJ state government/office of the AG to obstruct Kaul's 2018 application for reinstatement of his illegally revoked NJ medical license.

The Injuries

Kaul:

Kaul's license was illegally suspended/revoked on April 2, 2012/March 24, 2014, a crime that continues to cause irreversible injury to his professional/personal life and economic standing/reputation, as well as ongoing injuries to his children. Some of the injuries, as of November 2018, are detailed in (Exhibit 25). From November 2018 to the present, Kaul has sustained further injuries as pled in K11-1 (Exhibit 107).

Kaul's patients:

Subsequent to the widely publicized suspension/revocation, hundreds of Kaul's patients without health insurance became abandoned, as they were unable to find a physician to provide care. A number of these individuals committed suicide.

Kaul's family:

Please see (Exhibit 108).

The Defendants in full knowledge of their crimes, the consequences of their crimes and the ongoing injuries to Kaul, his family and patients, continue their “**pattern of racketeering**” within the United States District Court. The Kaul Cases are being watched by a global audience of just over two million (2,000,000) individuals, consisting principally of business executives, physicians, lawyers, politicians/judges and journalists. K1 was filed on February 22, 2016 and was publicized, as have all The Kaul Cases. The majority of the Defendants know that Kaul has communicated his opinion (emails/briefs) that foreign companies should not invest in New Jersey, due to the endemic corruption. The majority of the Defendants are aware of the fact that Kaul's family were central to the building of modern-day India after independence in 1947, and that once Kaul has commenced winning The Kaul Cases, he will relocate to India and begin his campaign to become Prime Minister. On January 25, 2021, CNN published a story entitled: “**Foreign companies are giving up on the United States and betting big on China ... Foreign direct investment to India has similarly skyrocketed, from less than \$25 billion in 2014 -- before Prime Minister Narendra Modi took power -- to \$57 billion last year.**” The husband of Kaul's cousin sits on the Indian Supreme Court, a Court whose judges are aware of The Kaul Cases. Corruption is not good for the economic health of a country, but judicial corruption, particularly when publicized, can be lethal.

Legal Claims

The Defendants' crimes, their aiding and abetting of the crimes and their failure to report the crimes to investigatory/prosecutorial authorities constitute violations of 18 U.S.C. § 201 - Bribery of public officials and witnesses. Kaul has brought to the attention of the FBI/State AG/US Senate/US Congress the Defendants crimes.

The legal claims are based on the above evidence.

COUNT ONE - RICO

As to Defendants Allstate/Geico/Northern Trust/McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson

Kaul incorporates the above evidence/facts into Count One (1).

In a period from April 19, 2016 to the present, the Defendants have engaged in massive schemes of bribery and judicial corruption in a series of quid pro quo schemes, that are ongoing and purposed to obstruct Kaul's prosecution of **The Kaul Cases**.

The Defendants, with knowledge of its illegality, have used the US mail and wires on hundreds, if not thousands, of occasions to perpetrate their illegal scheme, in which they knowingly converted the United States District Court for the District of New Jersey-Newark ("**DNJ-N**"), into a "**racketeering enterprise**", from which they procured illegal profits.

Defendant Northern Trust holds a large minority of shares in Defendant Allstate, a corporation traded on the NYSE.

Subsequent to the filing of K1, Defendants Allstate and Northern Trust have engaged in thousands of acts of mail and wire fraud, in furtherance of the scheme of judicial corruption of judges in DNJ-N.

Defendants Allstate/Northern Trust conspired to and did commit judicial corruption of judges in DNJ-N, in order to obstruct Kaul's prosecution of **The Kaul Cases**, in an attempt to conceal evidence of their decades long massive schemes of public corruption of state/federal politicians/judges.

Specifically, Defendants Allstate/Northern Trust recognize that **The Kaul Cases** have exposed and will continue to expose the specific detail of their decades-long schemes of bribery and public/judicial corruption.

Defendants Allstate/Northern Trust recognize the serious criminal consequences of their schemes of judicial corruption and their conversion of the American federal court system into a racketeering enterprise, from which they have illegally profited.

Defendants Allstate/Northern Trust have for at least the last two decades, laundered their illegal profits through the NYSE, thus converting it into a racketeering enterprise and depriving its market competitors and the public of their right to honest services.

Defendants Allstate/Northern Trust conspired with, amongst others, **The Kaul Cases** Defendants, Christie, Sweeney, Solomon and Kaufman to pervert the course of justice in an administrative proceeding (April 2, 2012 to March 24, 2014 - OAL: BDS 08959-2012N) that caused the illegal revocation of Kaul's license.

In a period from April 2012 to the present, Defendants Allstate/Northern Trust have perpetrated a **“pattern of racketeering”** through administrative/state/bankruptcy/district/state appellate/state supreme courts within the geographic boundaries of New Jersey, through the commission of the predicate acts mail fraud/fraud/bribery and public corruption.

Defendants Allstate/Northern Trust, in attempting to provide cover for the illegal activities of their criminal enterprise, have attempted to silence the entire political/judicial bodies of the United States, in an effort to prevent the disintegration of their market capitalizations.

In a period from approximately 1999, Defendants Allstate/Northern Trust developed a knowingly illegal system of public/judicial corruption, in which they extracted increasingly higher premiums from the public, while reducing monies paid to physicians who provided clinical care to their injured clients.

Commencing in approximately 2006, Defendants Allstate/Northern Trust employed this illegal system to have Kaul's medical license revoked, in order to manufacture an excuse to not pay him for clinical services he had provided to their injured clients.

Consequent to the illegal revocation on March 24, 2014 of Kaul's license, Defendants Allstate/Northern Trust expected Kaul to leave the United States. The Defendants, in the planning of their knowingly illegal scheme, used the US mail and wires, as well as face-to-face meetings to discuss with other state co-conspirators, the specifics of how they would use state/federal court systems to eliminate Kaul.

Defendants Allstate/Northern Trust in collusion and conspiracy with other co-conspirators identified in **The Kaul Cases** used the US mail and wires in an attempt to have the FBI indict Kaul, have him incarcerated and then deported.

Commencing in approximately 2012, Defendants Allstate/Northern Trust conspired with the NJ FBI field office/NJ AG to commence multiple criminal investigations into Kaul, with the sole purpose being to have him eliminated, in order to eradicate their debt to him.

From approximately 2012 to 2014, the FBI interviewed many Third Party Witnesses regarding Kaul. The investigation was eventually closed. **The Kaul Cases** Defendant Christie abused the power of the State of New Jersey and that of the local federal government in an attempt to have Kaul incarcerated, in conjunction with the illegal revocation of his license.

In a period from approximately 2008 to 2014, Defendants Allstate/Northern Trust funnelled bribes to Christie through public relation firms/political lobbyists/law firms as well as depositing bribes into off-shore trusts/bank accounts.

The bribes were part of a series of quid pro quo schemes in which Christie abused the power of the State of New Jersey to destroy Kaul's reputation/economic standing/professional career and attempt to destroy his physical/psychological/emotional welfare.

Up until February 22, 2016, Defendants Allstate/Northern Trust assumed that Kaul had been eliminated.

On February 22, 2016 Kaul filed K1, and Defendants Allstate/Northern Trust activated their long-standing scheme of judicial corruption in DNJ-N, in the belief that Kaul's prosecution of K1 would be obstructed by the Defendant judges.

Defendants Allstate/Northern Trust funnelled bribes to the Defendant judges, through law firms/public relation firms/political lobbyists and other as yet to be determined avenues of corruption.

The Defendant judges obstructed Kaul's prosecution of **The Kaul Cases**, using the above stated tactics, with the expectation that Kaul would cease his prosecution of the Defendants.

The Defendant judges and agents acting on their behalf conspired with Defendants Allstate/Northern Trust and their agents/lawyers through both digital/non-digital communications, purposed to further their knowingly illegal scheme of judicial corruption. The overarching purpose of this scheme was to conceal evidence of their decades-long criminal enterprise and to attempt to prevent Kaul from exposing evidence of the crimes they had committed against him.

Defendant Linares, shortly after having received a letter from Kaul in May 2019 regarding his financial disclosures/conflicts of interest/ex parte communications, relinquished his position as Chief Judge and joined the law firm of English and McCarter, a firm to whom he had granted many favorable judgments in the preceding decade.

Defendant Linares abused the power of the federal bench and conspired with the law firm of McCarter and English in furtherance of a quid pro quo scheme in which he rendered favorable judgments in return for a partnership position with the law firm.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion have, in a period from at least 2016, engaged in a “**pattern of racketeering**” in the DNJ-N, in which they have through the commission of the predicate acts of bribery/mail fraud/wire fraud converted the DNJ-N into a racketeering enterprise, for the purposes of self-enrichment and the obstruction of Kaul’s prosecution of **The Kaul Cases**.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion have been referred to state/federal investigatory/prosecutorial authorities by Kaul.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion have used the US mail and wires, as well as face-to-face meetings to perpetrate their scheme of judicial corruption, in collusion and conspiracy with the other Defendants in this case.

Defendants McNulty/Wolfson/Vazquez/Dickson/Mannion, in the knowledge that all judges in DNJ-N have had some involvement in the racketeering schemes of Defendants Allstate/Northern Trust, recognized that no other judge would report their criminal conduct.

The Defendants in both this count and all other counts recognized that those judges who had not received bribes regarding **The Kaul Cases** had done so in other matters, and that their failure to report their crimes constitutes the crime of aiding and abetting.

The Defendants have been able to perpetrate their crimes for decades because no judge or lawyer will report the crimes, because they are either fearful of the professional consequences or because they have committed the same crimes in other cases. The Black Wall of Silence.

COUNT TWO - RICO

As to Defendants Leviss/McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson

Kaul incorporates the above evidence/facts/allegations into Count Two (2).

Defendant Leviss conspired and colluded with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson, in a period that commenced on or around April 19, 2016 to the present, to obstruct Kaul's prosecution of **The Kaul Cases**.

Defendant Leviss acted on behalf of counsel for all of the other Defendants in **The Kaul Cases** in furtherance of massive schemes of bribery/judicial corruption, in which the Defendants funnelled bribes through the NJ law firm of Berkowitz/Lichstein/Kuritsky/Giasullo, as part of a series of quid pro quo schemes purposed to obstruct Kaul's prosecution of **The Kaul Cases**.

Defendant Leviss used the US mail and wires, as well as face-to-face meetings to communicate information in furtherance of the Defendants crimes.

Defendant Leviss knew his actions constituted state/federal felonies punishable with jail terms in excess of ten (10) years, yet persisted because he believed that Kaul would eventually cease his prosecution of **The Kaul Cases**.

Defendant Leviss used the US mail and wires, as well as face-to-face meetings to communicate to counsel for **The Kaul Cases** Defendants, the substance of his communications with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Dickson.

Defendant Leviss communicated that Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson had informed him that they would deny Kaul the right to discovery, deny any motions for Default/Summary Judgment, deny any motions to have any of **The Kaul Cases** transferred out of DNJ-N, in return for the continued receipt of bribes.

Defendant Leviss communicated that Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson had informed him that they would deny Kaul the right to discovery, deny any motions for Default/Summary Judgment, deny any motions to have any of **The Kaul Cases** transferred out of DNJ-N, in return for

referring work to law firms/public relation firms/political lobbying firms in which either they or their relatives to the third degree held any measure of interest.

Defendant Leviss conspired and colluded with counsel for all Defendants in **The Kaul Cases** in the belief that the communications regarding the criminal schemes of bribery/judicial corruption would be protected under the doctrine of attorney-client privilege.

Defendant Leviss, in using his law firm to further a knowingly illegal scheme, has conferred on the firm liability pursuant to RICO.

Defendant Leviss, in failing to report the crimes of bribery/judicial corruption, has conferred on himself and his law firm the liability associated with the crimes of aiding and abetting a “**pattern of racketeering**”.

COUNT THREE - RICO
As to Defendants Wolfson/AA

Kaul incorporates the above evidence/facts/allegations into Count Three (3).

Defendants AA had and have knowledge of the Defendants crimes of bribery/judicial corruption.

Defendants AA failed to report the crimes to state/federal investigatory/prosecutorial authorities, as they were fearful of professional retaliation and because they had committed the same crimes in other cases.

Defendant Wolfson conspired and colluded with Defendants AA using the US mail and wires, as well as face-to-face meetings to ensure they did not report the Defendants crimes to authorities.

Defendant Wolfson, as the Chief Judge in DNJ-N, aided and abetted the Defendants crimes by granting orders to transfer **The Kaul Cases** to corrupted judges in DNJ-N, with the purpose of obstructing Kaul’s prosecution of **The Kaul Cases**, and in the knowledge that the prosecution would expose highly incriminating evidence of Defendants Allstate/Geico/Northern Trust decades-long schemes of bribery/racketeering/judicial corruption.

Defendant Wolfson used the US mail and wires, as well as face-to-face meetings to communicate information to the other Defendants in furtherance of the Defendants crimes.

Defendant Wolfson used the US mail and wires, as well as face-to-face meetings to communicate information regarding the Defendants schemes, to certain judges in the United States Court of Appeals for the Third Circuit.

The substance of the communications between Defendant Wolfson and certain judges in the Third Circuit pertained to the Defendants scheme to attempt to prevent Kaul from litigating the case in either the district or appellate courts, with the intention of dissuading Kaul from prosecuting **The Kaul Cases**.

The AA Defendants recognition that the DNJ-N had been converted into a “**racketeering enterprise**” in a scheme of bribery/judicial corruption spearheaded by Defendants Allstate/Geico/Northern Trust, and their failure to report the crimes constitute the crime of aiding and abetting.

COUNT FOUR - DEPRIVATION OF RIGHT UNDER COLOR OF LAW

As to Defendants Allstate/Geico/Northern Trust/McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson

Kaul incorporates the above evidence/facts/allegations into Count Four (4).

Defendants Allstate/Geico/Northern Trust, consequent to their corruption of Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson and perpetration of a series of quid pro quo schemes, established a “**sympiotic**” relationship with state actors, and thus assumed the mantle/responsibility/liability of state.

Defendants Allstate/Geico/Northern Trust in becoming “**state actors**” did knowingly and with malice violate Kaul’s civil rights pursuant to section 1983 of the 1964 Civil Rights Act.

Defendants Allstate/Geico/Northern Trust violated Kaul’s civil rights in their pursuit of corporate /executive profit, and did so under color of law.

Defendants Allstate/Geico/Northern Trust’s criminal perversion of the course of justice was purposed to willfully and with malice/aforethought continue the violation of Kaul’s constitutional and civil rights, a scheme of violation that Defendants Allstate/Geico/Northern Trust commenced planning in or around 2009.

Defendants Allstate/Geico/Northern Trust conspired/colluded with **The Kaul Cases** Defendants to deprive Kaul of his basic human right to justice, in order to attempt to eliminate Kaul and the debt owed to him.

Defendants Allstate/Geico/Northern Trust colluded and conspired with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson to obstruct Kaul's prosecution of **The Kaul Cases** by denying him discovery, denying all motions for Default/Summary Judgment and staying all cases based on knowingly false legal opinions/orders, that are the products of bribery/judicial corruption.

Defendants Allstate/Geico/Northern Trust colluded and conspired with Defendants McNulty/Mannion/Vazquez/Dickson/Linares/Wolfson and certain members of the U.S.C.A. for the Third Circuit to deprive Kaul of his constitutionally protected right to prosecute **The Kaul Cases** by manipulating the procedural posture of the cases to prevent resolution and or examination by other courts.

The Defendants used the US mail and wires, as well as face-to-face meetings in DNJ-N to coordinate their scheme to violate Kaul's civil rights through the perpetration of a multi-pronged judicial racket of obstruction of justice.

The Defendants, in conspiring and colluding, to abuse the power of the federal judiciary, to engage in massive schemes of judicial corruption purposed to deprive Kaul of his civil and constitutional rights, have brought the DNJ-N into international disrepute and preclude it and the Defendant judges from any further involvement in any aspect of **The Kaul Cases**.

Relief

The relief sought by Kaul includes that relief set forth on February 22, 2016 (**Exhibit 1**) in K1, in addition to the following:

1. This Court refer this matter to the FBI.
2. This Court refer the Defendant judges to the Judicial Disciplinary Council for the Third Circuit.
3. This Court recommends to the Judicial Disciplinary Council for the Third Circuit that for the pendency of this case, all Defendant judges be prohibited from any

further involvement in any cases involving Defendants Allstate/Geico/Northern Trust.

4. This Court recommends to the US Congress that any criminal convictions of healthcare providers/physicians procured in cases in DNJ-N based on allegations of health insurance fraud are immediately referred to a special prosecutor for examination of judicial corruption.
5. This Court enters an order of judicial notice that the **“New Jersey Insurance Fraud Protection Act (Section 17:33A-1-30) violates the Constitutions of the United States and of the State of New Jersey.”**

I, Richard Arjun Kaul, MD, do hereby certify and swear under penalty of perjury that the above evidence/facts/statements/claims are true and accurate to the best of my knowledge, and that if it is proved I knowingly and willfully misrepresented the facts, then I will be subject to punishment.



Dated: January 27, 2021

Richard Arjun Kaul, MD