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May 20, 2018

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DISTRICT OF NEW JERSEY
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2018 MAY 21 P 1:00

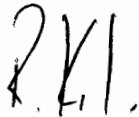
Honorable Steven C. Mannion
United States District Court
District of New Jersey
UNITED STATES DISTRICT COURT

**Re: Kaul v Christie, et al.,
Docket No. 18-CV-08086
Defendant Przybylski – Violation of American Association of Neurological Surgeons
(AANS) Code of Professional Conduct**

Dear Sir/Madam

Please find submitted the original version of a letter to Judge McNulty.

Yours sincerely



Richard Arjun Kaul, MD
cc: All Counsel via e-mail
Judge McNulty
Judge Steven C. Mannion

www.drrichardkaul.com

May 20, 2018

Honorable Kevin McNulty
United States District Court
District of New Jersey
UNITED STATES DISTRICT COURT

**Re: Kaul v Christie, et al.,
Docket No. 18-CV-08086
Defendant Przybylski – Violation of American Association of Neurological Surgeons
(AANS) Code of Professional Conduct**

Dear Judge McNulty,

I write this letter to bring to the Court's attention, the fact that on April 21, 2017, Defendant Przybylski was officially and publicly reprimanded by the American Association of Neurological Surgeons, for having violated Section A.1 of the AANS Rules for Neurosurgical Medical/Legal Expert Opinion Services, which states:

"The neurosurgical expert witness shall be an impartial educator for attorneys, jurors and the court on the subject of neurosurgical practice."

The Board of Directors also concluded that Defendant Przybylski violated Section A.4, which states:

"The neurosurgical expert witness shall recognize and correctly represent the full standard of neurosurgical care and shall with reasonable accuracy state whether a particular action was clearly outside of, or close to the margins of the standard of neurosurgical care."

The Board of Directors found that Defendant Przybylski misrepresented the standard of care when he testified that antibiotic treatment for six weeks after an esophageal tear closure, monitoring ESR and CRP and personal review of esophageal swallow studies are all required during treatment of a pharyngeal tear.

This piece of evidence, which I believe supports my claims that the administrative proceedings that commenced on April 2, 2012 and concluded on March 12, 2014 with the revocation of my medical license, were a massive fraud. The disciplinary action against Defendant Przybylski only came to my attention on May 18, 2018, while I was collecting address information for the completion of forms USM-285, in Kaul v Christie (Docket No. 18-CV-08086-KM-SCM).

Please also find attached a copy of a letter that I sent to the American Association of Neurological Surgeons, on or about February 6, 2018, in which I presented evidence of Defendant Przybylski's misconduct in the administrative law proceedings.

The purpose of submitting these materials at this juncture in the case, is to highlight Defendant Przybylski's pattern of fraudulent conduct, of which he has been found guilty by a group of his own peers. I hope that this information assists the Court in its determination of the case.

I thank you for your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kaul'.

Richard Arjun Kaul, MD

cc: All Counsel via e-mail

Judge Steven C. Mannion
Clerk of the Court

NEUROSURGEON

AANS Neurosurgeon | Volume 27, Number 1, 2018

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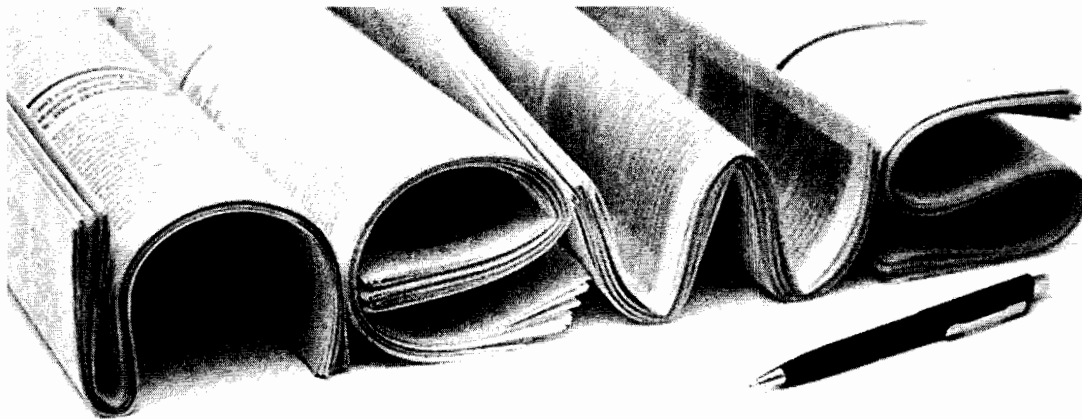


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Notice of Disciplinary Action

AANS Neurosurgeon | Inside Neurosurgeon | AANS News
AANS Neurosurgeon: Volume 26, Number 3, 2017

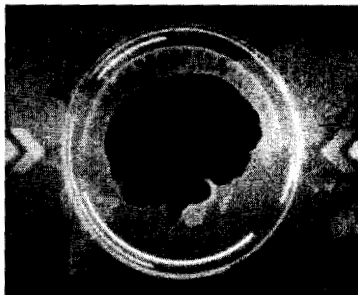
At its meeting on April 21, 2017, the American Association of Neurological Surgeons

SHARES

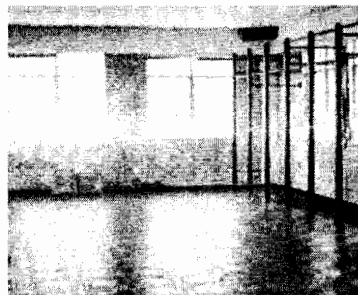
witnesses in medical malpractice lawsuit. The disciplinary action is as follows:

- Gregory J. Przybylski, MD, FAANS – **Censure**. The Board of Directors concluded that Dr. Przybylski of Edison, NJ., violated Section A.1 of the AANS Rules for Neurosurgical Medical/Legal Expert Opinion Services by demonstrating improper advocacy when he testified, among other things, that the patient had osteomyelitis, and that no other diagnosis was a more likely cause for the fusion construction failure, based on ESR, CRP, MRI and Staphylococcus epidermidis wound culture in the revision surgery; that longer and different antibiotic treatment and longer wound drainage would have avoided need for revision surgery; and that the unrecognized osteomyelitis burned out without antibiotic therapy. The Board of Directors also concluded that Dr. Przybylski violated Section A.4 by misrepresenting the standard of care when he testified that antibiotic treatment for six weeks after an esophageal tear closure, monitoring ESR and CRP and personal review of esophageal swallow studies are all required during treatment of a pharyngeal tear.

FEATURES



DEPARTMENTS



CALENDAR/COURSES

2018 Advanced Endoscopic Skull Base and Pituitary Surgery

June 1-2, 2018; New York

2018 Annual Meeting of the Michigan Association of Neurological Surgeons

June 8-10, 2018; Thompsonville, MI

2018 American Society for Stereotactic and Functional Neurosurgery Biennial Meeting

June 2-5, 2018; Denver

CARS 2018 Computer Assisted Radiology and Surgery

June 20-23, 2018; Berlin, Germany

Complex Endoscopic Endonasal Surgery of the Skull Base

June 7-9, 2018; Pittsburgh, PA

[Interactive Calendar](#)

LEAVE A REPLY

SHARES

www.drRichardKaul.com

February 6, 2018

American Association of Neurological Surgeons
5550 Meadowbrook Drive
Rolling Meadows, IL 60008-3852

Re: Gregory Przybylski, MD

Dear Sir/Madam

I wish to file a complaint against Dr. Gregory Przybylski, for violating the following sections of the AANS Rules for Neurological Medical/Legal Expert Opinion Services:

A. Impartial Testimony

1. The neurosurgical expert witness shall be an impartial educator for attorneys, jurors and the court on the subject of neurosurgical practice – Dr. Przybylski, as is detailed in the enclosed documents, was not an impartial witness, but in fact had conspired with both the New Jersey Attorney General, and other neurosurgeons to have my medical license revoked. This misconduct, which spanned at least five (5) years, included acts of political corruption, racketeering and most relevantly for the purposes of this complaint, the commission of thirty (30) separate instances of witness perjury. The substance of these malfeasant acts is detailed in 'The Solomon Critique' + Kaul v Christie.
2. The neurosurgical expert witness shall represent and testify as to the practice behavior of a prudent neurological surgeon giving different viewpoints if such there are – Dr. Przybylski knew that there are many different methods for the diagnosis and surgical management of degenerative spinal pathology. However, he willfully, and whilst under oath, repeatedly misrepresented this information in multiple legal proceedings, over a period of two years, until May 6, 2013, when he admitted this position under cross-examination. The specific testimony is contained within 'The Solomon Critique' + Kaul v Christie.

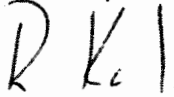
3. The neurosurgical expert witness shall recognize and correctly represent the full standard of neurosurgical care and shall with reasonable accuracy state whether a particular action was clearly outside of, or close to the margins of the standard of neurosurgical care – Dr. Przybylski, an individual with almost two decades of expert witness experience, knew that the standards from which he accused me of having deviated, were not standards at all. He knew that the standard of care was not determined by factors associated with education, training, hospital privileges or local administrative regulations pertaining to healthcare. He willfully ignored the law; knowingly misrepresented the facts and found conclusions that he understood were false. He was cognizant of the fact that his accusations of my purported “gross deviations” were devoid of truth.

I understand that the current bylaws of your organization seek to restrict the filing of complaints to its members. However, I believe that the evidence of Dr. Przybylski’s misconduct is so incriminating, that to not open an investigation, would condone his malfeasance, and would neither reflect the true purpose nor the spirit of the Rules. I hope this matter is administered with a transparency and fairness that accurately communicates your organization’s ethical framework.

Copies of ‘The Solomon Critique’ + Kaul v Christie are contained within the enclosed flash drive.

I look forward to your response.

Yours sincerely

Handwritten signature of Richard Arjun Kaul, consisting of the letters 'R', 'K', and 'I' in a stylized, cursive font.

Richard Arjun Kaul, MD