

EXHIBIT 16 · CORONER SPINAL-CORD OMISSION

Institutional Cover-Up of the Death of Raffi Ceylan — The Missing Strychnine Test

Proceeding: BCSC Civil Claim (NOCC Filing #01) · Mareva Injunction Application (Filing #03) · Norwich Pharmacal Application (Filing #04) · Private Information under Criminal Code s. 504 (Filing #02)

Claimants: Francesco Giovanni Longo · Lucy Ceylan · Armin Ceylan · Betty Ceylan

Filed: Pass 4 · 27 April 2026

Primary evidentiary source: The 28 coroner-file screenshot exhibits (exhibit series EX-RAFFI-COR-001 through EX-RAFFI-COR-028) published at the Raffi Ceylan Evidence Hub, together with the investigative narrative Raffi Ceylan Complete Report January 2026 dated 24 January 2026 and Lucy Ceylan's authenticated audio inventory referenced in Filing #06.

1 · What This Exhibit Pleads

The Plaintiffs plead that the **death of Raffi Ceylan on 16 July 2016 at Island Lake Road, Chapleau, Ontario** was investigated by the Office of the Chief Coroner of Ontario and the Ontario Centre of Forensic Sciences in a manner that was **objectively incompatible with the professional standard of care** for a sudden unexplained death of a man in his early forties without a prior cardiac diagnosis, and that the specific **omissions** — above all the failure to examine the spinal cord and the failure to test for strychnine — are not consistent with negligence and **are consistent with a coordinated institutional cover-up** operating in concert with the Windsor Cartel defendants named at Filing #01.

Specifically, the Plaintiffs plead the following facts on the strength of the 28 coroner-file screenshot exhibits and the authenticated audio record, all of which are held by the co-Plaintiff Lucy Ceylan and are available for production on demand of this Court:

2 · The Coroner-File Record — Anchor Facts

Fact	Source	Exhibit #
Coroner case number: 2016-8196	Coroner investigative file	EX-RAFFI-COR-001
CFS toxicology case number: 2016-0001036	Centre of Forensic Sciences toxicology file	EX-RAFFI-COR-002
Date of death: 16 July 2016	Coroner record	EX-RAFFI-COR-003
Autopsy report dated: 11 July 2016 — five days BEFORE the death	Coroner autopsy form	EX-RAFFI-COR-004
Coroner's Investigation Statement Form 3 Page 2/2: UNSIGNED	Coroner Form 3	EX-RAFFI-COR-005
Spinal cord: NOT examined	Autopsy protocol	EX-RAFFI-COR-024
Vitreous humor toxicology: NOT tested — only glucose/urea/creatinine	Autopsy chemistry panel	EX-RAFFI-COR-013
Strychnine: NOT tested — Toxicology Report CFS 2016-0001036 screened only cocaine, codeine, fentanyl,	CFS toxicology panel	EX-RAFFI-COR-010

Fact	Source	Exhibit #
hydromorphone, methadone, morphine, oxycodone, ethanol		
Cameron email admission: "No anatomic or toxicologic cause of death" — yet ruling entered as "Probable primary cardiac arrhythmia"	Internal coroner-office correspondence	EX-RAFFI-COR-029
ANK2 genetic variant: heterozygous, " uncertain significance " (VUS) — deployed to imply Long QT syndrome without definitive proof	Genetic screening report	EX-RAFFI-COR-018
Raffi Ceylan's laptop: stolen two days after his death	Lucy Ceylan audio record; Windsor Police Occurrence 16-87459	EX-RAFFI-COR-020

Each anchor-fact above is pleaded to be true on the Plaintiffs' information and belief, supported by the 28 coroner-file screenshot exhibits held in the custody of the co-Plaintiff Lucy Ceylan.

3 · The Clinical Impossibility of the Finding as Entered

3.1 · "Probable primary cardiac arrhythmia" is not a finding — it is a placeholder

A finding of "probable primary cardiac arrhythmia" is a category of last resort in forensic pathology. It is invoked **only when all other reasonable causes of death have been affirmatively excluded** by a complete autopsy, a complete toxicology screen, and (for a man under 50 with no prior cardiac diagnosis) a genetic workup that returns a definitive pathogenic variant.

None of these three thresholds was met in the Raffi Ceylan file:

(a) **The autopsy was incomplete:** the spinal cord was not examined and the vitreous humor was not subjected to toxicological analysis.

(b) **The toxicology screen was incomplete:** strychnine was not on the analyte list, though strychnine is one of the classical household and commercial rodenticide and pesticide toxins for which a targeted assay is routinely available at the Centre of Forensic Sciences.

(c) **The genetic workup returned a variant of uncertain significance** (ANK2 VUS) — which by its own designation is **insufficient evidence** of Long QT syndrome or of any inheritable arrhythmic disorder. The pathologist's file nevertheless deployed this VUS as the **presumptive substrate** for a cardiac arrhythmia ruling. This is a misuse of genetic information in forensic pathology and is contrary to the American Heart Association and Heart Rhythm Society guidance on molecular autopsy (Ackerman et al., Heart Rhythm 2011; Circulation: Genomic and Precision Medicine 2017) which forms the applicable professional standard in Ontario.

3.2 · The Cameron email is a smoking-gun internal contradiction

Dr. Cameron's internal email (Exhibit EX-RAFFI-COR-029) states in plain text: "**No anatomic or toxicologic cause of death.**" Yet the ruling entered on the death certificate is "**Probable primary cardiac arrhythmia.**"

These two statements cannot both be true. Either:

(a) There is no anatomic or toxicologic cause of death, in which case the correct ruling under the Ontario Coroners Act, R.S.O. 1990, c. C.37 is "**undetermined,**" which would trigger a discretionary inquest under s. 20 of the Act; OR

(b) There is a cardiac cause of death, in which case Dr. Cameron's email is false and the underlying autopsy record supports a positive finding.

The ruling as entered — cardiac arrhythmia without anatomic or toxicologic support — is **scientifically unsupported** on the face of the coroner's own internal correspondence. This is a **direct evidentiary contradiction** that, under the Ontario Evidence Act s. 35 and the *Pizza Pizza Ltd v Gillespie* (1990) 75 OR (2d) 225 admissibility framework, establishes prima facie that the official record does not reflect the findings of the examining pathologists.

3.3 · The autopsy document dated five days before the death

The autopsy report bears the date **11 July 2016**. Raffi Ceylan died on **16 July 2016**.

There is no ordinary-course explanation for an autopsy dated five days before the death it records. The Plaintiffs plead this as **prima facie evidence of document fabrication or substitution** in the coroner's file. In the alternative, if the date is a clerical error, the Plaintiffs plead that a clerical error of this magnitude on an official forensic document is itself evidence of the gross departure from professional standards that underlies the remainder of this exhibit.

A corroborating pattern appears in the Windsor-Cartel evidence at Exhibit 11 (Lucy Ceylan's authenticated audio inventory), where **Dr. Queen, a second coroner-office signatory**, is documented to have signed the death certificate **four days before the death**. Two independent forensic documents in the same file, each dated before the death they record, cannot both be innocent clerical error.

3.4 · Form 3 Page 2/2 unsigned

The Coroner's Investigation Statement (Form 3), Page 2/2, is **UNSIGNED**. Form 3 is the formal vehicle by which the investigating coroner certifies the cause and manner of death under the Coroners Act, R.S.O. 1990, c. C.37 s. 18(2). A Form 3 that is not signed on its final page is **not a lawful certificate of death** — it is a document in draft. That the Raffi Ceylan file was closed with an unsigned Form 3 is a **statutory defect** rendering the underlying ruling reviewable on a Paccar jurisdictional standard without deference.

4 · The Spinal Cord — The Single Most Critical Omission

Strychnine is a glycine-receptor antagonist. The glycine receptor is densely expressed in the **spinal cord** and the brainstem, and it is this anatomical concentration that produces the classical clinical picture of strychnine poisoning: hyperreflexia, violent tonic contractions of the voluntary musculature with opisthotonos, respiratory arrest — **all without loss of consciousness.**

Post-mortem, strychnine and its metabolites persist in spinal-cord tissue after they have cleared from peripheral blood and urine, because the molecule is bound to the very receptor sites that caused the fatal reaction. This is the basis for the long-standing forensic-pathology teaching that **in any sudden death where strychnine is a differential, examination of the spinal cord is the single most probative test available.**

The Raffi Ceylan autopsy **did not examine the spinal cord.**

Francesco Giovanni Longo's voice directive of 27 April 2026 (to be sworn at Filing #05) records the Plaintiff's position in plain language:

"They're rat poisoning. They're chained as a coroner. ... All you have to do is check the spinal cord. This fucking test out of them all. But nope. For the cover up since day one."

That voice directive, when read against the documentary anchor that **strychnine was not tested on the CFS toxicology panel and the spinal cord was not examined on the autopsy protocol**, converts Plaintiff's allegation from assertion into pleaded fact corroborated by the coroner's own file.

Commercial anticoagulant rodenticides — warfarin, brodifacoum, difenacoum, bromadiolone — are the most commonly available modern rat poisons in Canada, and they do not act through the glycine receptor. But strychnine remains commercially obtainable (including through veterinary and predator-control channels) and was not excluded from the Raffi Ceylan workup. Whichever specific rodenticide

was used — and the Plaintiffs plead, on information and belief, that a poisoning event occurred — the failure to test is the evidentiary wrong, independent of which toxin is ultimately established.

Relief sought directly from this section: a court-ordered exhumation of the remains of Raffi Ceylan and independent re-autopsy with full toxicological panel addressing at minimum: (a) spinal-cord tissue strychnine assay, (b) hair-follicle segmental analysis for heavy metals and anticoagulant rodenticides, (c) bone-marrow analysis for rodenticide metabolites, (d) vitreous humor toxicology, and (e) whole-body CT prior to any incision.

5 · Symptoms at Death — Consistent with Acute Poisoning

The witness accounts documented in the Raffi Ceylan Evidence Hub and corroborated by Lucy Ceylan's authenticated audio record establish a clinical picture at death that is inconsistent with "sudden cardiac arrhythmia" and **consistent with acute toxic exposure**. Those witness accounts are held by the co-Plaintiff Lucy Ceylan, are incorporated into Filing #06, and will be disclosed in full to this Court as scheduled at the viva voce protocol memo (Filing #12).

The Plaintiffs rely at this Pass 4 stage on the Windsor Cartel evidence marker: **Emily Groot**, a coroner-office officer documented in Lucy Ceylan's audio record, made a recorded admission (cited at LUCY_CEYLAN_COMPLETE_EVIDENCE.html in the Windsor Cartel evidence package) that "the coroner couldn't deny that poison could have gone under the radar in Raffi's case." That admission — made by a coroner-office officer to a blood relative of the decedent — is a **statement against interest by an agent of the Office of the Chief Coroner**, admissible under the Khan hearsay-exception framework (R v Khan, [1990] 2 SCR 531) and under Ontario Evidence Act s. 35 as a business-record exception.

6 · The Coroner's Office as an Institutional Joint-Enterprise Member

The Plaintiffs plead the Office of the Chief Coroner of Ontario as an **institutional joint-enterprise member** in the civil-conspiracy head pleaded at Filing #01 ¶¶ 54-61, on the strength of the following converging indicators:

- (a) An autopsy document dated five days before the death it records.
- (b) A death certificate signed by a second coroner-office signatory (Dr. Queen) four days before the death.
- (c) A Form 3 Page 2/2 closed unsigned.
- (d) A toxicology panel that included every common opioid and ethanol but excluded strychnine.
- (e) An autopsy protocol that omitted the spinal cord.
- (f) An autopsy chemistry panel that omitted vitreous-humor toxicology in favour of glucose/urea/creatinine only.
- (g) A presumed-cardiac ruling supported solely by a genetic VUS and contradicted on the face by the examining pathologist's own internal email (Cameron).
- (h) A recorded statement-against-interest by a coroner-office officer (Groot) that poison could have gone undetected.
- (i) A contemporaneous theft of the decedent's laptop within 48 hours of death — the single device most likely to hold any pre-death electronic communication identifying toxin source, relationships, or threats.

No single item of the above is dispositive. The nine together, in a single coroner file closed without inquest, establish a pattern that this Court may find rises to the level of **systematic omission amounting to obstruction of justice under Criminal Code s. 139(2)** and to **breach of statutory duty under the Coroners Act**.

The Plaintiffs do not, at this Pass 4 stage, add the Office of the Chief Coroner of Ontario as a named Defendant. The Plaintiffs reserve that right for Pass 5 following disclosure of the complete coroner file on the Norwich application (Filing #10), at which time the Plaintiffs will be in a position to identify the specific natural persons whose conduct crossed the statutory threshold.

The Plaintiffs **do**, at Pass 4, join the Office of the Chief Coroner of Ontario (Service: 25 Morton Shulman Avenue, Toronto, ON M3M 0B1) and the Centre of Forensic Sciences (Service: 25 Morton Shulman Avenue, Toronto, ON M3M 0B1) as **Information Custodians** in the Norwich Order at Filing #10, with production directed to the full coroner and toxicology files for Case 2016-8196 / CFS 2016-0001036.

7 · Causes of Action Arising From the Coroner File

1. **Gross negligence by a public official** — Office of the Chief Coroner of Ontario, for systematic omission of standard-of-care testing and closure of the file on a pathologically unsupported ruling.
2. **Breach of statutory duty under the Coroners Act, R.S.O. 1990, c. C.37** — specifically s. 15 (investigation duty), s. 18 (formal statement of cause), s. 20 (discretionary inquest), and s. 40(2) (record-keeping obligations).
3. **Obstruction of justice, Criminal Code s. 139(2)** — pleaded in the alternative as the underlying actus reus supporting the s. 504 Private Information at Filing #02 insofar as the coroner's omissions served to conceal the unlawful act that caused Raffi Ceylan's death.
4. **Civil conspiracy** — as a joint-enterprise participant with the Windsor Cartel defendants already named at Filing #01.
5. **Breach of fiduciary duty** — in the alternative, on the footing that the Office of the Chief Coroner owes a duty of candid

investigation to the statutory next of kin of a decedent, which duty includes the duty not to close a file on a pathologically unsupported ruling.

8 · Relief Flowing From This Exhibit

The Plaintiffs seek, consequent upon this Exhibit:

1. **A court order for exhumation** of the remains of Raffi Ceylan, presently interred at [cemetery and plot to be confirmed from the Estate File 2017-036367], and for an **independent re-autopsy** conducted by a forensic pathologist outside the Ontario coroner system, with full toxicological workup as specified at § 4 above (spinal cord, hair follicle, bone marrow, vitreous humor, whole-body CT).
2. **Addition of the Office of the Chief Coroner of Ontario and the Centre of Forensic Sciences** as Information Custodians in the Draft Order for Norwich Pharmacal Relief at Filing #10 (patched in Pass 4).
3. **A preservation order** directed to the Office of the Chief Coroner of Ontario, the Centre of Forensic Sciences, and the Ontario Forensic Pathology Service, forbidding destruction, alteration, or disposal of any record bearing on Case 2016-8196 or CFS 2016-0001036, including all internal correspondence (Cameron, Queen, Groot, and any other signatory identified on disclosure).
4. **Reservation of right to add the Office of the Chief Coroner of Ontario and any natural-person coroner-office officer as a named Defendant at Pass 5**, upon Norwich disclosure of the complete file.
5. **Production to the Plaintiffs, under the Norwich Order, of the full 28 coroner-file screenshot exhibits in their native resolution**, together with any related internal correspondence currently redacted or withheld on claim of privilege, for authentication and reliance in the proof of this action.

6. **Incorporation of this Exhibit by reference** into the prayer for aggravated and punitive damages at Exhibit 17, insofar as the coroner's omissions aggravate the harm of the underlying wrongful death and compound the grief and trauma of the four Plaintiffs beyond what the Sun Life fraud alone inflicted.

9 · Connection to Pass 4 Damages Schedule (Exhibit 17)

The coroner's omissions are pleaded as a **discrete aggravating factor** at Exhibit 17 in two ways:

(a) **Wrongful-death damages** under the Mason v Peters (1982) 39 OR (2d) 27 framework — insofar as the coroner's refusal to conduct the spinal-cord examination and strychnine assay has denied the family the forensic proof that would ordinarily establish the cause of death, this denial is itself a compensable harm distinct from the death.

(b) **Charter damages under Vancouver (City) v Ward, 2010 SCC 27** — the Plaintiffs plead that the coroner's conduct breaches s. 7 Charter liberty and security-of-the-person interests of the surviving family members by denying them lawful access to the truth about their close relative's death, a deprivation not in accordance with the principles of fundamental justice.

The dollar quantification of the coroner-omission aggravation is set out at Exhibit 17 § 4.3 (aggravated emotional distress) and § 4.7 (Charter damages).

10 · The Raffi Ceylan Evidence Hub — Public Record

The 28 coroner-file screenshot exhibits are presently published at the Raffi Ceylan Evidence Hub at the Genspark-mirror site within the Pass-4 trifecta (Longo, Simetic, Ceylan, Swinton). The public

publication of the coroner-file exhibits is itself part of the procedural history of this action and is pleaded as **a reasonable and good-faith effort by the Plaintiffs to secure institutional attention** — an effort that has been met with silence from every institutional reviewer from 2016 through 2026. That ten-year silence is pleaded as the **institutional-capture aggravator** at Exhibit 17 § 4.4.

This Exhibit is sworn to be true and is incorporated by reference into the affidavits of Lucy Ceylan (Filing #06), Armin Ceylan (Filing #07), and Betty Ceylan (Filing #08). Pass 5 will re-swear those affidavits to include this Exhibit in numbered paragraphs.

— Exhibit 16 ends —