#### ONTARIO COURT OF JUSTICE

#### Notice of Hearing

#### to Informant in Private Complaint

		4810 998 25 48114391-00
		Case/File No.
Name of Informant:	ANTHONY HEUGHAN	
You have laid an In	ormation alleging that the accused has committed	an offence. You must appear
before the Ontario	ourt of Justice in Courtroom 1305	, in the court located at
Ontario Court of J	ıstice - Toronto Courthouse, 10 Armoury Stree	t, Toronto, ON
in the City/Town of	Toronto	, starting at 9:00 a.m.
on the 19th	day of December	, yr. 2025
Distribute to:	✓ Informant	
	■ File	
	All Dance	5 <sup>th</sup> December 2025
	Justice of the Peace/Clerk of the Court  JUSTICE OF THE PEACE S.SCANGA	Date

# PRIVATE PROSECUTION APPLICATION

QOURT OF JUSTICE 4810 998 25 48114391

#### Part I: (to be completed by Informant)

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943-12-06		

Allegations					
Name of Informant Anthony Heughan	Date of Birth 1943-12-06				
Address 11 Sutherland Avenue	City/Town Toronto				
Postal Code M4C1R8 Telephone (647) 231-2001	Email Info@AnthonyCarrPsychic.com				
Name(s) of Accused Peter Baguma  Address c/o In-Home Assisted Living 2 St. Clair Ave W	Date of Birth				
18th Floor Toronto Ontario	City/Town Toronto				
Postal Code M4V 1L5 Telephone (416) 595-5888					
Relationship of the Accused to the Informant or Victim: (i.e. spouse, neighbour, etc.)  A former Clinical Assistant at St. Michael's Hospital who was assigned to CARE for the remains of Josephine Victoria Heughan					
☐ I wish to appear by video by Zoom.					
I wish to receive correspondence from the Court in relation to this matter by(please check and complete):					
email at the following email address: Rev.Lyall.Sanders@minister.com & Info@AnthonyCarrPsychic.					
mail at the following mailing address: 11 Sutherland Avenue East York					
pick up at the criminal counter at the courthouse.					
Particulars of Offence:					
Date 2023-07-23 Location St. Mic	hael's Hospital - 30 Bond St. Tor, ON M5B1W8				

### Offence(s) Alleged

I will say (Please provide sufficient details of the offence(s) to support an Information to be drafted) The Criminal Code, R.S.C., 1985, c. C-46 states:

"182 Every person is guilty of an indictable offence and liable to imprisonment for a term of not more than five years or is guilty of an offence punishable on summary conviction who

(a) neglects, without lawful excuse, to perform any duty that is imposed on him by law or that he undertakes with reference to the burial of a dead human body or human remains, or

(b) improperly or indecently interferes with or offers any indignity to a dead human body or human remains, whether buried or not.

R.S., 1985, c. C-46, s. 1822019, c. 25, s. 63"

[source - https://statutes.ca/r-s-c-1985-c-c-46/182]

Peter Baguma is guilty of 182 (b) as he improperly and indecently offered an "indignity to a dead human body", my Mother Josephine Victoria Heughan (nee Lonsdale.

(continued on next page)

Sam Edgar, the "Patients Relations Specialist" at St. Michael's Hospital, stated in an email that she was aware that "the staff member was not careful when providing care, resulting with her head connecting with the side rail. We strive to ensure the utmost respect and dignity for care after death and are sincerely sorry for your experience." She further stated that "Unity Health Toronto is committed to providing a safe, healthy and supportive working environment and to the prevention of workplace violence."

The handling of my Mother's body, the smashing of her face and head against the bed rail, a metal plate - an act which i witnessed (and which awoke the sleeping patient in the next bed) is clearly an act of violence! Ms. Edgar was fully aware that Peter Baguma had committed this unspeakable act, but she refused to release his name and was finally (after more than two years of attempts) forced to do so because of a government "Freedom of Information" request to the "Information and Privacy Commissioner of Ontario". This indicates a culture of secretive actions on the part of staff at St. Michael's Hospital.

Even though my Mother had passed away, there was no reason for Peter Baguma, the Clinical Assistant given the responsibility of CARING for her mortal coil, to treat her poor body as "a piece of meat". It is criminal to believe that she did not merit his respectful handling of her physical self. Peter Baguma was and is still an employee of the agency "In-Home Assisted Living" (also referred to as iHAL) and was working at St. Michael's Hospital when he carried out his crime.

I personally witnessed Peter Baguma commit the crime of "indignity to a dead human body" in his negligent and unethical handling of my Mother, Josephine Victoria Heughan (nee Lonsdale) while preparing her to be taken to the morgue.

My Mother, a decorated war veteran, whose life was in constant danger as she drove a Red Cross ambulance during the worst times of Hitler's attack on London (The London Blitz), a front-line battle field nurse, a woman who served as a CWAC (Canadian Women's Army Corps), and dedicated her life to helping others as a nurse at Sunnybrook Hospital (with 20 years of service) did not deserve to be treated so callously.

To be clear, I saw, with my own eyes, Peter Baguma grab the "protective underwear" off of my dear Mother and yank it with such brute force that her body spun towards the metal plate on her bed, bashing her poor face with such force that the person in the next bed was awaked from deep sleep, bolt upright and was fearful of the terrible noise that was created when my Mother's face smashed into the cold steel,

When my Mother's body arrived at the funeral parlour, the director immediately saw the large yellow hematoma (bruise) on her face and asked what had happened. She has stated that she would be a witness to the horrible sight. Further, Reverend Lyall Sanders (a friend of mine and my Mother, who is graciously assisting me in the proceedings) also witnessed this contusion and was taken aback at such careless treatment of such a loving, caring woman.

The hospital called me in for an "interview" after the fact (a sure sign that they were worried about the events that had taken place). Reverend Sanders attended this meeting with me and witnessed the way that they treated me. The hospital (specifically Sam Edgar, patients relations coordinator) absolutely refused to provide the name of the Clinical Assistant (C.A.), telling us that a lawyer had to apply for this and that The College of Physicians and Surgeons could access this information (even though this is an "untruth" as the C.A. is not a doctor. When I (with the Reverend's help) attempted to use the Freedom of Information Act to obtain the name, they stalled, asked for an extended period to "" "research" the name and Rev. Sanders finally had to make an application to The Freedom of Information and Privacy Commission to force Unity Health to release the information. Once FIPPA was involved, the name of Peter Baguma was final supplied to us, or else this application would have been submitted months ago.

(continued on next page)

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We ask that Peter Baguma, an employee of iHAL (In-Home Assisted Living) be charged with the crime of "indignity to a dead human body" for his assault on Josephine Victoria Heughan on July 23rd, 2023 as t his should never have happened and must never occur again. To note, the owner of iHAL, Mr. Steven Jones, has refused to provide Rev. Sanders with a way to serve paperwork upon Mr. Baguma, so his work-place address must stand as his address of service.

Please see the additional attached pages as supporting this application.

## Part II: (to be completed by Justice of the Peace)

Identification of informant confirmed by Justice of the Peace

#### Directions to Court Staff:

Please prepare a Private Prosecution Common Information by the Informant named above, charging the accused person named above, with the following offences(s):

The offence of indignety to a	dead hu	man body	
against Josephine Mictoria He	ughan	Committed in the City / Town of	
Toroxto	on the $23$	day of Jaly, 20-2	
Contrary to section (82(6)	***************************************		······································
The offence of	***************************************		******************
against	······································	Committed in the City / Town of	
	on the	day of , 20	
Contrary to section		***************************************	
The offence of			
against	***************************************	Committed in the City / Town of	***************************************
***************************************	on the	day of, 20	
Contrary to section			••••••••••••
The offence of			
against	***************************************	Committed in the City / Town of	······································
	on the	Committed in the City / Town of	3.
Contrary to section	OII (IIC	day of, 20	
The offence of			
		***************************************	,* 
against		Committed in the City / Town of	
Cantrant 11:	on the	day of, 20	••••••
Contrary to section	***************************************	,,	*******************************
The offence of			
against		Committed in the City / Town of	***************************************
	on the	day of .20	
Contrary to section			***************************************
Contrary to section  Signature of Justice of the Peace		Dec 5/25	
o and o o tiple i cace		Daté	

### - Witness Information Anthony Heughan Name: 11 Sutherland Avenue, East York ON. M4C1R8 Address: (647) 231-2001 Phone Number: Name: Address: Phone Number: Have the police investigated this incident? What, if anything, did the police say or do as a result of your complaint? The police told us that we should put in an application for a Private Prosecution. Have you previously sworn an Information / filed a statement of allegation regarding this matter? If yes, when? October Where? The Ontario Court of Justice -Has another Justice of the Peace refused to issue process for this offence? If yes, when? Where? Do you have any new evidence with respect to this offence? If yes, give details: Details of an admission from Sam Edgar, the "Patients Relations Specialist" of St. Michael's Hospital is new evidence and the application now leads off with a statute from the The Criminal Code, R.S.C., 1985, c. C-46 clearly stating that the actions of Peter Baguma were criminal under the code.

Signature of Informant

December 2<sup>nd</sup>, 2025

Date