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IN THE MATTER OF	: SUPERIOR COURT OF NEW JERSEY
MURRAY COHEN, DECEASED	: CHANCERY DIVISION
: MIDDLESEX COUNTY	: DOCKET NUMBER:
	: <u>Civil Action</u>
	: AFFIDAVIT
	:
	:

I, William B. Anderson, M.D., being duly sworn, hereby certifies as follows:

1. I am presently employed as a forensic pathologist for Forensic Dimensions at 1630 Bridgewater Drive, Lake Mary, Florida.
2. I was Associate Medical Examiner at the Office of the Medical Examiner for District 12 in Sarasota, Florida from 2002 until 2003.
3. I was Deputy Chief Medical Examiner for District 9 in Orlando, Florida from 1990 until 2002.
4. Since 1976, I have been board certified in the areas of pathology and anatomic and forensic pathology.
5. Since 1980, I have been board certified in the area of clinical pathology.
6. I was a pathologist at the Office of the Medical Examiner for District 12 in Sarasota, Florida on January 13, 2003, the date of Murray B. Cohen's death.
7. The Medical Examiner's Office performed the initial medical examination of the decedent, Murray B. Cohen.
8. On January 16, 2003, I signed the death certificate for Murray B. Cohen.
9. At the time of Murray B. Cohen's death, the Sarasota County Sheriff's Office determined that the circumstances of death appeared to be natural involving a patient with significant reported medical history. Thus, I determined that no autopsy needed to be performed on Murray B. Cohen consistent with the information that I was provided with at the time.

10. Based upon my many years of professional experience and training as a forensic pathologist, an exhumation of Murray B. Cohen's remains, for the purpose of performing an autopsy, would prove to be invaluable in confirming the cause of death.

11. Furthermore, based on my many years of professional experience and training as a medical examiner, there is a good and reasonable likelihood that an autopsy will disclose relevant information relating to Murray B. Cohen's cause of death.

12. I believe that the body of Murray B. Cohen should be disinterred for the purpose of performing an autopsy to determine and establish the cause of death.

13. In my opinion, and within reasonable medical probability, I believe that this disinterment and post-mortem exam will provide a cause of death.

14. I believe there is a need to undertake the autopsy in this case because there are issues which have come to my attention after the embalming and burial of Murray B. Cohen, give rise to an issue whether or not the death was a result of natural cause.

15. As a medical examiner I question that had the information that I am now aware been raised at the time of death, I would have ordered an autopsy to be performed under the requirements of FS406.

16. At this point, I believe there is an immediate and urgent necessity that the body of Murray B. Cohen be exhumed for the purpose of examination and autopsy in order to help answer questions regarding his cause of death.

17. As a medical examiner for many years, when I am confronted with a case involving an alleged natural death, it is my role and duty to determine if there is a need to rule out other than natural causes.

18. I do not believe that I am bound by an investigative report or any allegations made by any of the parties. I base the request to exhume in this case and the need for an autopsy to rule out the cause of death as being other than natural.

19. It is my professional opinion that in the setting of his pre-existing medical conditions, administration of a stimulant drug such as the Corazol, found at the scene, could have directly contributed to the death of Mr. Cohen.

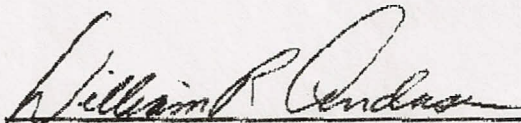
20. Corazol being a stimulant, can affect the function of the heart and, would have represented a health hazard in a patient such as Mr. Cohen. An autopsy, in my opinion, would allow drug analysis to determine whether or not Corazol is present, and how it might have contributed to Mr. Cohen's death.

21. Corazol, in essence, is a drug and poison and the opportunity to discover same would be forever lost unless an immediate autopsy is performed.

22. It is also my professional opinion that at this point in time we could most likely still detect if, in fact, Corazol is in the body of Mr. Cohen.

23. From the facts and circumstances that I have since become aware, specifically finding the Corazol at the scene, and later determining that it was not a prescribed medication as was initially reported, there is no question that an autopsy would have been performed to address this discrepancy. At this point, based upon the current information, I feel that performing an autopsy is the only reasonable way to address these issues and answer remaining questions regarding the death of Mr. Cohen.

I hereby certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


WILLIAM R. ANDERSON, M.D.

Dated: October 04, 2005



DEBORAH RAEDER ALLEN
MY COMMISSION # DD 152128
EXPIRES: November 16, 2008
Bonded Thru Budget Notary Services

