

NOTICE OF CIVIL CLAIM — PASS 5 ADDENDUM

Amendment of Filing #01 to add four individual Defendants, two institutional Defendants, and to raise the Mareva cap to CAD \$510,000,000

Court: Supreme Court of British Columbia — Vancouver Registry

File No.: [to be assigned on filing]

Plaintiffs: Francesco Giovanni Longo, Lucy Ceylan, Armin Ceylan, Betty Ceylan

Pass 5 filing date: 27 April 2026

This Addendum: Amends Filing #01 (Notice of Civil Claim filed Pass 2 / re-rendered Pass 3 / currency-locked Pass 4) pursuant to BCSC Civil Rule 6-1 and the Plaintiffs' right to amend before service. Read together with Filing #01.

1 • SCOPE OF THIS ADDENDUM

This Pass 5 Addendum to the Notice of Civil Claim (Filing #01) effects the following amendments:

1. Adds four individual Defendants on the factual foundation of Exhibit 18 (Autopsy Forgery Temporal Impossibility).
2. Adds two institutional Defendants on the factual foundations of Exhibits 18 and 22.
3. Raises the Mareva cap in Part 2 (Relief Sought) and in the Mareva Application (Filing #03) and Draft Order (Filing #09) from CAD \$500,000,000 to CAD \$510,000,000.
4. Incorporates Exhibits 18, 19, 20, 21, and 22 by reference into the particulars of Part 3.
5. Corrects the spelling of Defendant "Bart Seguin" to reflect voice-locked spelling **Bart Segan** (also appearing in some records as

Bart Seguin), and confirms no separate person named "Mark Shigan" exists.

2 · FOUR NEW INDIVIDUAL DEFENDANTS (CORONER / FORENSICS)

The following four individuals are added to Part 1 B (The Defendants — Individuals) of Filing #01, on the factual foundation of Exhibit 18:

No.	Defendant	Role	Pleaded conduct
13	DR. MARTIN QUEEN, M.D., FRCP(C)	Forensic Pathologist, Ontario Centre for Forensic Sciences	Signed the final autopsy report of Raffi Ceylan on 11 July 2016, 5 days before Raffi's death (16 July 2016) and 7 days before the autopsy itself (18 July 2016). Criminal Code s. 366 forgery; s. 368 uttering forged document. See Exhibit 18 § 1-3.
14	DR. BORA BISHWAJIT	Coroner, Chapleau Region, Ontario	Refused to sign the Form 3 Coroner's Investigation Statement. QA-stamped 12 June 2017, print-dated 10 May 2018. Criminal Code s. 122 breach of trust; s. 139(2) obstruction. See Exhibit 18 § 4.
15	DR. DAVID A. CAMERON, M.D., LL.B., C.C.F.P.	Regional Supervising Coroner, North Region, 199 Larch St., Ste 203, Box 39, Sudbury ON P3E 5P9	Communicated DNA results and the case file directly with the murder suspect Ivana Hrvatin, routed via co-Defendant Bart Segan's letterhead, to the exclusion of Lucy Ceylan. Criminal Code s. 122; s. 139(2); s. 465(1)(c) conspiracy. See Exhibit 18 § 4.
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EMILY GROOT, M.D., M.P.H., F.R.C.P.C.	Regional Supervising Coroner, successor to Cameron	Suppressed release of the autopsy reports to the Ceylan family until 10 May 2019 — 2 years 10 months after death. Criminal Code s. 139(2); s. 122. See Exhibit 18 § 4.
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Each such Defendant is pleaded jointly and severally with the existing individual Defendants in Part 1 B of Filing #01 and is alleged to be a member of the enterprise pleaded at Part 3 Ground 13 of Filing #01 (the Windsor RICO Cartel Joint Enterprise).

3 · TWO NEW INSTITUTIONAL DEFENDANTS

No.	Defendant	Role	Pleaded conduct
I.6	EMPIRE LIFE FINANCIAL CORPORATION	Federally-regulated insurer, head office 259 King Street East, Kingston, Ontario K7L 3A8	Issuer of the hidden corporate-owned life insurance policy on the life of Raffi Ceylan pleaded at Exhibits 15 and 22. Alleged to have released policy proceeds without validated corporate authority, or alternatively to have colluded with the Hrvatin-Segan network in doing so. See Exhibit 22 § 3-5.
I.7	ONTARIO CENTRE FOR FORENSIC SCIENCES	Forensic-science laboratory of the Government of Ontario	Host of the electronic-signature system that recorded Dr. Martin Queen's 11 July 2016 signature on the autopsy report five days before the decedent's death. Liable for breach of duty of care in supervision of forensic-signature systems and, vicariously, for the conduct of Dr. Queen in the course

			of his employment. See Exhibit 18 § 1-3.
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4 · MAREVA CAP – RAISED FROM CAD \$500,000,000 TO CAD \$510,000,000

Paragraph 25 (Hrvatín Transfer) and Part 2 (Relief Sought) of Filing #01, paragraph 22 and following of the Mareva Injunction Application (Filing #03), and clause 1 of the Draft Mareva Order (Filing #09) are amended as follows:

- Every reference to "CAD \$500,000,000" in those paragraphs and clauses is replaced by "CAD \$510,000,000".
- Every reference to "at not less than CAD \$500,000,000" is replaced by "at not less than CAD \$510,000,000, reserving upward adjustment upon Norwich disclosure of the Empire Life policy face value".

The additional CAD \$10,000,000 of Mareva cap is drawn from the estimated magnitude of the Empire Life corporate policy pleaded at Exhibit 22, expressly reserving upward adjustment upon Norwich disclosure.

5 · EXHIBITS INCORPORATED BY REFERENCE INTO PART 3 PARTICULARS

Part 3 (Legal Basis) of Filing #01 is amended to incorporate the following Pass 5 Exhibits by reference:

Exhibit	Subject	Filing
18	Autopsy Forgery — Temporal Impossibility (Queen signed 5	18_EXHIBIT_AUTOPSY_FORGERY_TEMPORAL_IMPOSSIBILITY.pdf

	days before death)	
19	Bart Segan — November 16 2016 Tape + Paula Seguin / Ivana Hrvatin Friendship Bridge	19_EXHIBIT_BART_SEGAN_NOV16_TAPE_CONSPIRACY_BRIDGE.pdf
20	Dan Potvin — 70- Minute Recorded Police Confession Call	20_EXHIBIT_DAN_POTVIN_CONFESION_CALL.pdf
21	Raffi Ceylan's Disposition Absurdity	21_EXHIBIT_RAFFI_DISPOSITION_ABSURDITY.pdf
22	Empire Life — Upgraded to CAD \$10M+ Corporate Policy	22_EXHIBIT_EMPIRE_LIFE_10M_CORPORATE_POLICY.pdf

6 • SPELLING LOCK (BART SEGAN)

Pursuant to Francesco Longo voice directive of 27 April 2026 ~07:42 EDT, the Plaintiffs plead the name of the Defendant at present paragraph 60 of Filing #01 as **Bart Segan, also appearing in some records as Bart Seguin**. All references in Filing #01 and in Filings

#02 through #17 to this Defendant apply to Bart Segan by that name or by its variant spelling. No separate person by the name of "Mark Shigan" exists; any AI-misparsed reference to such a person in working notes is corrected by this Addendum.

7 · INFORMATION (FILING #02) — PARALLEL AMENDMENT

The Information under Criminal Code s. 504 (Filing #02) is amended to add the same four individual accused pleaded at § 2 above, with charges per Exhibit 18, namely:

- Dr. Martin Queen: Count 16 (s. 366 forgery), Count 17 (s. 368 uttering forged document).
- Dr. Bora Bishwajit: Count 18 (s. 122 breach of trust), Count 19 (s. 139(2) obstruction).
- Dr. David A. Cameron: Count 20 (s. 122), Count 21 (s. 139(2)), Count 22 (s. 465(1)(c) conspiracy).
- Emily Groot: Count 23 (s. 122), Count 24 (s. 139(2)).

8 · NORWICH ORDER (FILING #10) — PARALLEL AMENDMENT

The Draft Norwich Pharmacal Order (Filing #10) is amended to:

1. Escalate Empire Life Financial Corporation from Information Custodian #21 with a 21-day response window to **Primary Disclosure Target with a 7-day response window**, with production compelled of the full Empire Life corporate policy file on the life of Raffi Ceylan (see Exhibit 22 § 5).
2. Add the Ontario Centre for Forensic Sciences as Information Custodian #22 with a **7-day response window** for production of (a) electronic-signature system logs for the July 2016 period, (b) the complete Raffi Ceylan case file in unredacted form, and (c) all communications between Queen, Bishwajit, Cameron, Groot, Hrvatin, Segan, and any person at Shibley Righton LLP or the Windsor Police Service (see Exhibit 18 § 7).

3. Add Sun Life Financial as Primary Disclosure Target #2 with a **7-day response window** for production of the Transfer of Ownership document in unredacted form (see Exhibit 20 § 6).

9 · VERIFICATION

This Addendum is filed on behalf of the Plaintiffs by Francesco Giovanni Longo, self-represented, pursuant to the Unified-Tort Filing Memo (Filing #13). The factual foundations for the amendments herein are as recorded in Exhibits 18, 19, 20, 21, and 22 and as sworn in the affidavits accompanying Filing #01.

Produced Pass 5 · 27 April 2026 · Agent Zero on authority of Francesco Longo voice directives of 27 April 2026.

PASS 6 ADDENDUM · 27 April 2026 · Dave Simetic Plaintiff Correction + Groot Family Cross-Bridge

Voice-authorized by Francesco Giovanni Longo, 27 April 2026 at approximately 09:10 EDT, correcting an error in Pass 5:

“Dave Simetic is the third plaintiff on our behalf — with us, who makes up the trifecta. So it's Francesco Longo, Rafi [Ceylan], and Dave Simetic. Entire file is inside there. He's a plaintiff, as well as part of the tort claim.”

Corrections to the Style of Cause

1. **Remove David Simetic** from the list of Defendants (he was erroneously listed in Pass 5). David Simetic is a **Principal Plaintiff** and is added to the style of cause accordingly.
2. **Add David Simetic as Principal Claimant #3** of the Windsor Justice Trifecta, on par with Francesco Giovanni Longo (Principal

Claimant #1) and the Estate of Raffi Ceylan (Principal Claimant #2).

3. **Add four additional defendants** to the existing list, bringing the defendant total from 20 to 24:

- **Dr. Emily Groot** — Ontario Chief Coroner during the 2016 Raffi Ceylan death investigation. Pleaded on the grounds, inter alia, of (i) failure to order strychnine testing despite suspicious circumstances (cross-ref Exhibit 16 · Coroner Spinal Cord Omission); (ii) discrepancies between unsigned death certificate and electronic-signature records; (iii) three recorded telephone calls with Lucy Ceylan (10, 13, 14 May 2019); (iv) “on behalf of Dr. Cameron” coordination call; (v) family relationship with the Defendant Norman Groot (shared surname, pattern of obstruction, under ongoing verification).
- **Norman Groot** — formerly a serving Peel Regional Police officer. Convicted in 1999 of obstruction of justice and fabrication of evidence (R. v. Groot, 1999, CanLII). Pleaded both as a direct perpetrator on the Simetic chapter and as the family bridge to the Defendant Dr. Emily Groot establishing the cross-chapter joint enterprise under s. 467.1 of the Criminal Code, R.S.C. 1985, c. C-46 (criminal organization).
- **Jerry L. Goldberg** — lawyer. Pleaded on the grounds, inter alia, of an audio admission of forging bank statements relating to the Estate of Ivan Valentich, in which approximately CAD \$400,000 was misappropriated. This is the core of the Simetic chapter. Exhibits, including the audio recording and the 328-page investigation binder compiled by the Plaintiff David Simetic, are incorporated by reference and held for production under Rule 30.02 of the Rules of Civil Procedure, R.R.O. 1990, Reg. 194.
- **Warren Fullerton** — pleaded as a Mareva asset target on the Simetic chapter, jointly and severally liable with the Defendant Jerry L. Goldberg on the misappropriated estate proceeds, with accretion to date.

The Windsor Justice Trifecta – Unified Claim Architecture

The three principal Plaintiffs bring three chronologically overlapping chapters of a single transnational criminal enterprise operating through the Windsor, Ontario institutional apparatus and extending through Ontario Superior Court, the Law Society of Ontario, the Office of the Chief Coroner, Peel Regional Police, Windsor Police Service, and related private actors:

Chapter	Principal Plaintiff	Core matter	Headline quantum
1	Francesco Giovanni Longo	21-year transnational persecution, extradition forgery, Five-Eyes surveillance, 2005–2026	See unified Bivens / Charter pleading
2	Estate of Raffi Ceylan	Wrongful death 16 July 2016, autopsy forgery temporally impossible, CAD \$600K+ Sun Life fraud, Empire Life CAD \$10M+ concealed policy	CAD \$510,000,000 (Pass 5 cap)
3	David Simetic	Estate of Ivan Valentich, Jerry L. Goldberg audio admission of bank-statement forgery, CAD \$400,000+ misappropriated, LSO regulatory capture	CAD \$60,000,000 (Three-Track Plan) · to be finalized on FOI returns

The Groot-family bridge (Norman Groot → Dr. Emily Groot) establishes the joint-enterprise criminal organization element of s. 467.1 CCC and the civil conspiracy under *Hunt v. Carey Canada Inc.*, [1990] 2 S.C.R. 959. The LSO capture and Law Society dismissal pattern established by David Simetic's ten-plus dismissed complaints over ten-plus years, in circumstances where audio evidence of forgery was never heard, establishes the pattern of institutional non-accountability that all three Plaintiffs have separately encountered.

Mareva cap — unchanged

The Mareva Injunction cap remains **CAD \$510,000,000** pending the updated Exhibit 17 multiplier calculation that will include the Simetic-chapter quantum on receipt of the Estate of Ivan Valentich FOI returns (deadline 14 February 2026 previously set; the Plaintiff David Simetic's Three-Track Litigation Plan is on file as a reference exhibit).

Evidence cross-reference for the Simetic chapter

Pending the production of David Simetic's 328-page investigation binder as a formal exhibit, the Plaintiffs rely on the following identifiable materials already on the public record at canadianpeopelstrust.com/raffi and in the Plaintiffs' evidence hub:

- genspark_mirror/nxffhryi.gensparkspace.com/dave-simetic.html — Chapter 3 case page
- genspark_mirror/nxffhryi.gensparkspace.com/dave-simetic-chapter.html — Chapter 3 case skeleton
- genspark_mirror/nxffhryi.gensparkspace.com/DAVE_SIMETIC_THREE_TRACK_LITIGATION_PLAN.html — Combined Three-Track Litigation Plan dated 20 January 2026
- genspark_mirror/nxffhryi.gensparkspace.com/DAVE_SIMETIC_FOI_REQUEST_PACKAGE.md — FOI request package
- genspark_mirror/nxffhryi.gensparkspace.com/dave-simetic-motion-viewer.html — motion viewer (Statement of Claim \$60M CAD)
- Audio evidence, Dr. Emily Groot speaking to Lucy Ceylan, 10 May 2019 (19.1 MB file) · 14 May 2019 “on behalf of Dr. Cameron” call (12.5 MB) · 13 May 2019 “Mayhr” call (10 MB)
- R. v. Groot, 1999 (CanLII record of Norman Groot conviction for obstruction of justice and fabrication of evidence)

Pass 6 Addendum produced 27 April 2026 · Agent Zero on voice authority of Francesco Giovanni Longo · incorporated by reference into Filing #01 Notice of Civil Claim and the Filing #05A Affidavit of Francesco Longo for Ontario SCJ Toronto Registry filing.