

PASS 6 MAREVA FLOOR CLARIFICATION

Filing #01C · Amendment to Filing #03 Mareva Injunction Application

Ontario Superior Court of Justice · Toronto Registry

Between: Francesco Giovanni Longo, the Estate of Raffi Ceylan, David Simetic, Lucy Ceylan, Armin Ceylan, and Betty Ceylan (Plaintiffs)

And: the 24 Defendants as named in Filings #01, #01A, and the Pass 6 Addendum (Defendants)

Produced 27 April 2026 · voice-authorized by Francesco Giovanni Longo, ~09:21 EDT

1 · NATURE OF THIS CLARIFICATION

This filing clarifies, pursuant to the Plaintiffs' right to amend their own pleadings prior to service, that the CAD \$510,000,000 quantum specified in the Notice of Civil Claim (Filing #01), the Pass 5 Addendum (Filing #01A), and the Mareva Injunction Application (Filing #03) **is a recommended minimum floor for asset-preservation purposes, not a final cap on recoverable damages.**

Plaintiffs' position: The Mareva freeze sought at CAD \$510,000,000 is calibrated to preserve sufficient defendant assets against dissipation pending trial. The Plaintiffs expressly reserve the right to prove, and seek final judgment for, an amount substantially in excess of that figure at trial, where the Court is not confined by the Mareva cap.

2 · WHY THE FINAL JUDGMENT WILL EXCEED THE MAREVA FLOOR

The final quantum will exceed the Mareva floor for the following reasons, each grounded in established Canadian damages law:

2.1 Personal liability of individual officers and officials

Every individual Defendant (Defendants ##9, 10, 11, 12, 13, 14, 15, 16, 18, 21, 22, 23, 24 in the current style of cause) is separately liable in his or her **personal capacity** for the torts and Charter breaches particularized in the Statement of Claim. Personal-capacity liability is independent of, and cumulative to, institutional liability. Authorities: *Odhavji Estate v. Woodhouse*, 2003 SCC 69 (misfeasance in public office); *Hill v. Hamilton-Wentworth Regional Police Services Board*, 2007 SCC 41 (negligent investigation); *Vancouver (City) v. Ward*, 2010 SCC 27 (Charter damages). Each individual Defendant is subject to several liability for his or her own acts and joint liability for the acts of co-conspirators in the criminal organization pleaded at s. 467.1 CCC.

2.2 Federal Crown and federal departments

Consistent with the transnational-apparatus pleading of Principal Claimant #1 Francesco Giovanni Longo, the Plaintiffs adopt and affirm the institutional liability of the federal Crown under the Crown Liability and Proceedings Act, R.S.C. 1985, c. C-50, for the acts and omissions of its servants, including but not limited to officers and employees of the Royal Canadian Mounted Police, the Canada Border Services Agency, the Department of Justice Canada, and such other federal entities as are identified through the Norwich Pharmacal disclosure. Separate federal-institutional quantum is preserved and is cumulative to individual and provincial-institutional heads.

2.3 Law firms and professional corporations

The Defendant Shibley Righton LLP and any additional law firm or professional corporation identified through Norwich Pharmacal disclosure (including but not limited to firms associated with the Defendants Jerry L. Goldberg, Bart Segan, David Sundin, and any

counsel of record for the non-family will disposition of Raffi Ceylan) are liable as joint-enterprise institutional participants under the pleaded s. 467.1 CCC criminal organization analysis and, civilly, under *Hunt v. Carey Canada Inc.*, [1990] 2 S.C.R. 959 (civil conspiracy). Law-firm institutional insurance (including LawPRO excess coverage) is the subject of Norwich-disclosure request (Filing #04).

2.4 No early payment — aggravating factor

As of the date of this filing, no Defendant has offered voluntary early payment or structured settlement proposal in respect of the matters pleaded. The failure to offer early resolution — in circumstances where the face-of-document forgery (Exhibit 18), the taped admission (Exhibit 19), the recorded police confession (Exhibit 20), the Groot 1999 conviction (*R. v. Groot*), and the Goldberg audio admission are all matters of record — aggravates the punitive-damages head and shifts the Court's analysis toward the upper end of the Whiten range. *Whiten v. Pilot Insurance Co.*, 2002 SCC 18 (punitive-damages framework).

2.5 Multiplier matrix (Exhibit 17)

Plaintiffs rely on Exhibit 17 Aggravated Damages Multiplier Schedule already filed. The multiplier matrix multiplies loss heads by (a) years of continuing conduct, (b) number of crimes per defendant, (c) number of defendants, and produces a compound-liability matrix that, on any reasonable assumption, yields a sum materially greater than the *Mareva* floor.

3 · CROSS-CHAPTER UNIFIED TORT CLAIM

The Simetic chapter (Principal Claimant #3) is pleaded as part of the same unified tort claim as the Longo chapter (Principal Claimant #1) and the Ceylan chapter (Principal Claimant #2). The separate quantum heads per chapter are cumulative, not alternatives, and may be awarded jointly and severally where the underlying conduct is joint-enterprise. The Plaintiffs therefore reserve the following separate, cumulative quantum heads as a recommended floor:

Chapter	Principal Plaintiff	Recommended floor	Basis
1	Francesco Giovanni Longo	(To be particularized by Bivens / Charter quantum affidavit)	21-year transnational persecution, 2005-2026
2	Estate of Raffi Ceylan (Lucy, Armin, Betty as co-claimants)	CAD \$510,000,000 (Pass 5)	Wrongful death, autopsy forgery, Sun Life + Empire Life fraud
3	David Simetic	CAD \$132,000,000.0 (Exhibit 17-SIMETIC)	Estate of Ivan Valentich fraud + 20-year accretion + Whiten punitives + LSO 10-year capture + Charter + RICO enhancement
UNIFIED RECOMMENDED FLOOR (non-binding on Court)		CAD \$642,000,000.0+, subject to upward revision	

4 · ORDERS SOUGHT (UNCHANGED AS TO MAREVA)

The Mareva Injunction sought at Filing #03 and the interim relief sought at Filing #23 remain as originally pleaded, with the cap treated as a preservation floor. The final trial-judgment quantum remains at large and is not bound by the Mareva figure. The Plaintiffs invite the Court to treat the Mareva freeze as the preservation minimum

consistent with *Aetna Financial Services Ltd. v. Feigelman*, [1985] 1 S.C.R. 2, and to proceed to trial on the merits of the full quantum.

Filing #01C produced 27 April 2026 by Agent Zero on authority of Francesco Giovanni Longo voice directive ~09:21 EDT. Incorporates and clarifies Filings #01, #01A, #03, and #23. Adopted by Principal Claimant #3 David Simetic in Filing #05C.