

INFORMATION

IN THE PROVINCIAL COURT OF BRITISH COLUMBIA

VANCOUVER REGISTRY

NO. _____

INFORMATION laid pursuant to section 504 of the Criminal Code of Canada, R.S.C. 1985, c. C-46, by a private informant.

THE INFORMANT

This is the Information of **LUCY CEYLAN**, of the City of Windsor, in the Province of Ontario, hereinafter called the Informant, who states that she has reasonable and probable grounds to believe and does believe that the persons named in the counts below have committed the indictable offences set out in each count.

The Informant further states that she lays this Information in her own name as a private citizen and in her capacity as the twin sister of the deceased Raffi Ceylan (also known as Rafael Salem and Rocky Ceylan). She is joined, as co-informants, by **FRANCESCO GIOVANNI LONGO** and **ARMIN CEYLAN** (through counsel or next-friend as his continuing detention requires).

PREAMBLE AND JURISDICTION

1. This Information is laid before a Justice of the Peace or Provincial Court Judge in the Province of British Columbia pursuant to s. 504 of the Criminal Code. Each of the accused is properly charged in British Columbia because the offences disclosed include ongoing conspiracy, continuing fraud, and intimidation of a justice-system participant, which are or include offences continuing to the present day and in respect of which the proceeds, benefits, and gains have or may have transited financial infrastructure having a real and substantial connection to British Columbia.
2. The Informant has exhausted the Ontario forum for the reasons particularised in the companion Notice of Civil Claim and brings this Information in the Province of British Columbia as a neighbouring

superior-court jurisdiction in which the Criminal Code applies with equal force and in which no provincial Attorney-General's consent is required for the laying of an Information under s. 504.

3. The Informant acknowledges the procedure of s. 507.1 (Information laid by a private person — pre-enquete) and is prepared to attend at any pre-enquete hearing this Court may direct.

THE ACCUSED PERSONS

All named accused persons are natural persons. Institutional defendants in the companion civil action (Sun Life Financial; Shibley Righton LLP; the Windsor Police Service; the Windsor Police Services Board) are not charged in this Information; their liability is pursued through the civil instrument only, save insofar as their agents are charged in their personal capacities.

1. **IVANA HRVATIN**
2. **DAVID SUNDIN**
3. **BART SEGUIN** (also known as Bart Segan)
4. **SGT. CHRIS RENAUD**
5. **DAN POTVIN**
6. **DREW DILKENS**
7. **JASON BELLAIRE**
8. **EDDIE FRANCIS**
9. **JOHN PAUL HOWARD**
10. **MARY JO NOLAN**
11. **DAVE SIMETIC**
12. **BILL BENSON**

(Accused Jason Crowley is not charged — his role in the Notice of Civil Claim is successor-in-office notice only.)

THE COUNTS

COUNT 1 — FRAUD OVER \$5,000

That **IVANA HRVATIN**, **BILL BENSON**, and **BART SEGUIN**, on or about 19 September 2016, at or near the City of Windsor in the Province of Ontario, and by means of electronic instruments causing effects in multiple provinces of Canada including the Province of British Columbia, by deceit, falsehood, or other

fraudulent means, defrauded the Estate of Raffi Ceylan (deceased) and its heirs and beneficiaries of money or valuable security in an amount exceeding five thousand dollars, to wit: approximately six hundred thousand dollars (\$600,000) or more transferred from a Sun Life Assurance Company of Canada policy to Ivana Hrvatin in contradiction of a Separation Agreement executed in November 2011 excluding her from any spousal share, contrary to section 380(1)(a) of the Criminal Code.

COUNT 2 – FRAUD OVER \$5,000 (CONTINUING)

That **IVANA HRVATIN**, **DAVID SUNDIN**, and **BART SEGUIN**, between on or about 16 July 2016 and the date of the swearing of this Information, at or near the City of Windsor and elsewhere in Canada, by deceit, falsehood, or other fraudulent means, defrauded the Estate of Raffi Ceylan and its heirs and beneficiaries through a continuing course of conduct including the concealment of the executed Separation Agreement for approximately eighteen (18) months; the production of an unsigned counterpart in lieu of the executed instrument; and the acceptance and retention of funds obtained thereby, contrary to section 380(1)(a) of the Criminal Code.

COUNT 3 – FORGERY

That **BILL BENSON** and **BART SEGUIN**, between on or about 16 July 2016 and 31 December 2017, made or caused to be made a false document, to wit: a representation of testamentary absence ("Raffi died without a Will") and/or a forged instrument purporting to displace an executed Will or Separation Agreement, with intent that it be acted on as genuine, contrary to section 366 of the Criminal Code.

COUNT 4 – UTTERING FORGED DOCUMENT

That **BILL BENSON** and **BART SEGUIN**, between on or about 16 July 2016 and 31 December 2017, knowing a document to be forged, used, dealt with, or acted upon it as if it were genuine, contrary to section 368 of the Criminal Code.

COUNT 5 – THEFT

That **BART SEGUIN**, on or about 17 or 18 July 2016, at or near the City of Windsor, did steal a laptop computer and its stored data, the property of the Estate of Raffi Ceylan, contrary to section 322 of the Criminal Code.

COUNT 6 – CRIMINAL HARASSMENT

That **CHRIS RENAUD**, on divers dates between 2016 and the date of the swearing of this Information, at or near the City of Windsor, without lawful authority and knowing that the Plaintiff Lucy Ceylan was harassed, or being reckless as to whether she was harassed, engaged in repeated threatening conduct, including on-record threats of criminal-harassment charges against her, causing Lucy Ceylan reasonably in all the circumstances to fear for her safety, contrary to section 264 of the Criminal Code.

COUNT 7 – INTIMIDATION OF A JUSTICE-SYSTEM PARTICIPANT

That **CHRIS RENAUD, DAN POTVIN, and JOHN DOE WPS OFFICERS** (to be particularised at pre-enquete), on divers dates between 2016 and the date of the swearing of this Information, at or near the City of Windsor, did, without lawful authority and with intent to provoke a state of fear in Lucy Ceylan in order to impede her in her capacity as a complainant, informant, witness, and justice-system participant in respect of the underlying frauds, threaten her with injury and with the institution of charges, contrary to section 423.1 of the Criminal Code.

COUNT 8 – UTTERING THREATS

That **CHRIS RENAUD**, on or about a date captured at tape-time 12:20 on a recording in the possession of Lucy Ceylan, at or near the City of Windsor, did knowingly utter a threat to cause death or bodily harm or to cause injury to the property of Lucy Ceylan, contrary to section 264.1(1) of the Criminal Code.

COUNT 9 – BREACH OF TRUST BY A PUBLIC OFFICER – WPS CHAIN

That **JASON BELLAIRE, DAN POTVIN, CHRIS RENAUD, and DREW DILKENS** (in his capacity as chair of the Windsor Police Services Board), being officials within the meaning of section 118 of the Criminal Code, between on or about 16 July 2016 and the date of the swearing of this Information, at or near the City of Windsor, did commit a breach of trust in connection with the duties of their office by, among other acts, shielding an ongoing fraud; sabotaging lawful investigation of that fraud; threatening witnesses; and rewarding members of the enterprise with promotion and continued employment, contrary to section 122 of the Criminal Code.

COUNT 10 – BREACH OF TRUST BY A PUBLIC OFFICER – JUDICIAL CHAIN

That **JOHN PAUL HOWARD**, being an official within the meaning of section 118 of the Criminal Code (namely, a judge of the Superior Court of Justice), between on or about 9 August 2016 and 5 October 2017, at or near the City of Windsor and Toronto in the Province of Ontario, did commit a breach of trust in connection with the duties of his office by, among other acts, presiding over a proceeding (Ontario civil action CV-17-25300) in which his own firm, Shibley Righton LLP, was represented by a partner (Bart Seguin); issuing rulings, including a Time Table Order of 3 October 2017 with a documented two-version anomaly; and providing judicial cover for the estate-fraud chain pleaded in Counts 1 through 5 above, contrary to section 122 of the Criminal Code.

COUNT 11 – CONSPIRACY

That **IVANA HRVATIN, DAVID SUNDIN, BART SEGUIN, CHRIS RENAUD, DAN POTVIN, DREW DILKENS, JASON BELLAIRE, EDDIE FRANCIS, JOHN PAUL HOWARD, MARY JO NOLAN, DAVE SIMETIC, BILL BENSON**, and others unknown, between on or about 1 January 2005 and the date of the swearing of this Information, at or near the City of Windsor and elsewhere in Canada and the United States of America, did conspire together and with one another to commit the indictable offences set out in Counts 1 through 10 above, contrary to section 465(1)(c) of the Criminal Code.

COUNT 12 – OBSTRUCTING JUSTICE

That **DAN POTVIN, CHRIS RENAUD**, and **BART SEGUIN**, between on or about 16 July 2016 and the date of the swearing of this Information, wilfully attempted in any manner to obstruct, pervert, or defeat the course of justice in judicial proceedings, including the Ontario estate proceedings in CV-17-25300 and in any anticipated criminal proceedings arising from Counts 1 through 10 above, contrary to section 139(2) of the Criminal Code.

COUNT 13 – PERJURY

That **IVANA HRVATIN**, between on or about 2017 and 2018, in the context of the Ontario estate proceedings, while giving evidence in a judicial proceeding with intent to mislead, made a false statement under oath or solemn affirmation, knowing it to be false, in particular by holding herself out as Estate Trustee of the Raffi Ceylan estate in contradiction of an executed Separation Agreement

excluding her from any spousal share, contrary to section 131 of the Criminal Code.

COUNT 14 – FABRICATING EVIDENCE

That **DR. DAVID CAMERON**, at or near the City of Sudbury and at or near the City of Windsor, in or about July 2016, with intent to mislead, fabricated something with intent that it be used as evidence in a judicial proceeding, existing or proposed, by other than perjury or incitement to perjury, to wit: an autopsy final report bearing a signature date of 11 July 2016, being five (5) days before the date of death of the decedent (16 July 2016), contrary to section 137 of the Criminal Code. (Dr. Cameron is added as Accused #13 for the purposes of this count only; the primary body of named accused remains as listed above.)

COUNT 15 – PARTICIPATION IN CRIMINAL ORGANISATION

That **IVANA HRVATIN, DAVID SUNDIN, BART SEGUIN, CHRIS RENAUD, DAN POTVIN, DREW DILKENS, JASON BELLAIRE, EDDIE FRANCIS, JOHN PAUL HOWARD, MARY JO NOLAN, DAVE SIMETIC, and BILL BENSON**, between on or about 1 January 2005 and the date of the swearing of this Information, at or near the City of Windsor and elsewhere in Canada and the United States of America, did participate in or contribute to the activity of a criminal organisation (namely, the "Windsor Cartel Joint Enterprise" as particularised in the companion Notice of Civil Claim), knowing that its members engaged in or had engaged in the commission of the serious offences set out in Counts 1 through 14 above, for the purpose of enhancing the ability of the organisation to facilitate or commit indictable offences, contrary to section 467.11 of the Criminal Code.

REQUESTS OF THE COURT

The Informant respectfully requests that this Court:

- (a) **receive** this Information under s. 504 of the Criminal Code;
- (b) **convene a pre-enquete** hearing under s. 507.1 as directed;
- (c) on being satisfied that a case for so doing is made out, **issue process** by way of summons or warrant in respect of each of the named accused persons;
- (d) in the alternative, **refer** this Information to the Attorney General of British Columbia or to the federal Director of Public Prosecutions as the circumstances

require for consideration of the intervention mechanisms set out in s. 579.01 and related provisions of the Criminal Code;

(e) **preserve** the evidentiary record furnished contemporaneously with this Information, including the 300+ audio and video corpus held by the Informant Lucy Ceylan, pending pre-enquete disposition.

SWORN before me at Vancouver, in the Province of British Columbia, this **_ day of _____, 2026.**

_____ A Justice of the Peace / Provincial Court Judge

_____ **LUCY CEYLAN**, Informant

_____ **FRANCESCO GIOVANNI LONGO**, Co-Informant

_____ **ARMIN CEYLAN**, Co-Informant (through next-friend as continuing detention requires)

End of Information.