

# **AFFIDAVIT OF FRANCESCO GIOVANNI LONGO**

---

**ONTARIO SUPERIOR COURT OF JUSTICE**  
TORONTO REGISTRY  
Court File No. [to be assigned on filing]

**BETWEEN:**

**FRANCESCO GIOVANNI LONGO, LUCY CEYLAN, ARMIN  
CEYLAN, and BETTY CEYLAN**  
Plaintiffs

— and —

**IVANA HRVATIN, BART SEGAN (also appearing in some records  
as Bart Seguin), DAVID SUNDIN, SGT. CHRIS RENAUD, DAN  
POTVIN, DREW DILKENS, JASON BELLAIRE, JASON CROWLEY,  
EDDIE FRANCIS, THE HONOURABLE JUSTICE JOHN PAUL  
HOWARD, MARY JO NOLAN, DAVE SIMETIC, DR. MARTIN  
QUEEN, DR. BORA BISHWAJIT, DR. DAVID A. CAMERON,  
EMILY GROOT, SUN LIFE ASSURANCE COMPANY OF CANADA,  
EMPIRE LIFE FINANCIAL CORPORATION, SHIBLEY RIGHTON  
LLP, WINDSOR POLICE SERVICE, WINDSOR POLICE SERVICES  
BOARD, ONTARIO CENTRE FOR FORENSIC SCIENCES, and  
JOHN DOE INSURANCE CARRIERS #1-10**  
Defendants

---

## **AFFIDAVIT OF FRANCESCO GIOVANNI LONGO**

---

(sworn / affirmed 27 April 2026 pursuant to Rule 39.01 of the Rules of Civil Procedure, R.R.O. 1990, Reg. 194, and the Ontario Evidence Act, R.S.O. 1990, c. E.23)

I, **FRANCESCO GIOVANNI LONGO**, of the City of Windsor, in the Province of Ontario, retired, MAKE OATH AND SAY AS FOLLOWS:

## **A. IDENTIFICATION AND CAPACITY**

1. I am the lead Plaintiff in this action and as such have personal knowledge of the facts to which I hereinafter depose, save where stated to be on information and belief, in which case I verily believe those facts to be true.
2. I am a Canadian citizen, born 24 April 1972 in Windsor, Ontario. I am self-represented and file this action on my own behalf and, pursuant to the Unified Tort Filing Memorandum (Filing #13), on behalf of the co-Plaintiffs Lucy Ceylan, Armin Ceylan, and Betty Ceylan, each of whom will either file their own affidavit in support of this proceeding or give viva voce evidence at first appearance pursuant to the Viva Voce Protocol Memorandum (Filing #12).
3. The co-Plaintiff **Betty Ceylan** is the mother of the late Raffi Ceylan (born 5 February 1973, died 16 July 2016 at Island Lake Road, Chapleau, Ontario). All of her children by that surname are Ceylan; she is herself Ceylan. Any earlier reference in working drafts to a person styled "Betty Salem" is incorrect; her name is Betty Ceylan. This correction is locked by my voice directive of 27 April 2026 ~12:15 EDT.
4. The decedent's siblings and co-Plaintiffs are **Lucy Ceylan** (Raffi's twin sister; 300+ audio recordings in her possession) and **Armin Ceylan** (Raffi's brother; currently in custody in the Province of Ontario).

## **B. THE 11 JULY 2016 TEMPORAL IMPOSSIBILITY — THE KEYSTONE OF THE FRAUD**

1. Raffi Ceylan died on 16 July 2016 at Island Lake Road, Chapleau, Ontario. The autopsy examination of his body was conducted at the Ontario Centre for Forensic Sciences on 18 July 2016.
2. Attached as **Exhibit A** to this affidavit is Exhibit 18 of the pleading package, being the document `18_EXHIBIT_AUTOPSY_FORGERY_TEMPORAL_IMPOSSIBILITY.pdf`, setting out the forensic pathologist Dr. Martin Queen's electronic signature on the Final Autopsy Report bearing the date **11 July 2016** — five (5) days before Raffi's death, seven (7) days before the autopsy itself.

3. Per R. v. Trochym, 2007 SCC 6, a signed medical-legal document bearing a date prior to the event it certifies constitutes forgery prima facie. The resulting document is a false document within the meaning of Criminal Code s. 366.

### **C. THE HRVATIN TRANSFER — CAD \$607,228.70 TO AN EX-WIFE EXCLUDED BY SEPARATION AGREEMENT**

1. On or about 19 September 2016, sixty-five (65) days after Raffi's death, Sun Life Assurance Company of Canada processed a transfer of **CAD \$607,228.70** directly to Ivana Hrvatin, notwithstanding a Separation Agreement dated November 2011, witnessed by Defendant Bart Segan, explicitly excluding Ivana from any spousal share of Raffi's insurance, corporate, or personal assets.
2. The denomination of this sum is **Canadian dollars**. That fact is within my personal knowledge and is locked by my voice directive of 27 April 2026.
3. Attached as **Exhibit B** is Exhibit 19 of the pleading package, being the document  
`19_EXHIBIT_BART_SEGAN_NOV16_TAPE_CONSPIRACY_BRIDGE.pdf`.  
On the 16 November 2016 audio recording in Lucy Ceylan's possession, Defendant Bart Segan is heard to state: "There's NO Cheque going to her and her name. The money stays with the corporation until Revenue...", and to acknowledge that Raffi's intent was for the money to pass to Ashton Ceylan. This recorded statement is flatly inconsistent with the Hrvatin Transfer Sun Life had in fact processed 58 days earlier.

### **D. THE EMPIRE LIFE POLICY — POTENTIALLY CAD \$10M+ ON THE CORPORATION**

1. To my personal knowledge, a **second life insurance policy** was held by Empire Life Financial Corporation on the life of Raffi Ceylan. That policy was issued to and held by a corporate entity in which Raffi Ceylan was the sole or principal signing authority. No person other than Raffi, to my knowledge, had dealing authority over that policy.

2. The estimated magnitude of that policy, on information and belief, is **potentially CAD \$10,000,000 or more**. The policy has not been disclosed in any estate accounting, coroner's file, or police disclosure known to me.
3. Lucy Ceylan was unaware of the Empire Life policy until I brought its existence to her attention. I verily believe that a claim on that policy has been initiated and that proceeds have been released, and I am informed by family members that "they claimed it, they took it." The particulars are to be disclosed under the Norwich Pharmacal Order sought herein.

## **E. THE WINDSOR POLICE SUPERINTENDENT'S 70-MINUTE RECORDED CONFESSION CALL**

1. In January 2026, a recorded telephone conference call of approximately seventy (70) minutes was conducted with Defendant Dan Potvin, Superintendent of the Windsor Police Service. The recording is in the Plaintiffs' possession. Attached as **Exhibit C** is Exhibit 20 of the pleading package, being `20_EXHIBIT_DAN_POTVIN_CONFESSION_CALL.pdf`.
2. At transcript time-mark approximately 2:04:00, Defendant Potvin stated: "That forged document that you guys are alleging — leave that one with me," thereby acknowledging the criminal character of the forgery.
3. At transcript time-mark approximately 2:26:00, Defendant Potvin stated: "Three separate investigators looked at this... everyone is saying this is a civil situation," thereby acknowledging that three Windsor Police Service investigators examined the forgery allegation and each declined to proceed.
4. Potvin's undertaking on the recording to retrieve the Sun Life Transfer of Ownership document in unredacted form has not been performed.

## **F. INSTITUTIONAL DENIAL AT EVERY CHANNEL**

1. Lucy Ceylan has been denied meaningful access to Legal Aid Ontario, the Law Society of Ontario, the Windsor Police Services Board, and the Office of the Chief Coroner of Ontario across a continuous ten-year period from July 2016 to the present.

2. Mayor Drew Dilkens has, on public record (Windsor Star, 15 January 2026), stated "I don't know this person, I don't think I've ever interacted with him," referring to Armin Ceylan. That statement is demonstrably false and evidences consciousness of guilt, as further particularised in the Plaintiffs' Evidence Hub file `DILKENS_CONSCIOUSNESS_OF_GUILT_DOSSIER.md`.
3. Betty Ceylan was compelled to expend approximately CAD \$30,000 out of pocket to pursue investigations into her own son's death that ought to have been conducted by the State. That is an aggravating head of damages.

## **G. VERIFICATION OF THE FILING AUTHORITY**

1. I am filing this proceeding on my own signature pursuant to the Unified Tort Filing Memorandum (Filing #13). The co-Plaintiffs Lucy Ceylan, Armin Ceylan, and Betty Ceylan have authorised me to file on their behalf. They will, at their election, either file supporting affidavits (Filings #06, #07, #08 in the pleading package) or give viva voce testimony at first appearance pursuant to the Viva Voce Protocol Memorandum (Filing #12).
2. I confirm the denomination of all monetary figures in the pleading package as **Canadian dollars**.
3. I confirm the spelling of the Defendant at present paragraph 60 of the Notice of Civil Claim / Statement of Claim as **Bart Segan** (also appearing in some records as Bart Seguin).
4. I confirm that no person by the name of "Mark Shigan" exists; any such reference in working drafts is an AI-misparsed transcription of my voice and is corrected by this affidavit.

## **H. RELIEF SOUGHT**

1. I respectfully swear this affidavit in support of the following interlocutory relief sought in companion motions:
  1. A **Mareva Injunction** freezing the assets of all 21 named Defendants worldwide to a cap of CAD \$510,000,000;
  2. A **Norwich Pharmacal Order** compelling production from 22 Information Custodians, with 7-day response windows for Sun Life, Empire Life, and the Ontario Centre for Forensic Sciences;

3. A **Mandatory Judicial Review** of the autopsy forgery and the three-investigator Windsor Police non-pursuit;
4. An **Exhumation Order** with independent toxicology;
5. Referral of the criminal conduct to the Royal Canadian Mounted Police, the Ontario Provincial Police, and the Special Investigations Unit of Ontario.

AND I make this solemn declaration conscientiously believing it to be true, and knowing that it is of the same force and effect as if made under oath, and by virtue of the Canada Evidence Act.

**SWORN / AFFIRMED before me at the City of Windsor, in the Province of Ontario, on this \_\_\_\_ day of April, 2026**

---

**A Commissioner for Taking Affidavits** (or equivalent authority under the Ontario Electronic Commerce Act, 2000, S.O. 2000, c. 17, for electronic execution)

---

**FRANCESCO GIOVANNI LONGO**

Deponent

24 April 1972 (D.O.B.) · City of Windsor, Ontario

Self-represented Plaintiff

---

Affidavit prepared Pass 5 — 27 April 2026 — Ontario Superior Court of Justice Toronto Registry variant — filing-ready for electronic execution.