

AFFIDAVIT OF FRANCESCO GIOVANNI LONGO

IN THE SUPREME COURT OF BRITISH COLUMBIA

VANCOUVER REGISTRY

NO. _____

BETWEEN:

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

PLAINTIFFS

AND:

IVANA HRVATIN et al. (as captioned in the Notice of Civil Claim filed herewith)

DEFENDANTS

AFFIDAVIT OF FRANCESCO GIOVANNI LONGO

(Sworn pursuant to Rule 22-2 of the Supreme Court Civil Rules, B.C. Reg. 168/2009, and the Evidence Act, R.S.B.C. 1996, c. 124)

Affidavit No. 1 of the Plaintiff Francesco Giovanni Longo

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

I. IDENTIFICATION AND CAPACITY

1. I am the lead Plaintiff in this action. I am a Canadian citizen, born 24 April 1972, and I reside in Windsor, Ontario. I swear this Affidavit in support of the Notice of Civil Claim filed herewith and in support of the contemporaneous applications for a Mareva Injunction (Application #03) and a Norwich Pharmacal Order (Application #04).

2. I have personal knowledge of the matters deposed to in this Affidavit, except where I have stated them on information and belief, in which case I have identified the source of the information and I believe that information to be true.
3. I am self-represented pro se. I am indigent. I act in my own personal capacity and, to the extent the Court considers it appropriate, as the lead litigant in a joint tort action brought together with the three co-Plaintiffs: **Lucy Ceylan**, the twin sister of the decedent Raffi Ceylan; **Armin Ceylan**, his brother; and **Betty Salem**, his mother. The mandate of the co-Plaintiffs to have me initiate the action on their collective behalf is the subject of the companion Viva Voce Declaration Protocol Memorandum (Filing #12) and the Unified-Tort Filing Memorandum (Filing #13).

II. STANDING — THE HRVATIN CROSS-MATTER BRIDGE

1. My standing to join this action as a co-Plaintiff arises from a documentary cross-link between the Ceylan-side conduct pleaded in the Notice of Civil Claim filed herewith and a parallel Longo-side proceeding in which I have been the claimant for over two decades.
2. The Defendant **Ivana Hrvatin** is the immediate beneficiary of the Ceylan-side fraud in the amount of not less than CAD \$600,000, being the transfer from Sun Life Assurance Company of Canada on or about 19 September 2016 pleaded in paragraph 25 of the Notice of Civil Claim. Hrvatin is **also** a documented asset-freeze target in my own Longo-side Mareva Injunction roster, item A.5.07, served on the parallel roster prior to this filing. I attach as **Exhibit A** to this Affidavit a true copy of the relevant excerpt of the Longo-side Mareva roster identifying Hrvatin as item A.5.07.
3. That same name, appearing on both rosters, is what the Plaintiffs collectively refer to in this action as the **Windsor Cartel Joint Enterprise Bridge**, and it is the primary evidentiary basis on which we plead the two conduct chains as a single continuing joint enterprise (pleaded at Part 3, Ground 13 of the Notice of Civil Claim).

III. THE LONGO-SIDE ORIGIN — BRIEF STATEMENT (NON-DUPLICATIVE)

1. I do not re-plead in this Affidavit the entirety of my Longo-side facts. Those facts are the subject of separate, live proceedings in the United States District Court for the Middle District of Florida (case 8:05-cr-263-T-17MSS, Coram Nobis petition verified and filed), and in the Superior Court of Justice, Toronto Region (case 05-CR-573). I depose here only to the two matters that

I need the Court in British Columbia to understand in order to accept my joinder:

(a) In 2005, a United States Drug Enforcement Administration Special Agent named **Glenn Dutton** initiated a cross-border operation against me. That operation secured a conviction in Florida on August 29, 2005 — that is, on a warrant reportedly issued on 21 June 2005, sixty-nine days before the alleged crime occurred. That documentary anomaly is preserved in the Coram Nobis petition now on file in MDfL.

(b) From 2005 through the present date, a Windsor-local conduct chain involving the **Windsor Police Service**, Chief **Jason Bellaire** (the 2005 and 2021 arresting officer, subsequently promoted to Chief of Police by Mayor **Drew Dilkens** on 29 November 2022), and Mayor **Drew Dilkens** himself, has continued that cross-border operation on the Canadian side.

1. Several of the same Windsor-based actors — specifically Mayor Dilkens, former Mayor Eddie Francis, Chief Bellaire, Sgt. Chris Renaud (Windsor Police Service Fraud Unit), and Superintendent Dan Potvin — appear both in the Longo-side conduct chain and in the Ceylan-side conduct chain particularised in this action. That is the factual basis for pleading them as members of the single Windsor Cartel Joint Enterprise.

IV. HOW I CAME TO HOLD THE CEYLAN EVIDENCE CORPUS

1. The co-Plaintiff **Lucy Ceylan** is the custodian of more than three hundred (300) audio and video recordings documenting the conduct pleaded in the Notice of Civil Claim. Ninety-six (96) of those recordings are catalogued in a document called the Trifecta Audio Inventory, which is in my possession and control. The balance is held on Lucy Ceylan's personal devices and cloud-storage accounts.
2. I came to hold the Ceylan evidence corpus through my collaboration with Lucy Ceylan, Armin Ceylan, and Betty Salem beginning no later than 2024. At that time Lucy Ceylan shared with me, on the basis of our common interest in exposing the Windsor conduct chain that had harmed both families, the audio catalogue, the supporting estate-proceeding documents, the autopsy records, the Sun Life correspondence, and the related material.
3. I have preserved the Ceylan corpus in machine-indexed form. The indexed corpus, together with the integrated evidence brief titled `CEYLAN_EVIDENCE_BRIEF.md` (6,090 words, 27 April 2026) and the supporting rule-references, is attached to this Affidavit as **Exhibit B** (index only) and is available to the Court on request.

V. THE HRVATIN BRIDGE — PARTICULARS

1. The Defendant Hrvatin was, at the time of Raffi Ceylan's death on 16 July 2016, legally separated from him pursuant to a Separation Agreement executed in November 2011 in four original counterparts, witnessed by the Defendant **Bart Seguin**. I have seen a copy of that Separation Agreement. It expressly excludes Hrvatin from any spousal share.
2. Notwithstanding that Agreement, Sun Life Financial processed a transfer in excess of CAD \$600,000 to Hrvatin on 19 September 2016 — approximately 65 days after Raffi Ceylan's death. The denomination of that transfer has been voice-directed by me, as lead Plaintiff, to be **Canadian dollars (CAD)**, not United States dollars. I gave that directive orally on 27 April 2026 and confirm it under oath now. The voice directive is preserved in my session notes and is the source reference for paragraph 25 of the Notice of Civil Claim as amended.
3. That same Hrvatin name, and that same bank-account relationship, is what I identified in my own Longo-side Mareva roster (A.5.07) as an asset-freeze target, independently and prior to collaborating with the Ceylan family. The two conduct chains converge at Hrvatin's account. That is the documentary basis for pleading the two conduct chains as a single Windsor Cartel Joint Enterprise.

VI. JOINT RICO ENTERPRISE — THEORY AS I OBSERVED IT

1. I plead the Windsor Cartel Joint Enterprise on the authority of Canada Cement LaFarge Ltd. v. British Columbia Lightweight Aggregate Ltd., [1983] 1 S.C.R. 452, and Agribrands Purina Canada Inc. v. Kasamekas, 2011 ONCA 460, which together establish the unlawful-means civil conspiracy cause of action as a distinct actionable tort in Canadian law.
2. The enterprise has, to my personal knowledge and the collective personal knowledge of my co-Plaintiffs, the following features:
 - (a) A common geographic centre of gravity — the City of Windsor, Ontario — and a common political-capture continuity through the offices of Mayor (Francis → Dilkens) and Chief of Police (Bellaire → Crowley);
 - (b) A shared financial bridge through the Hrvatin account and the Sun Life institutional infrastructure;
 - (c) A shared pattern of witness-intimidation conduct — specifically, threats by Sgt. Renaud against Lucy Ceylan at tape-time 12:20 on a recording in Lucy's possession ("there will be consequences"), paralleled by intimidation conduct against me personally in 2005 and 2021; and

(d) A shared institutional concealment chain operating through Shibley Righton LLP (the firm founded by the Defendant Justice John Paul Howard and partnered by the Defendant Bart Seguin), the Windsor Police Service, and the Windsor Police Services Board.

VII. GITHUB SUPPRESSION — PLATFORM-CENSORSHIP EVIDENCE

1. At a date I can presently approximate as 2025, I created a public repository on the platform GitHub, Inc. for the purpose of publishing the Longo-side case materials. The repository bore the name **flongo11/rvlongo-case**. I am the sole owner of that account.
2. The repository contained, among other materials, documentation implicating the following Windsor Police Service personnel:

(a) Officer **Ken Price** of the Windsor Police Service — a personnel file referencing, to the best of my knowledge, pornography-related criminal charges;

(b) Chief **Jason Crowley** (successor Chief); and

(c) Chief **Jason Bellaire** (who is named as a Defendant in this action).

1. Following the publication of that material, public access to the repository at <https://github.com/flongo11/rvlongo-case> was restricted or blocked by GitHub, Inc. without any lawful notice, Canadian court order, or DMCA counter-notice process being completed. I have caused a letter of complaint to be addressed to GitHub, Inc. regarding this suppression. GitHub has, to the date of swearing this Affidavit, failed to remove the block.
2. I have caused a search of the Internet Archive (Wayback Machine) to be conducted on 27 April 2026 against the URL pattern [github.com/flongo11/rvlongo-case*](http://web.archive.org/cdx/search/cdx?url=github.com/flongo11/rvlongo-case*). That search (via the CDX API at http://web.archive.org/cdx/search/cdx?url=github.com/flongo11/rvlongo-case*) returned **zero archived snapshots**. The availability API at <https://archive.org/wayback/available?url=github.com/flongo11/rvlongo-case> likewise returned an empty `archived_snapshots` object. The raw JSON response, saved as `wayback_cdx_flongo11_rvlongo-case.json` in the same folder as this Affidavit, is attached as **Exhibit C**.
3. That dual-null result — a public repository that existed and was crawled by ordinary public search engines, but which is absent from the Internet Archive entirely — is itself unusual and, in my belief, consistent with suppression of archival capture at or near the moment of the publication of the material adverse to Windsor Police Service personnel. It is in any event documentary of the fact that the repository is no longer publicly available and that no historical public-record version of it remains accessible through

ordinary archival channels. That fact itself supports the relief I seek: the Norwich Pharmacal Order sought in Application #04 expressly contemplates compelled production from GitHub, Inc. as an information custodian.

4. This platform-censorship fact pattern is pleaded, on my personal knowledge, as a live act within the Windsor Cartel Joint Enterprise. In plain language: when I tried to publish evidence of Windsor Police Service wrongdoing on the most widely used public-record code platform in the world, the platform made the evidence disappear.

VIII. PROCEDURAL AUTHORITIES I RELY UPON

1. For the joinder of plaintiffs (Rule 3-1(1)(a) and Rule 6-2 of the Supreme Court Civil Rules), I rely on *Western Canadian Shopping Centres Inc. v. Dutton*, 2001 SCC 46, by analogy for the proposition that where the individual interests of four claimants arise out of a common factual matrix and a common defendant-group, the lead-plaintiff structure is procedurally available. The related filing at Memorandum #13 elaborates this.
2. For the receipt of co-Plaintiff evidence at first appearance in the form of viva voce sworn declaration in lieu of pre-signed affidavit, I rely on Evidence Act (B.C.), R.S.B.C. 1996, c. 124, s. 17, and on BCSC Rule 12-5. The protocol is set out at Memorandum #12.

IX. RELIEF SOUGHT AND URGENCY

1. I respectfully ask this Honourable Court to grant the relief sought in the Notice of Civil Claim filed herewith, including the ancillary interlocutory relief (Mareva Injunction, Norwich Pharmacal Order, Anton Piller order, and preservation order) sought by the companion applications filed contemporaneously.
2. I depose to the urgency of the Mareva relief, in particular, on my personal knowledge of the Defendants' demonstrated capacity to move funds and to alter documentary records. I have observed that capacity in the Longo-side proceedings, in the Ceylan-side conduct chain, and in the GitHub suppression event described above. I believe, and verily so believe, that absent ex parte interlocutory relief in the 24-48 hour window the relief sought will be defeated by asset dissipation.

X. CLOSING

1. I make this Affidavit bona fide and for no improper purpose. I understand the oath I am about to take. I make this Affidavit for use in support of the Notice

of Civil Claim and the companion applications filed herewith, and for no other purpose.

[Option A – Commissioner execution]

SWORN (or AFFIRMED) before me at
the City of _____,
in the Province of British Columbia,
this ____ day of _____, 2026.

A Commissioner for taking Affidavits in
and for the Province of British Columbia

FRANCESCO GIOVANNI LONGO, Deponent

[Option B – Viva Voce in-court declaration]

Declared viva voce before the Honourable Justice _____,
Supreme Court of British Columbia, Vancouver Registry,
this ____ day of _____, 2026,
pursuant to Evidence Act (B.C.), R.S.B.C. 1996, c. 124, s. 17,
in open court.

FRANCESCO GIOVANNI LONGO, Deponent

Registrar / Clerk of the Court

EXHIBITS TO THIS AFFIDAVIT

Ex.	Description	Status
A	Longo-side Mareva roster excerpt — item A.5.07 (Hrvatín)	Held; to be tendered
B	Index of Ceylan Evidence Corpus (300+ recordings; Trifecta Audio Inventory; CEYLAN_EVIDENCE_BRIEF.md)	Attached by index; full corpus on request

Ex.	Description	Status
C	Wayback Machine CDX and availability API null-return for <code>github.com/flongo11/rvlongo-case*</code> , retrieved 27 April 2026	Attached (<code>wayback_cdx_flongo11_rvlongo-case.json</code>)
D	GitHub complaint-letter correspondence regarding repository suppression	Held; to be tendered
E	Separation Agreement of Raffi Ceylan and Ivana Hrvatin, November 2011, witnessed by Bart Seguin	Copy held; original execution contested

End of Affidavit of Francesco Giovanni Longo — approximately 2,700 words