

AFFIDAVIT OF LUCY CEYLAN

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 LUCY CEYLAN

(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 Lucy Ceylan

I, **LUCY CEYLAN**, of the City of Windsor, in the Province of Ontario, co-Plaintiff herein, MAKE OATH AND SAY AS FOLLOWS:

I. IDENTIFICATION AND CAPACITY

1. I am a co-Plaintiff in this action. I am the twin sister of the decedent **Raffi Ceylan** (also known as Rafi Ceylan, Rafael Salem, and Rocky Ceylan), who died at Island Lake Road, Chapleau, Ontario on 16 July 2016.
2. 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). I have personal knowledge of the matters deposed to below except where stated on information and belief, in which case I identify the source.

3. I am the principal fact witness in this matter. Together with my brother **Armin Ceylan** and our mother **Betty Salem**, I am a direct heir and beneficiary of the estate of Raffi Ceylan.

II. MY TWIN BROTHER AND THE ESTATE

1. Raffi Ceylan was my twin brother. We were born together, raised together, and remained close through adulthood. I have personal knowledge of the relationships, the financial arrangements, and the family history described below.
2. My brother was, at the time of his death, legally separated from the Defendant **Ivana Hrvatin** pursuant to a Separation Agreement executed in November 2011. That Agreement was prepared and witnessed by the Defendant **Bart Seguin**, partner of Shibley Righton LLP. Four (4) original counterparts were executed. I personally observed the execution of the Agreement. I have personally handled at least one original counterpart. The Agreement expressly excluded Hrvatin from any spousal share of my brother's assets and life-insurance proceeds.
3. The Defendant Seguin, after my brother's death, concealed the executed counterparts of the Separation Agreement from our family for a period of approximately eighteen (18) months. He furnished our family with only an unsigned copy and told us we would have to obtain a signed copy from Hrvatin herself — the very person excluded by the Agreement. I state this on my personal knowledge.
4. Within forty-eight (48) hours of my brother's death, Seguin attended at premises containing my brother's personal laptop and took possession of that device. He has not returned it. I state this on my personal knowledge.

III. THE SUN LIFE \$600,000+ TRANSFER

1. I have personal knowledge, through my own direct communications with agents of Sun Life Financial, that on or about **19 September 2016** — approximately sixty-five (65) days after my brother's death — Sun Life processed a transfer of funds in excess of CAD \$600,000 from policies on my brother's life to Hrvatin. The denomination of that transfer is **Canadian dollars (CAD)**, as confirmed by the lead Plaintiff Francesco Giovanni Longo's voice directive dated 27 April 2026, which I adopt.

2. I deposed earlier that I have personal knowledge of direct communications with Sun Life agents. Specifically, in recorded conversations the Sun Life agent **Bill Benson** stated to me and to members of our family on multiple occasions words to the effect: "Raffi died without a Will." That statement was, and is, false. Our family was in possession of an unsigned Last Will and Testament dated 11 November 2007 which is appended as Exhibit A to my prior statement in the Ontario estate file (CV-17-25300).
3. At timestamp 83:00 of one of the Benson recordings held by me, Benson made a further statement which I understood in context as an admission that the Will instrument relied upon to process the transfer to Hrvatin was a forgery. I preserve that recording on my personal devices and will produce it on the direction of this Court.
4. I have personal knowledge that a further Sun Life administrator, **Carmen Yip**, processed the actual mechanical transfer to Hrvatin on 19 September 2016.

IV. THE 300+ AUDIO CORPUS

1. I am the lawful custodian of more than three hundred (300) audio and video recordings evidencing the conduct pleaded in the Notice of Civil Claim. The recordings were made lawfully in circumstances in which I was a participant to the conversation; they are admissible under Canadian one-party-consent recording law.
2. Ninety-six (96) of those recordings are catalogued in a document called the Trifecta Audio Inventory held by the lead Plaintiff Francesco Giovanni Longo. The remainder are held on my personal devices and in cloud-storage accounts under my control. I will preserve the corpus in its entirety pending further order of this Court.

V. SGT. CHRIS RENAUD — WITNESS-INTIMIDATION THREAT

1. On a date I can identify from the file metadata on my recording archive, I attended on Sergeant **Chris Renaud** of the Windsor Police Service Fraud Unit to report elements of the conduct pleaded in the Notice of Civil Claim.
2. At **tape-time 12:20** on the recording of that meeting — a recording I preserve in my custody — Sgt. Renaud stated to me, in words I recall with clarity and which are captured verbatim on the recording: "There will be consequences." I understood his statement to be a direct threat that continuing my complaint to police would result in retaliation against me.
3. Following that meeting, Sgt. Renaud thereafter threatened me on further occasions with criminal-harassment charges if I continued to report the

estate and insurance frauds. Those further threats are also preserved on the audio record.

VI. DAN POTVIN – SABOTAGED UNDERTAKING

1. On a subsequent date, Superintendent **Dan Potvin** of the Windsor Police Service attended a conference call with me and with other members of my family. On that recorded call, Supt. Potvin undertook to obtain a copy of the Sun Life document relevant to the transfer to Hrvatin in unredacted form.
2. Supt. Potvin thereafter did not produce that document. The undertaking was, on my information and belief, deliberately sabotaged. I state this on my personal knowledge of the call and on my observation of what followed.
3. **Inspector Jill Lawrence** of the Windsor Police Service gave our family false legal advice in the same window. I state this on my personal knowledge.

VII. BART SEGUIN / SHIBLEY RIGHTON – CONCEALMENT AND CONFLICT

1. The Defendant Bart Seguin is a partner of the law firm **Shibley Righton LLP**. That firm was founded by the Defendant **Justice John Paul Howard**. Seguin represented, or held himself out as representing, an interest adverse to the Ceylan family in the Ontario estate matter despite having witnessed the Separation Agreement in 2011 and therefore having direct personal knowledge that Hrvatin was excluded.
2. The mediator appointed on the Ceylan estate matter was the Defendant **Mary Jo Nolan**. Nolan's husband, Brian Nolan, is a senior partner at Shibley Righton LLP. Nolan did not disclose that conflict. Within five to ten minutes of the commencement of the mediation, Nolan excluded me and my husband from the mediation room. I state this on my personal knowledge.

VIII. JUSTICE HOWARD – ONTARIO ESTATE PROCEEDINGS

1. The Ontario estate proceedings (CV-17-25300) were presided over by the Defendant Justice **John Paul Howard** of the Superior Court of Justice (Ontario). Justice Howard is the founder of Shibley Righton LLP.
2. I have personal knowledge that Justice Howard:
 - (a) stamped my brother's file on or about **9 August 2016**;
 - (b) issued an ink-stamped order dated **5 August 2017**; and

(c) issued a Time Table Order dated **3 October 2017**, a second version of which, bearing the date 5 October 2017, thereafter circulated.

1. I state on information and belief that the two-version anomaly in the Time Table Order evidences altered official documentation, and I will produce both versions to this Court on direction.

IX. THE AUTOPSY ANOMALIES

1. The autopsy on my brother was performed at Health Sciences North, Sudbury, on 18 July 2016. The pathologist was **Dr. David Cameron**. I have personal knowledge that Dr. Cameron's final report bears a signature date of **11 July 2016** — five (5) days before my brother's death on 16 July 2016. This temporal impossibility is on the face of the document.
2. Dr. Cameron transmitted the autopsy results to Hrvatin (via Seguin), not to me — my brother's twin sister. I state this on my personal knowledge. I was not notified of the autopsy results by the pathologist.
3. **Dr. Emily Groot** of the Office of the Chief Coroner ruled the death to be from "natural causes" on an "inducible cardiac arrhythmia" finding, and thereafter blocked my access to the underlying file. No strychnine testing was performed. The spinal cord and the vitreous humor were not tested. I state this on my personal knowledge and on the coroner-file documentation in my possession.

X. FAMILY FINANCES AND HRVATIN RELATIONSHIP

1. I have personal knowledge of my brother's family finances. The estate on which the Ontario proceeding was advertised is valued at approximately CAD \$9,000,000. The Hrvatin transfer of CAD \$600,000+ is the most immediately identifiable fraud-proceeds but it is not the entirety of the estate exposure.
2. I have personal knowledge that Hrvatin, notwithstanding the 2011 Separation Agreement, subsequently acted as Estate Trustee in the Ontario proceeding. That conduct is, on my understanding, itself perjurious.

XI. POST-DEATH CONDUCT BY NAMED DEFENDANTS

1. I have personal knowledge of post-death conduct by the following Defendants that I adopt as evidence for each pertinent ground pleaded in the Notice of Civil Claim:

(a) **Ivana Hrvatin** — receipt of the CAD \$600,000+ transfer; acting as Estate Trustee; non-return of the Separation Agreement counterparts;

- (b) **David Sundin (McTague LLP)** — tactical extensions on estate timelines; the 6 March 2017 email to co-Defendant Seguin (Exhibit C in my DiPietro statement); and the 17 September 2017 email correspondence;
- (c) **Bart Seguin (Shibley Righton LLP)** — eighteen-month concealment; laptop taking within 48 hours of death; social tie to Mayor Dilkens;
- (d) **Sgt. Chris Renaud (WPS)** — tape-time 12:20 threat; subsequent harassment-charge threats;
- (e) **Supt. Dan Potvin (WPS)** — conference-call undertaking and sabotage;
- (f) **Mary Jo Nolan** — conflicted mediation, five-to-ten-minute exclusion of me and my husband from the mediation room;
- (g) **Justice John Paul Howard (SCJ Ontario)** — the stamp pattern and Time Table Order two-version anomaly;
- (h) **Dr. David Cameron** — autopsy-report date predating the death;
- (i) **Dr. Emily Groot (OCC)** — natural-causes ruling and gatekeeping;
- (j) **Bill Benson (Sun Life)** — forgery-admission statement at 83:00 and repeated false "no Will" statements;
- (k) **Carmen Yip (Sun Life)** — mechanical processing of the 19 September 2016 transfer.

XII. THE WINDSOR CARTEL JOINT ENTERPRISE — MY OBSERVATIONS

1. I have personally observed the political-capture continuity pleaded in the Notice of Civil Claim. Specifically:

- (a) I have observed public statements of Mayor **Drew Dilkens** in his capacity as chair of the Windsor Police Services Board at the time of the appointment of Chief **Jason Bellaire** on 29 November 2022. Dilkens's publicly-reported statement that there was "widespread comfort" with Bellaire is a matter of public record I have read.
- (b) I have personal knowledge, from Francesco Longo's account to me, of Bellaire's presence on or about 3 May 2021 at the Amherstburg, Ontario address in the lead-up to the Kijiji-sting arrest that Longo has documented. I rely on Longo's direct testimony for that fact.
- (c) I have personal knowledge that the Defendants named in my Affidavit — Seguin, Renaud, Potvin, Lawrence, Nolan, Howard, Benson, Yip, Hrvatin —

operate within a tight geographic and institutional perimeter centred on Windsor and on the Shibley Righton / Sun Life / Windsor Police Service / Windsor Police Services Board triangle.

1. I plead, and I depose, that this is one joint enterprise, not a sequence of coincidences.

XIII. CLOSING

1. I make this Affidavit bona fide and for no improper purpose. I make it 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

LUCY CEYLAN, 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.

LUCY CEYLAN, Deponent

Registrar / Clerk of the Court

EXHIBITS TO THIS AFFIDAVIT

Ex.	Description
A	Unsigned Last Will and Testament of Raffi Ceylan, dated 11 November 2007 (Exhibit A to prior Ontario DiPietro statement)
B	Separation Agreement of Raffi Ceylan and Ivana Hrvatin, November 2011 (copy; signed counterparts at issue)
C	Recording of Sgt. Chris Renaud — tape-time 12:20 "there will be consequences"
D	Recording of Bill Benson (Sun Life) — 83:00 forgery-admission timestamp
E	Recording of Supt. Dan Potvin conference call — undertaking / sabotage
F	Trifecta Audio Inventory — index of 96 catalogued recordings (balance of 300+ held on Deponent's devices)
G	Autopsy final report of Dr. David Cameron, signed 11 July 2016 (predating death 16 July 2016)
H	Time Table Order of Justice John Paul Howard dated 3 October 2017 and the 5 October 2017 second-version counterpart

End of Affidavit of Lucy Ceylan — approximately 2,200 words