

AFFIDAVIT OF ARMIN 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 ARMIN 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 Armin Ceylan

I, **ARMIN CEYLAN**, presently in custody 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 brother of **Raffi Ceylan** (also known as Rafi Ceylan, Rafael Salem, and Rocky Ceylan), who died at Island Lake Road, Chapleau, Ontario on 16 July 2016. I am the brother of **Lucy Ceylan**, the co-Plaintiff and Raffi's twin sister. Our mother, **Betty Salem**, is also a co-Plaintiff.

2. I am presently detained in a correctional facility in the Province of Ontario. I state, on my personal knowledge, that I hold the reasonable belief — and the documentary basis to substantiate that belief — that my detention is connected to, and in retaliation for, my involvement in the estate-fraud and police-misconduct complaints that form the factual matrix of this action.
3. I swear this Affidavit in support of the Notice of Civil Claim and the companion 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.
4. Where my detention at the time of swearing operates as a practical barrier to the ordinary in-person administration of the oath, I adopt the alternate protocol set out in Filing #12 (Viva Voce Declaration Protocol Memorandum) and, in the further alternative, acknowledge that my co-Plaintiff sister Lucy Ceylan may attend as next-friend for procedural service of this Affidavit under Rule 20-3 of the Supreme Court Civil Rules.

II. THE 250-PAGE EVIDENCE PACKAGE

1. I hold, or have held, a 250-page evidence package documenting the estate-fraud and related misconduct described by my sister Lucy Ceylan and by the lead Plaintiff Francesco Giovanni Longo in their respective Affidavits in this action. That package covers, among other items, the Sun Life \$600,000+ transfer of 19 September 2016 to the Defendant Hrvatin, the Separation Agreement of November 2011 witnessed by the Defendant Seguin, and the Ontario estate proceeding CV-17-25300.
2. I have sought to use that evidence package in my own detention proceedings. I am informed by my sister and verily believe that the Crown attorney on my file — Ashley Dale — has refused to permit me to use that package in my own defence. I state this on my personal knowledge of my own dealings with her office.

III. FAMILY FINANCES AND RAFFI'S ESTATE — MY PERSONAL KNOWLEDGE

1. I have personal knowledge of my brother Raffi's finances arising from my relationship with him during his lifetime. I have personal knowledge that he held life-insurance policies with Sun Life Financial. I have personal knowledge that he and the Defendant Hrvatin were, at the time of his death, legally separated under a Separation Agreement executed in November 2011.

2. I have personal knowledge that the aggregate estate value at issue in the Ontario proceeding CV-17-25300 is in the range of CAD \$9,000,000, of which the Sun Life transfer of CAD \$600,000+ to the Defendant Hrvatin is the most directly traceable fraud-proceeds element.
3. I have personal knowledge, derived from my own observations of my brother's household and affairs in the years preceding his death, that the Defendant Hrvatin had no lawful expectancy of benefit from his life-insurance policies post-separation, and that the 19 September 2016 transfer is therefore without any colour of right.

IV. HRVATIN BENEFICIARY DESIGNATION DISPUTE

1. I have personal knowledge that, following my brother's death, the Defendant Hrvatin represented herself as Estate Trustee notwithstanding the exclusionary Separation Agreement. I state this on the basis of my own observations of her conduct and of documents that were made available to me through my sister Lucy Ceylan.
2. I have personal knowledge that the Sun Life agent **Bill Benson**, on multiple occasions communicated to our family, stated in substance that "Raffi died without a Will." I state this on my personal knowledge from conversations at which I was present and on the recordings in my sister's custody.

V. POST-DEATH CONDUCT BY THE NAMED DEFENDANTS — MY OBSERVATIONS

1. I have personal knowledge, or well-grounded belief supported by the documentary record, of the following post-death conduct by the Defendants named in the Notice of Civil Claim:
 - (a) The Defendant **Bart Seguin** (Shibley Righton LLP) concealed the executed counterparts of the November 2011 Separation Agreement from our family for approximately eighteen (18) months. I state this on my personal observation of the family response to Seguin's disclosures and on what my sister Lucy and my mother Betty relayed to me from their own direct dealings with Seguin.
 - (b) The Defendant **Sun Life Assurance Company of Canada** processed the CAD \$600,000+ transfer to Hrvatin on 19 September 2016. I rely on the documentary record now held by my sister Lucy Ceylan and by the lead Plaintiff Longo.
 - (c) The Defendant **Mary Jo Nolan** presided as mediator on the Ceylan estate matter notwithstanding the undisclosed conflict that her husband, Brian Nolan, is a senior partner at Shibley Righton LLP — the same firm that employed the Defendant Seguin. I rely on the matter documents now held by my sister.

(d) The Defendant **Justice John Paul Howard** presided over the Ontario estate proceeding CV-17-25300 notwithstanding that the same firm he founded (Shibley Righton LLP) was materially involved in the estate conduct chain. I rely on the court record.

(e) The Defendant **Sgt. Chris Renaud** (Windsor Police Service Fraud Unit) threatened my sister Lucy at tape-time 12:20 on a recording held by her — "there will be consequences" — after she attempted to report the conduct described above to the Windsor Police Service.

1. On the basis of the foregoing, and on my own personal observations of the pattern of conduct that followed my brother's death, I adopt the position pleaded in the Notice of Civil Claim that the conduct constitutes a continuing joint enterprise (the Windsor Cartel Joint Enterprise) and that the named Defendants are jointly and severally liable for the resulting harm to our family.

VI. MY OWN DETENTION AS A DATA POINT

1. I state, on my personal knowledge, that the charges under which I am presently detained arise against the backdrop of, and concurrently with, the estate-fraud and police-misconduct complaints described above. I do not invite this Honourable Court to adjudicate those charges; they are the subject of separate proceedings. I depose to them only as a data point in the joint-enterprise pattern: co-Plaintiffs to Ceylan-side estate-fraud complaints have, as a class, been subjected to retaliatory criminal process.

2. Specifically, the pattern that I have observed includes:

(a) Sgt. Renaud's repeated threats to my sister Lucy of criminal-harassment charges for continuing to make police reports;

(b) My own detention under charges that the Crown has prevented me from contesting with the 250-page evidence package in my possession; and

(c) The Longo-side 2021 Kijiji-sting arrest documented by the lead Plaintiff Francesco Giovanni Longo.

1. Those three datapoints, to my mind, establish that the Windsor Cartel Joint Enterprise engages in the pattern of converting complainants into accused as a feature of its operation.

VII. THE WINDSOR CARTEL JOINT ENTERPRISE — FAMILY-NETWORK INFRASTRUCTURE

1. I further have personal knowledge, on information and belief, of the family-network infrastructure through which the Defendants coordinate:

(a) The Defendant Supt. **Dan Potvin** (WPS) and the civilian **Jim Potvin**, related as cousins, both operate within the Windsor-local institutional perimeter;

(b) The Defendant **Justice John Paul Howard** founded Shibley Righton LLP, of which the Defendant **Bart Seguin** is a partner, and whose senior partner Brian Nolan is the husband of the Defendant mediator **Mary Jo Nolan**;

(c) The Defendant Mayor **Drew Dilkens** chairs the Windsor Police Services Board and announced the promotion of the Defendant Chief **Jason Bellaire** on 29 November 2022; and

(d) Former Mayor **Eddie Francis** "passed the baton" of the mayoralty to Dilkens in October 2014, evidencing political-capture continuity.

1. Those overlapping institutional relationships, each independently established on the documentary record, constitute the infrastructure of the joint enterprise pleaded at Part 3, Ground 13 of the Notice of Civil Claim.

VIII. 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.

2. I adopt the Affidavits of the co-Plaintiffs Francesco Giovanni Longo (Filing #05), Lucy Ceylan (Filing #06), and Betty Salem (Filing #08), to the extent they are not in conflict with my own.

[Option A — Commissioner execution, in-facility]

SWORN (or AFFIRMED) before me at
the institution at _____,
in the Province of Ontario (remote commissioning into British Columbia pursuant
to Rule 22-2(13) or by video-link),
this ____ day of _____, 2026.

A Commissioner for taking Affidavits (remote / video-link execution)

ARMIN CEYLAN, Deponent

[Option B – Viva Voce in-court declaration (including video-link from the correctional facility)]

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 and Rule 12-5 of the
Supreme Court Civil Rules,
the Deponent appearing by video-link from the Ontario institution.

ARMIN CEYLAN, Deponent

Registrar / Clerk of the Court

EXHIBITS TO THIS AFFIDAVIT

Ex.	Description
A	250-page Evidence Package on the Raffi Ceylan / Rafael Salem estate fraud, compiled by the Deponent, held by co-Plaintiff Lucy Ceylan pending release
B	Copy of Separation Agreement of Raffi Ceylan and Ivana Hrvatin, November 2011 (unsigned counterpart as provided by Seguin)
C	Sun Life beneficiary-designation/transfer records of 19 September 2016, to the extent in Deponent's knowledge

End of Affidavit of Armin Ceylan — approximately 1,800 words