

# **AFFIDAVIT OF BETTY CEYLAN**

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**IN THE SUPREME COURT OF BRITISH COLUMBIA**

**VANCOUVER REGISTRY**

**NO.** \_\_\_\_\_

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**BETWEEN:**

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

PLAINTIFFS

**AND:**

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

DEFENDANTS

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## **AFFIDAVIT OF BETTY CEYLAN**

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(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 Betty Ceylan**

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I, **BETTY 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 mother of **Raffi Ceylan** (also known as Rafi Ceylan), who died at Island Lake Road, Chapleau, Ontario, on 16 July 2016. I am the mother of the co-Plaintiffs **Lucy Ceylan** (Raffi's twin sister) and **Armin Ceylan** (Raffi's brother).
2. 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.
3. I am a direct heir and beneficiary of the Estate of Raffi Ceylan. My standing to sue arises as of that status and as his mother.

## **II. RAFFI'S DEATH — 16 JULY 2016 AT CHAPLEAU**

1. My son Raffi Ceylan died on 16 July 2016 at Island Lake Road, Chapleau, Ontario. The time of death pronounced was 16:33. An autopsy was performed at Health Sciences North, Sudbury, on 18 July 2016.
2. I received no advance notification from any agency or medical practitioner prior to my son's death. I was not permitted any meaningful participation in the coroner-file process that followed. I state these facts on my personal knowledge.
3. I am aware, from documents and recordings in the custody of my daughter Lucy Ceylan and the lead Plaintiff Francesco Giovanni Longo, that the autopsy report authored by Dr. **David Cameron** bears a signature date of 11 July 2016 — five (5) days before my son's death. I have seen that report. That temporal impossibility is on the face of the document.

### **III. THE 2011 SEPARATION AGREEMENT AND HRVATIN**

1. I have personal knowledge that my son Raffi and the Defendant **Ivana Hrvatin** separated in 2011 and executed a Separation Agreement in November 2011, witnessed by the Defendant **Bart Seguin**, partner of Shibley Righton LLP. Four (4) original counterparts were executed.
2. I have personal knowledge, both from my own observation of my son's life and from the text of the Separation Agreement itself, that the Agreement expressly excluded Hrvatin from any spousal benefit, including from any life-insurance proceeds on my son's life.
3. Following my son's death, the Defendant Seguin concealed the executed counterparts of that Separation Agreement from our family for approximately eighteen (18) months. He provided our family with only an unsigned copy and directed us to obtain the signed copy from Hrvatin herself. I personally dealt with Seguin during this period. I repeatedly requested the signed counterparts. I was repeatedly refused.

### **IV. THE SUN LIFE \$600,000+ TRANSFER — MY PERSONAL KNOWLEDGE**

1. I have personal knowledge, through communications involving Sun Life Financial representatives and through the documentary record in our family's possession, that Sun Life Financial processed a transfer exceeding CAD \$600,000 to the Defendant Hrvatin on or about 19 September 2016 — approximately sixty-five (65) days after my son's death. The denomination is Canadian dollars, as confirmed by the lead Plaintiff Francesco Giovanni Longo's voice directive dated 27 April 2026, which I adopt.
2. I have personal knowledge of the Sun Life agent **Bill Benson**. Mr. Benson, on multiple occasions when I was present or when I spoke to him directly, stated 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. I have personally seen and held that document.

3. I have personal knowledge, from conversations I have had with my daughter Lucy in which she has played back portions of her recordings, that Mr. Benson made a further statement at timestamp 83:00 of one such recording which my daughter and I understood to amount to an admission that the Will-instrument relied upon by Sun Life to effect the transfer to Hrvatin was a forgery.

## **V. HRVATIN'S RELATIONSHIP TO MY SON**

1. I have personal knowledge of the Defendant Hrvatin's relationship to my son. She was his estranged spouse at the time of his death. She had not cohabited with him for a period exceeding that required to dissolve any common-law presumption. She had no lawful expectancy of benefit from his life-insurance policies or his estate in light of the executed 2011 Separation Agreement.
2. Notwithstanding the foregoing, Hrvatin subsequently represented herself as Estate Trustee in the Ontario estate proceeding CV-17-25300. I state that on my personal knowledge of the Ontario proceeding as one of the surviving next-of-kin.

## **VI. POST-DEATH CONDUCT BY THE NAMED DEFENDANTS — PATTERN I OBSERVED**

1. In the months and years following my son's death I have personally observed, and been personally subjected to, the following conduct by Defendants named in the Notice of Civil Claim:

(a) **Bart Seguin (Shibley Righton LLP)**: concealment of the Separation Agreement counterparts for approximately eighteen (18) months; refusal to return my son's laptop after taking possession of it within 48 hours of the death.

(b) **David Sundin (McTague LLP)**: tactical extensions on the estate timelines that had the effect of running the clock on our family's attempts to challenge the Hrvatin transfer.

(c) **Mary Jo Nolan**: a mediation on the estate that was terminated within five to ten minutes by her excluding my daughter Lucy and her husband from the mediation room, conducted in circumstances where Nolan did not disclose that her husband is a senior partner at Shibley Righton LLP.

(d) **Justice John Paul Howard**: presided over the Ontario estate proceeding involving the same firm he founded, stamped my son's file beginning 9 August 2016, issued an ink-stamped order dated 5 August 2017, and issued a Time Table Order of 3 October 2017 that later circulated in a differently-dated 5 October 2017 version.

(e) **Sgt. Chris Renaud (Windsor Police Service, Fraud Unit)**: threatened my daughter Lucy on the police record at tape-time 12:20 with words to the effect "there will be consequences", after she sought to report the conduct described above; he thereafter threatened her with criminal-harassment charges for continuing to make police reports.

(f) **Supt. Dan Potvin (WPS)**: made an undertaking on a recorded conference call to obtain the Sun Life transfer document unredacted, and thereafter sabotaged that undertaking.

(g) **Bill Benson (Sun Life)**: repeatedly stated to our family that my son died without a Will — a statement I know to be false, and in respect of which Benson made a further on-tape statement at 83:00 which my daughter and I understood as an admission of forgery.

(h) **Carmen Yip (Sun Life)**: processed the 19 September 2016 transfer.

(i) **Dr. David Cameron (pathologist)**: signed the autopsy report five days before my son's death and transmitted the autopsy results to Hrvatin via Seguin rather than to me or to my daughter Lucy.

(j) **Dr. Emily Groot (Office of the Chief Coroner)**: ruled the death from "natural causes" on an "inducible cardiac arrhythmia" finding; no strychnine test was performed; the spinal cord was not examined; the

vitreous humor was not tested; I was blocked, through her office, from meaningful access to the underlying coroner file.

## **VII. POTVIN CORRESPONDENCE**

1. Between 2017 and 2019 I corresponded from time to time with the Defendant Supt. **Dan Potvin** of the Windsor Police Service regarding my son's estate and the Sun Life transfer. Copies of that correspondence are in our family's possession and are available to the Court on direction. My recollection is that Supt. Potvin never produced the unredacted Sun Life document he had undertaken on the recorded conference call to produce.
2. I similarly corresponded from time to time with the Defendant attorneys **David Sundin** and **Bart Seguin**. Those communications form part of the documentary record at Exhibit C to my daughter Lucy Ceylan's prior Ontario DiPietro statement.

## **VIII. DAMAGE TO ME AS MOTHER**

1. I have suffered, and continue to suffer, profound grief and emotional harm arising from:
  - (a) The loss of my son Raffi Ceylan on 16 July 2016;
  - (b) The subsequent diversion of CAD \$600,000+ from his estate to a person legally excluded from any such benefit;
  - (c) The obstruction of our family's legitimate investigation of his death and of the circumstances surrounding his estate; and
  - (d) The detention of my living son Armin Ceylan in circumstances our family believes to be retaliatory.
1. I adopt the damages sought at Part 1, paragraph 42, and Part 2 of the Notice of Civil Claim, including in particular the wrongful-death-adjacent damages sought under the Family Compensation Act, R.S.B.C. 1996, c. 126, and the Negligence Act, R.S.B.C. 1996, c. 333, for loss of guidance, care, and companionship.

## **IX. 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 Armin Ceylan (Filing #07), to the extent they are not in conflict with my own.
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### **[Option A – Commissioner execution]**

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

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

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**BETTY CEYLAN**, Deponent

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### **[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.

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**BETTY CEYLAN**, Deponent

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Registrar / Clerk of the Court

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## **EXHIBITS TO THIS AFFIDAVIT**

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<b>Ex.</b>	<b>Description</b>
A	Unsigned Last Will and Testament of Raffi Ceylan dated 11 November 2007
B	Correspondence between Deponent and Supt. Dan Potvin, 2017-2019
C	Correspondence between Deponent and David Sundin / Bart Seguin, 2016-2018
D	Autopsy final report of Dr. David Cameron, signed 11 July 2016
E	Coroner-file correspondence with the Office of the Chief Coroner / Dr. Emily Groot

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End of Affidavit of Betty Ceylan — approximately 1,900 words