

**DRAFT ORDER — NORWICH
PHARMACAL (COMPELLED
DISCLOSURE)**

IN THE SUPREME COURT OF BRITISH COLUMBIA

VANCOUVER REGISTRY

NO. _____

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)

DEFENDANTS

**ORDER (NORWICH PHARMACAL —
COMPELLED DISCLOSURE FROM
INFORMATION CUSTODIANS)**

MADE BEFORE: The Honourable Justice _____

DATE: ____ day of _____, 2026

ON THE APPLICATION of the Plaintiffs, brought pursuant to the inherent jurisdiction of this Court and the principles established in

Norwich Pharmacal Co. v. Commissioners of Customs and Excise, [1974] A.C. 133 (H.L.), as adopted by the Supreme Court of Canada in GEA Group AG v. Flex-N-Gate Corporation, 2009 ONCA 619 (leave refused), and as applied in British Columbia in Kenney v. Loewen, 1999 CanLII 6110 (B.C.S.C.) and subsequent authorities;

AND ON READING the Notice of Civil Claim, the Notice of Application for Norwich Pharmacal Order (Application #04), and the Affidavits of Francesco Giovanni Longo, Lucy Ceylan, Armin Ceylan, and Betty Ceylan sworn in support;

AND ON HEARING the lead Plaintiff;

AND FINDING that:

- The Plaintiffs have an arguable case against the Defendants on the merits pleaded;
- Each Information Custodian identified in Schedule A below is either **mixed up** with the wrongdoing, or was an innocent bystander with knowledge relevant to identifying further wrongdoers and assets;
- The information sought is **necessary** for the Plaintiffs to trace, recover, and preserve the fraud proceeds;
- The information cannot be obtained by any less intrusive means; and
- The interests of justice favour disclosure;

THIS COURT ORDERS THAT:

1. Compelled Disclosure — Information Custodians

1.1 Each of the twenty (20) Information Custodians identified in **Schedule A** to this Order **shall**, within twenty-one (21) days after service of this Order upon them, produce to the Plaintiffs complete, certified, unredacted copies of the records set out at **Schedule B** to this Order, insofar as those records relate to:

(a) the Defendant **Ivana Hrvatin** (also known as Ivana Salem and Ivana Ceylan);

(b) the Estate of **Raffi Ceylan** (also known as Rafi Ceylan) in Ontario Estate File 2017-036367;

(c) Sun Life Assurance Company of Canada policies on the life of the decedent and the beneficiary transfer of on or about **19 September 2016** in excess of **CAD \$600,000**;

(d) any law-firm trust account balances, movements, or instructions relating to the foregoing; and

(e) any insurance policy or policy balance touching the Raffi Ceylan estate, the Windsor Police Service (professional liability), Shibley Righton LLP (solicitor professional indemnity), McTague LLP (same), or LawPRO (primary insurer to Ontario-licensed lawyers).

1.2 The compelled disclosure under paragraph 1.1 extends to the period commencing **1 January 2016** and continuing to the date of production.

2. Form of Production

2.1 Production shall be made in native digital format wherever available, with accompanying printed certified copies where digital format is not available.

2.2 Each Information Custodian shall accompany its production with a sworn certificate of a records custodian identifying the records, certifying their completeness, and identifying any records withheld on any ground of privilege (with a Claims-of-Privilege Schedule sufficient to support a privilege claim under Rule 7-1(6) of the Supreme Court Civil Rules).

3. Confidentiality Ring

3.1 The records produced under this Order shall be received into a **Confidentiality Ring** comprising:

(a) the Plaintiffs;

(b) any lawyer retained by the Plaintiffs in this action (if and when retained); and

(c) such forensic accountants, forensic-document examiners, and investigators as the Plaintiffs may retain with prior written notice to the Court.

3.2 Persons inside the Confidentiality Ring shall not disclose the records or their contents to any person outside the Ring without prior written order of the Court.

3.3 The Confidentiality Ring does not prevent use of the records in open court in this proceeding or in any related proceeding identified in paragraph 4.1 below, subject to any subsequent sealing order made on proper application.

4. Use — Joint-Enterprise and Cross-Matter

4.1 Records produced under this Order may be used by the Plaintiffs in:

(a) this proceeding;

(b) any parallel civil proceeding in any Canadian jurisdiction involving overlapping subject-matter of the Windsor Cartel Joint Enterprise pleaded in the Notice of Civil Claim; and

(c) the Longo-side proceedings referenced in the Affidavit of Francesco Giovanni Longo (MDFL 8:05-cr-263-T-17MSS and SCJ 05-CR-573), to the extent reception in those proceedings is procedurally permissible.

5. Costs of Production

5.1 Each Information Custodian's reasonable costs of production are **reserved** for determination upon delivery of the production and a statement of costs.

5.2 The Plaintiffs, being indigent and self-represented, invite the Court to direct that the costs of production be treated as costs in the cause.

6. Non-Tipping-Off

6.1 Each Information Custodian shall **not notify** the Defendant Hrvatin, or any other Defendant identified in the Notice of Civil Claim,

of the existence or terms of this Order or of the fact of production until seven (7) days after delivery of the production to the Plaintiffs.

6.2 This non-tipping-off provision is ancillary to, and reinforces, the Mareva Injunction granted contemporaneously (Filing #09).

7. Liberty to Apply

7.1 Any Information Custodian may apply, on 48 hours' notice to the Plaintiffs, to vary or discharge this Order on any ground, including:

- (a) claim of privilege;
- (b) statutory or regulatory constraint on disclosure;
- (c) cost-sharing arrangement;
- (d) form or timing of production.

8. Costs of Application

8.1 Costs reserved.

THE HONOURABLE JUSTICE _____

SCHEDULE A – INFORMATION CUSTODIANS (20)

A.1 Schedule I Banks (Canadian)

1. **Bank of Montreal (BMO)** · 129 Saint Clair Avenue West,
Toronto, ON M5V 1J3 · c/o Office of the General Counsel
2. **The Bank of Nova Scotia (Scotiabank)** · 44 King Street West,
Toronto, ON M5H 1H1 · c/o Office of the General Counsel
3. **Canadian Imperial Bank of Commerce (CIBC)** · 199 Bay
Street, Toronto, ON M5L 1A2 · c/o Legal Services

4. **Royal Bank of Canada (RBC)** · Royal Bank Plaza, 200 Bay Street, Toronto, ON M5J 2J5 · c/o Office of the General Counsel
5. **Toronto-Dominion Bank (TD)** · 66 Wellington Street West, Toronto, ON M5K 1A2 · c/o Office of the General Counsel
6. **National Bank of Canada** · 600 De La Gauchetière Ouest, Montréal, QC H3B 4L2 · c/o Legal Services

A.2 Schedule II Banks / Credit Unions / Specialty Deposit Takers

1. **HSBC Bank Canada** · 885 West Georgia Street, Suite 300, Vancouver, BC V6C 3E9 · c/o Office of the General Counsel
2. **Desjardins Group (Fédération des caisses Desjardins du Québec)** · 100 Des Commandeurs, Lévis, QC G6V 7N5 · c/o Legal
3. **Meridian Credit Union** · 75 Corporate Park Drive, St. Catharines, ON L2S 3W3 · c/o General Counsel
4. **Libro Credit Union** · 217 York Street, London, ON N6A 5P9 · c/o General Counsel
5. **Alterna Savings and Credit Union** · 842 Thurlow Street, Vancouver, BC V6E 1W2 (for BC branch service) · c/o General Counsel
6. **Tangerine Bank** · 3389 Steeles Avenue East, Toronto, ON M2H 0A1 · c/o Legal

A.3 Life Insurers and Related

1. **Sun Life Assurance Company of Canada** · 1 York Street, Toronto, ON M5J 0B6 · c/o Office of the General Counsel (primary custodian; the originating carrier)
2. **Manulife Financial Corporation (The Manufacturers Life Insurance Company)** · 200 Bloor Street East, Toronto, ON M4W 1E5 · c/o General Counsel
3. **Canada Life Assurance Company** · 100 Osborne Street North, Winnipeg, MB R3C 1V3 · c/o General Counsel
4. **Industrial Alliance (iA Financial Group)** · 1080 Grande Allée Ouest, Québec, QC G1K 7M3 · c/o Legal
5. **RBC Insurance Holdings Inc.** · 6880 Financial Drive, Mississauga, ON L5N 7Y5 · c/o General Counsel

6. **LawPRO (Lawyers' Professional Indemnity Company)** · 250 Yonge Street, Suite 3101, Toronto, ON M5B 2L7 · c/o General Counsel

A.4 Law Firms (Trust Account Custodians)

1. **Shibley Righton LLP** · 250 University Avenue, Suite 700, Toronto, ON M5H 3E5 · c/o Managing Partner (trust account for Raffi Ceylan estate file)
2. **McTague LLP** · 456 Ouellette Avenue, Suite 700, Windsor, ON N9A 1B2 · c/o Managing Partner (trust account for Raffi Ceylan estate file; David Sundin file)

A.5 Empire Life — Pass 4 Second-Policy Custodian (per Exhibit 15)

1. **Empire Life Financial Corporation** · 259 King Street East, Kingston, ON K7L 3A8 · c/o Office of the General Counsel (second insurance policy on the life of Raffi Ceylan; all policy, claim, beneficiary, and premium records from 1 January 2010 onward per Exhibit 15 § 5)

A.6 Coroner and Forensic Custodians — Pass 4 Additions (per Exhibit 16)

1. **Office of the Chief Coroner of Ontario** · 25 Morton Shulman Avenue, Toronto, ON M3M 0B1 · c/o Office of the General Counsel (complete file for Coroner Case 2016-8196 including all internal correspondence of Dr. Cameron, Dr. Queen, Emily Groot, and any other officer; Form 3 originals; autopsy protocol; the 28 coroner-file screenshot exhibits in native resolution)
2. **Centre of Forensic Sciences (Ontario)** · 25 Morton Shulman Avenue, Toronto, ON M3M 0B1 · c/o Office of the General Counsel (complete file for CFS Toxicology Case 2016-0001036 including all analyte panels, sample inventory, chain-of-custody records, and any internal correspondence regarding the non-testing of strychnine and non-examination of spinal-cord and vitreous-humor tissue)

SCHEDULE B — RECORDS TO BE PRODUCED

For each Information Custodian, insofar as within its custody or control:

1. All accounts, policies, contracts, trusts, mortgages, guarantees, and contractual relationships with the Defendant **Ivana Hrvatin** (including any married-name variants on record).
2. All accounts, policies, contracts, trusts, mortgages, and contractual relationships with or referencing the Estate of **Raffi Ceylan** (also known as Rafi Ceylan).
3. All beneficiary-designation records (original, amended, and substituted) on any life-insurance policy on Raffi Ceylan with any named Information Custodian.
4. All transactional records of the Sun Life transfer to Hrvatin on or about 19 September 2016 — inbound, outbound, confirmations, swift/wire advices, cheque images.
5. All transactional records of any subsequent transfer, investment, roll-over, withdrawal, or deposit associated with the funds from item 4, to the present date.
6. All account-opening records, KYC / AML files, source-of-funds attestations, and beneficial-ownership declarations on any account associated with items 1-5.
7. All internal communications (email, memo, call-log, AML-flag, fraud-flag) referencing Raffi Ceylan, Ivana Hrvatin, or the 19 September 2016 transfer.
8. All trust-account ledgers, file-opening memoranda, client-identification forms, and retainer records at Shibley Righton LLP and McTague LLP referencing the Raffi Ceylan estate.
9. All policy files, claim files, and professional-indemnity notice files at LawPRO referencing Bart Seguin, David Sundin, Mary Jo

Nolan, Brian Nolan, or Shibley Righton LLP / McTague LLP in connection with the Raffi Ceylan estate.

10. All crypto-asset or digital-asset balances, transfer records, and KYC files at the named custodians (Coinbase Canada, Coinsquare, NDAX, BitBuy, Kraken, and any other custodian identified by subsequent amendment to this Order) associated with Hrvatin or the Ceylan estate.
11. Any records relating to insurance carriers providing professional-indemnity or general-liability cover to the **Windsor Police Service**, the **Windsor Police Services Board**, or any named individual Defendant in the period 2016 to the date of this Order, insofar as those records touch the Ceylan matter.

11A. **Empire Life specific production** (addressed to Information Custodian #21 only): the complete Empire Life policy file for any contract naming Raffi Ceylan as insured, owner, payor, or beneficiary, including face value, beneficiary-designation history, premium-payment history, claim file (if any), payout ledger (payee, destination bank, date), lapse or unclaimed-property referral, and all internal AML/fraud-flag correspondence, per Exhibit 15 § 5.

11B. **Coroner and CFS specific production** (addressed to Information Custodians #22 and #23 only): the complete coroner and toxicology files for Case 2016-8196 / CFS 2016-0001036 including all autopsy documentation, Form 3 originals (signed and unsigned pages), internal correspondence of the examining pathologists and coroner-office officers, the 28 coroner-file screenshot exhibits in their native resolution, and any redacted or withheld material currently held on claim of privilege, per Exhibit 16.

1. The identity of every other information custodian known to the Information Custodian as holding records within Schedule B items 1-11 above ("onward-disclosure" chain).

End of Draft Order — Norwich Pharmacal (Compelled Disclosure).
Confidentiality ring applies on production.