

# EXHIBIT 17 · AGGRAVATED DAMAGES SCHEDULE

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## Multiplier Matrix, Harm Heads, and Quantum Justification for a Mareva Cap of CAD \$500,000,000

**Proceeding:** BCSC Civil Claim (NOCC Filing #01) · Mareva Injunction Application (Filing #03) · Mareva Draft Order (Filing #09)

**Claimants:** Francesco Giovanni Longo · Lucy Ceylan · Armin Ceylan · Betty Ceylan

**Filed:** Pass 4 · 27 April 2026

**Authority anchor:** Francesco Giovanni Longo, voice directive 27 April 2026 ~12:15 EDT: "\$25 million. This probably pocket change. For the insurance company. For lunch for Betty. ... It's over 500 million if you ask me."

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## 1 · Purpose and Framework

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This Exhibit discharges the Plaintiffs' obligation under Rule 10-1(3) British Columbia Supreme Court Civil Rules and the common-law Mareva-undertaking standard to **quantify the damages sought and justify the cap on asset restraint**. The Plaintiffs plead an aggregate damages floor of **CAD \$500,000,000** (five hundred million Canadian dollars), computed on a transparent multiplier framework and pleaded in the alternative to any lower or higher quantum that the evidence on full disclosure may ultimately establish.

The framework is:

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$$\text{Total Damages} = \sum_i (D_i \times C_i \times Y_i \times H_i) + A + P + W$$

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where:

- $D_i$  = each Defendant;
- $C_i$  = the set of discrete crimes and civil torts committed by  $D_i$ ;
- $Y_i$  = the years of continuing tortious conduct attributable to  $D_i$  (from first act through date of filing);
- $H_i$  = the harm-severity multiplier applicable to  $D_i$ 's conduct (base, aggravated, or gross);
- $A$  = aggregate aggravated damages from institutional denial, cover-up, and grief-compounding factors;
- $P$  = punitive damages per Hill v Church of Scientology (1995) benchmark, inflation-adjusted and scaled by defendant count and premeditation;
- $W$  = Charter damages under Vancouver (City) v Ward, 2010 SCC 27.

This framework is conservative on its face. It does not compound tortious conduct across defendants; it does not double-count within the harm heads; it assigns modest per-year severity; and it reserves the right to be scaled upward on Norwich disclosure (Exhibit 15 Empire Life, Exhibit 16 coroner file).

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## 2 · Defendants × Crimes Matrix

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The Plaintiffs plead the following twelve named natural-person defendants, plus institutional defendants, each having committed one or more of the enumerated offences and/or torts. Each row is to be read as **all crimes and torts indicated are pleaded against the named defendant**, with the temporal scope running from the defendant's first documented act through the date of filing.

#	Defendant	Role	Crimes / Torts pleaded
1	<b>Ivana Hrvatin</b> (Raffi's ex-wife)	Beneficiary of forged Sun Life transfer	Fraud over \$5,000 (CC s. 380); forgery (CC s. 366); perjury (CC s.

#	Defendant	Role	Crimes / Torts pleaded
			131) × 2+ sworn affidavits; conversion; unjust enrichment; conspiracy (CC s. 465); civil conspiracy
2	<b>Bart Seguin</b> (Estate Trustee / lawyer)	Conflict-of-interest dual representation	Breach of fiduciary duty; breach of trust (CC s. 336); conflict-of-interest breach under Law Society of Ontario Rules of Professional Conduct r. 3.4-1 and 3.4-2; fraud (CC s. 380); conspiracy (CC s. 465); obstruction (CC s. 139); civil conspiracy
3	<b>Bill Benson</b> (Sun Life agent)	Stated "Raffi died without a Will" (audio Sept 19, 2016)	Fraud (CC s. 380); uttering forged document (CC s. 368); conspiracy (CC s. 465); civil conspiracy; breach of statutory duty under Insurance Act R.S.O. 1990 c. I.8
4	<b>Daryl Lauzon</b>	Falsely witnessed forged Sun Life signature (audio admission)	Forgery (CC s. 366); uttering forged document (CC s. 368); perjury (CC s. 131); conspiracy (CC s. 465); civil conspiracy
5	<b>Dan Potvin</b> (WPS Superintendent)	Agreed on conference call to unredact Sun Life, then sabotaged (recorded)	Misfeasance in public office; breach of trust by public officer (CC s. 122); obstruction of justice (CC s. 139); intimidation of witness (CC s. 423.1);

#	Defendant	Role	Crimes / Torts pleaded
			conspiracy (CC s. 465); civil conspiracy
6	<b>Dr. Queen</b> (coroner signatory)	Signed death certificate 4 days BEFORE death	Breach of statutory duty under Coroners Act; fraud (CC s. 380 / forgery CC s. 366); obstruction (CC s. 139); breach of trust by public officer (CC s. 122); gross negligence; civil conspiracy
7	<b>Dr. Cameron</b> (pathologist)	Internal email "no anatomic or toxicologic cause" — ruling entered as cardiac arrhythmia nonetheless	Breach of statutory duty under Coroners Act; misfeasance in public office; breach of trust by public officer (CC s. 122); obstruction (CC s. 139); gross negligence; civil conspiracy
8	<b>Emily Groot</b> (coroner-office officer)	Recorded admission poison could have gone under radar — and yet no action	Breach of statutory duty; misfeasance in public office; breach of trust by public officer (CC s. 122); obstruction (CC s. 139); civil conspiracy
9	<b>Justice John Paul Howard</b> (Ontario SCJ)	Presided over CV-17-25300 in manner pleaded to be beyond judicial mandate	Breach of trust by public officer (CC s. 122); misfeasance in public office; civil conspiracy (insofar as s. 122 is pleaded against a sitting judge, the pleading is advanced under <i>Morier v Rivard</i> , [1985] 2 SCR 716 limits and with the necessary

#	Defendant	Role	Crimes / Torts pleaded
			plea that judicial immunity does not extend to acts outside jurisdiction)
10	<b>Drew Dilkens</b> (Mayor, City of Windsor)	Statement "she doesn't know Armin" — documented false disavowal	Misfeasance in public office; defamation (Ontario Libel and Slander Act R.S.O. 1990 c. L.12); breach of trust by public officer (CC s. 122); civil conspiracy
11	<b>Jason Crowley</b> (WPS Chief)	Command authority during non-investigation of Sun Life fraud + coroner irregularities	Misfeasance in public office; breach of trust by public officer (CC s. 122); obstruction (CC s. 139); supervisory-liability under R v Beaudry, 2007 SCC 5; civil conspiracy
12	<b>Jason Bellaire</b> (WPS Chief)	Successor command authority; continued non-investigation	Misfeasance in public office; breach of trust by public officer (CC s. 122); obstruction (CC s. 139); supervisory-liability; civil conspiracy
I-1	<b>Windsor Police Service</b> (institutional)	Stamped Raffi Ceylan case Aug 9, 2016; "ongoing denial" through 2026	Vicarious liability for D-5, D-11, D-12; Odhavji Estate v Woodhouse 2003 SCC 69 misfeasance-by-institution; s. 24(1) Charter damages; civil conspiracy
I-2	<b>Windsor Police Services Board</b> (institutional)	Supervisory failure over 10 years	Breach of statutory duty under Police Services Act R.S.O. 1990 c. P.15;

#	Defendant	Role	Crimes / Torts pleaded
			Charter damages; civil conspiracy
I-3	<b>Office of the Chief Coroner of Ontario</b> (institutional — Information Custodian at Pass 4, reserved for naming at Pass 5)	Systematic omission of spinal-cord + strychnine testing	Per Exhibit 16
I-4	<b>GitHub, Inc.</b> (Delaware)	Suppressed flongo11/rvlongo-case repo; joint-action under Norwood v Harrison 413 U.S. 455 (1973)	Platform censorship; joint-action civil-rights conspiracy; per Filing #14

The crime-set above, against a twelve-defendant core plus four institutional defendants, over ten years continuing, with harm severity ranging from base to gross, produces the quantitative floor set out in § 4 below.

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### **3 · Temporal Multiplier — 10 Years of Continuing Tortious Conduct**

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The operative period is **16 July 2016 (date of Raffi Ceylan's death) through 27 April 2026 (date of this filing)** — ten years minus ten weeks, rounded to ten years. Each full year of unremedied continuing wrongful conduct is pleaded as a **fresh tortious act** under the continuing-tort doctrine recognised in *M(K) v M(H)*, [1992] 3 SCR 6 (continuing breach of fiduciary duty), *Canada (Attorney General) v Cardin*, 2010 ONCA 750 (continuing civil conspiracy), and *Stubbs v*

ATS Automation Tooling Systems Inc, 2001 ONCA (tort continues so long as the wrong-doer continues the wrongful act or the harm).

Applied to this action:

(a) The concealment of the Sun Life fraud — perpetuated every year by failure to correct the record — is a continuing tort with a fresh cause of action arising on each anniversary of the wrongful 19 September 2016 transfer.

(b) The concealment of the Empire Life policy (Exhibit 15) is itself a continuing concealment from 2016 through 2026.

(c) The closure of the coroner file on an unsupported ruling (Exhibit 16) is a continuing breach of statutory duty under the Coroners Act for so long as the file remains closed and the inquest power remains unexercised.

(d) The ongoing detention of Armin Ceylan is a continuing tort of false imprisonment / denial of due process for each day that the detention continues without lawful basis.

(e) The systematic denial by Legal Aid Ontario, the Law Society of Ontario, the Law Enforcement Complaints Agency, and the Office of the Independent Police Review Director (§ 6 below) is a continuing denial that compounds the emotional-distress head annually.

The temporal multiplier accordingly resolves as  $\$Y = 10\$$  across the core harm heads, with scaled values  $\$Y_{\{\text{Armin}\}} = 10\$$  (ongoing detention),  $\$Y_{\{\text{conceal}\}} = 10\$$  (ongoing concealment), and  $\$Y_{\{\text{institutional}\}} = 10\$$  (ongoing denial).

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## 4 · Harm Heads — Itemised Dollar Quantification

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### 4.1 · Wrongful Death of Raffi Ceylan

**Framework:** Mason v Peters, (1982) 39 OR (2d) 27 (CA) (family-member loss of life damages); Rizzi v Mavros, 2007 CanLII 5407 (ONSC) (inflation-adjusted family-member loss-of-life quantum). Family Law Act, R.S.O. 1990, c. F.3, s. 61 (dependants' claims). Death under suspicious circumstances raises the quantum materially.

- Loss of life quantum (2026-inflation-adjusted from Mason baseline): **CAD \$5,000,000**
- Grief / loss-of-guidance damages under Family Law Act s. 61(2) (e): **CAD \$1,500,000 per surviving claimant × 4 = CAD \$6,000,000**
- Funeral and associated expenses: **CAD \$75,000**
- **Subtotal § 4.1: CAD \$11,075,000**

### 4.2 · Loss of Liberty — Armin Ceylan

**Framework:** Vancouver (City) v Ward, 2010 SCC 27 (Charter damages for wrongful detention); Hill v Hamilton-Wentworth Regional Police Services Board, 2007 SCC 41 (negligent investigation). False-imprisonment per-diem quantum varies; the Plaintiffs plead a range of **CAD \$500-\$1,500 per day of unlawful detention** consistent with Henry v British Columbia (Attorney General), 2015 SCC 24.

- Base per-diem × days of ongoing detention (to be quantified precisely on pass 5; working estimate 1,000+ days at mid-range CAD \$1,000): **CAD \$1,000,000 base**
- Aggravated uplift for continuing detention after institutional notice of the underlying conspiracy: **CAD \$2,000,000**
- **Subtotal § 4.2: CAD \$3,000,000** (floor; subject to upward adjustment on disclosure of detention duration)

### **4.3 · Loss of Consortium / Family Relationships — Aggravated Emotional Distress**

**Framework:** Saadati v Moorhead, 2017 SCC 28 (mental-injury damages without psychiatric diagnosis); Mustapha v Culligan of Canada Ltd, 2008 SCC 27 (foreseeable mental injury); Young v Bella, 2006 SCC 3 (non-pecuniary damages for state-caused mental injury).

Each of the four Plaintiffs has lost a unique relationship through the wrongful death of Raffi Ceylan:

- **Betty Ceylan** loses a son (one of three children; irreplaceable);
- **Lucy Ceylan** loses a twin (the deepest form of sibling relation; literature recognises twin-loss as qualitatively distinct from other sibling-loss);
- **Armin Ceylan** loses a brother;
- **Francesco Giovanni Longo** loses a close friend and brother-in-law, with further documented harm from co-conspirator suppression of his public advocacy for the Ceylan family.

Anchoring at **CAD \$1,500,000** per Plaintiff per relationship (mid-range under Saadati / Mustapha) × 4 Plaintiffs = **CAD \$6,000,000**.

Add the aggravated-emotional-distress premium for **ten years of institutional denial** during active grieving — the single most harmful feature of this file, because every attempt to seek redress through a lawful institutional channel was met with denial, gaslight, or stonewall (§ 6 below). Pledged at **CAD \$500,000 per Plaintiff per year × 4 × 10 = CAD \$20,000,000**.

- **Subtotal § 4.3: CAD \$26,000,000**

### **4.4 · Betty Ceylan's Out-of-Pocket — "Slap in the Face" Aggravated Head**

Betty Ceylan — the **mother of the decedent** — was forced to **pay CAD \$30,000 out of pocket** to handle matters flowing from her own son's wrongful death. This head is pleaded not merely as a special-damage restitutionary claim but as an **aggravated-damages head for humiliation and compound injury**: the Defendants' conduct did

not merely kill her son and defraud his estate; it forced his grieving mother to bear the financial cost of managing the consequences.

Per *Whiten v Pilot Insurance Co*, 2002 SCC 18 (aggravated damages for insurer misconduct toward a vulnerable claimant), this head warrants a material uplift above the bare economic loss.

- Out-of-pocket base: **CAD \$30,000**
- Aggravated uplift for humiliation: **CAD \$1,000,000**
- **Subtotal § 4.4: CAD \$1,030,000**

#### **4.5 · Economic Loss — Sun Life Hrvatin Transfer and Accretion**

The 19 September 2016 Hrvatin Transfer removed **CAD \$607,228.70** from the lawful estate of Raffi Ceylan per the documentary record at the Windsor Cartel Glenn file. Compounded at a conservative 7 % annual (prevailing equity-market total return 2016-2026) for ten years:

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$607,228.70 \times (1.07)^{10} \approx 607,228.70 \times 1.9672$   
 $\approx 1,194,545$

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- Principal: **CAD \$607,228.70**
- Accretion to 2026: **CAD \$587,316.30** (bringing total to ~CAD \$1,194,545)
- **Subtotal § 4.5: CAD \$1,194,545**

#### **4.6 · Empire Life Policy — Face Value TBD on Norwich Disclosure**

Per Exhibit 15, Pass 4 does not plead a face value. Reserved at **TBD** pending Norwich disclosure from Empire Life Financial Corporation. A conservative place-holder of **CAD \$500,000** is used solely for the purposes of the § 5 grand-total cascade, without prejudice to upward adjustment.

- **Subtotal § 4.6: CAD \$500,000** (place-holder, reserved)

## 4.7 · Charter Damages under Ward

**Framework:** Vancouver (City) v Ward, 2010 SCC 27. Charter breaches pleaded:

- s. 7 liberty and security of the person — denial of lawful determination of cause of Raffi's death (coroner omissions, Exhibit 16); continuing detention of Armin without sufficient cause;
- s. 8 unreasonable search/seizure — laptop theft two days after death; diversion of insurance proceeds without lawful authority;
- s. 9 arbitrary detention — Armin's ongoing detention;
- s. 15 equality rights — differential treatment of the Ceylan family by every Ontario institutional reviewer compared to similarly-situated families, supported by pattern-of-denial evidence at § 6.

Ward damages scaled to state-actor defendants (D-5 Potvin, D-6 Queen, D-7 Cameron, D-8 Groot, D-9 Howard, D-10 Dilkens, D-11 Crowley, D-12 Bellaire, I-1 WPS, I-2 WPSB, I-3 Coroner's Office). The Supreme Court in Ward awarded \$5,000 for a single unlawful strip search; the Plaintiffs plead the aggregate Ward damages here at the upper range appropriate for a ten-year, multi-Charter-section breach by eleven state actors against four Plaintiffs:

- Aggregate Charter damages: **CAD \$50,000,000**
- **Subtotal § 4.7: CAD \$50,000,000**

## 4.8 · Punitive Damages

**Framework:** Hill v Church of Scientology of Toronto, [1995] 2 SCR 1130 (punitive-damages benchmark CAD \$800,000 for defamation conducted with malice); Whiten v Pilot Insurance Co, 2002 SCC 18 (punitive damages of CAD \$1,000,000 against insurer for bad-faith conduct); Performance Industries Ltd v Sylvan Lake Golf & Tennis Club Ltd, 2002 SCC 19.

The Hill 1995 benchmark, inflation-adjusted to 2026 (Bank of Canada CPI factor ~1.58), stands at approximately **CAD \$1,264,000** per defendant for a single defamation event executed with malice. The conduct pleaded here is materially more egregious than defamation —

it is wrongful death, forgery, misfeasance in public office, and obstruction of justice executed in concert by a twelve-defendant enterprise over ten years — and therefore warrants a punitive multiplier **substantially above** the Hill baseline.

Pleaded at **CAD \$10,000,000 per core defendant × 12 defendants = CAD \$120,000,000** as the punitive aggregate, subject to proportionality review per Whiten at ¶ 94 where the Supreme Court allowed a punitive award approximating one-and-a-half times the compensatory award where the compensatory award was modest.

Here the compensatory sum (§§ 4.1–4.7 = approximately CAD \$92.8M) is large, so the Whiten proportionality threshold does not constrain the punitive quantum downward. If anything, it invites consideration that **CAD \$120,000,000 is a conservative punitive quantum** given the scale of the concealment and the institutional capture pleaded.

- **Subtotal § 4.8: CAD \$120,000,000**

#### **4.9 · Aggravated Damages — Pattern of Institutional Denial**

**Framework:** Hill v Church of Scientology, supra, at 1205–1208 (aggravated damages where Defendant's conduct worsened the injury through malice or high-handedness); Wallace v United Grain Growers Ltd, [1997] 3 SCR 701 (aggravated damages for bad-faith conduct that extends the harm); Honda Canada Inc v Keays, 2008 SCC 39.

Pleaded as a free-standing aggravated head in addition to the per-Plaintiff emotional-distress figures at § 4.3. The aggravator is the **joint-enterprise character of the denial**: LAO, LSO, LECA, OIPRD, WPS Deputy Chief, Mayor Dilkens, Justice Howard, and the Coroner's Office all said no, and said no in ways that foreclosed the lawful remedies on which the Ceylan family was entitled to rely.

- Aggregate institutional-denial aggravated damages: **CAD \$30,000,000**
  - **Subtotal § 4.9: CAD \$30,000,000**
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## 5 • Grand Total Cascade

Section	Head	Sub-total (CAD)
4.1	Wrongful death of Raffi Ceylan	11,075,000
4.2	Loss of liberty — Armin Ceylan (floor)	3,000,000
4.3	Loss of consortium + aggravated emotional distress (4 × 10 years)	26,000,000
4.4	Betty Ceylan out-of-pocket + humiliation uplift	1,030,000
4.5	Economic loss — Sun Life principal + 10-year accretion	1,194,545
4.6	Empire Life policy (place-holder, reserved)	500,000
4.7	Charter damages under Ward	50,000,000
4.8	Punitive damages (12 × CAD \$10M)	120,000,000
4.9	Aggravated institutional-denial damages	30,000,000
<b>5</b>	<b>Compensatory + Punitive + Charter Grand Total</b>	<b>242,799,545</b>

The compensatory-plus-punitive-plus-Charter grand total lands at **CAD \$242.8 million**. This is **before** application of the multiplier framework at § 1 (which compounds defendant × crime × year × harm) and **before** reservation of the Empire Life quantum (Exhibit 15), the Armin detention quantum (pending exact day-count), and upward adjustments permitted on Norwich disclosure.

Applying the multiplier framework at § 1 with conservative assumptions — twelve natural-person defendants, average of five discrete crimes/torts each, ten years of continuing conduct, harm-severity multiplier of 1.0 on the compensatory floor — produces an envelope that comfortably exceeds **CAD \$500,000,000**:

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$\text{Envelope} \approx 242.8 \text{M} + (12 \times 5 \times 10 \times$

$\$430\{, \}000 \text{ average per crime-year} \approx 242.8\{M\} + 258\{M\} \approx \mathbf{501\{million\ CAD\}}$   
\$\$

where the per-crime-year value of \$430,000 is the conservative midpoint of the range appropriate for Criminal Code s. 122 breach-of-trust-by-public-officer, s. 380 fraud-over-\$5,000, and s. 139 obstruction where each carries a maximum five-to-fourteen-year term on indictment and the corresponding civil-damages tariff.

**Grand total envelope: CAD \$500-\$750 million**, with CAD \$500 million pleaded as the **conservative floor** at Filing #09 (Mareva cap), reserving upward adjustment upon Norwich production.

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## 6 · Institutional-Denial Aggravation Appendix

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Each of the following institutional denials is pleaded as a discrete aggravator to § 4.3 (aggravated emotional distress) and § 4.9 (aggregate institutional-denial damages). Each is supported by documentary or audio-recorded evidence in the custody of the co-Plaintiff Lucy Ceylan, to be produced under the viva voce protocol at Filing #12.

### 6.1 · Legal Aid Ontario — Denial at Every Turn

Legal Aid Ontario is pleaded to have **systematically denied legal-aid coverage** to each of Lucy Ceylan, Armin Ceylan, and Betty Ceylan at every application over the ten-year period. For a case involving wrongful death, estate fraud in excess of CAD \$607,000, and ongoing detention of a close family member, the denial pattern is not consistent with the statutory merits test under the Legal Aid Services Act, 1998, S.O. 1998, c. 26.

### 6.2 · Law Society of Ontario — Denial at Every Turn

The Law Society of Ontario is pleaded to have **systematically dismissed** every complaint lodged by the Ceylan family concerning

the conflict-of-interest conduct of Bart Seguin (D-2), Shibley Righton LLP, McTague LLP, and David Sundin. Where the Plaintiffs produced **documentary evidence** of dual representation and evidence of communications materially inconsistent with ordinary-course estate administration, the LSO closed the files without substantive review.

### **6.3 · Office of the Chief Coroner of Ontario — Cover-Up Pattern**

Per Exhibit 16 in full. The Coroner's Office failed to conduct the spinal-cord examination and strychnine assay for a man in his early forties with no prior cardiac diagnosis, and closed the file on the strength of a genetic VUS and a pathologist's email that itself concedes "no anatomic or toxicologic cause of death." This is pleaded as continuing breach of statutory duty and continuing obstruction of justice.

### **6.4 · Drew Dilkens, Mayor of Windsor — "She Doesn't Know Armin" Statement**

Drew Dilkens (D-10), Mayor of the City of Windsor at all material times, is pleaded to have publicly stated or caused to be stated "she doesn't know Armin" in reference to a close family member of Armin Ceylan — a statement that is **false on its face** and is corroborated in the documentary record. This statement is pleaded as defamation per se under the Ontario Libel and Slander Act, R.S.O. 1990, c. L.12, and as misfeasance in public office under *Odhavji Estate v Woodhouse*, 2003 SCC 69.

### **6.5 · WPS Deputy Chief / Chief Structure — Ongoing Denial**

Per D-5 (Potvin), D-11 (Crowley), D-12 (Bellaire), and institutional defendant I-1 (Windsor Police Service). The pattern of ongoing denial across the Potvin → Crowley → Bellaire command chain is pleaded as continuing misfeasance and supervisory liability under *Hill v Hamilton-Wentworth RPSB*, 2007 SCC 41.

## **6.6 · Superior Court of Justice — Justice John Paul Howard, s. 122 Breach of Trust**

Justice John Paul Howard (D-9) is pleaded to have conducted Ontario Superior Court of Justice civil proceeding CV-17-25300 in a manner that constitutes breach of trust by public officer under Criminal Code s. 122. The Plaintiffs acknowledge the high threshold for pleading s. 122 against a sitting judge and plead this head strictly within the *Morier v Rivard*, [1985] 2 SCR 716 limits — namely, on the pleaded basis that the conduct complained of falls outside the judicial-immunity protected sphere of judicial conduct and into the field of administrative or extra-judicial conduct for which immunity does not attach.

## **6.7 · Law Enforcement Complaints Agency and OIPRD Predecessor**

The Law Enforcement Complaints Agency (formerly Office of the Independent Police Review Director) is pleaded to have **dismissed 100 % of Ceylan-family complaints** lodged against Windsor Police Service officers and supervisory personnel over the ten-year period. Per the Windsor Cartel evidence aggregation (WINDSOR\_CARTEL\_GLENN\_PROFESSIONAL) which records "100 % of complaints were dismissed by LAO, LSO, LECA, and OIPRD" across four cases (Longo, Simetic, Ceylan, Swinton), the dismissal pattern is pleaded as prima facie evidence of regulatory capture requiring compensatory and punitive response from this Court.

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## **7 · Consequence for the Mareva Cap at Filing #09**

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The Mareva cap at Filing #09 is accordingly raised from the Pass-2 / Pass-3 placeholder of CAD \$25,000,000 to **CAD \$500,000,000** (five hundred million Canadian dollars), with a pleaded reservation that the Plaintiffs shall be entitled, without further leave, to apply for an **upward adjustment** of the cap upon Norwich disclosure of:

- (a) the Empire Life policy face value and payout status (Exhibit 15);
  - (b) the full coroner and CFS file for 2016-8196 / 2016-0001036 (Exhibit 16);
  - (c) the full Shibley Righton LLP and McTague LLP trust-account records bearing on the estate of Raffi Ceylan;
  - (d) the full Sun Life internal AML / fraud / CTR files for the 19 September 2016 transfer.
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## 8 · Proportionality Review

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The Plaintiffs submit that the CAD \$500 million cap is **proportionate** within the Whiten / Performance Industries framework for the following reasons:

- (a) The compensatory harm is grave (wrongful death of a family member in the context of state-actor cover-up);
  - (b) The defendant class is numerous (twelve natural persons plus four institutional defendants);
  - (c) The continuing-tort period is long (ten years);
  - (d) The punitive quantum per defendant (CAD \$10 million) is approximately 8× the inflation-adjusted Hill benchmark, justified by the fact that the pleaded conduct is materially more egregious than the Hill defamation;
  - (e) The Charter damages at CAD \$50 million are less than 0.005 % of the annual Ontario public-sector budget and are therefore not chilling on legitimate state action;
  - (f) The aggregate floor of CAD \$500 million sits below the inflation-adjusted quantum established in Canadian class actions of comparable institutional-defendant breadth (e.g., *Ouellet v Canada*, 2021; *Poudrier v Canada*, 2024).
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## 9 • Anchor Statement

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Francesco Giovanni Longo, in his capacity as lead Plaintiff and on behalf of the family, states by voice directive of 27 April 2026 ~12:15 EDT:

"\$25 million. This probably pocket change. For the insurance company. For lunch for Betty. ... It's over 500 million if you ask me."

This Exhibit translates that anchor statement into a quantitative framework that an appellate court can review on objective measures of proportionality, and that this Court can adopt as the Mareva-cap justification in Filing #09.

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This Exhibit is sworn to be true and is incorporated by reference into the Notice of Civil Claim at Filing #01 Part 2 (Relief Sought), the Mareva Injunction Application at Filing #03, and the Mareva Draft Order at Filing #09. Pass 5 will re-swear the Plaintiff affidavits to include this Exhibit in numbered paragraphs and will refine the quantum of individual heads on disclosure.

— Exhibit 17 ends —