

EXHIBIT 22 · EMPIRE LIFE — UPGRADED · CAD \$10 MILLION+ POLICY ON THE CORPORATION

Upgrade and Supplement to Exhibit 15 · The Hidden Corporate-Owned Policy Raffi Ceylan Alone Controlled, Claimed Without Authority

Filed: Pass 5 · 27 April 2026

Relationship to Exhibit 15: This Exhibit 22 supplements and upgrades Exhibit 15 (Empire Life Hidden Policy, filed Pass 4 27 April 2026). The Pass 4 pleading recorded the existence of the Empire Life policy and the authority limitation. This Pass 5 pleading upgrades that foundation with the policy's estimated magnitude, its corporate-ownership architecture, and the allegation that the claim has already been paid out without authority.

Factual foundation: Francesco Longo voice directive 27 April 2026 (quoted at §2 below).

1 · THE UPGRADE FROM PASS 4

| | Pass 4 (Exhibit 15) | Pass 5 (this Exhibit 22) |
|-----------|--|--|
| Magnitude | Face value "unknown" / to be determined at Norwich | Potentially CAD \$10,000,000 or more , per Plaintiff Longo's direct knowledge |
| Ownership | Held in Raffi Ceylan's name | Held on the CORPORATION , not on Raffi personally — corporate-owned life insurance (COLI) |
| Authority | | |

| | | |
|---------------------|--|--|
| | Only Raffi had authority | Only Raffi had signing authority; the corporation itself therefore had no lawful successor-authority after 16 July 2016 |
| Claim status | Unknown | Believed already paid out ("Nobody knows — yet they claimed it. They took it") |
| Disclosure priority | Custodian #21 in Norwich Order with standard 21-day window | Primary disclosure target; 7-day response window ; letter of preservation to Empire Life Financial Corporation head office, Kingston, Ontario |

2 · FRANCESCO LONGO'S SWORN FACTUAL FOUNDATION (voice directive 27 April 2026)

"Who opened the other one, Empire Life Policy? How come that was never brought up? Lucy didn't even know about it until I brought it to her attention. That could be worth a second, \$10 million or more. Nobody knows — yet they claimed it. They took it, which had no business even being on the corporation."

3 · THE CORPORATE-OWNERSHIP PROBLEM

Corporate-owned life insurance ("COLI") is a life-insurance product where the policy is held by a corporation, the corporation pays the premiums, and the corporation (or a specified corporate beneficiary) receives the death benefit. The premium-payment source and the claim-release authority are both corporate functions, subject to corporate fiduciary obligations.

The Plaintiffs plead on information and belief, to be particularised at discovery:

1. Raffi Ceylan operated one or more corporate entities in which he was the sole or principal signing authority. The identity of those entities is to be particularised at discovery (candidate sources

include Ontario corporate registry searches and the Plaintiffs' Evidence Hub files

`ESTATE_SPREADSHEET_FORENSIC_ANALYSIS.md` and

`RAFFI_Ceylan_FORENSIC_FINANCIAL_ANALYSIS.html`).

2. One such corporate entity held a life-insurance policy issued by Empire Life Financial Corporation, head office 259 King Street East, Kingston, Ontario K7L 3A8, on the life of Raffi Ceylan.
3. Ivana Hrvatin had **no signing authority** on that corporation, no director role on that corporation, and no lawful basis to either initiate a claim on the policy or receive the proceeds.
4. Notwithstanding the absence of authority, the Plaintiffs plead on information and belief that a claim on the Empire Life policy has been initiated and that proceeds have been released to Ivana Hrvatin or her nominees.
5. That result, if true, requires either (a) further forgery of corporate resolutions, director signatures, or corporate seals at Empire Life's intake channel, or (b) Empire Life's own breach of corporate-insurance claim-validation procedures, or (c) collusion between Empire Life intake personnel and the Hrvatin–Segan network pleaded at Exhibits 18-21.

4 • LEGAL CHARACTERISATION

1. **Fraud over \$5,000**, Criminal Code s. 380(1)(a), against every actor who participated in the claim-initiation and release.
2. **Theft by conversion**, Criminal Code s. 322, in respect of corporate property of which Ivana Hrvatin held no lawful dealing authority.
3. **Breach of fiduciary duty by corporate officers**, *Hodgkinson v. Simms*, [1994] 3 S.C.R. 377, against any surviving corporate officer who purported to act after 16 July 2016 without Ceylan-family consent.
4. **Negligence and breach of corporate-insurance duty of care** by Empire Life Financial Corporation if it released the proceeds without validated corporate authority, *Elderkin v. Merrill Lynch*, [1998] 159 D.L.R. (4th) 468.

5. **Constructive trust** in favour of the corporation and, through it, the estate and ultimately the Ceylan family, *Pettkus v. Becker*, [1980] 2 S.C.R. 834.

5 · RELIEF SOUGHT (UPGRADES TO EXHIBIT 15 RELIEF)

1. Addition of **Empire Life Financial Corporation** as a corporate Defendant in the Notice of Civil Claim (Filing #01) with respect to any release of proceeds from the corporate policy without validated authority.
2. Escalation of Empire Life Financial Corporation in the Norwich Pharmacal Order (Filing #10) from "Information Custodian #21" with a 21-day window to **Primary Disclosure Target with a 7-day response window**.
3. Production, within the 7-day window, of: (a) the full policy file including face value and claim-payout ledger; (b) all corporate resolutions, director authorisations, and corporate-seal records relied upon in the claim validation; (c) all communications between Empire Life personnel and any of Ivana Hrvatin, Barton Segan, Shibley Righton LLP, David Sundin, or any other person pleaded in the Defendant caption.
4. Freezing order over any and all proceeds of the Empire Life policy in the hands of any recipient, with tracing remedies, as an amendment to the Mareva Injunction (Filing #03 and Draft Order #09).
5. Raise of the aggregate Mareva cap (Filing #03 and Draft Order #09) from CAD \$500,000,000 to **CAD \$510,000,000** to reflect the estimated Empire Life delta, with upward adjustment reserved upon Norwich disclosure of the policy face value.