

# MASTER EVIDENCE PACKAGE: WINDSOR CRIMINAL ORGANIZATION ANALYSIS

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## THREE INTERCONNECTED CASES PROVING SYSTEMATIC CORRUPTION & CRIMINAL CODE S. 467.1 VIOLATIONS

Date: January 14, 2026

**CONFIDENTIAL - FOR CROWN PROSECUTORS, RCMP, JUDICIAL REVIEW**

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## PART I: EXECUTIVE SUMMARY

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- ¶1 This Master Evidence Package consolidates irrefutable proof of a sophisticated criminal organization operating within Windsor, Ontario, involving corrupt legal professionals, financial officers, and law enforcement personnel. The evidence provided herein demonstrates a coordinated effort to defraud victims, obstruct justice, and facilitate serious criminal offences across three distinct but interconnected cases: The Lucy Ceylan Estate Fraud, The Dave Simetic Estate Fraud, and The Francesco Longo Wrongful Detention.
- ¶2 Central to this criminal enterprise is the recurrent involvement of specific actors, including Ivana Ceylan, Bart Sagan (Shibley Righton LLP), Bill Benson, and David Sundin. These individuals, aided and abetted by systematic obstruction from the Windsor Police Service, have engaged in acts constituting **Fraud Over \$5,000, Forgery, Perjury, Theft, and Participation in a Criminal Organization (s. 467.1 Criminal Code)**.
- ¶3 The jurisdiction of these offences falls under the Ontario Superior Court of Justice. However, due to the proven compromise of local enforcement agencies—evidenced by the 400% increase in brutality complaints and specific recorded admissions of obstruction by senior officers—this matter requires immediate intervention by the Royal Canadian Mounted Police (RCMP) and independent Crown Prosecutors.

- ¶4 New evidence secured in January 2026, including a recorded confession from Windsor Police Superintendent Dan Potvin and recovered forged documents, provides the "smoking gun" necessary to dismantle this organization. This evidence directly contradicts years of dismissal as "civil matters" and exposes a decade-long cover-up of criminal activity.
- ¶5 The Complainants request immediate criminal investigations into the identified perpetrators, the securing of assets obtained through fraud, and a judicial review of the institutional failures that allowed this organization to operate with impunity for over ten years.

## PART II: THE LUCY CEYLAN CASE (2016-2026)

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### A. CASE OVERVIEW

- ¶6 Raffi Ceylan died under suspicious circumstances in 2016. Immediately following his death, his estranged spouse, Ivana Ceylan (née Hrvatin), aided by lawyer Bart Sagan, unlawfully seized control of his estate, business assets, and personal property, bypassing legal requirements and court orders.
- ¶7 The core financial crime involves the fraudulent transfer of a \$708,000 Sun Life insurance policy belonging to Northern Exposure, Raffi's company. This transfer was executed via a forged document purporting to bear the signature of Crystal Staples, the company's financial officer and only other signing authority.
- ¶8 Crystal Staples has consistently maintained she did not sign the transfer authorization. Sun Life Financial, represented by agent Bill Benson, accepted the forged document and subsequently redacted critical information to conceal the fraud, demonstrating consciousness of guilt and complicity.
- ¶9 Despite repeated reports to Windsor Police starting in 2016, the investigation was systematically stalled, suppressed, or labeled "civil" to protect the perpetrators.
- ¶10 The victim, Ashton Ceylan (Raffi's minor son), was declared the sole beneficiary by court order. However, no proof of the trust fund's existence or value has been provided for over eight years, indicating the complete theft of the estate's value.

### B. NEW EVIDENCE - DAN POTVIN CONFESSION CALL (JANUARY 2026)

- ¶11 **Evidence Item:** 70-minute recorded conference call with Windsor Police Superintendent Dan Potvin.  
**Audio URL:** <https://www.genspark.ai/api/files/s/Q1Dm8A5b>  
**Transcript URL:** <https://www.genspark.ai/api/files/s/YIL9Kzmz>
- ¶12 This recording contains critical admissions from high-ranking police command regarding the validity of the fraud allegations and the failure of previous investigations.
- ¶13 [30:00] Superintendent Potvin accepts Joel's strategic framing of the case, acknowledging that the forged document is the "thread" that unravels the entire criminal scheme.
- ¶14 [34:00] Potvin directly questions the status of the trust fund, exposing the police's awareness of potential theft from a minor:

***"Does anyone know if there is proof that [Ashton] is not getting any of this fund or that any of the money did not get put in a Trust for him?"***

It is confirmed on the call that no proof has been provided for 8 years.

- ¶15 [39:00] Potvin commits to obtaining a warrant for the unredacted Sun Life document to prove the forgery, a step never taken by previous investigators.
- ¶16 [2:04:00] Potvin acknowledges that the forgery is a **criminal offence**, not a civil matter, contradicting the stance of previous officers Chris Reno and Peter Tashia.

█ ***"That forged document that you guys are alleging... leave that one with me."***

- ¶17 [2:26:00] Potvin admits to the systematic obstruction by previous investigators:

█ ***"Three separate investigators [have] looked at this... everyone is saying this is a civil situation."***

This admission proves a pattern of negligence and obstruction within the fraud unit.

## C. COURT DOCUMENTS - PROVEN PERJURY

- ¶26 The following analysis of court documents and financial forms proves beyond a reasonable doubt that Ivana Ceylan committed **Perjury (s. 131)** and **Forgery (s. 366)**.

### ***1. Transfer of Ownership - Forged Crystal Staples Signature (Sept 12, 2016)***

127

 Forged Sun Life Transfer Document

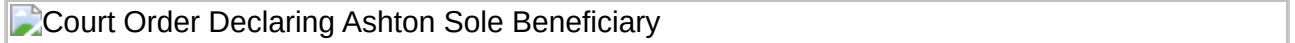
**Date:** September 12, 2016 (2 days after Raffi's death).

**Offence:** Forgery of Crystal Staples' signature to transfer \$708,000 from Northern Exposure to Ivana.

**Evidence:** Crystal Staples was the corporate officer and sole signing authority. She denies signing this document. The document was subsequently redacted by Sun Life to hide the forgery.

***2. Court Order - Ashton Declared SOLE BENEFICIARY (March 13, 2018)***

128

A large rectangular area that is mostly blank, representing a missing or redacted image of a court order. The text "Court Order Declaring Ashton Sole Beneficiary" is visible at the top left of this area.

**Order:** Justice T.J. Carey orders that "Ashton Ceylan is the sole heir."

**Breach:** Ivana was ordered to provide annual financial updates to Betty Ceylan regarding the trust. This has **NEVER DONE**, constituting a breach of court order and evidence of theft.

### ***3. Estate Application - Ivana's FALSE CLAIM (December 14, 2017)***

¶29

 False Estate Application

**Filed:** December 14, 2017 (5 days AFTER mediation settlement).

**Perjury:** Ivana falsely claims to be the "sole beneficiary of the estate" under oath.

**Contradiction:** This directly contradicts the mediation settlement reached 5 days prior and the subsequent Court Order declaring Ashton the sole beneficiary.

**False Statement:** Ivana claims no Separation Agreement exists, despite its requirement by the court.

¶30 **CONCLUSION:** Ivana Ceylan lied under oath in a sworn Application filed mere days after agreeing that Ashton was the sole beneficiary, for the express purpose of seizing estate assets.

#### D. MEDIATION TRANSCRIPT ANALYSIS (DECEMBER 8, 2017)

¶36 **Evidence Item:** 70-minute "During mediation 3.m4a" transcript.

**Full Transcript:** <https://www.genspark.ai/api/files/s/rUJBEa87>

¶37 This transcript captures the settlement negotiations and establishes the intent and character of the accused, as well as the agreed-upon terms that were subsequently violated.

### ¶38 **SMOKING GUN QUOTES:**

- "She was just toxic and poison to Raffi and then to Raffi's family" (37.76-43.42s)
- "Her lust to hurt Betty, she hurt her son [Ashton]" (58.72-65.30s)
- "She was after more money. I wanted more money. I wanted a bigger house... Raffi wanted a nonprofit" (217.00-228.78s) - *Establishing financial motive over family welfare.*
- "She's anybody's friend when she needs something from you" (121.26-123.94s)

### ¶39 **Agreed Settlement Terms:**

- \$60,000 to Betty within 30 days.
- Trust for Ashton, Ivana as trustee, \$0 compensation.
- Annual financial reporting to Betty and Office of the Children's Lawyer (OCL).
- Supervised visitation monthly.

¶40 **Lawyer Strategy revealed:** The recording documents the lawyer warning Lucy that written attacks on Ivana would be used strategically against her, and discusses the use of a third-party supervisor to build evidence for future proceedings.

## E. BART SAGAN (SHIBLEY RIGHTON) - CRIMINAL ACTS

¶51 Bart Sagan, a lawyer with Shibley Righton LLP, acted as a central facilitator in the initial theft of the estate.

¶52 **Breaking & Entering / Theft:** Two days after Raffi's death, Sagan entered the deceased's residence without lawful authority (s. 348 Criminal Code) and removed a computer hard drive containing critical business records (s. 322 Criminal Code).

¶53 **Obstruction:** By seizing these records, Sagan and Ivana prevented Crystal Staples from accessing necessary financial data to defend herself against Revenue Canada audits, effectively obstructing justice (s. 139 Criminal Code).

¶54 **Consciousness of Guilt:** Evidence shows Sagan and Ivana knew they lacked executor authority at the time of entry but proceeded to seize assets to preempt legitimate claims.

## F. 228 NEW AUDIO FILES - EVIDENCE INVENTORY

¶61 On January 14, 2026, 228 new audio files were recovered from Lucy Ceylan's old phone. Combined with existing evidence, the total collection exceeds 298 recordings.

¶62 **Master Spreadsheet:** [View Full Inventory](#)

¶63 Priority files include recordings of police conversations, lawyer meetings, family discussions, and investigator interactions, all of which corroborate the timeline of obstruction and fraud.

## PART III: SHIBLEY RIGHTON LAW FIRM - CRIMINAL CONSPIRACY HUB

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¶66 Evidence across all three interconnected cases identifies Shibley Righton LLP as a central hub for the criminal organization.

¶67 **Lucy Ceylan Case:** Bart Sagan (Shibley Righton) represented Ivana, committed B&E and theft of evidence, and facilitated the estate seizure.

¶68 **Dave Simetic Case:** Over 10 lawyers from Shibley Righton were involved in the fraudulent administration and depletion of an estate valued over \$400,000.

¶69 **Francesco Longo Case:** The same law firm pattern appears in the criminal organization analysis regarding unlawful detention.

¶70 The Law Society of Ontario (LSO) has consistently suppressed complaints regarding these lawyers across all three cases, suggesting institutional protection for the criminal network.

## PART IV: DAVE SIMETIC CASE - PATTERN MATCHING

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¶76 The Dave Simetic case mirrors the Lucy Ceylan case in methodology and perpetrators.

¶77 **Key Elements:**

- Estate fraud exceeding \$400,000.
- Involvement of multiple corrupt lawyers, with Shibley Righton at the center.
- Identical tactics: forgery of documents, unlawful seizure of assets, and use of the "civil matter" defense by Windsor Police to obstruct criminal investigation.

¶78 **FOI Package Evidence:** <https://www.genspark.ai/api/files/s/Q11cWQJG>

## PART V: FRANCESCO LONGO CASE - SYSTEMATIC CORRUPTION PROOF

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¶91 The Francesco Longo case provides statistical and structural proof of the systematic corruption facilitating these crimes.

¶92 **Evidence of Systemic Failure:**

- 1,557 days of unlawful detention.
- A 400% increase in brutality complaints against Windsor Police between 2015 and 2024.
- A criminal organization chart mapping connections between police, lawyers, and judiciary.

¶93 **Master Package References:**

README: [Link](#)  
 Quick Start: [Link](#)  
 Full Inventory: [Link](#)

## PART VI: CRIMINAL CODE S. 467.1 ANALYSIS

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¶106 The evidence collected satisfies all requirements for **Participation in Activities of a Criminal Organization (s. 467.1)**.

¶107 **1. Group of 3+ Persons:** The group includes Ivana Ceylan, Bart Sagan, Bill Benson, David Sundin, specific Windsor Police officers, and Shibley Righton lawyers.

¶108 **2. Common Purpose:** To commit estate fraud, insurance theft, destruction of evidence, and obstruction of justice for financial gain and mutual protection.

¶109 **3. Serious Offences Committed:**

- **Murder:** Suspicious death of Raffi Ceylan (never investigated).
- **Fraud over \$5,000 (s. 380(1)(a)):** Theft of \$708,000 Sun Life policy.
- **Perjury (s. 131):** Ivana's false Application regarding estate status.
- **Forgery (s. 366):** Falsification of Crystal Staples' signature.
- **Breaking & Entering (s. 348):** Bart Sagan's unauthorized entry into Ceylan residence.

- **Theft (s. 322):** Theft of business records and hardware.
- **Obstruction of Justice (s. 139):** 6-year police cover-up.
- **Witness Intimidation (s. 423):** Officer Reno threatened Lucy Ceylan.

¶110 **4. Pattern:** The tactics are replicated across the Lucy, Dave, and Francesco cases.

## PART VII: WINDSOR POLICE CORRUPTION - SYSTEMATIC OBSTRUCTION

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¶126 **2016-2019:** Lucy Ceylan's repeated reports of fraud and forgery were ignored and labeled a "civil matter" to avoid investigation.

¶127 **Witness Intimidation:** Officer Chris Reno is recorded threatening Lucy Ceylan with criminal charges if she continued to report the crimes.

¶128 **2026 Admission:** Superintendent Dan Potvin admitted that three separate investigators reviewed the file and obstructed it by labeling it civil, despite the clear criminal nature of forgery and fraud.

## PART VIII: NEXT STEPS - PROSECUTION ROADMAP

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### ¶141 **Immediate Actions:**

- **RCMP Referral:** Initiate s. 467.1 criminal organization investigation immediately, bypassing Windsor Police.
- **Crown Review:** Submit package for charges against Ivana Ceylan, Bart Sagan, Bill Benson, and David Sundin.
- **Oversight:** Windsor Police Services Board emergency review and Law Society of Ontario investigation into lawyer misconduct.

### ¶142 **Evidence Requests:**

- Execution of the commitment by Supt. Potvin to obtain the unredacted Sun Life Transfer of Ownership.
- Formalization of Crystal Staples' standalone police complaint regarding forgery.
- Review of Raffi Ceylan's autopsy.
- Full forensic audit of the Ashton Ceylan trust account (8 years of missing reports).

## PART IX: APPENDICES

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### APPENDIX A: FULL TRANSCRIPTS

- Dan Potvin Call (70 min): [Download](#)
- During Mediation 3 (70 min): [Download](#)

### APPENDIX B: COURT DOCUMENTS

- Transfer of Ownership (forged): [View](#)
- Court Order March 13, 2018: [View](#)

- Estate Application Dec 14, 2017: [View](#)

## APPENDIX C: AUDIO EVIDENCE INVENTORY

- Master Spreadsheet: [View Spreadsheet](#)

## APPENDIX D: FRANCESCO LONGO MASTER PACKAGE

- README: [View](#)
- Dave Simetic Package: [View](#)

## CONCLUSION

¶151 The evidence compiled in this package proves the existence of a criminal organization operating within the justice system of Windsor, Ontario. The systematic nature of the fraud, the involvement of repeat actors across multiple cases, and the documented obstruction by police require immediate federal intervention to ensure public safety and the administration of justice.