

EXHIBIT 24 — COVER MEMO · LUCY CEYLAN AND FRANCESCO LONGO — 31 JANUARY 2026 AUDIO

In the matter of the Estate of Raffi Ceylan (BCSC Vancouver Registry ·
Court File No. [to be assigned])

Exhibit **24** **file:**
24_EXHIBIT_LUCY_AND_FRANCESCO_LONGO_JAN31_2026_AUDIO.mp3 (99.4 MB)

1. Parties on the recording

1. **Lucy Ceylan** — co-Plaintiff; twin sister of the decedent Raffi Ceylan; custodian of the 300+ audio recording corpus referenced at paragraph H.1 of the Affidavit of Francesco Giovanni Longo (Pass 10).
2. **Francesco Giovanni Longo** — lead Plaintiff. In the personal vernacular of Lucy Ceylan, of the Ceylan family, and of many longstanding acquaintances in the City of Windsor, **Mr. Longo is addressed as "Frank."** The file-naming convention of this recording ("Lucy & Frank") is accordingly a personal-address convention, not a reference to any other person named Frank.

For avoidance of doubt: this Exhibit does not depict Frank Miller (solicitor of record to David Simetic in a separate matter). Mr. Miller is not a party to this recording and has no involvement in the Raffi Ceylan matter referenced in this audio. "Frank" in this file name is Francesco Giovanni Longo.

2. Relationship context material to the Plaintiffs' standing

Francesco Longo and the Ceylan family are **lifelong personal friends from childhood**. Mr. Longo's relationship with the decedent Raffi Ceylan, with Lucy Ceylan, with Armin Ceylan, and with Betty Ceylan predates by decades any of the events pleaded in the Notice of Civil Claim. That personal bond is the foundation for Mr. Longo's role as lead Plaintiff on behalf of the Ceylan heirs and is the reason for the depth of personal knowledge sworn to in the Affidavit of Francesco Giovanni Longo (Pass 10).

The relationship was not known to, or was not anticipated by, the persons whose conduct is pleaded as Defendants in this proceeding. The Plaintiffs plead that

fact only insofar as it bears on the credibility and independence of the investigative work product of Francesco Longo in compiling the evidentiary record.

3. Date, duration, and provenance

- **Date of recording:** 31 January 2026.
 - **Participants:** Lucy Ceylan (co-Plaintiff) and Francesco Giovanni Longo (lead Plaintiff).
 - **Subject-matter:** the events of Raffi Ceylan's passing (16 July 2016); the subsequent insurance, estate, and police conduct chains pleaded at sections B-I of the Affidavit (Pass 10); and related matters within the Plaintiffs' personal knowledge.
 - **Custody:** original file retained by Francesco Giovanni Longo; working copy furnished to the Court as Exhibit 24 of the pleading package.
 - **Format:** MP3 audio; 99.4 MB.
 - **Chain-of-custody:** the recording has not been edited, excised, or otherwise altered. The Plaintiffs will tender the native file on request and will make the forensic hash value available at the Mareva hearing.
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4. Relationship to the Affidavit of Francesco Giovanni Longo (Pass 10)

This Exhibit supports and is referenced by paragraph H.1.3 of the Affidavit (Pass 10): "Further recorded admissions from within the 300+ recording corpus, to be tendered in the Mareva motion record including, without limitation, recordings implicating Defendants Bart Segan, Ivana Hrvatin, and named Windsor-based professionals on matters of estate diversion, concealment of insurance proceeds, and interference with the family's pursuit of the investigation."

This Exhibit is tendered in support of the urgent Mareva Injunction sought at section M of the Affidavit (Pass 10).

5. Reservation

The Plaintiffs reserve the right to tender further recordings from the 300+ recording corpus as the Court may direct. The Plaintiffs further reserve the right to tender a written transcript of this Exhibit with time-marked quotations upon the Court's leave.

Cover memo prepared 28 April 2026. Filed with the Trifecta Bundle at the Supreme Court of British Columbia, Vancouver Registry.