

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

CASE NO.: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ,
MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES
GROUP, LLC, BRIAN J. SCHWARTZ,
EMERALD ASSETS 2018, LLC,
INTEGRITY ASSETS 2016, LLC,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
PARA LONGEVITY 2015-3, LLC,
PARA LONGEVITY 2015-5, LLC,
PARA LONGEVITY 2016-3, LLC,
PARA LONGEVITY 2016-5, LLC,
PARA LONGEVITY 2018-3, LLC,
PARA LONGEVITY 2018-5, LLC,
PARA LONGEVITY 2019-3, LLC,
PARA LONGEVITY 2019-5, LLC,
PARA LONGEVITY 2019-6, LLC,
PARA LONGEVITY VI, LLC,
SH GLOBAL, LLC N/K/A PARA
LONGEVITY V, LLC, ALTRAI GLOBAL,
LLC A/K/A ALTRAI HOLDINGS, LLC,
VALENTINO GLOBAL HOLDINGS, LLC,
AMERITONIAN ENTERPRISES, LLC,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION ISG Holdings, LLC,
CENTURION ISG Holdings II, LLC,
CENTURION ISG (Europe) Limited,
CENTURION ISG SERVICES, LLC,
CENTURION ISG FINANCE GROUP, LLC,
CENTURION FUNDING SPV I LLC,
CENTURION FUNDING SPV II LLC,
GRACE HOLDINGS FINANCIAL, LLC,
PRIME SHORT TERM CREDIT INC.,

Defendants.

THE ESTATE OF ERIC CHARLES HOLTZ,
SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY,
INC., SHPC HOLDINGS I, LLC,

Relief Defendants.

**CORPORATE MONITOR'S AGREED MOTION FOR AUTHORIZATION TO
DESTROY INCONSEQUENTIAL RECORDS**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”) for the property, assets, and business of the twenty-seven (27) corporate-entity Defendants identified below (collectively, the “Consenting Corporate Defendants”), pursuant to the Court’s *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, dated September 14, 2021, respectfully moves for entry of the proposed order attached hereto as **Exhibit “A”**, authorizing the Corporate Monitor to, in his sole discretion and the exercise of his professional business judgment, to destroy and/or shred certain inconsequential documents or files located at 301 Yamato Road, Suite 2222, Boca Raton, Florida 33431 (the “Corporate Office”) in connection with the office wind-down and vacating of the Corporate Office. In support of this Motion, the Corporate Monitor states:

Background

1. On September 10, 2021, the Plaintiff, State of Florida, Office of Financial Regulation (the “Plaintiff” or “OFR”) filed a *Consent Motion for Appointment of Corporate Monitor*, seeking the appointment of the Corporate Monitor for the property, assets, and business of the Consenting Corporate Defendants listed below, as well as a temporary injunction against the Consenting Corporate Defendants and two natural-person Defendants, Marshal Seeman and Brian J. Schwartz (the “Consenting Individual Defendants”):

1. NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ,
2. CENTURION INSURANCE SERVICES GROUP, LLC,
3. EMERALD ASSETS 2018, LLC,
4. INTEGRITY ASSETS 2016, LLC,
5. INTERGRITY ASSETS, LLC,
6. PARA LONGEVITY 2014-5, LLC,
7. PARA LONGEVITY 2015-3, LLC,
8. PARA LONGEVITY 2015-5, LLC,
9. PARA LONGEVITY 2016-3, LLC,
10. PARA LONGEVITY 2016-5, LLC,
11. PARA LONGEVITY 2018-3, LLC,
12. PARA LONGEVITY 2018-5, LLC,
13. PARA LONGEVITY 2019-3, LLC,
14. PARA LONGEVITY 2019-5, LLC,
15. PARA LONGEVITY 2019-6, LLC,
16. PARA LONGEVITY VI, LLC,
17. SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
18. VALENTINO GLOBAL HOLDINGS, LLC,
19. AMERITONIAN ENTERPRISES, LLC,
20. SEEMAN-HOLTZ CONSULTING CORP.,
21. CENTURION ISG Holdings, LLC,
22. CENTURION ISG Holdings II, LLC,
23. CENTURION ISG (Europe) Limited,
24. CENTURION ISG SERVICES, LLC,
25. CENTURION ISG FINANCE GROUP, LLC,
26. CENTURION FUNDING SPV I LLC, and
27. CENTURION FUNDING SPV II LLC

2. On September 14, 2021, the Court entered an *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* (the "September 14, 2021 Order"), thereby approving and appointing, *inter alia*, Daniel J. Stermer as the Corporate Monitor for the Consenting Corporate Defendants and their affiliates, subsidiaries, successors and assigns, until further Order of the Court.

3. On September 15, 2021, in compliance with Section VI of the September 14, 2021 Order, the Corporate Monitor took control of the Consenting Corporate Defendants' financial accounts, books and records, electronically stored information ("ESI"), passcodes, and all other

documents or instruments relating to the Consenting Corporate Defendants from the Corporate Office.

4. Since his appointment, the Corporate Monitor has been analyzing all aspects of the Consenting Corporate Defendants, investigating ways to maximize value and has prepared and filed his Initial Report.

5. As further set forth in the *Corporate Monitor's Initial Report* (the "Initial Report") filed on October 14, 2021, the Corporate Monitor has been in active discussions with counsel for the landlord of the Corporate Office (MCM 301 Yamato, LLC, as successor to Arbern Investors IV, L.P. (the "Landlord")) regarding issues of unpaid rent, ongoing rent obligations, signage on the building, and the prospect of the Corporate Monitor vacating the Corporate Office and relocating to a smaller office space within the building so that the Landlord could relet the Corporate Office to a new tenant, thereby mitigating any potential amounts due to the Landlord for the Corporate Office.

6. This scaling down of office space will reduce expenses and assist the Corporate Monitor in his continuing efforts to fulfill his duties.

7. In connection with the Corporate Office wind-down and related issues, the Corporate Monitor has identified books, records, and other documents (collectively, "Records") that do not assist in the administration of this case and are unrelated to the Corporate Monitor's duties under the September 14, 2021 Order. The Records do not relate to the investment activities of the Consenting Corporate Defendants or the life settlement portfolio. The Records primarily consist of old/historical vendor invoices, old/historical expense reports and supporting documents, old/historical human resource documents, old/historical NSI client files that contain personal identifying information (documents that have already been imaged and are electronically

available), NSI's potential client files that contain personal identifying information/documentation, other documents that have been stored onsite and not in storage dating back years, and multiple copies of documents.

8. The Records do not have any value nor do they serve any purpose to the Corporate Monitor or the administration of this case. However, because of the potential confidential or sensitive information that may be contained in the Records, as well as the continued burden of storing the Records, the Corporate Monitor intends to destroy the Records by shredding. The Corporate Monitor will utilize ShredAssured, Inc. which was the company used by the Consenting Corporate Defendants to dispose/shred documents prior to the Corporate Monitor's appointment.

9. The destruction of the Records will benefit the case by limiting costly storage expenses and permitting the Corporate Monitor to relocate to a smaller, less expensive office space with less storage space.

10. As the Records are not needed and the continued storage expense is burdensome, the Corporate Monitor submits that it is in the best interest of the case to destroy the documents.

WHEREFORE, Daniel J. Stermer, as Corporate Monitor, respectfully requests entry of the proposed Agreed Order attached as **Exhibit "A"**, (i) granting this Motion; (ii) authorizing the Corporate Monitor, in his sole discretion, to destroy the Records, including by means of shredding;

and (iii) granting such other and further relief as the Court deems just and proper.

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By: /s/ *Brian G. Rich*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 30, 2021, the foregoing was filed using the Florida Court's E-Filing Portal, which served a copy of the foregoing electronically upon all electronic service parties. I further certify that a true and correct copy of the foregoing was served by electronic transmission and first class, U.S. Mail upon all parties on the attached Service List.

By: /s/ *Brian G. Rich*
Brian G. Rich

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Corporate Monitor

EXHIBIT “A”

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Relief Defendants.

**AGREED ORDER GRANTING CORPORATE MONITOR'S AGREED MOTION FOR
AUTHORIZATION TO DESTROY INCONSEQUENTIAL RECORDS**

THIS CAUSE came before the Court on the Corporate Monitor, Daniel J. Stermer's *Agreed Motion for Authorization to Destroy Inconsequential Records*. The Motion seeks authorization for the Corporate Monitor to, in his sole discretion and the exercise of his professional business judgment, to destroy and/or shred certain inconsequential documents or files located at 301 Yamato Road, Suite 2222, Boca Raton, Florida 33431 (the "Corporate Office") in connection with the office wind-down and vacating of the Corporate Office. The Court, having considered the Motion and having reviewed the Court file, and being otherwise fully advised in the premises, it is hereupon,

ORDERED and ADJUDGED:

1. The Motion is **GRANTED**.
2. The Corporate Monitor is authorized to destroy the Records, as defined in the Motion, including by means of shredding.

DONE AND ORDERED, in Chambers at West Palm Beach, Florida.

Bradley G. Harper
Circuit Judge

Copies to: Counsel of Record and Corporate Monitor

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