

January 25, 2022

Dear Noteholders:

I am writing to in furtherance of previous Update issued regarding tax matters and in response to specific questions received from Noteholders to dates.

**Background of Corporate Monitorship**

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 (the “Order”) entered by The Honorable Ashley Zuckerman in the matter *State of Florida, Office of Financial Regulation* (the “OFR”) vs. *National Senior Insurance, Inc. d/b/a Seeman Holtz, et al.*, Palm Beach County Circuit Court Case No. 50-2021-CA-008718-XXXX-MB (the “OFR Action”), Daniel J. Stermer was 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”):

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. INTEGRITY 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.

### **Investors in the Private Placement Entities**

In its *Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and Other Statutory and Equitable Relief* filed on July 12, 2021 in the OFR Action, the OFR defines the following fourteen (14) entities under the Corporate Monitor's control as the "Defendant Private Placement Entities" or the "Defendant PPEs":

1. EMERALD ASSETS 2018, LLC ("Emerald 2018");
2. INTEGRITY ASSETS 2016, LLC ("Integrity 2016")
3. INTEGRITY ASSETS, LLC ("Integrity")
4. PARA LONGEVITY 2014-5, LLC ("PL 2014-5")
5. PARA LONGEVITY 2015-3, LLC ("PL 2015-3")
6. PARA LONGEVITY 2015-5, LLC ("PL 2015-5")
7. PARA LONGEVITY 2016-3, LLC ("PL 2016-3")
8. PARA LONGEVITY 2018-3, LLC ("PL 2018-3")
9. PARA LONGEVITY 2018-5, LLC ("PL 2018-5")
10. PARA LONGEVITY 2019-3, LLC ("PL 2019-3")
11. PARA LONGEVITY 2019-5, LLC ("PL 2019-5")
12. PARA LONGEVITY 2019-6, LLC ("PL 2019-6")
13. PARA LONGEVITY VI, LLC ("PL VI"), and
14. SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC ("SH Global").

The OFR alleges that the Defendant PPEs received millions of dollars after issuing a Private Placement Memorandum ("PPM") through which hundreds of investors subscribed and participated in the Defendant PPEs.

### **Distributions; Tax and Related Matters**

In my Update dated October 6, 2021, I informed you that neither the Consenting Corporate Defendants nor I are able to make any payments or distributions at this time, including any distributions to enable any individual retirement account ("IRAs") to fund Required Minimum Distributions ("RMDs") to its beneficiary.

This status remains the same at this time. The amount and timing of any distribution(s) which may be made in this matter are uncertain and will be determined in the course of the proceedings with respect to the Consenting Corporate Defendants and the Defendant PPEs and would need court approval. I will provide updated information on the Corporate Monitor's website – <https://nationalseniormonitorship.com/> – as it becomes available.

Additionally, please note the following information:

- Tax Information Reporting. The Consenting Corporate Defendants and the Defendant PPEs remain responsible for filing all applicable tax returns and forms. This includes all informational reporting on applicable Forms 1099 for each entity. The Corporate Monitor's office does not prepare or file these returns or forms for any of the entities. My understanding is that all Forms 1099-INT, Interest Income, for the 2021 tax year have been issued to report interest payments made during

2021. If no interest payment was made to you during 2021 you will not receive a 1099\_INT.

- Individual Retirement Account Matters. With respect to Noteholders who have one or more IRAs:
  - Tax Information Reporting. The custodian of each IRA, whether Vantage or other custodian, remains responsible for filing all applicable tax returns and forms for the IRA itself. This includes any Form 1099 with respect to distributions received by an IRA from the Consenting Corporate Defendants or Defendant PPEs. The Corporate Monitor's office does not prepare or file these returns or forms for any IRA.
  - RMDs. The RMD of each IRA is specific to that IRA and is a function of the specific assets held by the IRA. Any distributions to be made from the Consenting Corporate Defendants or Defendant PPEs will be determined at the entity level and are not tied to RMD determinations at the IRA level. As stated above, at this time there are no pending distributions from any of the Consenting Corporate Defendants or Defendant PPEs.
  - Custodian Fees. Each IRA is responsible for making or arranging the payment of the administrative fees of its custodian. The Consenting Corporate Defendants and Defendant PPEs are not responsible for the payment of these fees. In the event of the resignation of Vantage or any other custodian of an IRA, the beneficiary is responsible for arranging and effectuating the transfer of the account to a new custodian.
  - Administration of IRAs. I encourage each beneficiary of an IRA to communicate directly with the custodian of the IRA in order to address any questions with respect to the information provided herein and any and all other matters with respect to the administration of the IRA.
- Valuation Matters. I am not aware of any third-party valuation obtained by any of the Consenting Corporate Defendants or Defendant PPEs with respect to their equity value at any time. Further, the Corporate Monitor's office has not performed a valuation or obtained a third-party valuation of the equity value of any of the Consenting Corporate Defendants or Defendant PPEs, or of any specific investor's investment, at any time. With respect to account statements issued by the Consenting Corporate Defendants or Defendant PPEs to Noteholder's prior to the appointment of the Corporate Monitor, the Corporate Monitor's office has not reviewed or audited the information set forth therein and cannot verify or otherwise comment at this time on the value of any account.

**Additional Information**

I strongly encourage each Noteholder to consult with your independent legal counsel and tax and other advisors to advise you with respect to all matters relating to your investment, the OFR Action, and the Consenting Corporate Defendants or Defendant PPEs. The Corporate Monitor's office cannot and does not provide legal, tax, or other advice to any investors.

Please review this website – <https://nationalseniormonitorship.com/> – for updates and other information regarding the status of these proceedings. If you have other questions that are not addressed through the information on this website, you may contact our office by sending an email to [monitor@nationalseniormonitorship.com](mailto:monitor@nationalseniormonitorship.com).

Very truly yours,

*Daniel J. Stermer*

Corporate Monitor