

**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 UNOPPOSED MOTION TO EXPAND CORPORATE
MONITORSHIP ESTATE**

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 an order to expand the corporate monitorship estate to include five additional entities, as listed below. As grounds therefor, the Corporate Monitor states:

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. Among the Corporate Monitor's duties under the September 14, 2021 Order is to collect and preserve documents and information about the Consenting Corporate Defendants and investigate the operations of the businesses subject of the monitorship.

4. Through the Corporate Monitor's investigation of the books and records of the Consenting Corporate Defendants and bank records, in conjunction with cooperative consultation with Messrs. Marshal Seeman and Brian Schwartz and their respective counsel regarding the

entities listed below, the Corporate Monitor has identified and confirmed that there are five additional corporate entities which should be added to and made a part of the monitorship estate:

- a. Para Global 2019, LLC;
- b. Alloy Assets, LLC;
- c. Seeman Holtz Wealth Management, Inc.;
- d. Agency Acquisition Funding, LLC; and
- e. America's Favorite Insurance Services LLC.

5. The September 14, 2021 Order grants the Corporate Monitor permission to “extend the monitorship over any corporate entity, or to apply for equitable relief over the assets of any corporate entity or natural person which or who is reasonably believed to have received or to be holding assets or proceeds or other items of value derived from the Consenting Corporate Defendants or their investors.” (§10 R, September 14, 2021 Order.)

6. According to information gathered in the Corporate Monitor's ongoing investigation, the above-named five additional entities (the “Additional Entities”) are owned or controlled by one or more of the Consenting Corporate Defendants and/or Consenting Individual Defendants or acted at the direction or for the benefit of one or more of the Consenting Corporate Defendants and/or Consenting Individual Defendants.

7. Further, the Additional Entities fall within the scope of the September 14, 2021 Order which requires the Corporate Monitor to “take control over the Consenting Corporate Defendants' rights, possession, and ownership of all life settlement insurance policies, monies, funds, cryptocurrencies, property, and other assets owned by, in the possession of, or under the control of, the Consenting Corporate Defendants, wherever situated . . .” (§10 H, September 14, 2021 Order).

8. Lastly, the Corporate Monitor submits that granting him authority over the Additional Entities is essential to the marshaling and preservation of assets of the Consenting Corporate Defendants and serves the interests of justice.

WHEREFORE, Daniel J. Stermer, as Corporate Monitor, respectfully requests entry of the proposed Order attached as **Exhibit "A"**, (i) granting this Motion; (ii) expanding the scope of the September 14, 2021 Order to include the Additional Entities as entities over which he has rights of possession, access and control for all purposes stated in the original order; and (iii) granting such other and further relief as the Court deems just and proper.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on January 4, 2022 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/ Gavin C. Gaukroger
Gavin C. Gaukroger

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EXHIBIT “A”

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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.

**AGREED ORDER GRANTING CORPORATE MONITOR, DANIEL J. STERMER'S
UNOPPOSED MOTION TO EXPAND CORPORATE MONITORSHIP ESTATE**

THIS CAUSE came before the Court upon the *Corporate Monitor, Daniel J. Stermer's Unopposed Motion to Expand Corporate Monitorship Estate* (the "Motion") filed by the Court-appointed Corporate Monitor Daniel J. Stermer ("Corporate Monitor"). The Motion requests the Court to expand the corporate monitorship estate to include five additional corporate entities. The Court, having considered the Motion, the *Declaration of Daniel J. Stermer in Support of the Corporate Monitor's Unopposed Motion to Expand Corporate Monitorship Estate*, and the Court file, having noted that the Motion is unopposed by the affected parties, and being otherwise fully advised in the premises, it is hereupon,

ORDERED AND ADJUDGED that:

1. The Motion is hereby **GRANTED**.
2. The scope of the corporate monitorship created in this case is expanded to include the following five entities (collectively, the "Additional Entities"):
 - a. Para Global 2019, LLC, a Georgia limited liability company;
 - b. Alloy Assets, LLC, a Florida limited liability company;
 - c. Seeman Holtz Wealth Management, Inc., a Florida corporation;
 - d. Agency Acquisition Funding, LLC, a Delaware limited liability company;

and

e. America's Favorite Insurance Services LLC, a Delaware limited liability company

3. Daniel J. Stermer is appointed Corporate Monitor for the Additional Entities.

4. Based upon the Plaintiff's previously filings and the information the Corporate Monitor has supplied in the Motion and in the Declaration of the Corporate Monitor filed with the Motion, the same findings and conclusions that led the Court to include the Consenting Corporate Defendants apply equally to the Additional Entities and all of the assets of the Additional Entities. The September 14, 2021 Order¹ shall apply with equal force and effect to the Additional Entities as it applies to the Consenting Corporate Defendants. The terms and provisions of the September 14 Order are incorporated herein by reference.

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

BRADLEY HARPER
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Corporate Monitor

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¹ Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion.

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