

**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.

**DECLARATION OF DANIEL J. STERMER IN SUPPORT OF THE
CORPORATE MONITOR'S UNOPPOSED MOTION TO EXPAND
CORPORATE MONITORSHIP ESTATE**

DANIEL J. STERMER declares, pursuant to Fla. Stat. § 92.525, as follows:

1. I am over the age of eighteen and am competent to make this declaration based upon my personal knowledge of the matters set forth herein.

2. I am the court-appointed Corporate Monitor (the "Corporate Monitor") for the property, assets and business of the following twenty-seven (27) corporate-entity Defendants (collectively, the "Consenting Corporate Defendants") in the above-captioned action:

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ,
CENTURION INSURANCE SERVICES GROUP, LLC,
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,
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, and
CENTURION FUNDING SPV II LLC.

3. I submit this Declaration in support of the *Corporate Monitor's Unopposed Motion to Expand Corporate Monitorship Estate* (the "Motion") filed contemporaneously herewith.

4. Pursuant to the *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* entered by this Court on September 14, 2021 (the "Monitorship Order"), I, my counsel, and my forensic team (collectively, the "Monitorship Team"), have done an extensive amount of research and investigation into numerous entities that are under the common ownership and control or direction, directly or indirectly, of the Consenting Corporate Defendants and the officers and directors of the Consenting Corporate Defendants.

5. Based upon my and the Monitorship Team's investigation, I have identified the following five additional entities which should be included in the monitorship estate:

- 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.

6. I have determined that the Consenting Corporate Defendants and/or the officers and directors of the Consenting Corporate Defendants "directly or indirectly" benefit, own, possess, or control the additional entities and the assets of the additional entities, based on the following:

- Official corporate records (“Corporate Records”), including written consents assigning amounts due to and due from Consenting Corporate Defendants and affiliates;
- Intercompany financial transactions supported by bank account statements and QuickBooks data, including payroll records; and
- Cooperative consultations with Messrs. Marshal Seeman and Brian Schwartz regarding the intercompany transactions.

7. I submit that the addition of the inclusion of the aforementioned five additional entities is essential for my performance of my duties under the Monitorship Order and serves the interests of justice.

DECLARATION PURSUANT TO FLA. STAT. § 92.525

Under the penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Executed this 4th day of January 2022.

/s/ Daniel J. Stermer

DANIEL J. STERMER