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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.
_____/

NOTICE OF INTENT TO SERVE SUBPOENA *DUCES TECUM* WITHOUT DEPOSITION

YOU ARE HEREBY notified that, pursuant to Fla. R. Civ. P. 1.351(b), after ten (10) days from the date of service of this Notice, and if no objections are received from any party, the undersigned will issue the attached *Subpoena Duces Tecum Without Deposition*, upon:

Bank of America, N.A.
c/o CT Corporation System, Registered Agent
1200 South Pine Island Road
Plantation, FL 33324

DATED: April 14, 2022

BERGER SINGERMAN LLP
Counsel for Corporate Monitor
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Tel. (561) 241-9500
Fax (561) 998-0028

By: */s/ Brian G. Rich*
Brian G. Rich
Florida Bar No. 38229
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Gavin C. Gaukroger
Florida Bar No. 76489
ggaukroger@bergersingerman.com
Michael J. Niles
Florida Bar No. 107203
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 14, 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.

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

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
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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,
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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.
_____/

SUBPOENA *DUCES TECUM* WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: **Bank of America, N.A.**
c/o CT Corporation System, Registered Agent
1200 South Pine Island Road
Plantation, FL 33324

YOU ARE COMMANDED to appear at BERGER SINGERMAN LLP, 525 Okeechobee Boulevard, Suite 1250, West Palm Beach, FL 33401, on **May 6, 2022 at 9:30 a.m.**, and to bring with you at the time and place all documents listed on the attached **Schedule A**. These items will be inspected and may be copied at that time. You will not be required to surrender the original items.

THIS IS NOT A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this Subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

If you fail to:

(1) Appear as specified; or
(2) Furnish the records instead of appearing as provided above; or

(3) Object to this subpoena, you may be in contempt of court.

YOU ARE SUBPOENAED to appear by the following attorney, and unless excused from this Subpoena by the attorney whose name appears on this Subpoena or the court, you shall respond to this subpoena as directed.

Dated April 26, 2022

BRIAN G. RICH, ESQ.
For the Court

By: s/ *Brian G. Rich*
Brian G. Rich
Florida Bar No. 38229

BERGER SINGERMAN LLP
Attorneys for Corporate Monitor, Daniel J. Stermer
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Tel.: (561) 241-9500
Fax: (561) 998-0028
E-mail: brich@bergersingerman.com

SCHEDULE A

DEFINITIONS

As used in this Subpoena, certain terms have specific meanings as defined in this section.

A. The term "all" shall mean "any and all" so as to bring within the scope of the requests herein all documents and things that otherwise might be construed to be outside its scope.

B. The terms "and" as well as "or" shall be construed both disjunctively and conjunctively, as necessary, to bring within the scope of the request all responses that might otherwise be construed to be outside its scope.

C. The terms "any" and "each" should be understood to include and encompass "all."

D. The terms "document", "documents" and "documentation" means any written or graphic matter or other means of preserving thought or expression including correspondence, memoranda, notes, messages, letters, emails, invoices, reports, receipts and statements of account, ledgers, books, drawings, graphs, charts, photographs, phone records, electronic tapes, discs or other recordings, computer programs, and other data compilations from which information can be obtained, including both written or electronic communications. "Documents" shall also include all electronically stored information (hereinafter "ESI") including but not limited to all computer-generated information or data of any kind, stored in or on any storage media located on computers, file servers, mobile devices, smart phones, disks, back up tapes or other media.

E. The terms "communication" and "communications" means any oral, written or electronic statement or discussion.

F. The term "related to" shall mean having as its subject, concerning, referring to, describing, evidencing or, in whole or in part, constituting.

G. The terms "You" and "Your" shall mean the individual this subpoena is directed to including any agents, representatives, or any person or entity acting or purporting to act on behalf of, in concert with, or is subject to the direction or control of, said individual.

H. The term "OFR" shall mean the State of Florida, Office of Financial Regulation, its attorneys, outside advisors or consultants, investigators, representatives of any kind, and any other person or related entity acting on behalf of or for the benefit of the OFR, either directly or indirectly.

I. The term "Defendants" shall mean, collectively, the following:

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;
INTEGRITY 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; and
PRIME SHORT TERM CREDIT INC.

J. The term "Relief Defendants" shall mean, collectively, the following:

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

INSTRUCTIONS

A. This Subpoena is intended to cover all documents in your possession, custody or control, or that you have the legal right or practical ability to obtain, whether located at your home or at any of your offices, at the offices or homes of family members, agents, successors or assigns, accountants, attorneys, assistants, bankers, affiliates or others, or at any other place, including in any remote or online storage (including, for example, in a Web-based or other online document storage system, contact storage or management system, calendar system or email account).

B. This Subpoena is intended to cover all documents in whatever form including, without limitation, in electronic form on any computer (including any personal computer), PDA,

mobile phone, email device, portable electronic storage device, or information storage media (including without limitation any Web-based or other online document storage system, contact storage or management system, calendar system or email account) in the possession, custody or control of you, your agents, any service subscribed to by you or on your behalf, or any other persons acting or purporting to act on your behalf.

C. This Subpoena is intended to cover all drafts of documents regardless of whether they were executed or not, as well as incomplete or partial documents, to the extent such draft or incomplete documents differ from other produced documents.

D. Documents shall be produced in their original file folders or, in lieu thereof, any writing on the file folders from which documents are taken shall be copied and appended to such documents, and the persons for whom, or department, division, or office for which, such file folders are maintained shall be identified.

E. Documents produced pursuant to this Subpoena shall be identified by the number of the request in response to which they are produced or produced as they are kept in the usual course of business.

F. Production of Electronically Stored Information ("ESI") or any electronically stored data shall be in native format unless otherwise agreed, consistent with attached **Schedule B**. In producing documents consisting of electronically stored data in machine-readable form in response to any request, provide such data in a form that does not require specialized or proprietary hardware or software.

G. If a claim of privilege is asserted in objecting to any request in this Subpoena, or sub-part thereof, and a full response is not provided on the basis of such assertion, respond to any part of the request which is not objectionable, produce all nonprivileged portions of responsive documents in redacted form, and furnish the following information in a privilege log with respect to that portion of the request as to which the claim of privilege is asserted: (1) the nature of the privilege that is being claimed; (2) the type of document or thing withheld; (3) the general subject matter of the document; (4) the date of the document; (5) such other information as is sufficient to identify the document for a *subpoena duces tecum* including where applicable, the author(s) of the document, the addressee(s) of the documents, and the other recipients, and, where not apparent, the relationship of the author, addressee and other recipients to each other.

H. If you maintain that any document or record responsive to any request in this Subpoena has been destroyed or is no longer in your possession, custody or control, state whether it: (1) is missing or lost; (2) has been destroyed; (3) has been transferred, voluntarily or involuntarily, to others; or (4) has been disposed of in some other manner. In addition, where possible, set forth (i) the content of said documents, (ii) the location of any copies of said document, (iii) the date of such destruction, and (iv) the name of any person(s) who ordered, authorized or participated in such destruction.

I. If a document is no longer in your possession, but a copy of said document has been maintained by an agent or consultant to you (such as, but not limited to, your accountants, auditors,

attorneys, assistants, bankers, affiliates, or any expert retained by you), identify such document and identify the present custodian of such document.

J. Each request calls for production of each document and thing in its entirety, without abbreviation, redaction, expurgation or modification.

K. These are continuing requests for the production of documents and things. If, after making your initial production, you or your attorneys, agents or representatives, obtain or become aware of any further documents or things responsive to this Subpoena, you are requested to promptly produce such additional documents or things.

DOCUMENTS TO BE PRODUCED

With respect to Grace Holdings Financial, LLC, Acct No. xxxxxxxx7285, please produce:

1. Bank statements for each month from January 1, 2015 to present.

2. All account records, including, but not limited to, signature cards, account applications, and account closure records.

3. Communications with any agents, managers, representatives, attorneys, or others regarding the account.

SCHEDULE "B"
Production of Electronically Stored Information (ESI)
FORM OF PRODUCTION

A. Imaged Production: All electronically stored information ("ESI") is to be produced in a structured format including industry standard load files, bates numbered image files, native files, and searchable text files.

1. Images

a. ESI will be produced (printed and loaded) in 300DPI resolution or greater, Group IV Monochrome single-page Tagged Image File Format (.TIF) files.

b. All Native files provided and word searchable OCR/extracted text (Optical Character Recognized – i.e. searchable text) in UTF-8 format.

c. Color pages should be produced as color JPEG images.

d. Email natives should be delivered in MSG or EML format.

e. Metadata will be provided in a DAT file with standard Concordance delimiters.

f. The text files containing the OCR/Extracted Text shall be produced in multi-page format with the name corresponding to its associated document.

g. **All small and oversized images should be resized to fit on 8.5x11 canvas.**

2. Load File

a. Load files will be provided in Opticon (.OPT) format and an IPRO LFP (.lfp) format.

3. Folder Structure: The files should be delivered with the following folder structure:

a. **IMAGES** – contains the TIF and JPG files, up to 10,000 items.

b. **DATA** – contains the OPT and LFP files and the metadata text file (DAT)

c. **NATIVES** – contains all the original native files named as the BEGDOC

d. **TEXT** – contains the document-level OCR/Extracted text files

named as the BEGDOC

B. Redacted Documents

1. By agreement, native documents will not be produced for Redacted Documents, which will be produced in 300DPI Group IV Monochrome Tagged Image File Format (.TIF or .tiff) files without native files or redacted information.

2. Metadata for redacted files shall be produced.

3. By agreement, metadata which discloses the content of redacted information may be withheld.

4. The specs for redacted documents are:

a. Single page TIF images.

b. MultiPage text files, also known as "Document level."

c. Metadata text file with concordance delimiters.

d. Load files will be provided in Opticon (.OPT) format and an IPRO LFP (.lfp) format.

C. Metadata: The following metadata fields will be produced: (Metadata is defined as "unaltered metadata that exists at the time of collection").

Eclipse Metadata Field	**Field Description**
BegDoc	BegDoc
EndDoc	EndDoc
BegAttach	BegAttach
EndAttach	EndAttach
Application	Application/Application Name
AttachmentIDs	Bates numbers of attachment(s)
Attachments	Names of attachment files
AttachRange	Attachment Range
Authors	Document author
BCC	BCC (Name + email)
CC	CC (Name + email)
Companies	Company name
Custodian	Custodian (Last, First)
DateCreated	Date created (MM/DD/YYYY)
DateReceived	Date email received (MM/DD/YYYY)
DateSaved	Date last saved (MM/DD/YYYY)
DateSent	Date email sent (MM/DD/YYYY)
Doctitle	Title

FileType	Document Type Description
FileExtension	File extension
Doclink	Link to native files produced
ExtractedText	Link to text files produced
Filename	Original filename
FileSize	File size in bytes
Folder	Relative Path (Inbox, Sent, etc.)
From	Sender (Name + email)
Hash_Code	MD5 hash
Header	Email header
InternetMSGID	IntMsgID
MessageID	MsgID
NumAttachments	Attachment count
NumPages	Page count
ParentID	Parent bates number
Password_Protect	Y/N field
Read	Y/N
SHA1	SHA1 hash
Sources	CD, DVD, hard drive; brief desc. of data
StoreID	Name of PST/NSF file (if relevant)
Subject	Email/Document subject
TimeReceived	Time email received (12-hour HH:MM)
TimeSent	Time email sent (12-hour HH:MM)
To	To (Name + email)

For **NATIVE .xls (Excel), .ppt (PowerPoint), and .doc (Word) files** the following additional metadata fields should be included.

Excel_Comments	Comments
Excel_HiddenColumns	Hidden Columns
Excel_HiddenRows	Hidden Rows
Excel_HiddenWorksheets	Hidden Worksheets
Num_Lines	Number of lines
Num_Paragraphs	Number of paragraphs
Num_slides	Number of slides
Num_Notes	Number of notes
Num_HiddenSlides	Number of hidden slides
Num_Multimedia	Number of multimedia clips
Security	Security
Word_Comments	Comments
Word_HiddenText	Hidden Text
Word_Revisions	Revisions/Markups