

**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.

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**CORPORATE MONITOR’S UNOPPOSED MOTION TO APPROVE THE  
PROPOSED NOTICING AND CLAIMS PROCESS**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”) for the property, assets, and businesses of the thirty-two (32) corporate entities<sup>1</sup> (the “Consenting Corporate Defendants”) pursuant to the *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, dated September 14, 2021, and the *Agreed Order Granting Corporate Monitor, Daniel J. Stermer’s Unopposed Motion to Expand Corporate Monitorship Estate*, dated January 6, 2022, respectfully moves for entry of an order approving the Corporate Monitor’s proposed noticing and claims administration procedures and the form of the notice to be sent to potential claimants (the “Claims Process”). 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”) filed a *Consent Motion for Appointment of Corporate Monitor* (the

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<sup>1</sup> The Consenting Corporate Defendants include: 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, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA’S FAVORITE INSURANCE SERVICES LLC

“Consent Motion”), seeking, *inter alia*, the appointment of the Corporate Monitor for the property, assets, and businesses of the initial Consenting Corporate Defendants, as well as a temporary injunction against the Consenting Corporate Defendants and two consenting natural-person Defendants, Marshal Seeman and Brian J. Schwartz (the “Consenting Individual Defendants”).

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 (such proceeding, the “Corporate Monitorship”).

3. On January 6, 2022, the Court entered an agreed order expanding the scope of the Corporate Monitorship to include five (5) additional corporate entities as Consenting Corporate Defendants (together with the September 14, 2021 Order, the “Appointment Orders”).

4. Pursuant to paragraph 8 of the September 14, 2021 Order, the Corporate Monitor was granted, *inter alia*, “possession of the assets, of whatever kind and wherever situated, of the Consenting Corporate Defendants to the Corporate Monitor for the purpose of preserving and maintaining their assets.” Further, pursuant to paragraph 13DD of the September 14, 2021 Order, the Corporate Monitor was directed to “propose to this Court a claims process for the determination of amounts owed to investors and other creditors, the determination of priorities among such claims, and a distribution plan for the return of funds.”

5. In the Corporate Monitor’s reports filed in this matter, the Corporate Monitor advised the Court that it was too early to determine the extent of claims against the entities, the assets that may be available to fund distributions or the potential and amount of any recovery, and

that he would continue his investigation into those issues. The Corporate Monitor has continued his investigation and anticipates filing and seeking approval of a proposed initial pro rata distribution plan (the “Distribution Plan”) at a later date to be determined, when the total amount of assets available for ultimate distribution to approved claims of creditors of the Corporate Monitorship has been determined. A more detailed description of the Corporate Monitor’s efforts to date with respect to the marshaling and liquidation of assets and investigation of potential claim(s) held by the Corporate Monitorship may be found in the *Corporate Monitor’s Initial Report* filed on October 14, 2021, the *Corporate Monitor’s Second Report* filed on January 12, 2022, and the *Corporate Monitor’s Third Report* filed on April 12, 2022.

**KNOWN NOTEHOLDERS<sup>2</sup> AND CREDITORS OF THE  
CORPORATE MONITORSHIP ESTATE<sup>3</sup>**

The Corporate Monitor has sent numerous emails to all known Noteholders (“All Known Noteholders”) and putative creditors of the Corporate Monitorship Estate, informing them of the commencement of this action and the Corporate Monitorship, providing general information regarding the case, keeping them informed by posting pleadings filed, orders entered, and status updates to the Corporate Monitorship website: <https://nationalseniormonitorship.com>. In addition, the Corporate Monitor has responded to inquiries from Noteholders and/or the Noteholder representatives, including family members and professionals, and creditors, and has addressed Noteholder concerns to the fullest extent possible, including via email and telephone calls.

Grace Holdings Financial, LLC (“Grace Holdings”) is a Corporate Defendant named in

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<sup>2</sup> For clarity’s sake, as utilized in this Motion, the phrase “All Known Noteholders” includes the Grace Holdings Noteholders as described below

<sup>3</sup> For purposes of this Motion, the term “Corporate Monitorship Estate” includes the Consenting Corporate Defendants and the Grace Holdings Financial, LLC noteholders (“Grace Holdings Noteholders”).



this matter but not one of the Consenting Corporate Defendants which the Corporate Monitor has been appointed and as such, is outside of the Corporate Monitorship Estate. However, the Corporate Monitor has communicated with Grace Holdings Noteholders directly in response to inquiries from them as certain Grace Holdings notes were purportedly secured by insurance policies owned by one or more of the Consenting Corporate Defendants.

When or if Grace Holdings will become part of the Corporate Monitorship Estate is subject to discussions between the Office of Financial Regulations and Grace Holdings and/or a future order of the Court. The Corporate Monitor cannot unilaterally take control of Grace Holdings and make it a part of the Corporate Monitorship Estate. Either Grace Holdings needs to consent/agree to same or the Court must enter an order determining same. Until either option occurs, the Corporate Monitor does not have authority over Grace Holdings.

However, the Corporate Monitor has been and continues to believe that the noteholders who invested with Grace Holdings, the Grace Holdings Noteholders, should be potential creditors of the Corporate Monitorship Estate, subject to further evaluation of these noteholders' interests through this proposed Claims Process. The Corporate Monitor continues to seek a resolution so that Grace Holdings becomes part of the Corporate Monitorship Estate. Notwithstanding, Grace Holdings Noteholders should be included in the Claims Process even if Grace Holdings itself ultimately does not become part of the Corporate Monitorship Estate.<sup>4</sup>

## **THE PROPOSED NOTICING AND CLAIMS PROCESS**

### **A. The Noticing Process and Claims Documentation**

The Corporate Monitor will use his best efforts to notify All Known Noteholders and creditors of the Corporate Monitorship Estate using the proposed Legal Notice, Notice of Bar

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<sup>4</sup> Grace Holdings filed a Motion to Dismiss the OFR Complaint and that Motion is set for hearing before the Court on July 12, 2022 at 2:00 p.m.

Date/Last Day to File Proofs of Claim (the “Bar Date Notice”), and Proof of Claim Form, attached hereto as **Exhibits “A”, “B” and “C”**, respectively (collectively, the “Claims Package”), by email to all known email addresses as contained in the business records of the Consenting Corporate Defendants and as provided by the putative creditors and parties in interest, and their counsel, as applicable, that have contacted the Corporate Monitor since his appointment. For any known creditors that only have a physical mailing address on record with the Consenting Corporate Defendants, the Corporate Monitor will mail them the Claims Package by U.S. Mail. Additionally, upon request from any party that believes it may be a creditor of the Corporate Monitorship Estate, the Corporate Monitor will provide an electronic copy of the Claims Package. Such request should be sent by email to: [dstermer@DSIconulting.com](mailto:dstermer@DSIconulting.com) with a copy to [brich@bergersingerman.com](mailto:brich@bergersingerman.com) (subject line: Request for Claims Package). The Corporate Monitor will also make the Claims Package available to download from the Corporate Monitorship website, accessible at <https://nationalseniormonitorship.com> and the Corporate Monitor will display information/documentation related to the Claims Package conspicuously on the Monitorship website.

The Legal Notice will apprise the potential claimants of how the Claims Process was created, who is eligible to submit a claim in order to potentially receive a monetary distribution from the Corporate Monitorship Estate, the process by which eligible claimants can submit a claim, and the process by which the Corporate Monitor will determine which eligible claimants have Allowed Claims and thus are entitled to receive a *pro rata* distribution from the Corporate Monitorship Estate. See **Exhibit “A”**.

The Bar Date Notice will notify the potential claimants of the deadline to file claims and advise claimants that they will be forever barred and permanently enjoined from asserting a claim

against the Consenting Corporate Defendants should they fail to timely file a proof of claim. *See* **Exhibit “B”**.

The Proof of Claim Form will ask claimants to provide, among other things: (i) the nature of the claim; (ii) a copy of the agreement(s) or other document evidencing or giving rise to the claim; (iii) the amount of the asserted claim against the Consenting Corporate Defendants or Corporate Monitorship Estate; and (iv) the amount of any transfer of funds that the claimant or any of its representatives received from any of the Consenting Corporate Defendants, or any of their affiliates, or any persons or entities on behalf of the foregoing, in connection with the asserted claim. The Proof of Claim Form will also require the claimant to, *inter alia*, certify the accuracy of the information provided and certify that each of the two factors of an Allowed Claim, set forth *infra*, are satisfied and requires that the Proof of Claim Form be executed and dated by the creditor submitting same. *See* **Exhibit “C”**.

#### **B. The Claims Process**

After analysis of the equities, expenses, and likely recovery to the Corporate Monitorship Estate, the Corporate Monitor proposes a Claims Process in which holders of Allowed Claims may participate in a pool of recovered funds, the *pro rata* distribution of which will be provided pursuant to a Distribution Plan that the Corporate Monitor will propose at a future date, subject to Court approval.

Accordingly, the attached Proof of Claim Form requests that claimants establish that they are “net losers” prior to having an Allowed Claim (as defined *infra*). The Corporate Monitor requests that the Court permit the Corporate Monitor to determine which claimants hold Allowed Claims, in his sole discretion, without further order of this Court. The Corporate Monitor will ask the Court to approve the amount and timing of any monetary *pro rata* distribution that he

seeks to make, upon collection and liquidation of assets of the Corporate Monitorship estate sufficient to make a distribution in the future.

1. **Proposed Eligibility of Claimants**

For purposes of ensuring a full and fair notice and claims process, the Corporate Monitor intends to distribute the Claims Package, which will include an approved form of Legal Notice, Bar Date Notice, and Proof of Claim Form, to each noteholder, investor or possible creditor that the Corporate Monitor has discovered in the books and records of the Corporate Monitorship Estate, to each party that has appeared or otherwise participated in this proceeding, and to individuals or entities that have contacted the Corporate Monitor asserting a claim. For the avoidance of doubt, receipt of a Claims Package does not constitute admission by the Corporate Monitor that such party is in fact a creditor of the Consenting Corporate Defendants. Upon the dissemination of the Claims Package, the Corporate Monitor will file a Notice of Distribution of Claims Package on the docket. To the extent that an alleged creditor believes it has a claim and has not received a Claims Package, such alleged creditor may request a Claims Package by email to the Corporate Monitor at: [dstermer@DSIconsulting.com](mailto:dstermer@DSIconsulting.com) with a copy to [brich@bergersingerman.com](mailto:brich@bergersingerman.com) (subject line: Request for Claims Package). Additionally, the Claims Package will be available to download from the monitorship website, accessible at: <https://nationalseniormonitorship.com>.

2. **Proposed Definition of “Allowed Claim” and Basis for Distribution**

The claim of a creditor will be allowed (an “Allowed Claim”), such that the creditor will be entitled to receive a *pro rata* monetary distribution based on the amount still owed to the creditor, provided that the creditor sufficiently demonstrates to the satisfaction of the Corporate Monitor through documentation and/or sworn statements, among other things:

- (i) that one or more of the Consenting Corporate Defendant(s) incurred a debt to



such creditor, and such debt remains unpaid in whole or in part;

AND

- (ii) that the total amount of funds that such creditor paid to or on behalf of the Consenting Corporate Defendants exceeds the total amount of funds that the Consenting Corporate Defendants or their affiliates transferred back to such creditor, or that the total value of the goods or services that the creditor provided to the Corporate Monitorship Estate exceeds the total amount that the Corporate Monitorship Estate paid to such creditor for those goods and services (including all period payments or other payment made by one or more of the Consenting Corporate Defendant(s) or someone on behalf of one or more of the Consenting Corporate Defendant(s) to the claimant.

The Corporate Monitor may consider other factors in determining whether a claim is an Allowed Claim.<sup>5</sup> If a creditor cannot prove both of the foregoing factors, that creditor's claim will be disallowed and such creditor will receive no monetary distribution on account of such alleged claim.<sup>6</sup>

If a creditor makes the requisite showing regarding his/her/its claim and the Corporate Monitor determines that such claim is an Allowed Claim, then, and only then, will the creditor be entitled to a recovery from the Corporate Monitorship Estate. **The Corporate Monitor will propose a method for monetary distribution to Allowed Claims for approval by the Court after sufficient assets have been recovered and/or liquidated to warrant a distribution to Allowed Claimants.** The Corporate Monitor will not include within his calculation for

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<sup>5</sup> Notwithstanding these factors for determining whether a claim should be allowed, the Corporate Monitor will analyze each claim individually, the circumstances surrounding each creditor's payment to and involvement with the Consenting Corporate Defendants and each creditor's dealings and relationship with the Consenting Corporate Defendants, and the Corporate Monitor reserves the right to object to and seek to disallow any claim.

<sup>6</sup> To the extent a creditor received funds from the Consenting Corporate Defendants or another entity on behalf of the Consenting Corporate Defendants in excess of the Consenting Corporate Defendants' total debt to such creditor, such that the creditor profited from, meaning that the purported creditor actually received more money from the Consenting Corporate Defendants than they remitted to the Consenting Corporate Defendants, as opposed to being a "net loser", the Corporate Monitor reserves the right to pursue a claim against such creditor for the return of the profit received and any other appropriate relief and specifically reserves the right to pursue such a claim, known as a "claw-back".

distributions any profit, rate of return, dividend, periodic interest or other payment in excess of the principal amount invested that was promised to such claimants: to be clear, the calculations will be based upon the principal amount of money forwarded, delivered or otherwise provided by the claimant to one or more of the Consenting Corporate Defendant(s) or any other Defendant, which shall be reduced by any periodic payment(s) or other payment made by one or more of the Consenting Corporate Defendant(s) or any other Defendant or by someone on behalf of one or more of the Consenting Corporate Defendant(s) or any other Defendant to the claimant, regardless of whether such payment was intended to be and/or identified as profit, rate of return, dividend, periodic interest or other payment in excess of the principal amount invested or as the return of principal.

3. **Proposed Sequence and Timing of Claims Submission Process**

The Corporate Monitor proposes that the Claims Process proceed in accordance with the following schedule:

- a. Claims Process Approval: The date upon which this Court grants this Motion and approves the Corporate Monitor's proposed Claims Process shall be referred to herein as the "Claims Process Approval Date";
- b. Corporate Monitor's Mailing of Claims Package: The Corporate Monitor would send the Claims Package to known creditors of the Consenting Corporate Defendants via email or first-class mail, within fifteen (15) days (the "Claims Package Distribution/Mailing Date") after the Claims Process Approval Date;
- c. Date by Which Claims are Required to be Submitted: Claimants would then have until August 31, 2022 (the "Claims Submission Date") to return the completed Proof of Claim Form to the Corporate Monitor.

Any completed Proof of Claim Form postmarked after the Claims Submission Date shall not be allowed, absent a showing of good cause by the claimant.

4. **Adjudication of Claims and Proposed Distribution of Funds to Creditors with Allowed Claims**

Upon conclusion of the claims submission process as described above, the Corporate Monitor will update the Court and all claimants regarding a proposed timeline for the adjudication of claims, which will include a post-adjudication process to request reconsideration of the Corporate Monitor's determination of the allowance or disallowance, in whole or in part, of any particular Proof of Claim, as well as a process to appeal the Corporate Monitor's final determination to this Court.

The Corporate Monitor, and his Professionals, including his counsel and his consultants, will review all Proof of Claim Forms received from Noteholders and putative creditors as of the Claims Submission Date, and determine the total monetary amount of each of the Allowed Claims. The Corporate Monitor will continue his efforts to liquidate the assets of the Consenting Corporate Defendants and prepare to make an initial monetary *pro rata* distribution, the amount of which will be determined by the amount of funds recovered by the asset liquidation(s) or as a result of potential claim(s) against third parties less any amount(s) approved by the Court.

Once an amount is set for the monetary *pro rata* distribution, the Corporate Monitor will determine what percentage of the total Allowed Claims is represented by the proposed *pro rata* distribution amount and propose a method for distribution based on the total Allowed Claims, amount available in the distribution fund and other pertinent factors. The Corporate Monitor will submit a proposed Distribution Plan to the Court for approval prior to any distributions being made thereunder. Further distributions may be made upon Court approval as additional distribution(s) become possible; however, holders of Allowed Claims need not resubmit any

claim or claim related documentation.

### **LEGAL AUTHORITY FOR CLAIMS PROCESS**

The Court's power to supervise an equity monitorship and to determine the appropriate actions to be taken in its administration is extremely broad. *S.E.C. v. Elliott*, 953 F.2d 1560, 1566 (11th Cir. 1992); *S.E.C. v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986). "A district court has summary jurisdiction over receivership proceedings [akin to a corporate monitorship] and may deviate from the Federal Rules of Civil Procedure in favor of exercising its broad powers and wide discretion to determine relief." *S.E.C. v. Torchia*, 922 F.3d 1307, 1316 (11th Cir. 2019) (internal quotations omitted). The Court's wide discretion derives from the inherent powers of an equity court to fashion relief. *Bendall v. Lancer Mgmt. Grp.*, LLC, 523 F. App'x 554, 557 (11th Cir. 2013) (citing *Elliott*, 953 F.2d at 1566). The relief sought by the Corporate Monitor falls squarely within those powers. In receivership proceedings [akin to a corporate monitorship], "[e]very person who has any claim or demand against the estate or property in the custody of the court through the receiver, . . . must assert such claim or demand in the court in which such receiver was appointed." Ralph E. Clark, *Clark on Receivers* § 646, at 1132 (3rd ed. 1992); *see also S.E.C. v. Morriss*, 2014 WL 585395, at \*3 (E.D. Mo. Feb. 14, 2014) (holding that claimant forfeited his right to either claim or object to a distribution by failing to submit a claim). One way for claimants to assert a claim is for claimants to be authorized "under a general order of the appointing court [to file their] claim with the receiver." *Clark on Receivers* § 646, at 1132. The receiver may agree or disagree with the claim, which claim is ultimately approved or disapproved by the court. *Id.*; *see also S.E.C. v. Founding Partners Capital Mgmt.*, 2014 WL 2993780, at \*1 (M.D. Fla. July 3, 2014) (agreeing with and adopting the receiver's recommendations concerning investor claims). "The claims should be definite enough to enable the receiver to pass on their



validity, fairness and legality and to place them in their proper and legal category of claims for preference, if any.” Clark on Receivers § 651, at 1142. In addition to approving the proof of claim form, it is not unusual for a court overseeing a receivership to enter an order limiting the time within which claims must be presented. *See S.E.C. v. Onix Capital, LLC*, 2018 WL 1124435 (S.D. Fla. 2018) (“among these broad powers is the power to establish proof of claim procedures and set an effective claims bar date”) (citations omitted). An order limiting the time within which claims must be submitted has been deemed to be necessary to “lay the foundation for the court to order payments to creditors and distribution to those entitled to receive.” Clark on Receivers § 651, at 1142.

Furthermore, a court with jurisdiction over a receivership [akin to a corporate monitorship], by advertisement and by proper notices by mail, by publication and otherwise should take measures to notify interested parties affected by the receivership. *Id.* § 652, at 1143; *see also S.E.C. v. Neal*, 2007 WL 1231790, at \*1 (D. Or. Apr. 24, 2007) (denying claimant’s objection to the denial of his claim filed after the claims bar date despite claimant’s assertion that he never received notice where notice to claimants was published in newspapers and online).

Under the terms and conditions of the September 14 Order, the Corporate Monitor, *among other things*, is authorized, empowered, and directed to (a) 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, (b) preserve, hold and manage all monitorship assets and perform all acts deemed necessary and appropriate to preserve the value of those assets in order to prevent any loss, damage or injury to investors of the Consenting Corporate Defendants, and (c) identify the liabilities the Corporate Monitor believes to be the

legal obligations of the Consenting Corporate Defendants. In exercising his duties, including the exercise of his professional business judgment, the Corporate Monitor has determined that it is reasonable, advisable, and in the best interest of the Monitorship that the Court approve the claims administration procedure, including the Proof of Claim Form, and the Claims Process Instructions set forth in this motion and in the attached exhibits.

### **CONCLUSION**

**WHEREFORE**, the Corporate Monitor, respectfully requests that this Court enter an order similar in form to the proposed Order attached hereto as **Exhibit “D”**: (1) approving and authorizing the Corporate Monitor to implement the Claims Process proposed herein or a process and plan that is substantially similar in form, effect and cost as the Corporate Monitor may determine, in the exercise of his professional judgment, in his sole discretion, is necessary, appropriate and in the best interest of the Corporate Monitorship Estate, including the Grace Holdings Noteholders; (2) authorizing the Corporate Monitor to carry out the noticing and claims processes pursuant to the Legal Notice attached as **Exhibit “A”**, the Bar Date Notice attached as **Exhibit “B”**, and the Proof of Claim Form attached as **Exhibit “C”**; (3) authorizing the Corporate Monitor to send the Claims Package by email to all eligible claimants except to the extent that he only has a physical address for an eligible claimant for which those will be mailed via USPS; and

(4) granting such other relief as this Court deems just and appropriate.

Dated: June 17, 2022

Respectfully submitted,

BERGER SINGERMAN LLP  
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By: /s/ Brian G. Rich

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 17, 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/ Brian G. Rich  
Brian G. Rich

**SERVICE LIST**

<p>A. Gregory Melchior, Esq., Chief Counsel  George C. Bedell, III, Esq., Chief Counsel  <i>Office of General Counsel</i>  <i>Florida Office of Financial Regulation</i>  200 East Gaines Street  Tallahassee, FL 32309  Greg.Melchior@flofr.gov  George.Bedell@flofr.gov  Sharon.Sutor@flofr.gov  <i>Counsel for Plaintiff</i></p>	<p>Scott Alan Orth, Esq.  <i>Law Offices of Scott Alan Orth</i>  3860 Sheridan Street, Ste. A  Hollywood, FL 33021  scott@orthlawoffice.com  service@orthlawoffice.com  eserviceSAO@gmail.com  <i>Attorney for Defendant Marshal Seeman,  Twenty-six Defendant Entities</i></p>
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<p>Harris J. Koroglu, Esq.  Shutts &amp; Bowen LLP  200 South Biscayne Boulevard, Suite 4100  Miami, FL 33131  hkoroglu@shutts.com  <i>Attorneys for MCM 301 Yamato LLC</i></p>	<p>Angela C. Flowers, Esq.  Kubicki Draper  13906 N.E. 20th Avenue, Building 500  Ocala, FL 34470  Af-kd@kubickidraper.com  <i>Attorneys for Pelican Capital Management, LLC</i></p>

# **EXHIBIT “A”**

**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.

/

**LEGAL NOTICE OF CLAIMS ADMINISTRATION PROCESS**

IF YOU ARE A CURRENT CREDITOR OF ANY OF THE CONSENTING CORPORATE DEFENDANTS (COLLECTIVELY, THE “CORPORATE MONITORSHIP ESTATE”), OR IF YOU ARE A GRACE HOLDINGS NOTEHOLDER, YOU MAY BE ENTITLED TO PARTICIPATE IN MONETARY RECOVERY FROM THE ASSETS RECOVERED IN THIS ACTION.

SUBMISSION OF ALL CREDITOR CLAIMS TO THE CORPORATE MONITOR, AS DEFINED HEREIN, ARE DUE PURSUANT TO THE COURT’S ORDER ON OR BEFORE: AUGUST 31, 2022.

**INTRODUCTION**

On September 14, 2021, the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida (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 (the “Corporate Monitor”) for twenty-seven (27) entities and their affiliates, subsidiaries, successors, and assigns, until further Order of the Court (such proceeding, the “Corporate Monitorship”).<sup>1</sup>

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<sup>1</sup> Grace Holdings Financial, LLC is not one of the Consenting Corporate Defendants, is not one of the entities over which the Corporate Monitor has been appointed and as such, is outside of the Monitorship Estate. However, the Corporate Monitor has communicated with Grace Holdings Noteholders directly and in response to inquiries from the



On January 6, 2022, the Court entered an agreed order (the “January 6, 2022 Order” and, together with the September 14, 2021 Order, collectively, the “Appointment Orders”) expanding the scope of the Corporate Monitorship to include five (5) additional corporate entities (the twenty-seven (27) entities together with the five (5) additional entities are referred to as the “Consenting Corporate Defendants”).<sup>2</sup> The Appointment Orders, among other things, empowered the Corporate Monitor to marshal all assets of the Consenting Corporate Defendants, including locating, taking custody, possession and control of, safeguarding, and liquidating all such assets, and ensure fair and equitable repayment of creditors of the Consenting Corporate Defendants.

On June 17, 2022, the Corporate Monitor filed with the Court the *Corporate Monitor’s Unopposed Motion to Approve the Proposed Noticing and Claims Process*. On June \_\_\_\_, 2022, the Court entered the *Order Approving the Noticing and Claims Administration Process* (the “Claims Procedure Order”), pursuant to which the “Eligible Claimants” (defined below) shall file the Proof of Claim Form attached hereto for recovery of such Eligible Claimant’s allowed claim

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Grace Holdings Noteholders.

When or if Grace Holdings will become part of the Monitorship Estate is subject to discussions between the Office of Financial Regulations and Grace Holdings and/or a future order of the Court. The Corporate Monitor cannot unilaterally take control of Grace Holdings and make it a part of the Monitorship Estate. Either Grace Holdings needs to consent/agree to same or the Court must enter an order determining same. Until either option occurs, the Corporate Monitor does not have authority over Grace Holdings.

However, the Corporate Monitor has been and continues to believe that the Noteholders who invested with Grace Holdings, the Grace Holdings Noteholders, should be a part of the Monitorship Estate and continues to seek a resolution so that the Grace Holdings becomes part of the Monitorship Estate but believes that the Grace Holdings Noteholders should be included in this proposed claims process in this matter even if Grace Holdings itself ultimately does not become part of the Monitorship Estate

<sup>2</sup> The Consenting Corporate Defendants include: 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, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA’S FAVORITE INSURANCE SERVICES LLC

against the Corporate Monitorship Estate. Upon collection, review, and allowance of timely and properly submitted Proofs of Claim, the Corporate Monitor intends to file a motion with the Court seeking (i) approval of a plan of distribution (the “Distribution Plan”), (ii) authority to create a settlement fund (the “Monitorship Fund”), and (iii) authority to distribute the proceeds of the Monitorship Fund in accordance with such Distribution Plan, after payment of administrative expenses of the Corporate Monitorship Estate as approved separately by the Court, to holders of claims deemed to be an “Allowed Claim” (defined below) by the Corporate Monitor.

### **LEGAL NOTICE**

If you are a creditor of the Consenting Corporate Defendants, or are a Grace Holdings Noteholder, you may be an Eligible Claimant entitled to file a Proof of Claim, and you may have an Allowed Claim. Accordingly, you may be entitled to a *pro rata* distribution from the Monitorship Fund. If you are an Eligible Claimant, you must fill out and return the Proof of Claim Form enclosed herein to the Corporate Monitor in accordance with the instructions below **ON OR BEFORE AUGUST 31, 2022**.

#### **Who is an Eligible Claimant?**

Creditors are eligible to participate in the Claims Process, and are encouraged to submit a claim, if the Consenting Corporate Defendants and/or Grace Holdings Financial, LLC incurred a debt to them that remains unpaid in whole or in part. Such Creditors are “Eligible Claimants” in this Claims Process.

#### **What is Required to Establish Existence of an Allowed Claim?**

The claim of an Investor or Creditor will be allowed (an “Allowed Claim”), such that the Creditor will be entitled to receive a distribution based on the amount that Consenting Corporate Defendants and/or Grace Holdings still owe to the Creditor, provided that the Creditor sufficiently demonstrates to the satisfaction of the Corporate Monitor through documentation and/or sworn statements, among other things:

- i. That one or more of the Consenting Corporate Defendants and/or Grace Holdings incurred a debt to such Creditor, and such debt remains unpaid in whole or in part;

#### **AND**

- ii. that the total amount of funds that such Creditor paid to or on behalf of the Consenting Corporate Defendants and/or Grace Holdings exceeds the total amount of funds that the Consenting Corporate Defendants or their affiliates and/or Grace Holdings transferred back

to such Creditor, or that the total value of the goods or services that the Creditor provided to the Corporate Monitorship Estate exceeds the total amount that the Corporate Monitorship Estate paid to such Creditor for those goods and services.

The Corporate Monitor may consider other factors in determining whether a claim is an Allowed Claim.<sup>3</sup>

If a Creditor cannot prove both of the foregoing factors, that Creditor's claim will be disallowed and such Creditor will receive no monetary distribution on account of such alleged claim.<sup>4</sup>

If a Creditor makes the requisite showing regarding his/her/its claim and the Corporate Monitor determines that such claim is an Allowed Claim, then and only then, will the Creditor be entitled to a recovery from the Corporate Monitorship Estate. The Corporate Monitor will propose a method for monetary distribution to the Allowed Claims for approval by the Court after sufficient assets have been recovered and/or liquidated to warrant a distribution. To be clear, the calculations will be based upon the principal amount of money forwarded by the claimant to one or more of the Consenting Corporate Defendant(s) and/or Grace Holdings which shall be reduced by any periodic payment(s) or other payment made by one or more of the Consenting Corporate Defendant(s) and/or Grace Holdings and/or someone on behalf of one or more of the Consenting Corporate Defendant(s) and/or Grace Holdings to the claimant, regardless of whether such payment was intended to be and/or identified as a periodic interest payment and/or return of principal. The Corporate Monitor will not include within his calculation for distributions any profit, rate of return, dividend, periodic interest or other payment in excess of the principal amount invested.

### **How Does an Eligible Claimant Submit a Claim?**

To submit a claim and participate in the Claims Process and Distribution Plan, you must fill out and submit the Proof of Claim Form, attached to this Legal Notice and available: (i) upon email request to the Corporate Monitor and the Corporate Monitor's Counsel addressed to: [dstermer@DSIconsulting.com](mailto:dstermer@DSIconsulting.com) with a copy to [brich@bergersingerman.com](mailto:brich@bergersingerman.com) (subject line: Request for Claims Package); and (3) on the Corporate Monitorship website, accessible at: <https://nationalseniormonitorship.com>.

The Proof of Claim Form requests information required to participate in the Claims Process and to receive a distribution from the Monitorship Fund if you are determined to have an Allowed

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<sup>3</sup> Notwithstanding these factors for determining whether a claim should be allowed, the Corporate Monitor will analyze each claim individually, the circumstances surrounding each Creditor's payment to and involvement with the Corporate Monitorship estate and each Creditor's dealings and relationship with the Consenting Corporate Defendants and/or Grace Holdings, and the Corporate Monitor reserves the right to object to and seek to disallow any claim.

<sup>4</sup> To the extent a Creditor received funds from the Corporate Monitorship estate or another entity on behalf of the Corporate Monitorship estate on account of and in excess of the Consenting Corporate Defendants' and/or Grace Holdings total debt to such Creditor, such that the Creditor profited, meaning that the purported creditor actually received more money from the Consenting Corporate Defendants and/or Grace Holdings than they remitted to the Consenting Corporate Defendants and/or Grace Holdings, as opposed to being a "net loser", the Corporate Monitor reserves the right to pursue a claim against such creditor for the return of the profit received and any other appropriate relief and specifically reserves the right to pursue such a claim, known as a "claw-back".



Claim. You will be required to submit all requested supporting documentation with your Proof of Claim Form. Claims that lack requested supporting documentation will not be considered. For technical support in completing the Proof of Claim Form, please contact the Corporate Monitor by email to [dstermer@DSIconsulting.com](mailto:dstermer@DSIconsulting.com) with a copy to [brich@bergersingerman.com](mailto:brich@bergersingerman.com) (please include subject line: “Technical Support for Claims Process”).

All Proof of Claim Forms must be returned to the Corporate Monitor **ON OR BEFORE August 31, 2022** by first class, U.S. Mail, together with all supporting documentation to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to [dstermer@DSIConsulting.com](mailto:dstermer@DSIConsulting.com). If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

**TIMELINE FOR CLAIMS PROCESS**

Fifteen (15) days from the date of the Order	Notice of Claims Process sent out by Corporate Monitor
August 31, 2022	Date by Which Submission of Claims is Required

Upon conclusion of the claims submission process, the Corporate Monitor will update the Court and all claimants regarding a proposed timeline for the adjudication of claims, which will include a post-adjudication process to request reconsideration of the Corporate Monitor’s determination of the allowance or disallowance, in whole or in part, of any particular Proof of Claim, as well as a process to appeal the Corporate Monitor’s final determination to the Court.

# **EXHIBIT “B”**

**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.

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**NOTICE OF BAR DATE / LAST DAY TO FILE PROOF OF CLAIMS**

**PLEASE TAKE NOTICE** that on \_\_\_\_\_, 2022, this Court entered an *Order Approving the Claims and Administration Process* (the “Claims Procedure Order”), which sets forth the following procedure to determine the valid claims against the Corporate Monitorship estate (the “Corporate Monitorship Estate”), as follows:

1. All Claimants that desire to preserve any claim against the Corporate Monitorship Estate must complete a Proof of Claim Form and attach copies of any supporting documents (collectively, “Proof of Claim”) to prove a claim against any of the Consenting Corporate Defendants and/or Grace Holdings or their assets and deliver the Proof of Claim to the Corporate Monitor via electronic mail or U.S. Mail postmarked before AUGUST 31, 2022 (“Bar Date”).

2. Any Claimant who fails to timely deliver Proof of Claim by the Bar Date shall be forever barred and permanently enjoined from asserting and claims against any of the Consenting Corporate Defendants and/or Grace Holdings or their assets.

3. Executed Proofs of Claim should be addressed to: **Daniel J. Stermer, Corporate Monitor**, Attn.: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, FL 33309 or shall be emailed to [dstermer@DSIConsulting.com](mailto:dstermer@DSIConsulting.com). If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

4. The filing of a Proof of Claim shall be deemed consent to jurisdiction by the Court.

5. You are urged to file a Proof of Claim in the manner listed above. If you fail to file a Proof of Claim as listed above, you will not be able to participate in the distribution, if any, from the Consenting Corporate Defendants for assets recovered by the Corporate Monitor.

6. Further, this confirms that the Corporate Monitor is not providing legal advice or tax consulting services. You may want to contact your own counsel in filing this claim and/or seek the advice of tax consultants/accountants.

7. At this time, the assets of Corporate Monitorship Estate do not exceed its liabilities. Therefore, those Claimants that timely file claims, as provided herein, may not collect 100% of their claims.

8. Any Proof of Claim not timely served will be disallowed and any documents relied upon by the Claimant to support its claims which are not timely filed and served in accordance

with this Notice will be inadmissible at any evidentiary hearing or trial conducted in this proceeding.

9. For more information, see <https://nationalseniormonitorship.com>.

**THE DEADLINE TO FILE YOUR PROOF OF CLAIM IS AUGUST 31, 2022.**



# **EXHIBIT “C”**

**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.

/

## **PROOF OF CLAIM FORM INFORMATION AND INSTRUCTIONS**

IF YOU TRANSFERRED FUNDS TO OR ON BEHALF OF ANY OF THE CONSENTING CORPORATE DEFENDANTS<sup>1</sup> AND/OR GRACE HOLDINGS FINANCIAL, LLC (COLLECTIVELY, THE “CORPORATE MONITORSHIP ESTATE”)<sup>1</sup> OR ARE OTHERWISE A CURRENT CREDITOR OF THE CORPORATE MONITORSHIP ESTATE (A “CREDITOR”), YOU MAY BE ENTITLED TO PARTICIPATE IN MONETARY RECOVERY FROM THE ASSETS RECOVERED IN THIS ACTION.

SUBMISSION OF ALL CREDITOR CLAIMS TO THE CORPORATE MONITOR, AS DEFINED HEREIN, ARE DUE PURSUANT TO THE COURT’S ORDER ON OR BEFORE **AUGUST 31, 2022**.

### **GENERAL INSTRUCTIONS**

1. In order to recover funds to which you may be entitled as an Eligible Claimant (as defined in the Legal Notice of Claims Administration Process (the “Legal Notice”) in the above-captioned proceeding with respect to the Consenting Corporate Defendants and/or Grace Holdings Financial, LLC, you must complete this Proof of Claim Form and sign it under penalty of perjury where indicated on page eight (8) of this document. Completed Proof of Claim Forms, together with all necessary supporting documentation (as discussed herein) must be returned to the Corporate Monitor by **August 31, 2022** (the “Claims Submission Date”). Any completed Proof of Claim Form postmarked after the Claims Submission Date will be allowed only for good cause shown.

2. Submission of this Proof of Claim Form, however, does not assure that you will share in the proceeds of the Fund, or that if you do receive a distribution, that you will be fully compensated for any claim you may have against any of the Consenting Corporate Defendants

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<sup>1</sup> The Consenting Corporate Defendants include: 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, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA’S FAVORITE INSURANCE SERVICES LLC

and/or Grace Holdings. The Corporate Monitor is providing the Proof of Claim Form in connection with this Claims Process and encourages all Creditors, who are Eligible Claimants (as defined in the Legal Notice), to submit a claim against the Corporate Monitorship Estate.

3. You must send by first class, U.S. Mail your completed and signed Proof of Claim Form with all supporting documentation to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to [dstermer@DSIConsulting.com](mailto:dstermer@DSIConsulting.com). If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

4. The Corporate Monitor shall conduct one Claims Process for all creditors of the Corporate Monitorship Estate. Upon completing his determinations as to the Allowed status of each filed claim, the Corporate Monitor shall then complete the asset recovery and liquidation phases of the Corporate Monitorship to raise funds to make a distribution to all creditors holding Allowed Claims. Such distribution will be the subject of separate approval by the Court.

5. If you are NOT an Eligible Claimant, as that term is defined in the Legal Notice, DO NOT submit a Proof of Claim.

#### **INSTRUCTIONS FOR PROOF OF CLAIM FORM**

1. If you are a Creditor, please provide in Section I entitled “Claimant Information” all information regarding the Creditor and appropriate contact information to be used in connection with this Claims Process.

2. If you are a Creditor, please provide in Section II entitled “Description of Debt” all information related to any debt owed to you by the Corporate Monitorship Estate, including (i) the nature of the claim; (ii) a copy of the agreement(s) or other document evidencing or giving rise to the claim; (iii) evidence of your performance under such agreement (i.e. provision of funds, goods, services, etc.); (iv) the amount of your asserted claim against the Corporate Monitorship Estate; and (v) the amount of any transfer of funds that you or any of your representatives received from the Consenting Corporate Defendants and/or Grace Holdings, the Corporate Monitorship Estate, or any of their affiliates, or any other person or entity on behalf of the foregoing, in connection with this claim.

3. Read carefully and execute the Certification in Section III.

4. Failure to report accurately any detail related to your claim may result in the rejection of your claim.

5. In addition to filling out and signing the Proof of Claim Form, you should attach any and all documentation you have supporting the information you are providing, including without limitation all correspondence, emails, statements, confirmations, and other documents relating to your transactions, dealings and communications with the Consenting Corporate Defendants, whether those documents are in hard copy or electronic form. Failure to provide such documentation could delay verification of your claim and/or result in rejection of your claim.

**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,  
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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.

\_\_\_\_\_ /

**PROOF OF CLAIM FORM**

MAIL TO: **Daniel J. Stermer, Corporate Monitor**  
Attn: Seeman Holtz Corporate Monitorship  
500 W. Cypress Creek Road, Suite 400  
Fort Lauderdale, Florida 33309

**ALL PROOF OF CLAIM FORMS**  
**MUST BE POSTMARKED BY**  
**\*\*\*\*\* \*\*, 2022**

OR

EMAIL TO: dsterner@DSIConsulting.com

If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

Name of Claimant: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone (Day): \_\_\_\_\_ Telephone (Night): \_\_\_\_\_

Email Address: \_\_\_\_\_

**CONSENTING CORPORATE DEFENDANT ENTITY(IES) MADE INVESTMENT WITH (CHECK ALL AS APPROPRIATE)**

- Centurion Insurance Services Group, LLC
- Emerald Asset 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
- SH GLOBAL, LLC n/k/a Para Longevity V, LLC
- Altrai Global 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.
- Other, Fund Name: \_\_\_\_\_



**AMOUNT AND DESCRIPTION OF CLAIM**

1. **What is the amount of the claim?** \$ \_\_\_\_\_

a. Does this amount include interest or other charges?

No.

Yes. Attach statement itemizing interest, fees, expenses, or other amounts other than principal included in the amount of the claim.

2. **What is the basis of the claim?** \_\_\_\_\_

\_\_\_\_\_  
(Examples: money loaned, services performed, goods sold). Attach copies of supporting documentation of the claim.

3. **Is all or part of the claim secured?**  No.  Yes.

4. **If you Answered “Yes” to Question 3 above, please provide the nature of property securing the claim:** \_\_\_\_\_, **and the basis for perfection:** \_\_\_\_\_.

Attach copies of documents, if any, that show evidence of perfection of a security interest (i.e. a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded).

Value of property: \$ \_\_\_\_\_.

Amount of the claim that is secured: \$ \_\_\_\_\_.

Amount of the claim that is unsecured: \$ \_\_\_\_\_.

5. **Have you received any funds from one or more of the Consenting Corporate Defendants and/or Grace Holdings or the Corporate Monitorship Estate or from any other person or entity on behalf of one or more of the Consenting Corporate Defendants and/or Grace Holdings or Corporate Monitorship Estate in connection with your asserted claim?**

No

Yes

If yes, provide the amount of funds received (whether in the form of periodic interest payments, return of principal, and/or redemption: \$ \_\_\_\_\_.



**IMPORTANT: FILING THIS PROOF OF CLAIM SHALL CONSTITUTE A WAIVER OF ANY CLAIMS AGAINST THE CORPORATE MONITORSHIP, ANY OF THE CONSENTING CORPORATE DEFENDANTS OR THE CORPORATE MONITOR.**

I DO HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS CORRECT TO THE BEST OF MY/OUR KNOWLEDGE AND BELIEF.

Date: \_\_\_\_\_, 2022

\_\_\_\_\_  
Signature of Claimant

\_\_\_\_\_  
Printed Name of Claimant

# **EXHIBIT “D”**

**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,  
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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.

---

**ORDER APPROVING THE NOTICING AND CLAIMS  
ADMINISTRATION PROCESS**

**THIS CAUSE** having come before the Court upon the *Corporate Monitor's Unopposed Motion to Approve the Proposed Noticing and Claims Process* (the "Motion") filed by the Corporate Monitor, Daniel J. Stermer (the "Corporate Monitor") on June 17, 2022. The Court, having considered the Motion, the Court file, and the argument of counsel, and being otherwise fully advised in the premises, does thereupon

**ORDER** as follows:

1. The Motion is **GRANTED**.
2. The Court approves the claims procedures as set forth in the Motion, including the Legal Notice, Bar Date Notice, and Proof of Claim Form attached to the Motion as Exhibits A, B, and C, respectively.
3. The following claims procedure is imposed for all potential creditors and/or Claimants of any of the Consenting Corporate Defendants<sup>1</sup> (collectively, the "Corporate Monitorship Entities") including the Grace Holdings Financial, LLC Noteholders:

---

<sup>1</sup> The Consenting Corporate Defendants include: 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, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH

a. Within 15 days of the entry of this Order, the Corporate Monitor will mail via U.S. postal service (including, without limitation, bulk rate postage, if applicable):

i. to All Known Noteholders and potential creditors of the Corporate Monitorship Entities, (1) a copy of this Order; (2) the Legal Notice; (3) the Bar Date Notice; and (4) the Proof of Claim Form.

b. The Corporate Monitor shall publish at least twice before July 30, 2022, the Legal Notice in at least two publications of nation-wide circulation, as well as post the Legal Notice, Proof of Claim Form and Bar Date Notice on the Internet website for the Corporate Monitorship Entities, to wit: <https://nationalseniormonitorship.com>.

4. All Known Noteholders and potential creditors of the Corporate Monitorship Entities and/or Grace Holdings Financial, LLC who desire to be eligible to share in the assets of the Corporate Monitorship Estate must complete a Proof of Claim Form (attached hereto as **Exhibit A**), attach copies of all documents they rely upon in support thereof, and send the completed Proof of Claim Form and supporting documents by first class, U.S. Mail, postmarked on or before August 31, 2022 (the “Bar Date”) to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to [dstermer@DSIConsulting.com](mailto:dstermer@DSIConsulting.com). If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

5. The filing of a Proof of Claim will be deemed intervention by such Claimants and/or creditors and a consent to the jurisdiction by the Court.

6. Any creditor or claimant who fails to timely complete and mail a Proof of Claim Form (including all supporting documents), including the Grace Holdings Financial, LLC Noteholders, shall be forever barred and permanently enjoined from asserting any claims against the Corporate Monitorship Entities and/or the assets of the Corporate Monitorship Estate.

7. Any Proof of Claim Form not timely mailed will be disallowed and any documents relied upon by the Court to support its claims will be inadmissible at any evidentiary hearing or trial conducted in this proceeding.

**DONE AND ORDERED** in Chambers at West Palm Beach, Florida this \_\_\_\_ day of \_\_\_\_\_, 2022.

---

BRADLEY HARPER  
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Corporate Monitor

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*Attorneys for Pelican Capital Management, LLC*

**Exhibit "A"**

**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.

/

---

**PROOF OF CLAIM FORM INFORMATION AND INSTRUCTIONS**

IF YOU TRANSFERRED FUNDS TO OR ON BEHALF OF ANY OF THE CONSENTING CORPORATE DEFENDANTS<sup>1</sup> AND/OR GRACE HOLDINGS FINANCIAL, LLC (COLLECTIVELY, THE “CORPORATE MONITORSHIP ESTATE”)<sup>1</sup> OR ARE OTHERWISE A CURRENT CREDITOR OF THE CORPORATE MONITORSHIP ESTATE (A “CREDITOR”), YOU MAY BE ENTITLED TO PARTICIPATE IN MONETARY RECOVERY FROM THE ASSETS RECOVERED IN THIS ACTION.

SUBMISSION OF ALL CREDITOR CLAIMS TO THE CORPORATE MONITOR, AS DEFINED HEREIN, ARE DUE PURSUANT TO THE COURT’S ORDER ON OR BEFORE **AUGUST 31, 2022**.

**GENERAL INSTRUCTIONS**

1. In order to recover funds to which you may be entitled as an Eligible Claimant (as defined in the Legal Notice of Claims Administration Process (the “Legal Notice”) in the above-captioned proceeding with respect to the Consenting Corporate Defendants and/or Grace Holdings Financial, LLC, you must complete this Proof of Claim Form and sign it under penalty of perjury where indicated on page eight (8) of this document. Completed Proof of Claim Forms, together with all necessary supporting documentation (as discussed herein) must be returned to the Corporate Monitor by **August 31, 2022** (the “Claims Submission Date”). Any completed Proof of Claim Form postmarked after the Claims Submission Date will be allowed only for good cause shown.

2. Submission of this Proof of Claim Form, however, does not assure that you will share in the proceeds of the Fund, or that if you do receive a distribution, that you will be fully compensated for any claim you may have against any of the Consenting Corporate Defendants

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<sup>1</sup> The Consenting Corporate Defendants include: 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, CENTURION FUNDING SPV II LLC, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA’S FAVORITE INSURANCE SERVICES LLC

and/or Grace Holdings. The Corporate Monitor is providing the Proof of Claim Form in connection with this Claims Process and encourages all Creditors, who are Eligible Claimants (as defined in the Legal Notice), to submit a claim against the Corporate Monitorship Estate.

3. You must send by first class, U.S. Mail your completed and signed Proof of Claim Form with all supporting documentation to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to [dstermer@DSIConsulting.com](mailto:dstermer@DSIConsulting.com). If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

4. The Corporate Monitor shall conduct one Claims Process for all creditors of the Corporate Monitorship Estate. Upon completing his determinations as to the Allowed status of each filed claim, the Corporate Monitor shall then complete the asset recovery and liquidation phases of the Corporate Monitorship to raise funds to make a distribution to all creditors holding Allowed Claims. Such distribution will be the subject of separate approval by the Court.

5. If you are NOT an Eligible Claimant, as that term is defined in the Legal Notice, DO NOT submit a Proof of Claim.

#### **INSTRUCTIONS FOR PROOF OF CLAIM FORM**

1. If you are a Creditor, please provide in Section I entitled "Claimant Information" all information regarding the Creditor and appropriate contact information to be used in connection with this Claims Process.

2. If you are a Creditor, please provide in Section II entitled "Description of Debt" all information related to any debt owed to you by the Corporate Monitorship Estate, including (i) the nature of the claim; (ii) a copy of the agreement(s) or other document evidencing or giving rise to the claim; (iii) evidence of your performance under such agreement (i.e. provision of funds, goods, services, etc.); (iv) the amount of your asserted claim against the Corporate Monitorship Estate; and (v) the amount of any transfer of funds that you or any of your representatives received from the Consenting Corporate Defendants and/or Grace Holdings, the Corporate Monitorship Estate, or any of their affiliates, or any other person or entity on behalf of the foregoing, in connection with this claim.

3. Read carefully and execute the Certification in Section III.

4. Failure to report accurately any detail related to your claim may result in the rejection of your claim.

5. In addition to filling out and signing the Proof of Claim Form, you should attach any and all documentation you have supporting the information you are providing, including without limitation all correspondence, emails, statements, confirmations, and other documents relating to your transactions, dealings and communications with the Consenting Corporate Defendants, whether those documents are in hard copy or electronic form. Failure to provide such documentation could delay verification of your claim and/or result in rejection of your claim.



**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,  
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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.

\_\_\_\_\_ /

**PROOF OF CLAIM FORM**

MAIL TO: **Daniel J. Stermer, Corporate Monitor**  
Attn: Seeman Holtz Corporate Monitorship  
500 W. Cypress Creek Road, Suite 400  
Fort Lauderdale, Florida 33309

**ALL PROOF OF CLAIM FORMS**  
**MUST BE POSTMARKED BY**  
**\*\*\*\*\* \*\*, 2022**

OR

EMAIL TO: dsterner@DSIConsulting.com

If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

Name of Claimant: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone (Day): \_\_\_\_\_ Telephone (Night): \_\_\_\_\_

Email Address: \_\_\_\_\_

**CONSENTING CORPORATE DEFENDANT ENTITY(IES) MADE INVESTMENT WITH (CHECK ALL AS APPROPRIATE)**

- Centurion Insurance Services Group, LLC
- Emerald Asset 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
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- Centurion ISG Holdings, LLC
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- 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.
- Other, Fund Name: \_\_\_\_\_

**AMOUNT AND DESCRIPTION OF CLAIM**

1. **What is the amount of the claim?** \$ \_\_\_\_\_

a. Does this amount include interest or other charges?

No.

Yes. Attach statement itemizing interest, fees, expenses, or other amounts other than principal included in the amount of the claim.

2. **What is the basis of the claim?** \_\_\_\_\_

\_\_\_\_\_  
(Examples: money loaned, services performed, goods sold). Attach copies of supporting documentation of the claim.

3. **Is all or part of the claim secured?**     No.         Yes.

4. **If you Answered “Yes” to Question 3 above, please provide the nature of property securing the claim:** \_\_\_\_\_, **and the basis for perfection:** \_\_\_\_\_.

Attach copies of documents, if any, that show evidence of perfection of a security interest (i.e. a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded).

Value of property: \$ \_\_\_\_\_.

Amount of the claim that is secured: \$ \_\_\_\_\_.

Amount of the claim that is unsecured: \$ \_\_\_\_\_.

5. **Have you received any funds from one or more of the Consenting Corporate Defendants and/or Grace Holdings or the Corporate Monitorship Estate or from any other person or entity on behalf of one or more of the Consenting Corporate Defendants and/or Grace Holdings or Corporate Monitorship Estate in connection with your asserted claim?**

No

Yes

If yes, provide the amount of funds received (whether in the form of periodic interest payments, return of principal, and/or redemption: \$ \_\_\_\_\_.

**IMPORTANT: FILING THIS PROOF OF CLAIM SHALL CONSTITUTE A WAIVER OF ANY CLAIMS AGAINST THE CORPORATE MONITORSHIP, ANY OF THE CONSENTING CORPORATE DEFENDANTS OR THE CORPORATE MONITOR.**

I DO HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS CORRECT TO THE BEST OF MY/OUR KNOWLEDGE AND BELIEF.

Date: \_\_\_\_\_, 2022

\_\_\_\_\_  
Signature of Claimant

\_\_\_\_\_  
Printed Name of Claimant