

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CIVIL DIVISION**

STATE OF FLORIDA  
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

CASE NO.: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.  
D/B/A SEEMAN HOLTZ,  
MARSHAL SEEMAN,  
CENTURION INSURANCE SERVICES GROUP, LLC,  
BRIAN J. SCHWARTZ,  
EMERALD ASSETS 2018, LLC,  
INTEGRITY ASSETS 2016, LLC,  
INTERGRITY ASSETS, LLC,  
PARA LONGEVITY 2014-5, LLC,  
PARA LONGEVITY 2015-3, LLC,  
PARA LONGEVITY 2015-5, LLC,  
PARA LONGEVITY 2016-3, LLC,  
PARA LONGEVITY 2016-5, LLC,  
PARA LONGEVITY 2018-3, LLC,  
PARA LONGEVITY 2018-5, LLC,  
PARA LONGEVITY 2019-3, LLC,  
PARA LONGEVITY 2019-5, LLC,  
PARA LONGEVITY 2019-6, LLC,  
PARA LONGEVITY VI, LLC,  
SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,  
ALTRAI GLOBAL, LLC A/K/A ALTRAI HOLDINGS, LLC,  
VALENTINO GLOBAL HOLDINGS, LLC,  
AMERITONIAN ENTERPRISES, LLC,  
SEEMAN-HOLTZ CONSULTING CORP.,  
CENTURION ISG Holdings, LLC,  
CENTURION ISG Holdings II, LLC,  
CENTURION ISG (Europe) Limited,  
CENTURION ISG SERVICES, LLC,  
CENTURION ISG FINANCE GROUP, LLC,  
CENTURION FUNDING SPV I LLC,  
CENTURION FUNDING SPV II LLC,  
GRACE HOLDINGS FINANCIAL, LLC,  
PRIME SHORT TERM CREDIT INC.,

Defendants.

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

Relief Defendants.

---

**CORPORATE MONITOR, DANIEL J. STERMER'S NOTICE OF CONSUMMATION  
OF SETTLEMENT WITH SHPC AND HUDSON LENDER PARTIES**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the "Corporate Monitor") for the property, assets, and business 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, hereby notices the consummation of the settlement contemplated by that certain *Stipulation of Settlement* by and between the Corporate Monitor, Seeman Holtz Property and Casualty, LLC f/k/a Seeman Holtz Property and Casualty, Inc. ("SHPC") and HSCM Bermuda Fund Ltd., a Bermuda corporation (the "Settlement"), which was approved by that certain *Order Granting Corporate Monitor, Daniel J Stermer's Motion to Approve Stipulation of Settlement With SHPC and Hudson Lender Parties* on August 15, 2022.

---

<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

SHPC funded the Initial Settlement Payment, as defined in the Settlement, on August 24, 2022.

Dated: August 30, 2022

Respectfully submitted,

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, FBN 38229  
brich@bergersingerman.com  
Gavin C. Gaukroger, FBN 76489  
ggaukroger@bergersingerman.com  
Michael J. Niles, FBN 107203  
mniles@bergersingerman.com  
DRT@bergersingerman.com

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 30, 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 identified 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,</i>  <i>Twenty-six Defendant Entities</i></p>
<p>Jeffrey H. Sloman, Esq.  <i>Stumphauzer Foslid Sloman &amp; Kolaya, PLLC</i>  One Biscayne Tower  2 South Biscayne Boulevard, Suite 1600  Miami, FL 33131  jsloman@sfslaw.com  <i>Attorneys for Defendants Brian J. Schwartz and</i>  <i>Ameritonian Enterprises, LLC</i></p>	<p>Daniel J. Stermer, Esq.  <i>Development Specialists, Inc.</i>  500 W. Cypress Creek Road, Suite 400  Fort Lauderdale, Florida 33309  dsterner@DSIConsulting.com  <i>Corporate Monitor</i></p>
<p>Susan Yoffee, Esq.  Gary A. Woodfield, Esq.  <i>Nason Yeager Gerson Harris &amp; Fumero, P.A.</i>  3001 PGA Boulevard, Suite 305  Palm Beach Gardens, FL 33410  syoffee@nasonyeager.com  gwoodfield@nasonyeager.com  sdaversa@nasonyeager.com  <i>Counsel for The Estate of Eric Charles Holtz</i></p>	<p>Victoria R. Morris, Esq.  Andrew C. Lourie, Esq.  Kobre &amp; Kim LLP  201 South Biscayne Boulevard, Suite 1900  Miami, FL 33131  Andrew.Lourie@kobrekim.com  Victoria.Morris@kobrekim.com  <i>Attorneys for Relief Defendant Seeman</i>  <i>Holtz Property and Casualty LLC</i></p>
<p>David L. Luikart III, Esq.  Hill, Ward &amp; Henderson, P.A.  101 East Kennedy Boulevard, Suite 3700  Tampa, FL 33602  Dave.luikart@hwlaw.com  Michelle.armstrong@hwlaw.com  <i>Attorneys for Prime Short Term Credit, Inc.</i></p>	<p>Joshua W. Dobin, Esq.  James C. Moon, Esq.  Meland Budwick, P.A.  3200 Southeast Financial Center  200 South Biscayne Boulevard  Miami, FL 33131  jdobin@melandbudwick.com  jmoon@melandbudwick.com  mramos@melandbudwick.com  <i>Attorneys for Teleios LS Holdings V DE,</i>  <i>LLC and Teleios LS Holdings IV DE, LLC</i></p>

<p>Bernard Charles Carollo, Jr., Esq.  John J. Truitt, Esq.  William Leve, Esq.  Vernon Litigation Group  8985 Fontana Del Sol Way  Naples, FL 34109  bcarollo@vernonlitigation.com  jtruitt@vernonlitigation.com  wleve@vernonlitigation.com  nzumaeta@vernonlitigation.com  <i>Attorneys for Edwin and Karen Ezrine, Intervenors  And Tom Echolds, Interested Party</i></p>	<p>Gary M. Murphree, Esq.  Brandy Abreu, Esq.  AM Law, LC  10743 SW 104<sup>th</sup> Street  Miami, FL 33186  gmm@amlaw-miami.com  babreu@amlaw-miami.com  mramirez@amlaw-miami.com  pleadings@amlaw-miami.com  <i>Attorneys for Zoe Seijas and Victor Seijas,  Jr., Trustees of Victor Seijas Living Trust</i></p>
<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>
<p>Adam J. Ruttenberg, Esq.  Argent Fox Schiff, LLP  800 Boylston Street, 32nd Floor  Boston, MA 02199  Adam.ruttenberg@afslaw.com  <i>Attorney for Pelican Capital Management, LLC</i></p>	