NOTICE OF SETTLEMENT OF CLASSACTION

This is a court-approved notice. It is not an attorney solicitation or advertisement.

You May Be A Class Member In A Class Action Settlement, if You purchased or held, within the six years prior to June 7, 2021, a beneficial interest in one or more Notes issued by one or more of the following:

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 V, LLC, Para Longevity Holdings VI, LLC, **Emerald Assets Holdings, LLC, Integrity Assets, LLC,** Integrity Assets 2016, LLC, SH Global, LLC, or Emerald Assets 2018, LLC.

Please read this notice carefully as it explains a lawsuit that affects your legal rights. This notifies you that you may be a member of a class (the "Class") in the case Fanny B. Millstein v. Marshal Seeman, National Senior Insurance, Inc., Centurion Insurance Services Group, LLC, Brian J. Schwartz, Para Longevity Holdings VI, LLC, Emerald Assets Holdings, 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, Emerald Assets 2018, LLC, Integrity Assets 2016, LLC, Integrity Assets, LLC, SH Global, LLC, Altrai Global, 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, Seeman Holtz Property and Casualty, LLC, SHPC Holdings I, LLC, and the Estate of Eric Charles Holtz (the "Lawsuit"), which is now pending in the United States District Court for the Southern District of Florida ("Court").

A proposed settlement has been reached with Seeman Holtz Property and Casualty, LLC ("SHPC"). This settlement is not an admission of wrongdoing, and SHPC denies these allegations and asserts that it fully complied with all applicable laws. The settlement fund equals approximately \$650,000 and includes funds to be paid for attorneys' fees and costs. The settlement cannot take effect without Court approval.

Because you may be a member of the Class, your legal rights are affected, and you have a choice to make now. You can choose one of the following three options:

1. STAY IN THE CLASS:

- (a) If you already filed a claim form with the Corporate Monitor for each note you purchased <u>and</u> want to be included in the Class, *THEN YOU DO NOT NEED TO DO ANYTHING*. You are a member of the Class and will participate in this settlement;
- (b) If you did not already file a claim form with the Corporate Monitor and want to be included in the Class and participate in this settlement, YOU MUST SUBMIT TO THE CORPORATE MONITOR ONE CLAIM FORM LISTING ALL NOTES YOU PURCHASED BY OCTOBER 31, 2022. The claim form can be accessed at https://secureservercdn.net/45.40.155.190/706.883.myftpupload.com/wp-content/uploads/2022/07/Proof-of-Claim-Form.pdf.

If you stay in the Class and the Settlement is approved, you will remain part of the Class and lose the ability to sue SHPC over these claims. However, if you do not submit a claim for to the Corporate Monitor you will NOT receive any benefits from the settlement.

Claim form by October 31, 2022.

- 2. ASK TO BE EXCLUDED: Get out of the Lawsuit. Get no benefits from the settlement. Keep the right to sue SHPC separately for this claim. If you do not wish to remain in the Lawsuit, you can ask to be excluded. If you DO NOT wish to remain in the Class, then you must send a written request to be excluded with the information required as set forth below to the Settlement Administrator, Daniel J. Stermer, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, no later than October 31, 2022.
- 3. **OBJECT.** If you disagree with the Settlement, you may file an objection with the Court no later than October 31, 2022. You may not object if you have excluded yourself from the Class. You must follow the procedure set forth below to object.

The purpose of this Notice is to explain to you:

- 1. Why you are getting this notice?
- 2. What the Lawsuit is about?
- 3. What is a class action?
- 4. Who is included in the Class?
- 5. Who represents the Class?
- 6. What does the settlement provide?
- 7. What are your rights and options as a Class member?
- 8. How you may exclude yourself from the Class?
- 9. How do I object?
- 10. Didn't I receive a prior notice in this Lawsuit? Why am I receiving a new notice?
- 11. How to obtain further information about the Lawsuit.

1. Why did I get this notice?

The Court authorized this notice because Class members have a right to know about the Lawsuit and about their legal rights and options as they pertain to the Lawsuit and the Settlement. This notice explains the Lawsuit, Settlement, and your legal rights as a Class member.

2. What is the Lawsuit about?

Judge Rodolfo A. Ruiz of the United States District Court for the Southern District of Florida presides over this Lawsuit. This Lawsuit is styled Fanny B. Millstein v. Marshal Seeman, National Senior Insurance, Inc., Centurion Insurance Services Group, LLC, Brian J. Schwartz, Para Longevity Holdings VI, LLC, Emerald Assets Holdings, 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, Emerald Assets 2018, LLC, Integrity Assets 2016, LLC, Integrity Assets, LLC, SH Global, LLC, Altrai Global, 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, Seeman Holtz Property and Casualty, LLC, SHPC Holdings I, LLC, and the Estate of Eric Charles Holtz, No. 0:21-cv-61179. The "Defendants" are Marshal Seeman, National Senior Insurance, Inc., Centurion Insurance Services Group, LLC, Brian J. Schwartz, Para Longevity Holdings VI, LLC, Emerald Assets Holdings, 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, Emerald Assets 2018, LLC, Integrity Assets 2016, LLC, Integrity Assets, LLC, SH Global, LLC, Altrai Global, 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, Seeman Holtz Property and Casualty, LLC, SHPC Holdings I, LLC. The relief defendant is the Estate of Eric Charles Holtz.

The Lawsuit involves the sale of promissory notes by one or more of the Defendants to members of the Class. The Lawsuit alleges that the Defendants engaged in a pattern of racketeering that defrauded Class members of their investments in the promissory notes. The Court has not decided who is right or wrong.

3. What is a class action?

In a class action, one or more people called a "Class Representative" (in this case, Fanny Millstein, a purchaser of a note issued by Para Longevity 2015-3, LLC, and Para Longevity 2016-3) sue on behalf of people or entities who have similar claims. Once a class is certified, the lawsuit is resolved for all of the people and entities in the class,

except for those who timely exclude themselves from the class.

4. Who is included in the Class?

The Court has granted preliminary approval of the Settlement for a class defined as follows:

All persons who purchased or held a beneficial interest in one or more of the Notes. Excluded from the Class are Defendants, any entity in which any Defendant had a controlling interest, Defendants' officers, directors, legal representatives, successors, and assigns, and Defendants' immediate family members.

5. Who represents the Class?

The following law firms and attorneys have been certified by the Court as Class Counsel:

Buckner + Miles David M. Buckner, Esq. Seth E. Miles, Esq. Brett E. von Borke, Esq. 2020 Salzedo Street Suite 302 Miami, Florida 33134 (305) 964-8003	Silver Law Group Scott L. Silver, Esq. Ryan A. Schwamm, Esq. Peter M. Spett, Esq., Of Counsel 11780 W. Sample Rd. Coral Springs, FL 33065 (954) 755-4799
Sallah Astarita & Cox, LLC James D. Sallah, Esq. Joshua A. Katz, Esq. 3010 N. Military Tr., Ste. 210 Boca Raton, FL 33431 (561) 989-9080	Menzer & Hill, P.A. Gary S. Menzer, Esq. Michael S. Hill, Esq. 7280 W. Palmetto Park Rd., Ste. 103 Boca Raton, FL 33433 (888) 923-9223

These attorneys will represent you as part of the Class, unless you timely exclude yourself from the Class.

You have the right to hire your own attorney at your own expense. Class Counsel represents the Class on a contingency basis and will only receive attorneys' fees and reimbursement of their expenses if the Court approves the settlement and the Court awards fees and costs.

6. What does the settlement provide?

A proposed settlement of this Lawsuit has been reached. This settlement is not an admission of wrongdoing and SHPC denies the allegations against it and asserts that it fully complied with all applicable laws. The Settlement fund equals \$650,000. The Settlement includes several parts: (1) funds to be paid to note purchasers; and (2) payment of attorneys' fees and costs.

To receive monetary benefits, note purchasers who are Class members will be required to submit a completed claim form to the Settlement Administrator, Daniel J. Stermer, who is the Corporate Monitor in the separate lawsuit in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida in Case No. 50-2021-CA-008718-XXX-MB (the "Monitorship Court"). This claim form must be received via electronic mail and/or postmarked by October 31, 2022.

The Corporate Monitor has established a process by which Class members can submit their individualized claim to the Corporate Monitor on a <u>proof of claim form</u>, the form of which is available on the Corporate Monitor's <u>website</u> at https://nationalseniormonitorship.com/claims-process-documents/; specifically, at: https://secureservercdn.net/45.40.155.190/706.883.myftpupload.com/wp-content/uploads/2022/07/Proof-of-Claim-Form.pdf.

IF YOU HAVE ALREADY SUBMITTED A CLAIM FORM TO THE CORPORATE MONITOR, YOU DO NOT NEED TO DO ANYTHING TO REMAIN A CLASS MEMBER

IF YOU HAVE <u>NOT</u> ALREADY SUBMITTED A CLAIM FORM AND WISH TO BE INCLUDED IN THE CLASS AND RECEIVE THE BENEFITS OF THE SETTLEMENT, YOU <u>MUST</u> COMPLETE A CLAIM FORM AND SEND IT TO THE CORPORATE MONITOR POSTMARKED NO LATER THAN OCTOBER 31, 2022.

After the deadline for the submission of proof of claim forms (October 31, 2022), the Corporate Monitor will calculate for each Class member who submits a proof of claim form their net loss as a result of their investment(s) in the Notes, and will then distribute the settlement proceeds (net of court-awarded Class counsel attorneys' fees and costs and net of the administrative expenses and other deductions for the administration of the distribution of net settlement proceeds from this action).

claim is available Corporate Monitor's The form on the website (https://nationalseniormonitorship.com/claims-process-documents/), or may be obtained by writing or emailing the Settlement Administrator at dstermer@DSIConsulting.com with the subject line: [Your name] Proof of Claim Submission. If you are unable to use email, you may send the completed and signed Proof of Claim by first class U.S. Mail, postage prepaid, to Daniel J. Stermer, Corporate Monitor, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309.

A single claim form indicating all notes purchased by the Class Member must be submitted. Settlement checks will be mailed after approval and processing. Each Settlement check will expire and become void 180 days after it is issued if it has not been cashed.

The Settlement also provides that Class Counsel may request attorney fees of up to 30% of the Settlement fund and costs.

The Settlement cannot take effect unless it is approved by the Court. All attorney fees and

costs must also be approved by the Court. The Court will hold a hearing on **December 20, 2022, at 10:00 a.m.** to consider all of these issues. If the Court fails to approve the Settlement, this Lawsuit will resume, the Settlement will become void, and it may not be used to prove liability.

7. What are your rights and options as a Class member?

If you want to remain a member of the Class, you do not need to take any action, but if you want to participate in the settlement and receive a benefit from it, YOU MUST SUBMIT A CLAIM FORM BY OCTOBER 31, 2022 unless you have already submitted a completed Proof of Claim to the Corporate Monitor. You will participate in the settlement if approved by the Court, but only if you submit a completed Proof of Claim form, as indicated above. You will be bound by the judgment in this Lawsuit. In other words, you will release SHPC from any claim relating in any way to the purchase of notes issued by any of the Defendants identified above, including but not limited to any claims made in the Lawsuit or that relate to or arise out of any claim or allegation made in the Lawsuit or which could have been made in the Lawsuit. Once again, if you wish to receive any benefit from the Settlement, you must make sure that you have submitted, or will submit by October 31, 2022, a completed Proof of Claim form indicating all Notes purchased to the Corporate Monitor as discussed above.

You will not need to appear at Court. You are welcome to attend at your own expense.

8. How does a Class Member exclude itself from the Class?

If you **DO NOT** wish to remain in the Class, you must send a signed request in writing to **the Corporate Monitor**, Daniel J. Stermer, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, **postmarked no later than October 31**, 2022. In your exclusion letter, you must provide the following information: (1) the name and case number of this Litigation; (2) the full legal name of the individual or entity that purchased a note; and (3) the approximate dates each note was purchased. Failure to provide all of this information will make your exclusion letter defective and you will remain a Class member.

If you request exclusion on behalf of anyone other than yourself, you must describe your legal authority to make this request.

If you exclude yourself from the Class, you will not participate in the Settlement but you also will not be bound by it. If you have already submitted a Claim Form to the Corporate Monitor you may exclude yourself from the Class by providing the required request for exclusion but you will then not be eligible to receive any share of this Settlement.

9. How do I object?

If you disagree with the Settlement, you may file an objection with the Court **no later** than October 31, 2022. You may not object if you have excluded yourself from the Class. In the written Objection, you must state: (1) the case name and number; (2) the

full legal name, address, telephone number, and, if available, the email address of the Person objecting; (3) the approximate dates of their investment(s) with National Senior Insurance, Inc., d/b/a Seeman Holtz ("Seeman Holtz") or any other defendant in the Litigation, and the amount of each investment; (4) a written statement of Objection(s), including the grounds for those Objection(s), and any legal or factual support for each Objection; (5) a description of all evidence to be presented at the Final Approval Hearing in support of the Objection, including a list of any witnesses, a summary of the expected testimony from each witness, and a copy of any papers, briefs, or other documents upon which the Objection is based; (6) the name and address of the lawyer(s), if any, who is representing the Person making the Objection or who may be entitled to compensation in connection with the Objection; (7) a statement of whether the Person objecting intends to appear at the Final Approval Hearing, either with or without counsel; (8) a statement of his/her membership in the Settlement Class, including all information required by the Claim Form; (9) the signature of the Person objecting, in addition to the signature of any attorney representing the Person objecting in connection with the Objection; and (10) a detailed list of any other objection by the Settlement Class Member, or his/her counsel, to any class actions submitted in any court, whether state or otherwise, in the United States in the previous five (5) years. If the Settlement Class Member or his/her counsel has not objected to any other class action settlement in any court in the United States in the previous five (5) years, he/she shall affirmatively state so in the written materials provided in connection with the Objection to the Settlement. No objection will be valid unless all of the information described above is included. Copies of all papers filed with the Court must be simultaneously delivered to Class Counsel and counsel for the Defendant. If you object, you are not required to appear at the hearing, and the Court will consider your objection whether you request to appear or not.

10. How to obtain further information.

If you need additional information about the Lawsuit or Settlement, you should visit the website https://nationalseniormonitorship.com for answers to frequently asked questions, to access the Court's orders and other documents in the Lawsuit, and for periodic updates about the litigation. If you cannot find the information you need there, you can contact Class Counsel at the addresses or telephone numbers above.

Complete copies of all public pleadings, Court rulings, and other filings are available for review by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at https://ecf.flsd.uscourts.gov. or by visiting during regular office hours at the offices of the Clerk of the United States District Court for the Southern District of Florida – Fort Lauderdale located at 299 East Broward Boulevard, Ste. 108, Fort Lauderdale, Florida 33301. Please do not contact the Court regarding the Lawsuit.