

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

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

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

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

Defendants.

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

Relief Defendants.

**NOTICE OF FILING AFFIDAVIT IN SUPPORT OF (I) DANIEL J. STERMER,
CORPORATE MONITOR, AND (II) DEVELOPMENT SPECIALISTS, INC.'S
FIRST INTERIM MOTIONS FOR COMPENSATION FOR PROFESSIONAL
SERVICES AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM SEPTEMBER 14, 2021 THROUGH JULY 31, 2022**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”) for the property, assets and business of the thirty-two (32) corporate-entities¹, by and through undersigned counsel, hereby files the attached *Affidavit in Support of (i) Daniel J. Stermer, Corporate Monitor, and (ii) Development Specialists, Inc.’s First Interim Motions for Compensation for Professional Services and Reimbursement of Expenses For the Period From*

¹ 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.

September 14, 2021 Through July 31, 2022 dated November 3, 2022.

DATED: November 7 2022

Respectfully submitted,

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

By: /s/ Brian G. Rich

Brian G. Rich
Florida Bar No. 38229
brich@bergersingerman.com
Gavin C. Gaukroger
Florida Bar No. 76489
ggaukroger@bergersingerman.com
Michael J. Niles
Florida Bar No. 107203
mniles@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 7, 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 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>
<p>Jeffrey H. Sloman, Esq. <i>Stumphauzer Foslid Sloman & 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 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>Gary A. Woodfield, Esq. <i>Nason Yeager Gerson Harris & Fumero, P.A.</i> 3001 PGA Boulevard, Suite 305 Palm Beach Gardens, FL 33410 syoffee@nasonyeager.com gwoodfield@nasonyeager.com <i>Counsel for The Estate of Eric Charles Holtz</i></p>	<p>Victoria R. Morris, Esq. Andrew C. Lourie, Esq. Kobre & 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 Holtz Property and Casualty LLC</i></p>
<p>David L. Luikart III, Esq. Hill, Ward & 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, 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 104th 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 & 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>	

**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.

**AFFIDAVIT IN SUPPORT OF (i) DANIEL J. STERMER, CORPORATE MONITOR,
AND (ii) DEVELOPMENT SPECIALISTS, INC.’S FIRST INTERIM MOTIONS FOR
COMPENSATION FOR PROFESSIONAL SERVICES AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 14, 2021
THROUGH JULY 31, 2022**

STATE OF FLORIDA)
) ss:
COUNTY OF BROWARD)

BEFORE ME, this date, personally appeared Philip J. Von Kahle, who being first duly sworn, deposes and says:

1. My name is Philip J. Von Kahle. I am over the age of 18 and competent to testify.
2. I am the President of Michael Moecker & Associates, Inc., located at 1885 Marina Mile Boulevard, Suite 103, Fort Lauderdale, FL 33315, and I have over 22 years of experience as a professional fiduciary.
3. I have acted as court-appointed fiduciary for the assignment for the benefit of creditors, receiver, chief restructuring officer, and trustee, and have interacted with lending institutions, secured and unsecured creditors, shareholders, bondholders and business owners.
4. I have reviewed the pleadings and docket in the above captioned case.
5. I have reviewed (i) *Daniel J. Stermer, Corporate Monitor* and (ii) *Development Specialists, Inc.’s First Interim Motions for Compensation and Reimbursement of Expenses For the Period From September 14, 2021 Through July 31, 2022* (the “Fee Motion”) specifically as to Daniel J. Stermer (“Corporate Monitor”) and Development Specialists, Inc.’s (“DSI”) entitlement to fees and

reasonableness of expenses.


6. I have reviewed the Corporate Monitor and DSI's detailed time records and the pleadings in connection with the above captioned case.

7. Based upon the foregoing, it is my opinion that the fees totaling \$717,612.50 and costs in the amount of \$5,125.39 sought through the Daniel Stermer, Corporate Monitor, Fee Motion are fair and reasonable considering each and every factor contemplated by *Florida Patient's Compensation Fund v. Rowe*, 472 So. 2d 1145 (Fla. 1985) and the principles of *Lewis v. Gramil Corp.*, 94 So. 2d 174, 177 (Fla. 1957). The 1,691.10 hours worked are fair and reasonable. The hourly rate in the Application is reasonable. I base that opinion on, among other things, the significant skill and knowledge necessary to successfully administer this monitorship estate and a review of the records. The services rendered by the Corporate Monitor and DSI have substantially benefited the monitorship estate.

8. Based upon the foregoing, it is my opinion that the fees totaling \$652,911.60 and costs in the amount of \$0.00 sought through the Development Specialists, Inc. Fee Motion are fair and reasonable considering each and every factor contemplated by *Florida Patient's Compensation Fund v. Rowe*, 472 So. 2d 1145 (Fla. 1985) and the principles of *Lewis v. Gramil Corp.*, 94 So. 2d 174, 177 (Fla. 1957). The 2,854.30 hours worked are fair and reasonable. The hourly rates in the Application are reasonable. I base that opinion on, among other things, the significant skill and knowledge necessary to successfully administer this monitorship estate and a review of the records. The services rendered by the Corporate Monitor and DSI have substantially benefited the monitorship

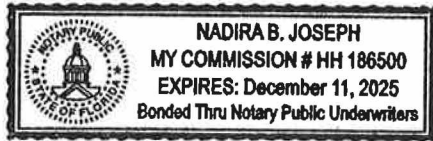
9. I have no interest in the outcome of this litigation and I am not associated with or employed by any party to this action or by the attorneys involved in this matter.

FURTHER AFFIANT SAYETH NAUGHT.


Philip J. Von Kahle

STATE OF FLORIDA)
) ss:
COUNTY OF BROWARD)

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 3rd day of November, 2022, by Philip J. Von Kahle, who is personally known to me or who has produced _____ as identification.



Nadira B. Joseph
Notary Public, State of Florida
My Commission Expires: