

**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.

RECEIVER’S INITIAL LIST OF KEY WITNESSES

Daniel J. Stermer, as Court-appointed Receiver (the “Receiver” and formerly the “Corporate Monitor”) for the property, assets, and business of the thirty-two (32) corporate entities¹ (collectively, the “Receivership Defendants” and formerly the “Consenting Corporate Defendants”), pursuant to paragraph 20 of the Court’s *Order Establishing Procedures Governing Recovery Actions to be Commenced by the Receiver* dated September 5, 2023 (the “Procedures Order”), hereby identifies the following key witnesses that may be called upon by the Receiver in connection with the Actions (as such term is defined in the *Receiver’s Motion for Orders Establishing Procedures and Scheduling Order Governing Recovery Actions to be Commenced by the Receiver* filed on August 22, 2023) to be commenced by the Receiver:

1. Marshal Seeman
c/o Scott Alan Orth, Esq.
Law Offices of Scott Alan Orth
3860 Sheridan Street, Ste. A
Hollywood, FL 33021

Testimony: Mr. Seeman would testify about testify about his personal knowledge of the operation of the Receivership Defendants’ businesses.

¹ The Receivership 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.

2. Daniel J. Stermer, Receiver
c/o Development Specialists, Inc.
500 W. Cypress Creek Road, Suite 400
Fort Lauderdale, FL 33309

Testimony: Mr. Stermer would testify about would testify about his personal knowledge of the operation of the Receivership Defendants' businesses based upon the information he has learned after his appointment as Corporate Monitor and subsequently Receiver of the Receivership Defendants.

3. Patrick J. O'Malley, Sr. Managing Director
c/o Development Specialists, Inc.
10 South LaSalle Street, Suite 3300
Chicago, IL 60603

Testimony: Mr. O'Malley would testify about his personal knowledge of the operation of the Receivership Defendants based upon review of the Receivership Defendants' books and records and other information received as Financial Advisor to the Corporate Monitor/Receiver.

4. Taylor F. Caruso, Director
c/o Development Specialists, Inc.
10 South LaSalle Street, Suite 3300
Chicago, IL 60603

Testimony: Mr. Caruso would testify about his personal knowledge of the operation of the Receivership Defendants based upon review of the Receivership Defendants' books and records and other information received as Financial Advisor to the Corporate Monitor/Receiver.

5. Jeffrey Abramson
848 Broken Sound Parkway, Apt. 207
Boca Raton, FL 33487

Testimony: Mr. Abramson would testify about testify about his personal knowledge of the operation of the Receivership Defendants' businesses and his employment by certain of the Receivership Defendants.

6. Antonio Dicembrino
11162 Sunset Ridge Circle
Boynton Beach, FL 33473

Testimony: Mr. Dicembrino would testify about testify about his personal knowledge of the operation of the Receivership Defendants' businesses and his employment by certain of the Receivership Defendants.

7. Dean Emmets
7633 Brook Forest Way
Pensacola, FL 32514

Testimony: Mr. Emmets would testify about his personal knowledge of the operation of the Receivership Defendants' businesses and his employment by certain of the Receivership Defendants.

8. Jason Sussman
27 Magnolia Drive N.
Ormond Beach, FL 32174

Testimony: Mr. Sussman would testify about his personal knowledge of the operation of the Receivership Defendants' businesses and his employment by certain of the Receivership Defendants.

9. Daniel Tepper
1500 East Ocean Boulevard, #709
Long Beach, CA 90802

Testimony: Mr. Tepper would testify about his personal knowledge of the operation of the Receivership Defendants' businesses and his employment by certain of the Receivership Defendants.

As set forth in the Procedures Order, the Receiver is authorized to modify this list of key witnesses, from time to time, in the Receiver's sole discretion, by filing an amended list with the Court.

DATED: November 1, 2023

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By: /s/ Gavin C. Gaukroger

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 1, 2023, 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 on the attached Service List.

By: /s/ Gavin C. Gaukroger
Gavin C. Gaukroger

SERVICE LIST

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