

**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 UNOPPOSED MOTION TO EXPAND
RECEIVERSHIP ESTATE TO INCLUDE GRACE HOLDINGS**

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 the Court’s *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, dated September 14, 2021 (the “Monitorship Order”), and the *Order Appointing Receiver*, dated May 12, 2023 (the “Receivership Order”), respectfully moves for entry of an order to expand the receivership estate to include Grace Holdings Financial LLC (“Grace Holdings”) as an additional entity. As grounds therefor, the Receiver states:

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.

1. On September 10, 2021, the Plaintiff, State of Florida, Office of Financial Regulation (the “Plaintiff” or “OFR”) filed a *Consent Motion for Appointment of Corporate Monitor*, seeking the appointment of the Corporate Monitor for the property, assets, and business of the Consenting Corporate Defendants listed below, as well as a temporary injunction against the Consenting Corporate Defendants and two natural-person Defendants, Marshal Seeman and Brian J. Schwartz (the “Consenting Individual Defendants”):

1. NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ,
2. CENTURION INSURANCE SERVICES GROUP, LLC,
3. EMERALD ASSETS 2018, LLC,
4. INTEGRITY ASSETS 2016, LLC,
5. INTERGRITY ASSETS, LLC,
6. PARA LONGEVITY 2014-5, LLC,
7. PARA LONGEVITY 2015-3, LLC,
8. PARA LONGEVITY 2015-5, LLC,
9. PARA LONGEVITY 2016-3, LLC,
10. PARA LONGEVITY 2016-5, LLC,
11. PARA LONGEVITY 2018-3, LLC,
12. PARA LONGEVITY 2018-5, LLC,
13. PARA LONGEVITY 2019-3, LLC,
14. PARA LONGEVITY 2019-5, LLC,
15. PARA LONGEVITY 2019-6, LLC,
16. PARA LONGEVITY VI, LLC,
17. SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC,
18. VALENTINO GLOBAL HOLDINGS, LLC,
19. AMERITONIAN ENTERPRISES, LLC,
20. SEEMAN-HOLTZ CONSULTING CORP.,
21. CENTURION ISG Holdings, LLC,
22. CENTURION ISG Holdings II, LLC,
23. CENTURION ISG (Europe) Limited,
24. CENTURION ISG SERVICES, LLC,
25. CENTURION ISG FINANCE GROUP, LLC,
26. CENTURION FUNDING SPV I LLC, and
27. CENTURION FUNDING SPV II LLC.

2. On September 14, 2021, the Court entered the Monitorship 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.

3. On January 6, 2022, the Court entered an *Agreed Order Granting Corporate Monitor, Daniel J. Stermer's Unopposed Motion to Expand Corporate Monitorship Estate*, thereby expanding the scope of the corporate monitorship to include the following five (5) additional corporate entities as Consenting Corporate Defendants/Monitorship Entities:

1. PARA GLOBAL 2019, LLC,
2. ALLOY ASSETS, LLC,
3. SEEMAN HOLTZ WEALTH MANAGEMENT, INC.,
4. AGENCY ACQUISITION FUNDING, LLC, and
5. AMERICA'S FAVORITE INSURANCE SERVICES LLC

4. On March 23, 2023, the Corporate Monitor filed a *Joint Motion to Appoint Receiver* (the "Receiver Motion"), which was filed jointly with the Plaintiff/OFR, seeking the entry of an order appointing the Corporate Monitor as receiver for the Consenting Corporate Defendants. The Receiver Motion was filed as it was the belief of the Corporate Monitor, with the consent of the OFR, that converting this monitorship into a receivership was necessary and appropriate to facilitate the wind up of the Consenting Corporate Defendants' affairs, including the liquidation of assets, disposition and prosecution of claims, and to facilitate litigation against third-parties, which will benefit the investors, noteholders and creditors.

5. On May 10, 2023, the Court conducted a hearing to consider the Receiver Motion, and, on May 12, 2023, the Court entered the *Order Appointing Receiver* (the "Receivership Order"), which appointed the Corporate Monitor as the Receiver of the Consenting Corporate Defendants.

6. Among the Corporate Monitor's duties under the Monitorship Order and Receiver's duties under the Receivership Order is to collect and preserve documents and information about the Consenting Corporate Defendants/Receivership Defendants and investigate the operations of the businesses subject of the monitorship/receivership.

7. Through the Corporate Monitor's, and now Receiver's, investigation of the books and records of the Consenting Corporate Defendants/Receivership Defendants and bank records, the Receiver has identified and concludes that Grace Holdings is an additional corporate entity which should be added to and made a part of the receivership estate.

8. On June 17, 2022, the Corporate Monitor filed *Corporate Monitor's Unopposed Motion to Approve the Proposed Noticing and Claims Process* (the "Claim Motion") seeking approval of certain proposed noticing and claims administration procedures and the form of the notice to be sent to potential claimants. Pursuant to the Claim Motion, the Corporate Monitor sought approval of (a) a legal notice to apprise 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 are thus entitled to receive a *pro rata* distribution, if any, from the Corporate Monitorship estate, (b) a bar date notice to 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, (c) a form Proof of Claim asking 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

9. The Claim Motion acknowledged that while Grace Holdings is a Corporate Defendant named in this matter but not one of the Consenting Corporate Defendants which the Corporate Monitor (at that time) had been appointed, the Corporate Monitor (now Receiver) has been and continues to believe that the noteholders who invested with Grace Holdings (the "Grace Holding's Noteholders"), should be potential creditors (understanding certain Grace Holding's Noteholders may also be Noteholders of one or more of the Consenting Corporate Defendants) of the Corporate Monitorship Estate, subject to further evaluation of these noteholders' interests through the proposed Claims Process even if Grace Holdings itself ultimately does not become part of the Corporate Monitorship Estate.

10. On June 27, 2022, the Court entered an *Agreed Order Approving the Noticing and Claims Administration Process*, as amended by the *Amended Agreed Order Approving the Noticing and Claims Administration Process* dated June 29, 2022 (collectively, the "Claim Order"), thereby granting the Claim Motion in its entirety, including the Grace Noteholders in the claims process.

11. The Receivership Order grants the Receiver permission to "seek authority to expand the scope of the receivership over other entities that (1) conducted any business or personal affairs related to or arising from the Receivership Estates, (2) commingled or pooled assets with

the Receivership Defendants, or (3) other participated in the transfer or receipt of assets stemming from the Receivership Defendants or from any business or personal activity that is the subject of the *Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and Other Statutory and Equitable Relief* filed by the OFR on July 12, 2021” (§2, Receivership Order.)

12. According to information gathered in the Receiver’s ongoing investigation, Grace Holdings is owned or controlled by an individual that is not named in the OFR Complaint but acted at the direction or for the benefit of one or more of the Receivership Defendants and/or Consenting Individual Defendants and its assets should be part of the Receivership Estate.

13. Further, Grace Holdings falls within the scope of the Receivership Order, which requires the Receiver to “take custody, control and possession of any and all of the property of the Receivership Defendants and records relevant thereto; to sue for and collect, recover, receive and take into possession from third parties property of the Receivership Defendants and records relevant thereto, including, but not limited to, assuming control of, and be named the authorized signatory for, all accounts at any bank, brokerage firm or financial institution which has possession, custody, or control of any assets or funds, wherever situated, of any of the Receivership Defendants and, upon order of this Court, of any of their subsidiaries or affiliates, provided the Receiver deems it necessary.” (§8b, Receivership Order).

14. The Receiver submits that granting him authority over Grace Holdings is essential to the marshaling and preservation of assets of the Receivership Defendants, assists the Receiver with the claims review/reconciliation process, the pursuit of Recovery Actions and serves the interests of justice.

15. Lastly, the Receiver has conferred with Counsel for Plaintiff who does not oppose the relief sought herein and the Receiver has conferred with Counsel for the individual who owns and/or controls Grace Holdings and the individual who owns and/or controls does not oppose and does consent to the relief sought herein.

WHEREFORE, Daniel J. Stermer, as Receiver, respectfully requests entry of the proposed Order attached as **Exhibit “A”**, (i) granting this Motion; (ii) expanding the scope of the Receivership Order to include Grace Holdings as an entity over which he has rights of possession, access and control for all purposes stated in the original order; and (iii) granting such other and further relief as the Court deems just and proper.

DATED: November 14, 2023

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on November 14, 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. 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

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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,
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CENTURION ISG SERVICES, LLC,
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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.

**AGREED ORDER GRANTING RECEIVER’S UNOPPOSED MOTION TO EXPAND
RECEIVERSHIP ESTATE TO INCLUDE GRACE HOLDINGS**

THIS CAUSE came before the Court upon the *Receiver’s Unopposed Motion to Expand Receivership Estate to Include Grace Holdings* (the “Motion”) filed by the Court-appointed Receiver Daniel J. Stermer (“Receiver”). The Motion requests the Court to expand the receivership estate to include Grace Holdings Financial LLC. The Court, having considered the Motion and the Court file, having noted that the Motion is unopposed by the affected parties, and being otherwise fully advised in the premises, it is hereupon,

ORDERED AND ADJUDGED that:

1. The Motion is hereby **GRANTED**.
2. The scope of the receivership created in this case is expanded to include the Grace Holdings Financial LLC (“Grace Holdings”).
3. Daniel J. Stermer is appointed Receiver for Grace Holdings.
4. Based upon the Plaintiff’s previously filings and the information the Receiver has supplied in the Motion and in the Declaration of the Receiver filed with the Motion, the same findings and conclusions that led the Court to include the Receivership Defendants, apply equally to Grace Holdings and all of the assets of Grace Holdings. The Receivership Order¹ shall apply with equal force and effect to Grace Holdings as it applies to the Receivership Defendants. The terms and provisions of the Receivership Order are incorporated herein by reference.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion.

DONE AND ORDERED in Chambers at West Palm Beach, Florida this ____ day of

_____, 2023.

BRADLEY HARPER
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Corporate Monitor

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