

**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.

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**RECEIVER’S AGREED MOTION TO APPROVE ADMINISTRATIVE CLAIM OF  
MCM 301 Yamato, LLC**

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 entities<sup>1</sup> (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 the entry of an Agreed Order approving an administrative expense claim in the amount of \$65,186.99 (“Administrative Claim”) in favor of MCM 301 Yamato, LLC (“Landlord”) for certain rent owed pursuant to an office lease agreement between Landlord and

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<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.

National Senior Insurance, Inc. d/b/a Seeman Holtz (“Seeman Holtz”). As grounds therefor, the Receiver states:

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 ("Corporate Monitor") for the Consenting Corporate Defendants and their affiliates, subsidiaries, successors and assigns (collectively, the "Corporate Monitorship Estate", 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 and the Corporate Monitorship Estate (hereinafter the “Receivership Estate”).

6. During the Corporate Monitorship, on September 30, 2022, the Court entered an *Agreed Order Granting Corporate Monitor, Daniel J. Stermer's Notice of Intent to Terminate Lease Agreement with Landlord, MCM 301 Yamato LLC and Unopposed Motion to Approve Administrative Claim* (the “Order”) which, among other things, i) provided notice to the Court of the Corporate Monitor (now Receiver's) intent to terminate the Office Lease Agreement (the “Lease”) for use of a commercial office space located at Suite 2222 (the “Lease Space”) of the property located at 301 Yamato Road, Boca Raton, Florida, commonly known as FNBCC Plaza @ Boca Raton (the “Property”) and ii) authorized the Corporate Monitor to enter into a new lease agreement with Landlord for use of another, smaller suite located on the Property.<sup>2</sup>

7. On November 30, 2021, the Corporate Monitor moved out of the Lease Space.

8. Pursuant to the Lease, and for the period of September 10, 2021 (i.e. the filing date of this case) through November 30, 2021 (i.e. the date the Lease Space was vacated), Landlord is entitled to an administrative claim in the amount of \$65,186.99 (“Administrative Claim”) which represents unpaid rent obligations incurred by Seeman Holtz, by and through the Corporate Monitor Estate, for its continued occupancy and use of the Lease Space.

9. The amount of the requested Administrative Claim is calculated in accordance with the terms of the Lease, and includes:

(a) September 2021 rent, pro-rated (\$14,995.61), plus late fees (\$2,100.00);

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<sup>2</sup> As provided in the Order and pursuant to the new lease agreement and first amendment thereto between Landlord and the Corporate Monitor, the Corporate Monitor was authorized to and has paid \$58,575 in rent to Landlord for use of the smaller suite on the Property for the period of December 1, 2021 through September 30, 2022.

(b) October 2021 rent (\$21,297.26), plus late fees (\$2,600.00), and

(c) November 2021 rent (\$21,694.25), plus late fees (\$2,500.00).

10. The Corporate Monitor's use of the Lease Space during the 82 day period between the filing of this case and the date the Corporate Monitor vacated the Lease Space provided the Corporate Monitor and his professionals uninterrupted access to and use of the Lease Space, which further facilitated the Corporate Monitor's effective and efficient administration of this case.

11. Accordingly, Landlord seeks the entry of an Order approving this Motion and deeming its Administrative Claim as an allowed administrative expense claim.

12. The Administrative Claim shall be paid in *pari passu* (in-line) with the Receiver and the Receiver's professionals (consistent with Paragraph 58 of the Receivership Order), and upon adequate funds being available in the Corporate Monitorship Estate.

**WHEREFORE**, Daniel J. Stermer, as Receiver, respectfully requests entry of the proposed Order attached as **Exhibit "A"**, (i) granting this Motion authorizing the Receiver to pay the Administrative Claim pursuant to the terms set forth herein; and (ii) granting such other and further relief as the Court deems just and proper.

**DATED:** November 16, 2023

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on November 16, 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 and first class, U.S. Mail upon all parties on the attached Service List.

By: /s/ Brian G. Rich  
Brian G. Rich



## SERVICE LIST

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**PROPOSED ORDER**

**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,  
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SEEMAN-HOLTZ CONSULTING CORP.,  
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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.

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**AGREED ORDER GRANTING RECEIVER’S AGREED MOTION TO APPROVE  
ADMINISTRATIVE CLAIM OF MCM 301 YAMATO, LLC**

**THIS CAUSE** came before the Court upon the *Receiver, Daniel J. Stermer’s Motion To Approve Administrative Claim of MCM301 Yamato LLC* (the “Motion”)<sup>3</sup> filed by the Court-appointed Corporate Monitor Daniel J. Stermer (“Corporate Monitor”). The Motion notified this Court of the Corporate Monitor’s intent to terminate the Lease Agreement with Landlord, and sought the entry of an Order approving an Administrative Claim in the amount of \$65,186.99 (“Administrative Claim”) in favor of Landlord. The Court, having considered the and having reviewed the Court file, and being otherwise fully advised in the premises, it is hereupon,

**ORDERED AND ADJUDGED that:**

1. The Motion is hereby **GRANTED**.
2. The Corporate Monitor is authorized to pay Landlord \$65,186.99 on an administrative claim basis, which shall be paid in *pari passu* with the Corporate Monitor and the

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<sup>3</sup> Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion.

Corporate Monitor's professionals (consistent with Paragraph 58 of the Receivership Order) for rent owed under the Lease and First Amendment from September through November 2021, and upon adequate funds being available in the Corporate Monitorship Estate.

**DONE AND ORDERED** in Chambers at West Palm Beach, Florida this \_\_\_\_ day of \_\_\_\_\_, 2023.

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**BRADLEY HARPER**  
**CIRCUIT COURT JUDGE**

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