

IN 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, ET AL,

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.

---

**NONPARTY ALEXANDRA HOLTZ'S RESPONSE TO  
RECEIVER'S SUBPOENA DUCES TECUM**

Nonparty Alexandra Holtz files this response to Receiver, Daniel J. Stermer's Subpoena Duces Tecum, dated October 23, 2023, served upon Nonparty Alexandra Holtz (the "Subpoena"), as follows:

1. Documents sufficient to identify all income, payments, benefits, and/or proceeds obtained by you from each of the Receivership Defendants, including by date, amount, and purpose for such payment.

**RESPONSE:** Alexandra Holtz ("Ms. Holtz") is uncertain as to the meaning of the term "Receivership Defendant," which is not a defined term. Ms. Holtz responds with the understanding that "Receivership Defendant" is the same as "Defendant" as defined in the

Subpoena's Definitions. To the best of her recollection, Ms. Holtz was an intern at National Senior Insurance d/b/a Seeman Holtz for the summers of 2008 or 2009 through 2012. She was an employee from the summer of 2013 through June 10, 2021. At no time did her annual salary exceed \$60,000 before taxes. Ms. Holtz has no records regarding the details of her employment with National Senior Insurance. Ms. Holtz is not aware of any income, payments, benefits, and/or proceeds obtained from any of the other Defendants.

2. Documents sufficient to identify all income, gifts, property, assets, or other monetary amounts you received from Eric C. Holtz, Marshal Seeman, or any of the Defendants, including by date, amount, and purpose for such transfer.

**RESPONSE:** Ms. Holtz has not received income, gifts, property, assets, or other monetary amounts from Marshal Seeman or any of the Defendants other than wedding and baby shower gifts from Marshal Seeman, not in excess of \$500 and a baby shower gift from Brian Schwartz, the details of which she cannot recall. Ms. Holtz received gifts from her father, Eric C. Holtz, none of which she can presently recall and none with a value of over \$1,000. She has no documents evidencing any of these gifts.

3. Documents sufficient to identify all proceeds from life insurance policies, Trust distributions, or other income, gift, or other monetary benefit You received from the Trust, Eric C. Holtz, or the Estate of Eric C. Holtz, from January 1, 2017 to Present.

**RESPONSE:** Ms. Holtz has not received any distribution or other income, gift, or monetary benefit from Eric C. Holtz, except as identified in response to #2 above or from the Estate of Eric C. Holtz. Ms. Holtz received funds as a beneficiary of the following life insurance policies owned by Eric C. Holtz:

MetLife (Brighthouse Life Insurance Company)

American General Life Insurance Company

Ms. Holtz also received funds from the Eric C. Holtz Revocable Trust Agreement, dated December 22, 2005.

Documents she has evidencing receipt of such funds will be produced.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing is being sent by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49 on this 4<sup>th</sup> day of December, 2023 to Brian G. Rich, Esq., Gavin C. Gaukroger, Esq., Berger Singerman LLP, *Counsel for Corporate Monitor*, 525 Okeechobee Boulevard, Suite 1250, West Palm Beach, FL 33401, [brich@bergersingerman.com](mailto:brich@bergersingerman.com), [drt@bergersingerman.com](mailto:drt@bergersingerman.com), [zmorton@bergersingerman.com](mailto:zmorton@bergersingerman.com), [ggaukroger@bergersingerman.com](mailto:ggaukroger@bergersingerman.com), [efile@bergersingerman.com](mailto:efile@bergersingerman.com), [ablanco@bergersingerman.com](mailto:ablanco@bergersingerman.com).

NASON YEAGER GERSON HARRIS & FUMERO, P.A.  
3001 PGA Boulevard, Suite 305  
Palm Beach Gardens, FL 33410  
Tel: (561) 686-3307  
Fax: (561) 686-5442  
[gwoodfield@nasonyeager.com](mailto:gwoodfield@nasonyeager.com)  
[sdaversa@nasonyeager.com](mailto:sdaversa@nasonyeager.com)

By: /s/ Gary Woodfield  
Gary Woodfield  
FL Bar No. 0563102