## 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,

S.	CASE NO.: 50-2021-CA-008718-XXXX-MB
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NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, et al.,

Defendants.	

### PLAINTIFF'S NOTICE OF FILING ACKNOWLEDGEMENT, WAIVER, AND ACCEPTANCE OF SERVICE BY TWENTY-SEVEN DEFENDANTS

- 1. Plaintiff, by and through undersigned counsel, provides notice of filing of the attached Acknowledgement of Receipt of Complaint, Waiver of Service of Complaint and Summons, Consent to Jurisdiction and Venue, General Appearance, and Acknowledgement of Standing Order for Case Management Plan as to Defendant Seeman and Certain Defendant Entities ("Acknowledgement"). The Acknowledgement is attached as Exhibit A.
- 2. The twenty-seven Defendants executing the above identified Acknowledgement, through counsel, are as follows:

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, MARSHAL SEEMAN,
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 2018-5, 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,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION INSURANCE SERVICES GROUP, LLC,
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, and

Respectfully submitted,

By: /s/ A. Gregory Melchior
A. Gregory Melchior
Chief Counsel
Office of General Counsel
Florida Office of Financial Regulation
200 East Gaines Street
Tallahassee, Florida 32309
(813) 218-5308
Greg.Melchior@flofr.gov
Fla. Bar No. 0407290
Attorney For Plaintiff

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Plaintiff's Notice of Filing has been furnished by using the Florida Courts E-Filing Portal to all parties of record and to the below parties on this 11<sup>th</sup> day of August 2021.

Scott A. Orth, Esq.
scott@orthlawoffice.com
service@orthlawoffice.com (service, primary)
eserviceSAO@gmail.com
Attorney for Defendant Marshal Seeman and Twenty-six Defendant Entities

Rose M. Schindler, Esq. rose.schindler@gmlaw.com
Attorney for Defendant Marshal Seeman

Jeffrey H. Sloman, Esq.
jsloman@sfslaw.com
Ian M. Ross, Esq.
iross@sfslaw.com
Attorneys for Defendants Brian J. Schwartz and Ameritonian Enterprises, LLC

/s/ A. Gregory Melchior
A. Gregory Melchior
Chief Counsel

# 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,

VS.

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

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, et al.,

Defendants.	
	,

ACKNOWLEDGEMNT OF RECEIPT OF COMPLAINT,
WAIVER OF SERVICE OF COMPLAINT AND SUMMONS,
CONSENT TO JURISDICTION AND VENUE,
GENERAL APPEARANCE,
AND ACKNOWLEDGEMENT OF STANDING ORDER
FOR CASE MANAGEMENT PLAN,
AS TO DEFENDANT SEEMAN AND CERTAIN DEFENDANT ENTITIES

- 1. Defendant Marshal Seeman ("Seeman"), through undersigned counsel:
  - a. Acknowledges receipt of the Complaint in the above styled proceeding;
  - b. Waives service of the Complaint and Summons;
- c. Acknowledges and consents to this Court's personal and subject matter jurisdiction in this proceeding;
  - d. Makes a general appearance in this proceeding;
  - e. Acknowledges venue is appropriate in Palm Beach County; and
- f. Acknowledges receipt of the Fifteenth Judicial Circuit's Standing Order for Case Management and Submission of Agreed Case Management Plan in Civil Cases Filed On or After April 30, 2021.
- 2. Seeman maintains and acknowledges, through undersigned counsel, that Seeman,

either as an officer or director, as an owner or part owner, or as a manager or managing member of each the following Defendant entities in this proceeding ("Defendant Entities") is authorized to accept service, waive service of the complaint and summons, consent to jurisdiction, make an appearance, and make acknowledgements as further described below:

#### Defendant Entities:

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, 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. SEEMAN-HOLTZ CONSULTING CORP., CENTURION INSURANCE SERVICES GROUP, LLC, 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,

- 3. Seeman, for each of the above Defendant Entities, through undersigned counsel:
  - a. Acknowledges receipt of the Complaint in the above styled proceeding;
  - b. Waives services of the Complaint and Summons;

CENTURION FUNDING SPV II LLC

- c. Acknowledges and consents to this Court's personal and subject matter iurisdiction in this proceeding;
- d. Makes a general appearance for each of the Defendant Entities in this proceeding, and each of the Defendant Entities hereby make a general appearance;
  - e. Acknowledges venue is appropriate in Palm Beach County; and
- f. Acknowledges receipt of the Fifteenth Judicial Circuit's Standing Order for Case Management and Submission of Agreed Case Management Plan in Civil Cases Filed On or After April 30, 2021.
- 4. The undersigned, Scott Alan Orth, Esq., as attorney for Seeman and the Defendant Entities, maintains Seeman has authorized the undersigned to execute this waiver, consent, and acknowledgment on behalf of Seeman and on behalf of the Defendant Entities, on this day of August 2021.

Scott Alan Orth, Esq.

Law Offices of Scott Alan Orth, PA

3860 Sheridan Street, Ste. A

Hollywood, FL 33021-3624

Scott@orthlawoffice.com

Attorney for Marshal Seeman

and the Defendant Entities Identified Above