

**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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**CORPORATE MONITOR, DANIEL J. STERMER’S, UNOPPOSED MOTION FOR  
APPROVAL OF EMPLOYMENT OF DEVELOPMENT SPECIALISTS, INC. AS  
FINANCIAL ADVISOR TO THE CORPORATE MONITOR,  
EFFECTIVE AS OF SEPTEMBER 14, 2021**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”) for the property, assets, and business of the twenty-seven (27) corporate-entity Defendants identified in paragraph 1 below (collectively, 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, respectfully moves for entry of the proposed agreed order attached as **Exhibit “A,”** approving the employment of Development Specialists, Inc. (“DSI”) as financial advisor to the Corporate Monitor. In support of this Motion, the Corporate Monitor 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 an *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* (the "September 14, 2021 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. Paragraph 13U of the September 14, 2021 Order provides that the Corporate Monitor is authorized "[t]o choose, engage, and employ attorneys, accountants and other reasonable agents or professionals, as the Corporate Monitor deems advisable or necessary in the performance of the Corporate Monitor's duties and responsibilities", and that "[t]he Corporate Monitor and Corporate Monitor's professionals shall be entitled to reasonable compensation from the assets now held by the Consenting Corporate Defendants or ultimately secured by the Corporate Monitor", and that "[s]aid compensation shall be commensurate with their duties and obligations under the circumstances, and subject to approval of this Court."

4. The Corporate Monitor seeks Court approval to retain DSI as his financial advisor in connection with this case, to provide day-to-day management, accounting and other support services, including, but not limited to: (i) oversight and analysis of financial transactions; (ii) evaluation of preferences, fraudulent conveyance and litigation matters; and (iii) assisting with such other matters as the Corporate Monitor deems necessary.

5. DSI is a leading provider of management consulting and financial advisory services, with offices located in Miami/Fort Lauderdale, FL; Los Angeles, CA; San Francisco, CA; Chicago, IL; New York, NY; Columbus, OH; Wilmington, DE; Madison, WI; and London, United Kingdom, and is well qualified to provide professional services and advice to the Corporate Monitor.

6. The Corporate Monitor believes that employing DSI is in the best interests of the estate because DSI has the experience and resources to efficiently and effectively represent the Corporate Monitor as financial advisor in this case.

7. DSI will charge for its services on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date services are rendered. The current billing rates of DSI's professionals range from \$205.00 to \$720.00 for forensic accountants, financial investigators and consultants, financial and business advisory, valuation analysts, and other technical persons. These rates may change from time to time in accordance with DSI's established billing practices and procedures.

8. At the request of the State of Florida Office of Financial Regulation ("OFR"), the Corporate Monitor has agreed to seek a discount to these billing rates in this regulatory proceeding from DSI.

9. The Corporate Monitor will also be billed for disbursements and charges in connection with DSI's representation, including charges for telephone calls, photocopying, messenger services, postage, travel and lodging expenses, and other expenses.

**WHEREFORE**, Daniel J. Stermer, as Corporate Monitor, respectfully requests entry of the proposed agreed Order attached as **Exhibit "A"**, approving the employment of DSI as financial advisor to the Corporate Monitor, effective as of September 14, 2021, and for such other and additional relief as the Court deems just and proper.

Dated: September 17, 2021

Respectfully submitted,

By: /s/ Daniel J. Stermer

Daniel J. Stermer, Corporate Monitor  
c/o Development Specialists, Inc.  
500 W. Cypress Creek Road, Ste. 400  
Fort Lauderdale, FL 33309  
Tel. (305) 374-2717  
[dsterner@DSIConsulting.com](mailto:dsterner@DSIConsulting.com)

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on September 17, 2021, 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.

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*Corporate Monitor*

# **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,  
BRIAN J. SCHWARTZ,  
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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.

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**AGREED ORDER GRANTING CORPORATE MONITOR, DANIEL J. STERMER'S  
UNOPPOSED MOTION FOR APPROVAL OF EMPLOYMENT OF DEVELOPMENT  
SPECIALISTS, INC. AS FINANCIAL ADVISOR TO THE CORPORATE MONITOR,  
EFFECTIVE AS OF SEPTEMBER 14, 2021**

**THIS CAUSE** came before the Court upon the *Corporate Monitor, Daniel J. Stermer's Unopposed Motion for Approval of Employment of Development Specialists, Inc. as Financial Advisor to the Corporate Monitor, Effective as of September 14, 2021* (the "Motion") filed by the Court-appointed Corporate Monitor Daniel J. Stermer ("Corporate Monitor"). The Motion seeks to retain Development Specialists, Inc. as financial advisor to the Corporate Monitor in this case. The Court, having considered the Motion 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 retain Development Specialists, Inc. as financial advisor to the Corporate Monitor in the captioned case, effective as of September 14, 2021.
3. The Corporate Monitor will endeavor to obtain a discount to the billing rates in this regulatory proceeding.
4. Compensation paid to Development Specialists, Inc. shall be in accordance with the Court's Order appointing Daniel J. Stermer as Corporate Monitor in this case, dated September

14, 2021.

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

\_\_\_\_\_, 2021.

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ASHLEY ZUCKERMAN  
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Corporate Monitor

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