

**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,
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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.

**AMENDED AGREED ORDER APPROVING THE NOTICING
AND CLAIMS ADMINISTRATION PROCESS**

THIS CAUSE having come before the Court upon the *Corporate Monitor's Unopposed Motion to Approve the Proposed Noticing and Claims Process* (the "Motion") filed by the Corporate Monitor, Daniel J. Stermer (the "Corporate Monitor") on June 17, 2022. The Court, having considered the Motion, the Court file, and the argument of counsel, and being otherwise fully advised in the premises, does thereupon

ORDER as follows:

1. The Motion is **GRANTED**.
2. The Court approves the claims procedures as set forth in the Motion, including the Legal Notice, Bar Date Notice, and Proof of Claim Form attached to the Motion as Exhibits A, B, and C, respectively.
3. The following claims procedure is imposed for all potential creditors and/or Claimants of any of the Consenting Corporate Defendants¹ (collectively, the "Corporate Monitorship Entities") including the Grace Holdings Financial, LLC Noteholders:

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

a. Within 15 days of the entry of this Order, the Corporate Monitor shall send, via electronic mail or via first class, U.S. mail (including, without limitation, bulk rate postage, if applicable):

i. to All Known Noteholders and potential creditors of the Corporate Monitorship Entities, (1) a copy of this Order; (2) the Legal Notice; (3) the Bar Date Notice; and (4) the Proof of Claim Form.

b. The Corporate Monitor shall publish at least twice before July 30, 2022, the Legal Notice in at least two publications of nation-wide circulation, as well as post the Legal Notice, Proof of Claim Form and Bar Date Notice on the Internet website for the Corporate Monitorship Entities, to wit: <https://nationalseniormonitorship.com>.

4. The Corporate Monitor shall use his best efforts to notify All Known Noteholders and creditors of the Corporate Monitorship Estate using the Legal Notice, the Bar Date Notice and the Proof of Claim Form (collectively, the “Claims Package”), by email to all known email addresses as contained in the business records of the Consenting Corporate Defendants and as provided by the putative creditors and parties in interest, and their counsel, as applicable, that have contacted the Corporate Monitor since his appointment. For any known creditors that only have a physical mailing address on record with the Consenting Corporate Defendants, the Corporate Monitor shall mail them the Claims Package by U.S. Mail. Additionally, upon request from any party that believes it may be a creditor of the Corporate Monitorship Estate, the Corporate Monitor shall provide an electronic copy of the Claims Package. Such request should be sent by email to: dstermer@DSiconsulting.com with a copy to brich@bergersingerman.com (subject line: Request

MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, and AMERICA’S FAVORITE INSURANCE SERVICES LLC

for Claims Package). The Corporate Monitor shall also make the Claims Package available to download from the Corporate Monitorship website, accessible at <https://nationalseniormonitorship.com> and the Corporate Monitor shall display information/documentation related to the Claims Package conspicuously on the Monitorship website.

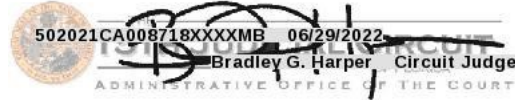
5. All Known Noteholders and potential creditors of the Corporate Monitorship Entities and/or Grace Holdings Financial, LLC who desire to be eligible to share in the assets of the Corporate Monitorship Estate must complete a Proof of Claim Form (attached hereto as **Exhibit A**), attach copies of all documents they rely upon in support thereof, and send the completed Proof of Claim Form and supporting documents by first class, U.S. Mail, postmarked on or before August 31, 2022 (the “Bar Date”) to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to dstermer@DSIConsulting.com. If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

6. The filing of a Proof of Claim will be deemed intervention by such Claimants and/or creditors and a consent to the jurisdiction by the Court.

7. Any creditor or claimant who fails to timely complete and mail a Proof of Claim Form (including all supporting documents), including the Grace Holdings Financial, LLC Noteholders, shall be forever barred and permanently enjoined from asserting any claims against the Corporate Monitorship Entities and/or the assets of the Corporate Monitorship Estate.

8. Any Proof of Claim Form not timely mailed will be disallowed and any documents relied upon by the Court to support its claims will be inadmissible at any evidentiary hearing or trial conducted in this proceeding.

DONE AND ORDERED in Chambers at West Palm Beach, Florida.



502021CA008718XXXMB 06/29/2022
Bradley G. Harper
Circuit Judge

**BRADLEY HARPER
CIRCUIT COURT JUDGE**

Copies to: Counsel of Record and Corporate Monitor

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EXHIBIT "A"
(PROOF OF CLAIM FORM)

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
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NATIONAL SENIOR INSURANCE, INC.
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MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES GROUP, LLC,
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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.

/

PROOF OF CLAIM FORM INFORMATION AND INSTRUCTIONS

IF YOU TRANSFERRED FUNDS TO OR ON BEHALF OF ANY OF THE CONSENTING CORPORATE DEFENDANTS¹ AND/OR GRACE HOLDINGS FINANCIAL, LLC (COLLECTIVELY, THE “CORPORATE MONITORSHIP ESTATE”)¹ OR ARE OTHERWISE A CURRENT CREDITOR OF THE CORPORATE MONITORSHIP ESTATE (A “CREDITOR”), YOU MAY BE ENTITLED TO PARTICIPATE IN MONETARY RECOVERY FROM THE ASSETS RECOVERED IN THIS ACTION.

SUBMISSION OF ALL CREDITOR CLAIMS TO THE CORPORATE MONITOR, AS DEFINED HEREIN, ARE DUE PURSUANT TO THE COURT’S ORDER ON OR BEFORE **AUGUST 31, 2022**.

GENERAL INSTRUCTIONS

1. In order to recover funds to which you may be entitled as an Eligible Claimant (as defined in the Legal Notice of Claims Administration Process (the “Legal Notice”) in the above-captioned proceeding with respect to the Consenting Corporate Defendants and/or Grace Holdings Financial, LLC, you must complete this Proof of Claim Form and sign it under penalty of perjury where indicated on page eight (8) of this document. Completed Proof of Claim Forms, together with all necessary supporting documentation (as discussed herein) must be returned to the Corporate Monitor by **August 31, 2022** (the “Claims Submission Date”). Any completed Proof of Claim Form postmarked after the Claims Submission Date will be allowed only for good cause shown.

2. Submission of this Proof of Claim Form, however, does not assure that you will share in the proceeds of the Fund, or that if you do receive a distribution, that you will be fully compensated for any claim you may have against any of the Consenting Corporate Defendants

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

and/or Grace Holdings. The Corporate Monitor is providing the Proof of Claim Form in connection with this Claims Process and encourages all Creditors, who are Eligible Claimants (as defined in the Legal Notice), to submit a claim against the Corporate Monitorship Estate.

3. You must send by first class, U.S. Mail your completed and signed Proof of Claim Form with all supporting documentation to: **Daniel J. Stermer, Corporate Monitor**, Attn: Seeman Holtz Corporate Monitorship, 500 W. Cypress Creek Road, Suite 400, Fort Lauderdale, Florida 33309, or by electronic mail to dstermer@DSIConsulting.com. If submitting your Proof of Claim Form by electronic mail, **please include subject line: [Name of Claimant] Proof of Claim Submission.**

4. The Corporate Monitor shall conduct one Claims Process for all creditors of the Corporate Monitorship Estate. Upon completing his determinations as to the Allowed status of each filed claim, the Corporate Monitor shall then complete the asset recovery and liquidation phases of the Corporate Monitorship to raise funds to make a distribution to all creditors holding Allowed Claims. Such distribution will be the subject of separate approval by the Court.

5. If you are NOT an Eligible Claimant, as that term is defined in the Legal Notice, DO NOT submit a Proof of Claim.

INSTRUCTIONS FOR PROOF OF CLAIM FORM

1. If you are a Creditor, please provide in Section I entitled “Claimant Information” all information regarding the Creditor and appropriate contact information to be used in connection with this Claims Process.

2. If you are a Creditor, please provide in Section II entitled “Description of Debt” all information related to any debt owed to you by the Corporate Monitorship Estate, including (i) the nature of the claim; (ii) a copy of the agreement(s) or other document evidencing or giving rise to the claim; (iii) evidence of your performance under such agreement (i.e. provision of funds, goods, services, etc.); (iv) the amount of your asserted claim against the Corporate Monitorship Estate; and (v) the amount of any transfer of funds that you or any of your representatives received from the Consenting Corporate Defendants and/or Grace Holdings, the Corporate Monitorship Estate, or any of their affiliates, or any other person or entity on behalf of the foregoing, in connection with this claim.

3. Read carefully and execute the Certification in Section III.

4. Failure to report accurately any detail related to your claim may result in the rejection of your claim.

5. In addition to filling out and signing the Proof of Claim Form, you should attach any and all documentation you have supporting the information you are providing, including without limitation all correspondence, emails, statements, confirmations, and other documents relating to your transactions, dealings and communications with the Consenting Corporate Defendants, whether those documents are in hard copy or electronic form. Failure to provide such documentation could delay verification of your claim and/or result in rejection of your claim.

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v.

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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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PROOF OF CLAIM FORM

MAIL TO: **Daniel J. Stermer, Corporate Monitor**
Attn: Seeman Holtz Corporate Monitorship
500 W. Cypress Creek Road, Suite 400
Fort Lauderdale, Florida 33309

**ALL PROOF OF CLAIM FORMS
MUST BE POSTMARKED BY
AUGUST 31, 2022**

OR

EMAIL TO: dsterner@DSIConsulting.com

If submitting your Proof of Claim Form by electronic mail, **please include subject line: [*Name of Claimant*] Proof of Claim Submission.**

Name of Claimant: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone (Day): _____ Telephone (Night): _____

Email Address: _____

**CONSENTING CORPORATE DEFENDANT ENTITY(IES) MADE INVESTMENT
WITH (CHECK ALL AS APPROPRIATE)**

- Centurion Insurance Services Group, LLC
- Emerald Asset 2018, LLC
- Integrity Assets 2016, LLC
- Integrity 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
- SH GLOBAL, LLC n/k/a Para Longevity V, LLC
- Altrai Global 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.
- Other, Fund Name: _____

AMOUNT AND DESCRIPTION OF CLAIM

1. **What is the amount of the claim?** \$ _____

a. Does this amount include interest or other charges?

No.

Yes. Attach statement itemizing interest, fees, expenses, or other amounts other than principal included in the amount of the claim.

2. **What is the basis of the claim?** _____

(Examples: money loaned, services performed, goods sold). Attach copies of supporting documentation of the claim.

3. **Is all or part of the claim secured?** No. Yes.

4. **If you Answered “Yes” to Question 3 above, please provide the nature of property securing the claim:** _____, **and the basis for perfection:** _____.

Attach copies of documents, if any, that show evidence of perfection of a security interest (i.e. a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded).

Value of property: \$ _____.

Amount of the claim that is secured: \$ _____.

Amount of the claim that is unsecured: \$ _____.

5. **Have you received any funds from one or more of the Consenting Corporate Defendants and/or Grace Holdings or the Corporate Monitorship Estate or from any other person or entity on behalf of one or more of the Consenting Corporate Defendants and/or Grace Holdings or Corporate Monitorship Estate in connection with your asserted claim?**

No

Yes

If yes, provide the amount of funds received (whether in the form of periodic interest payments, return of principal, and/or redemption: \$ _____.

IMPORTANT: FILING THIS PROOF OF CLAIM SHALL CONSTITUTE A WAIVER OF ANY CLAIMS AGAINST THE CORPORATE MONITORSHIP, ANY OF THE CONSENTING CORPORATE DEFENDANTS OR THE CORPORATE MONITOR.

I DO HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS CORRECT TO THE BEST OF MY/OUR KNOWLEDGE AND BELIEF.

Date: _____, 2022

Signature of Claimant

Printed Name of Claimant