

**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.

**CORPORATE MONITOR’S RESPONSE AND LIMITED OBJECTION TO
INTERVENOR TOM ECHOLDS’ LIMITED OBJECTION TO REFINANCE
OR SALE OF CENTURION ASSETS AND MOTION TO INTERVENE
AND INCORPORATED MEMORANDUM OF LAW**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”) for the property, assets and businesses of the thirty-two (32) corporate entities¹ (the “Consenting Corporate Defendants”) pursuant to the *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, dated September 14, 2021, and the *Agreed Order Granting Corporate Monitor, Daniel J. Stermer’s Unopposed Motion to Expand Corporate Monitorship Estate*, dated January 6, 2022, and pursuant to Florida Rules of Civil Procedure, hereby responds to *Intervenor Tom Echolds’ Limited Objection to Refinance or Sale of Centurion Assets and Motion to Intervene and Incorporated Memorandum of Law* (the “Motion to Intervene”) filed by Tom Echolds (the “Intervenor”) as follows:

Background

1. On September 10, 2021, the Plaintiff, State of Florida, Office of Financial

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

Regulation (the “Plaintiff”) filed a *Consent Motion for Appointment of Corporate Monitor* (the “Consent Motion”), seeking, *inter alia*, the appointment of the Corporate Monitor for the property, assets, and businesses of the initial Consenting Corporate Defendants, as well as a temporary injunction against the Consenting Corporate Defendants and two consenting natural-person Defendants, Marshal Seeman and Brian J. Schwartz (the “Consenting Individual Defendants”).

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 (such proceeding, the “Corporate Monitorship”).

3. On January 6, 2022, the Court entered an agreed order expanding the scope of the Corporate Monitorship to include five (5) additional corporate entities as Consenting Corporate Defendants (together with the September 14, 2021 Order, the “Appointment Orders”).

4. On April 6, 2022, the Corporate Monitor filed *Corporate Monitor, Daniel J. Stermer’s Motion for Entry of an Order Approving (I) a Marketing Process to Refinance Existing Secured Debt Obligation or Sell Assets, (II) Bid Procedures, (III) the Retention of Maplelife Analytics, LLC and (IV) the Agreement with Teleios, Including Authorizing Teleios (A) to Commence a Public Foreclosure Process, and (B) to Exercise Certain Remedies* (the “Bid Procedures Motion”), seeking to approve (i) a marketing process to refinance existing secured debt obligations to sell the Centurion Assets;² (ii) Bid Procedures for such process; (iii) the retention of Maple Life Analytics, LLC (“MapleLife”) as Exclusive Life Settlement Portfolio Sales and

² Capitalized terms used but not defined herein shall have the meanings ascribed in the Bid Procedures Motion.

Marketing Agent; (iv) an agreement between Teleios and the Corporate Monitor in connection with such process, including authorizing Teleios (x) to commence a public foreclosure process, and (y) to exercise remedies to the extent necessary to implement and effectuate the terms and the agreements between the parties.

5. On April 22, 2022, the Court entered the *Order Granting Corporate Monitor, Daniel J. Stermer's Motion for Entry of an Order Approving (I) a Marketing Process to Refinance Existing Secured Debt Obligation or Sell Assets, (II) Bid Procedures, (III) the Retention of Maplelife Analytics, LLC and (IV) the Agreement With Teleios, Including Authorizing Teleios (A) to Commence a Public Foreclosure Process, and (B) to Exercise Certain Remedies* (the "Bid Procedures Order"), which, *inter alia*, granted the Bid Procedures Motion.

6. Pursuant to the Bid Procedures Order, Qualified Bids (as defined in the Bidding Procedures) were to be delivered to and received by the Notice Parties no later than 5:00 p.m. (prevailing Eastern Time) on May 26, 2022 (the "Bid Deadline").

7. MapleLife undertook an extensive marketing process, contacted 54 buyers, and executed 20 NDAs. 18 interested parties submitted initial bids and 7 of those submitted final bids to MapleLife. None of the bids (either alone or in combination) met the qualifications under the Bid Procedures Order to be deemed Qualified Bids.

8. Despite the extensive marketing efforts as of May 26, 2022, no Qualified Bids were received by the Corporate Monitor.

9. The Corporate Monitor, in the exercise of his professional business judgment, and following discussions with his counsel, financial advisors and MapleLife, filed, on June 27, 2022, *Corporate Monitor's Notice of No Qualified Bids, Cancellation of Auction and Conclusion of Monitor Refinance/Sale Process* ("Notice of No Qualified Bids") which provided the Court and parties-in-interest with a detailed status of the extensive efforts undertaken to sell the Centurion

life settlement portfolio, advised that no qualified bids were received, and that the auction and the July 28, 2022 hearing would be cancelled.

10. Pursuant to the Bid Procedures Order, including paragraphs 8, 30 and 39 therein, as a result of no Qualified Bid being received on or prior to the Bid Deadline as extended through June 27, 2022 (as discussed in the Notice of No Qualified Bids), Teleios was authorized, without further order of the Court to, among other things, exercise any and all rights and remedies under the Credit Documents³, Preferred Unit Document and Securities Agreement and to foreclose on the Collateral pursuant to the NYUCC Sale (defined in the Bid Procedures Order). Teleios, in its sole and absolute discretion, was authorized to exercise its remedies as permitted in the Bid Procedures Order.

11. On June 2, 2022, the Motion to Intervene was filed, which included a limited objection to the procedures in which creditors can assert their rights in proceeds derived from specific policies in the Centurion life settlement portfolio.

12. By this response and objection, the Corporate Monitor states that the portion of the Motion to Intervene relating to the objection to the sale procedures is now moot because there was no sale of the Centurion life settlement portfolio as set forth above. The Corporate Monitor generally does not object to the request by the Intervenor to intervene, but the Corporate Monitor does not know what intervention would accomplish because of the claims and noticing procedures in place in this case. As the Court and parties-in-interest are aware, August 31, 2022, is the deadline by which creditors of the Consenting Corporate Defendants or Noteholders of Grace Holdings Financial, LLC must submit claims in this case, which would operate as intervention pursuant to the Claims Procedures, and any claims that the Intervenor timely submits will be

³ Capitalized terms used but not defined herein shall have the meanings ascribed in the Bid Procedures Motion.

included in the claims process.

DATED: July 25, 2022

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By: /s/ Brian G. Rich

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 25, 2022, 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 upon all parties on the attached Service List.

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

SERVICE LIST

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