

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.

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**THE ERIC HOLTZ LIVING TRUST, C/O SHANNON HOLTZ, TRUSTEE'S,  
RESPONSE TO RECEIVER'S SUBPOENA DUCES TECUM**

Shannon Holtz, Trustee of the Eric Holtz Living Trust (the "Trust")<sup>1</sup> responds to the subpoena, dated October 23, 2023, served upon the Trust as follows:

1. All accountings, for the period of January 1, 2017, through the present, of Trust assets and property, including all acquisitions by the Trust and disbursements from the Trust.

**RESPONSE:** The Trustee has no responsive documents.

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<sup>1</sup> Eric C. Holtz created two trusts—the Eric Holtz Living Trust dated June 25, 2014, which is presumed to be the Trust defined in the Subpoena's Definitions, and the Eric C. Holtz Revocable Trust Agreement dated December 22, 2005 (the "Revocable Trust"). The Trust was never funded.

2. An inventory of assets held by the Trust, including all documents sufficient to identify all contributions, the source and value of assets, the source of funds used to obtain the assets, including all cash, investments, or other assets with monetary value.

**RESPONSE:** The Trustee has no responsive documents.

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

**RESPONSE:** The Trustee has no responsive documents.

4. Documents sufficient to identify each beneficiary of the Trust and all distributions of Trust assets to each beneficiary, by asset and date, including the amount of cash equivalents distributed to each beneficiary.

**RESPONSE:** A copy of the Trust will be produced. There have been no distributions from the Trust.

5. Copies of all life insurance policies in the name of Eric Holtz, including the premiums paid, sources of funds for payment of such premiums, and the proceeds received therefrom.

**RESPONSE:** The Trustee has no responsive documents.

6. All proceeds from life insurance policies, or other income, gifts, contributions, or other monetary benefits the Trust received from Eric Holtz, or the Estate of Eric Holtz, from January 1, 2017 to the present.

**RESPONSE:** The Trustee has no responsive documents.

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).

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