

**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.

JUDGMENT OF PERMANENT INJUNCTION AND OTHER RELIEF
AS TO DEFENDANT MARSHAL SEEMAN

The State of Florida, Office of Financial Regulation (“**OFR**”) having filed a Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and other Statutory and Equitable Relief (“**Complaint**”) in this action against Defendant Marshal Seeman (“**Seeman**”); and the Court having appointed Daniel J. Stermer as Receiver (“**Receiver**”) over thirty-four corporate entity defendants (“collectively referred to as the “**Receivership Entities**”); and Seeman having acknowledged being served with a Summons and the Complaint, having acknowledged Seeman’s filing through counsel of his Answer to the Complaint, and having acknowledged this Court’s personal jurisdiction over Seeman and over the Defendant entities owned or controlled by Seeman as identified in the Complaint, and over the subject matter of this action; and Seeman having consented to entry of this Judgment of Permanent Injunction and Other Relief as to Defendant Marshal Seeman (“**Judgment**”), without admitting or denying the allegations of the Complaint (except as to acknowledging jurisdiction); waived findings of fact and conclusions of law; and Seeman having waived any right to appeal from this Judgment; each as set forth in the Consent of Marshal Seeman to Judgment of Permanent Injunction and Other Relief as to Defendant Marshal Seeman (“**Consent**”); and the Court having reviewed the Consent, pleadings, and the Monitor’s reports in this action, and being fully advised:

IT IS hereby **ORDERED** that the Joint Motion to Approve Judgment of Permanent Injunction and Other Relief is **GRANTED**.

Accordingly, **IT IS** hereby **ORDERED, ADJUDGED, and DECREED** that:

1. Seeman has consented to a permanent injunction and bar for violations of sections 517.07, 517.12(1) and (4), 517.301(1)(a)1., 2. and 3., and 517.301(1)(c), Florida Statutes.

2. As authorized by sections 517.191(1) and (10), Florida Statutes, Seeman is permanently enjoined and barred from continuing the following practices and violations alleged in the Complaint, or engaging therein, or doing any act or practice in furtherance thereof or in violation of chapter 517, Florida Statutes:

a. engaging in the offer or sale of any "security" either registered or exempt from registration, including any federal covered security or security offered or sold in an exempt transaction, from offices in Florida or to persons residing in Florida; however, Seeman is not prohibited from the purchase, liquidation or transfer of any security that is held by a federal or state registered securities dealer for Seeman's own individual account or jointly held account, when such purchase, liquidation or transfer is conducted by a registered securities dealer or pursuant to this Judgment;

b. engaging in the continued offer or sale of any "security" issued by or associated with the Defendant entities, the Relief Defendant entities or any other issuer in violation of sections 517.07 and 517.12(1) and (4), Florida Statutes;

c. violating, directly or indirectly, sections 517.301(1)(a)1., 2. and 3., Florida Statutes, in connection with the rendering of any investment advice or in connection with the offer, sale, or purchase of any investment or security, including any security exempted under the provisions of section 517.051, Florida Statutes, and including any security sold in a transaction exempted under the provisions of section 517.061, Florida Statutes, by:

i. employing any device, scheme, or artifice to defraud;

ii. obtaining money or property by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or

iii. engaging in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon a person;

by directly or indirectly, (i) creating a false appearance or otherwise deceiving any person, or (ii) disseminating false or misleading documents, materials, or information or making, either orally or in writing, any false or misleading statement in any communication with any investor or prospective investor, about:

(a) the financial position of the Defendant entities and the Relief Defendant entities or any other issuer;

(b) any investment in or offering of securities;

(c) the prospects for success of any business, product, or company;

(d) any returns on investment;

(e) the use of investor funds or investment proceeds;

(f) the misappropriation or misuse of investor funds or investment proceeds; or

(g) the nature of compensation paid or intended to be paid to sales agents in connection with any investment or securities offering.

d. violating section 517.301(1)(c), Florida Statutes, in any matter within the jurisdiction of the OFR, by knowingly and willfully falsifying, concealing, or covering up, by any trick, scheme, or device, a material fact, or by making any false, fictitious, or

fraudulent statement or representation, or by making or use any false writing or document, knowing the same to contain any false, fictitious, or fraudulent statement or entry, in any statement, representation, writing or document submitted to the OFR for any purpose including, but not limited to, any statement, representation, writing or document required by this Judgment or in this action;

e. acting as an affiliate as defined by section 517.021(2), Florida Statutes, of any dealer or issuer offering or selling any security identified in subsection a. above, from offices in Florida or to persons residing in Florida;

f. providing investment advisory services from offices in Florida or to persons residing in Florida;

g. acting as an affiliate of any person who provides investment advisory services in Florida or to persons residing in Florida;

h. applying for licensure or registration in any capacity with the Office under any of the chapters of the Florida Statutes regulated by the OFR; and,

i. engaging in any activity that would require disclosure of Seeman's name, status, or function in any application for registration pursuant to sections 517.081 and 517.12, Florida Statute.

3. As provided in Florida Rule of Civil Procedure 1.610(c), the foregoing paragraph shall be binding on the following who receive actual notice of this Judgment: (a) Seeman's officers, agents, servants, employees, attorneys, and family members; and (b) other persons in active concert or participation with Seeman or with anyone described in part (a) of this paragraph.

4. Seeman, individually and on behalf of the Receivership Entities as identified in the Consent, is found to have consented to injunctive relief that was previously entered against these entities in this proceeding by Order of this Court.

5. A judgment of restitution (“**Restitution Award**”) of \$100,000,000 (One Hundred Million Dollars) is entered against Seeman for the benefit of all bona fide investors or other creditors providing moneys to the entities currently subject to Receivership as identified in Orders of this Court. The identity of each bona fide investor or other creditor and amounts due shall be governed by the *Amended Agreed Order Approving the Noticing and Claims Administration Process* entered on June 29, 2022 (the “**Claims Procedure Order**”). All Restitution Award amounts due and payable by Seeman pursuant to this Restitution Award and this Judgment shall be due and payable to Daniel J. Stermer as Receiver, Case No.: 50-2021-CA-008718-XXXX-MB, Circuit Court for the 15th Judicial Circuit for Palm Beach County, Florida, Civil Division. The Receiver’s address pursuant to section 55.10(1), Florida Statutes, is the following: Daniel J. Stermer as Receiver, Development Specialists, Inc., 500 E. Broward Boulevard, Suite 1700, Fort Lauderdale, Florida 33394; dstermer@DSIConsulting.com. All amounts collected shall be distributed to the investors or other creditors pursuant to the Claims Procedure Order and other orders of this Court as may be applicable. The OFR and/or the Receiver may move to enforce this Restitution Award and the other terms of this Judgment, provided however that Seeman and Seeman’s spouse’s Florida residence, which is designated as homestead property as of this date, is protected under Florida’s Homestead Exemption, and is not subject to execution or levy by this Restitution Award and this Judgment against Seeman.

6. Claims for civil penalties, pursuant to section 517.191(4), Florida Statutes, by the OFR, and causes of action for the disgorgement of ill-gotten gains by the OFR or by the Receiver are

merged, compromised, and agreed to as part of this Restitution Award, and no separate and independent claim(s) by the Receiver or the Receivership Estate shall be brought against Seeman.

7. Seeman shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on the OFR's counsel and the Receiver and his counsel within 60 days from the date of the Judgment. Seeman shall provide additional financial disclosure information to the OFR or the Receiver as may be reasonably requested by the OFR or the Receiver.

8. Seeman shall transfer ownership of any and all of Seeman's shares or other forms of ownership interests in the entity previously disclosed by Seeman to the OFR and the Receiver as a corporate entity having value, partly owned by Seeman through shares or interests, and having no affiliation with the Receivership Entities or the subject matter of the Complaint ("**Company A**"), whether such shares or interests are issued or not, owned directly, indirectly or by any family member or trust or in any third party entity that may have been created for the purpose of holding Seeman's shares or interests in Company A, and additionally shall cause and assure the transfer of any shares or interests in Company A held by Seeman's spouse, whether held for Seeman or held independently, to the Receiver within 30 days from the date of this Judgment, such shares, or interests to be incorporated as an asset of the Receivership. Seeman shall be given credit for the estimated fair market value of the shares or interests transferred against the above identified Restitution Award, in an amount to be determined in further proceedings before this Court, on the motion of the OFR, the Receiver, or Seeman.

9. In connection with the OFR's or the Receiver's subsequent motion or motions in any way related to Seeman's compliance with the Consent or this Judgment, or the enforcement of this Judgment, at any hearing held on such a motion or motions:

a. Seeman shall be precluded from arguing that he did not violate Florida securities laws as alleged in the Complaint;

b. Seeman shall not challenge the validity of the Consent or the Judgment;

c. Solely for the purposes of such motion, the allegations of the Complaint shall be accepted as and deemed true by the Court, understanding that Seeman denies such allegations; and,

d. This Court may determine the issues raised in the motion or motions on the basis of affidavits, declarations, excerpts of sworn deposition or investigative testimony, documentary evidence, and any claims process determinations made by the Court, each without regard to the standards for summary judgment contained in Rule 1.510 of the Florida Rules of Civil Procedure. In connection with any motion filed by the OFR or by the Receiver; the OFR, the Receiver, and Seeman may take discovery, including discovery from appropriate non-parties.

10. In connection with Seeman neither admitting nor denying the allegations of this Complaint:

a. Seeman shall not take any action or make or permit to be made any public statement denying, directly or indirectly, any allegation in the Complaint or creating the impression that the Complaint is without factual basis;

b. Seeman shall not make or permit to be made any public statement to the effect that Seeman does not admit the allegations of the Complaint, or that this Consent contains no admission of the allegations, without Seeman also stating that he does not deny the allegations;

c. Upon the filing of the Consent, Seeman is found to have withdrawn any papers filed in this action to the extent that they deny any allegation in the Complaint, contest jurisdiction or assert any defense or affirmative defense to any allegation in the Complaint.

11. Seeman shall not seek or accept, directly or indirectly, reimbursement or indemnification from any source, including, but not limited to, payment made pursuant to any insurance policy, with regard to any Restitution Award amounts that Seeman pays pursuant to this Judgment, regardless of whether such Restitution Award amounts or any part thereof are added to a distribution fund or otherwise used for the benefit of investors. Seeman shall not claim, assert, or apply for a tax deduction or tax credit with regard to any federal, state, or local tax for any Restitution Award amounts that Seeman pays pursuant to this Judgment, regardless of whether such Restitution Award amounts or any part thereof are added to a distribution fund or otherwise used for the benefit of investors or distributed to investors.

12. Solely for purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C. §523, it is found that the allegations in the Complaint are true and admitted by Seeman, and further, any debt for Restitution Award amounts due by Seeman under this Consent and Judgment or any other judgement or order entered in connection with this action, is a debt for Seeman's violation of the State of Florida's securities laws or any regulation or order issued under such laws, as set forth in Section 523(a)(19) of the Bankruptcy Code, 11 U.S.C. §523(a)(19). It is also found that the allegations of the Complaint contain claims of actual fraud, false pretenses, and false representations, which are true and admitted by Seeman for purposes of exceptions to discharge, and this Judgment is deemed non-dischargeable in bankruptcy, as agreed by Seeman, under the provisions of 11 U.S.C. §§523(a)(2), (a)(3), a(4), (a)(6) and (a)(19), and any other applicable provision of Title 11 of the United States Code, or any other applicable federal or state

law; and Seeman shall henceforth be legally estopped from asserting otherwise, including, but not limited to any argument that this Judgment fails to specify the factual based for the non-dischargeable nature of the liability and indebtedness. To the extent necessary or appropriate, the OFR or the Receiver shall be entitled to present facts to any court sufficient to support a finding by the court of the non-dischargeability of this Judgment and indebtedness pursuant to the provisions of Section 523 of the Bankruptcy Code and any other applicable provision of Title 11 of the United States Code, and Seeman shall not to interpose any objection thereto.

13. Seeman shall be subject to subpoena(s) for deposition or other discovery in this matter and/or in any action(s) commenced by the OFR and /or the Receiver, and/or any other action brought on behalf of aggrieved investors/Noteholders, whether in state court or federal court, including *Millstein, et al. v. Wells Fargo Bank, N.A.*, Case No 24-cv-22142-Gayles, currently pending in the United States District Court, Southern District of Florida, Miami Division. Should Seeman receive a subpoena(s) for testimony, including for deposition or trial, this Judgment does not restrict Seeman's right(s) to defend against the subpoena, including, but not limited to, Seeman's assertion of Fifth Amendment right(s) to remain silent.

14. It is found that Seeman has waived and released the OFR and the Receiver, and their agents and representatives, attorneys, and employees from any and all causes of action, if any, that Seeman or anyone on Seeman's behalf, including, but not limited to Seeman's spouse, may have arising from or relating to the subject matter hereof.

15. Seeman shall be solely responsible for his attorneys' fees, other fees, costs, and expenses incurred up to the entry of this Judgment and will not seek reimbursement from any source, including, but not limited to, the Receivership Entities, the State of Florida, the OFR, any other agency of the State of Florida, the Receiver, and/or any of the Receiver's professionals. For these

purposes, Seeman is found to not be a prevailing party in this action since the parties have reached a good faith settlement.

16. Should any provision of the Consent or the application thereof to any person or circumstance be held invalid, such invalidity shall not affect other provisions or applications that can be given effect without the invalid provision. To this extent, the provisions of this Consent are severable.

17. Seeman having voluntarily waived service of this Judgment, this Court finds and agrees that entry of the Judgment by this Court and filing with the Clerk of the Court shall constitute sufficient and actual notice to Seeman of its terms and conditions.

18. This Court finds that Seeman has waived the right, if any, to a jury trial and to appeal from the entry of this Judgment.

19. This Court finds that Seeman has waived entry of findings of fact and conclusions of law.

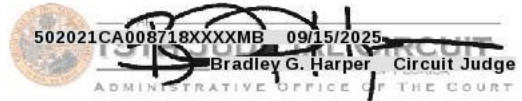
20. This Court finds that Seeman has agreed that he will not oppose the enforcement of the Judgment on the ground, if any exists, that it fails to comply with Rule 1.610(c) of the Florida Rules of Civil Procedure, and that Seeman has waived any objection based thereon.

21. The Consent is hereby incorporated into this Judgment with the same force and effect as if fully set forth therein.

22. This Court finds that Seeman has agreed that the OFR or the Receiver through respective counsel may present the Judgment to the Court for signature and entry without notice to Seeman.

23. This Court shall retain jurisdiction of this matter for the purposes of enforcement, modification, or construction of the terms of this Judgment.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida.



502021CA008718XXXXMB 09/15/2025
Bradley G. Harper
Circuit Judge

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