

**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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**RECEIVER, DANIEL J. STERMER’S MOTION FOR AUTHORIZATION  
TO PAY PREVIOUSLY AWARDED, BUT NOT YET PAID, FEES TO (I)  
RECEIVER, (II) DEVELOPMENT SPECIALISTS, INC.,  
AND (III) BERGER SINGERMAN LLP**

Daniel J. Stermer, as Court-appointed Receiver (the “**Receiver**” and previously the “**Corporate Monitor**”), hereby moves this Court (the “**Motion**”) for the entry of an order authorizing the Receiver to pay certain fees to (i) the Receiver, (ii) his financial advisor, Development Specialists, Inc., and (iii) his counsel, Berger Singerman LLP, that were previously awarded by this Court, but remain unpaid. In support of this Motion, the Receiver states as follows:

**Background**

1. On July 12, 2021, the State of Florida, Office of Financial Regulation (hereinafter “**Plaintiff**” or “**OFR**”) filed a *Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and Other Statutory and Equitable Relief* (the “**Complaint**”) against thirty corporate defendants (collectively, the “**Corporate Defendants**”), two individual defendants, Marshal Seeman and Brian J. Schwartz (collectively, the “**Individual Defendants**” and, together with the Corporate Defendants, collectively, the “**Defendants**”) and three relief defendants (collectively, the “**Relief Defendants**”), seeking to restrain acts and practices of the Defendants and Relief Defendants in violation of various provisions of Chapter

517, Florida Statutes, including sections 517.301, 517.12 and 517.07, and “halt the securities fraud scheme and common enterprise operated and controlled by Defendant Marshal Seeman (“Seeman”) and Seeman’s recently deceased business partner, Eric Charles Holtz (“Holtz”).”

2. On September 9, 2021, the OFR filed its *Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, requesting the appointment of the Corporate Monitor for the property, assets, and business of the following twenty-seven corporate-entity defendants (the “**Consenting Corporate Defendants**” or “**Monitorship Entities**”), seeking a temporary injunction against the Consenting Corporate Defendants and against 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,<sup>1</sup>
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,

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<sup>1</sup> “Integrity Assets, LLC” as used in the caption is defined in the Complaint as “Integrity Assets, LLC.” The Corporate Monitor has not identified any entity named “Integrity Assets, LLC” and therefore asserts the distinction is not a difference and rather a scrivener’s error.

26. CENTURION FUNDING SPV I LLC, and
27. CENTURION FUNDING SPV II LLC.

3. On September 14, 2021, the Court entered the Monitorship 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.

4. Pursuant to paragraph 13U of the Monitorship Order, the Corporate Monitor was 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.”

5. On January 6, 2022, the Court entered an *Agreed Order Granting Corporate Monitor, Daniel J. Stermer’s Unopposed Motion to Expand Corporate Monitorship Estate*, thereby expanding the scope of the corporate monitorship to include the following five (5) additional corporate entities as Consenting Corporate Defendants/Monitorship Entities:

1. PARA GLOBAL 2019, LLC,
2. ALLOY ASSETS, LLC,
3. SEEMAN HOLTZ WEALTH MANAGEMENT, INC.,
4. AGENCY ACQUISITION FUNDING, LLC, and
5. AMERICA’S FAVORITE INSURANCE SERVICES LLC

6. On March 23, 2023, the Corporate Monitor filed a *Joint Motion to Appoint Receiver* (the “**Receiver Motion**”), which was filed jointly with the Plaintiff/OFR, seeking the entry of an order appointing the Corporate Monitor as receiver for the Consenting Corporate Defendants. The

Receiver Motion was filed as it was the belief of the Corporate Monitor, with the consent of the OFR, that converting this monitorship into a receivership was necessary and appropriate to facilitate the wind up of the Consenting Corporate Defendants' affairs, including the liquidation of assets, disposition and prosecution of claims, and to facilitate litigation against third-parties, which will benefit the investors, noteholders and creditors.

7. On May 10, 2023, the Court conducted a hearing to consider the Receiver Motion, and, on May 12, 2023, the Court entered the *Order Appointing Receiver* (the “**Receivership Order**”), which appointed the Corporate Monitor as the Receiver of the Consenting Corporate Defendants and the Corporate Monitorship Estate (hereinafter the “**Receivership Estate**”).

8. On November 23, 2023, the Court entered an *Agreed Order Granting Receiver's Unopposed Motion to Expand Receivership Estate to Include Grace Holdings*, thereby expanding the scope of the receivership to include Grace Holdings Financial LLC.

### **The Corporate Monitor/Receiver's Fee and Expense Motions**

#### **A. First Fee Motion**

9. On October 28, 2022, the Corporate Monitor filed his first interim motion for compensation for professional services and reimbursement of expenses for the period from September 14, 2021 through July 31, 2022, requesting approval of fees in the amount of \$681,731.88 and expenses in the amount of \$5,125.39, for a total fee and expense request in the amount of \$686,857.27. On December 7, 2022, the Court entered an order (the “**Order Granting Corporate Monitor's First Fee Motion**”) (i) awarding fees to the Corporate Monitor in the amount of \$681,731.88 and expenses in the amount of \$5,125.39, and (ii) authorizing the Corporate Monitor to pay the Corporate Monitor the sum of \$211,392.83 in fees and \$5,125.39 in expenses, for a total payment of \$216,518.22, subject to further payments on the amounts awarded

therein at a later date.

**B. Second Fee Motion**

10. On October 10, 2023, the Corporate Monitor filed his second interim motion for compensation for professional services and reimbursement of expenses for the period from August 1, 2022 through May 11, 2023, requesting approval of fees in the amount of \$459,184.88 and expenses in the amount of \$0.00. On November 4, 2023, the Court entered an order (the “**Order Granting Corporate Monitor’s Second Fee Motion**”) (i) awarding fees to the Corporate Monitor in the amount of \$459,184.88, subject to payment at a later time, and (ii) authorizing the Receiver to pay the Corporate Monitor the sum of \$470,339.05, representing the unpaid fees that were previously approved and awarded by the Court to the Corporate Monitor pursuant to the Order Granting Corporate Monitor’s First Fee Motion.

**C. Third Fee Motion**

11. On November 14, 2024, the Receiver filed his third interim motion for compensation for professional services and reimbursement of expenses for the period from May 12, 2023 through September 30, 2024, requesting approval of fees in the amount of \$449,454.50 and expenses in the amount of \$0.00. On November 20, 2024, the Court entered an order (the “**Order Granting Receiver’s Third Fee Motion**”) (i) awarding fees to the Receiver in the amount of \$449,454.50, subject to payment at a later date, and (ii) authorizing the Receiver to pay the Receiver the sum of \$459,184.88, representing the unpaid fees that were previously approved and awarded by the Court to the Receiver pursuant to the Order Granting Corporate Monitor’s Second Fee Motion.

12. As of the filing of this motion, the total amount of previously awarded, but unpaid fees that remain owing to the Receiver is \$449,454.50.

## **Development Specialists, Inc.’s Retention and Fee and Expense Motions**

13. On September 17, 2021, the Corporate Monitor filed a motion seeking the approval of the employment of Development Specialists, Inc. (“**DSI**”) as financial advisor to the Corporate Monitor, effective as of September 14, 2021. On September 18, 2021, the Court entered an order authorizing the Corporate Monitor to employ DSI as financial advisor to the Corporate Monitor effective as of September 14, 2021.

### **A. First Fee Motion**

14. On October 28, 2022, DSI filed its first interim motion for compensation for professional services and reimbursement of expenses for the period from September 14, 2021 through July 31, 2022, requesting approval of fees in the amount of \$652,911.60 and expenses in the amount of \$0.00. On December 7, 2022, the Court entered an order (the “**Order Granting DSI’s First Fee Motion**”) (i) awarding fees to DSI in the amount of \$652,911.60, and (ii) authorizing the Corporate Monitor to pay DSI the sum of \$211,392.83 in fees, subject to further payments on the amounts awarded therein at a later date.

### **B. Second Fee Motion**

15. On October 10, 2023, DSI filed its second interim motion for compensation for professional services and reimbursement of expenses for the period from August 1, 2022 through May 11, 2023, requesting approval of fees in the amount of \$367,920.80 and expenses in the amount of \$1,037.19, for a total fee and expense request in the amount of \$368,957.99. On November 4, 2023, the Court entered an order (the “**Order Granting DSI’s Second Fee Motion**”) (i) awarding fees to DSI in the amount of \$367,920.80 and expenses in the amount of \$1,037.19, subject to payment at a later time, and (ii) authorizing the Receiver to pay DSI the sum of \$441,518.77, representing the unpaid fees that were previously approved and awarded by the Court

to DSI pursuant to the Order Granting DSI's First Fee Motion.

**C. Third Fee Motion**

16. On November 14, 2024, DSI filed its third interim motion for compensation for professional services and reimbursement of expenses for the period from May 12, 2023 through September 30, 2024, requesting approval of fees in the amount of \$456,032.00 and expenses in the amount of \$119.81, for a total fee and expense request in the amount of \$456,151.81. On November 20, 2024, the Court entered an order (the "**Order Granting DSI's Third Fee Motion**") (i) awarding fees to DSI in the amount of \$456,032.00 and expenses in the amount of \$119.81, subject to payment at a later date, and (ii) authorizing the Receiver to pay DSI the sum of \$368,957.99, representing the unpaid fees and expenses that were previously approved and awarded by the Court to DSI pursuant to the Order Granting DSI's Second Fee Motion.

17. As of the filing of this motion, the total amount of previously awarded, but unpaid fees and expenses that remain owing to DSI is \$456,151.81.

**Berger Singerman's Retention and Fee and Expense Motions**

18. On September 17, 2021, the Corporate Monitor filed a motion seeking the approval of the employment of Berger Singerman LLP ("**Berger Singerman**") as general counsel to the Corporate Monitor, effective as of September 14, 2021. On September 18, 2021, the Court entered an order authorizing the Corporate Monitor to employ Berger Singerman as general counsel to the Corporate Monitor effective as of September 14, 2021.

**A. First Fee Motion**

19. On October 28, 2022, Berger Singerman filed its first interim motion for compensation for professional services and reimbursement of expenses for the period from September 14, 2021 through July 31, 2022, requesting approval of fees in the amount of

\$767,391.00 and expenses in the amount of \$8,666.76, for a total fee and expense request of \$776,057.76. On December 7, 2022, the Court entered an order (the “**Order Granting Berger Singerman’s First Fee Motion**”) (i) awarding fees to Berger Singerman in the amount of \$767,391.00 and expenses in amount of \$8,666.76, and (ii) authorizing the Corporate Monitor to pay Berger Singerman the sum of \$300,000.00 in fees and \$8,666.76 in expenses, subject to further payments on the amounts awarded therein at a later date.

**B. Second Fee Motion**

20. On October 10, 2023, Berger Singerman filed its second interim motion for compensation for professional services and reimbursement of expenses for the period from August 1, 2022 through May 11, 2023, requesting approval of fees in the amount of \$274,234.80 and expenses in the amount of \$4,989.98, for a total fee and expense request in the amount of \$279,224.78. On November 4, 2023, the Court entered an order (the “**Order Granting Berger Singerman’s Second Fee Motion**”) (i) awarding fees to Berger Singerman in the amount of \$274,234.80 and expenses in the amount of \$4,989.98, (ii) authorizing the Receiver to pay Berger Singerman the sum of \$120,751.18 in fees and \$4,989.98 in expenses, subject to further payments on the amounts awarded therein at a later date, and (iii) authorizing the Receiver to pay Berger Singerman the sum of \$467,391.00, which represents the unpaid fees approved and awarded pursuant to the Court’s Order Granting Berger Singerman’s First Fee Motion.

**C. Third Fee Motion**

21. On November 14, 2024, Berger Singerman filed its third interim motion for compensation for professional services and reimbursement of expenses for the period from May 12, 2023 through September 30, 2024, requesting approval of fees in the amount of \$884,449.00 and expenses in the amount of \$11,588.99, for a total fee and expense request in the amount of

\$896,037.99. On November 20, 2024, the Court entered an order (the “**Order Granting Berger Singerman’s Third Fee Motion**”) (i) awarding fees to Berger Singerman in the amount of \$884,449.00 and expenses in the amount of \$11,588.99, and (ii) authorizing the Receiver to pay Berger Singerman the sum of \$660,268.14 in fees and \$11,588.99 in expenses, subject to further payments on the amounts awarded therein at a later date, which amount included the sum of \$153,483.62, representing the unpaid fees approved and awarded pursuant to the Court’s Order Granting Berger Singerman’s Second Fee Motion.

22. As of the filing of this motion, the total amount of previously awarded, but unpaid fees that remain owing to Berger Singerman is \$377,664.48.

#### **Significant Developments Since Last Interim Fee Motions**

23. In support of the relief requested by this Motion, the Receiver wishes to apprise the Court and parties-in-interest, in summary form as set forth below, as to some of the additional work performed by the Receiver and his professionals since the filing of their last interim fee motions, that has benefitted the Receivership Estate:

- The Receiver and his professionals assisted with negotiating resolutions and entering into numerous settlement agreements with sales agents who are defendants in the supplemental proceeding captioned *Daniel J. Stermer, Receiver v. Jason Sussman, et al.*, Case No. 50-2023-CA-015245-XXXAMB. Certain of these settlements resulted in monies being brought into the Receivership Estate;
- The Receiver and his professionals worked together with the OFR and counsel for Marshal Seeman in negotiating the terms of that certain *Consent of Defendant Marshal Seeman to Judgment of Permanent Injunction and Other Relief* and *Judgment of Permanent Injunction and Other Relief as to Defendant Marshal Seeman* (the “**Judgment**”), whereby, *inter alia*, a judgment of restitution of \$100,000,000 (“**Restitution Award**”) was entered against Marshal Seeman (“**Seeman**”) for the benefit of all bona fide investors or other creditors of the Receivership Estate;
- The Receiver and his professionals prepared a motion to disqualify counsel for Pelican Capital Management, LLC, prepared for and attended an evidentiary hearing to consider the motion to disqualify, and defended an appeal commenced by Pelican Capital Management, LLC to the Fourth District Court of Appeals of this Court’s *Order Granting*

*Plaintiff's Verified Motion to Disqualify the Law Offices of Scott Alan Orth, P.A. and Scott Alan Orth, Esq. as Counsel to Defendant Pelican Capital Management, LLC (the "Disqualification Order")*, which resulted in an appellate order affirming this Court's Disqualification Order.

**Relief Requested**

24. By this Motion, the Receiver respectfully requests the Court to authorize the Receiver to pay the Receiver, DSI, and Berger Singerman the amounts previously awarded to each, that remain unpaid. The total amount previously awarded to the Receiver, DSI, and Berger Singerman, in the aggregate, that remains unpaid is \$1,283,270.79 (the "**Awarded But Unpaid Fees and Expenses**"), which sum is broken down as follows:

Professional	Amount Previously Awarded But Not Yet Paid
Daniel J. Stermer, Receiver	\$449,454.50 (fees)
Development Specialists, Inc., Financial Advisor to the Receiver	\$456,032.00 (fees) \$119.81 (expenses)
Berger Singerman LLP, General Counsel to the Receiver	\$377,664.48 (fees)
<b>TOTAL</b>	<b>\$1,283,270.79</b>

Attached hereto as **Composite Exhibit A** are copies of the Order Granting Receiver's Third Fee Motion, Order Granting DSI's Third Fee Motion, and the Order Granting Berger Singerman's Third Fee Motion.

25. As set forth in each of the prior fee and expense motions filed by the Receiver, DSI, and Berger Singerman, the fees for professional services for which the Receiver, DSI, and Berger Singerman requested compensation were necessary and beneficial to the Receivership Estates. The Awarded But Unpaid Fees and Expenses were previously awarded by the Court, following

the filing of various fee and expense motions that were duly noticed and heard before this Court.<sup>2</sup>

26. The Receivership Estate presently has sufficient cash on hand with which to pay the Awarded But Unpaid Fees and Expenses.<sup>3</sup>

27. Accordingly, the Receiver respectfully requests the entry of an Order in the form attached as **Exhibit B**, authorizing the Receiver to pay the Awarded But Unpaid Fees and Expenses.

**WHEREFORE**, the Receiver, Daniel J. Stermer, respectfully requests that this Court enter an Order in the form attached hereto as **Exhibit B**, (i) granting this Motion; (ii) authorizing the Receiver to pay the Awarded But Unpaid Fees and Expenses to the Receiver, DSI, and Berger Singerman, and (iii) granting such other and further relief as the Court deems just and proper.

Dated: October 14, 2025

Respectfully submitted,

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By: /s/ Brian G. Rich

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<sup>2</sup> The Receiver, DSI, and Berger Singerman have not, as of the filing of this Motion, filed their fourth fee motions for professional time and expenses for the period commencing October 1, 2024, and will do so in the future.

<sup>3</sup> As detailed in the Receiver's Eighth Report filed on October 1, 2025, Summary of Cash Activity, the Receiver's book cash balance as of September 12, 2025, is \$1,927,177.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on October 14, 2025, the foregoing was filed using the Florida E-Portal Filing System, which will serve a copy of the foregoing electronically upon all electronic service parties indicated on the attached Service List.

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

## SERVICE LIST

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# **COMPOSITE 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,  
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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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**ORDER GRANTING DANIEL J. STERMER, RECEIVER, THIRD INTERIM MOTION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
MAY 12, 2023 THROUGH SEPTEMBER 30, 2024**

**THIS CAUSE** came before the Court for hearing on November 20, 2024, at 8:45 a.m., upon *Daniel J. Stermer, Receiver Third Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From May 12, 2023 Through September 30, 2024* (the “Motion”), filed by Daniel J. Stermer, the Court appointed Receiver (the “Receiver”), pursuant to which the Receiver seeks approval of fees in the amount of \$449,454.50, for services rendered by the Receiver during the period of May 12, 2023 through September 30, 2024. The Court, having considered the Motion and the record in this proceeding, noting that no objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby


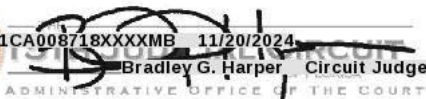
**ORDERED** that:

1. The Motion is **GRANTED**.
2. Receiver Daniel J. Stermer is awarded fees in the amount of \$449,454.50 for the period of May 12, 2023 through September 30, 2024. As set forth in the Motion, the Receiver is not requesting payment at this time of the fees requested in the Motion. The fees awarded herein are subject to payment at a later date.

3. The Receiver is authorized to pay to the Receiver the sum of \$459,184.88, which represents the unpaid fees previously approved and awarded by this Court to the Corporate Monitor, pursuant to the Court's *Order Granting Daniel J. Stermer, Corporate Monitor's Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022 Through May 11, 2023* entered on November 4, 2023.

4. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered by the Corporate Monitor now for the benefit of the then monitorship estate now receivership estate.

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

 502021CA008718XXXMB 11/20/2024  
  
Bradley G. Harper Circuit Judge  
ADMINISTRATIVE OFFICE OF THE COURT

502021CA008718XXXMB 11/20/2024  
Bradley G. Harper  
Circuit Judge

---

BRADLEY HARPER  
CIRCUIT COURT JUDGE

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**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,  
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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.

---

**ORDER GRANTING DEVELOPMENT SPECIALISTS, INC., AS FINANCIAL  
ADVISOR TO CORPORATE MONITOR/RECEIVER DANIEL J. STERMER, THIRD  
INTERIM MOTION FOR COMPENSATION FOR PROFESSIONAL SERVICES  
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
MAY 12, 2023 THROUGH SEPTEMBER 30, 2024**

**THIS CAUSE** came before the Court for hearing on November 20, 2024, at 8:45 a.m., upon *Development Specialists, Inc., as Financial Advisor to Corporate Monitor/Receiver, Daniel J. Stermer, Third Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From May 12, 2023 Through September 30, 2024* (the “Motion”), filed by Development Specialists, Inc., financial advisor to Daniel J. Stermer, the Court appointed Receiver (formerly the “Corporate Monitor” and now “Receiver”), pursuant to which Development Specialists, Inc. seeks approval of fees in the amount of \$456,032.00,<sup>1</sup> and expenses in the amount of \$119.81, for services rendered and expenses incurred by Development Specialists, Inc. during the period of May 12, 2023 through September 30, 2024. The Court, having considered the Motion and the record in this proceeding, noting that no objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby

**ORDERED** that:

1. The Motion is **GRANTED**.

---



<sup>1</sup> As set forth in the Motion, Development Specialists, Inc. voluntarily reduced its fees during the period of May 12, 2023 through September 30, 2024, from \$570,040.00 to \$456,032.00 at the request of the Plaintiff. In addition, as set forth in the Motion, although Development Specialists, Inc. is requesting an award of fees in the amount of \$456,032.00 and expenses in the amount of \$119.81 incurred during the period of May 12, 2023 through September 30, 2024, Development Specialists, Inc. is not requesting payment at this time.

2. Development Specialists, Inc., as financial advisor to the Corporate Monitor/Receiver, is awarded fees in the amount of \$456,032.00 and expenses in the amount of \$119.81 for the period of May 12, 2023 through September 30, 2024. As set forth in the Motion, Development Specialists, Inc. is not requesting payment at this time of the fees and expenses requested in the Motion. The fees and expenses awarded herein are subject to payment at a later date.

3. The Receiver is authorized to pay to Development Specialists, Inc., the sum of \$368,957.99, which represents the unpaid fees previously approved and awarded by this Court to Development Specialists, Inc., pursuant to the Court's *Order Granting Development Specialists, Inc., Financial Advisor to Corporate Monitor Daniel J. Stermer, Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022 Through May 11, 2023* entered on November 4, 2023.

4. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered by Development Specialists, Inc. now for the benefit of the then monitorship estate, now receivership estate.

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

 502021CA008718XXXXMB 11/20/2024  
  
Bradley G. Harper Circuit Judge  
ADMINISTRATIVE OFFICE OF THE COURT

502021CA008718XXXXMB 11/20/2024  
Bradley G. Harper  
Circuit Judge

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BRADLEY HARPER  
CIRCUIT COURT JUDGE

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**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,  
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VALENTINO GLOBAL HOLDINGS, LLC,  
AMERITONIAN ENTERPRISES, LLC,  
SEEMAN-HOLTZ CONSULTING CORP.,  
CENTURION ISG Holdings, LLC,  
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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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**ORDER GRANTING BERGER SINGERMAN LLP’S THIRD INTERIM MOTION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES AND REIMBURSEMENT  
OF EXPENSES FOR THE PERIOD FROM MAY 12, 2023  
THROUGH SEPTEMBER 30, 2024**

**THIS CAUSE** came before the Court for hearing on November 20, 2024, at 8:45 a.m., upon *Berger Singerman LLP’s Third Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From May 12, 2023 Through September 30, 2024* (the “Motion”), filed by Berger Singerman LLP (“Berger Singerman”), as counsel to the Receiver, Daniel J. Stermer (the “Receiver”), pursuant to which Berger Singerman seeks approval of fees in the amount of \$884,449.00<sup>1</sup> and expenses in the amount of \$11,588.99, for services rendered by Berger Singerman as counsel to the Receiver during the period of May 12, 2023 through September 30, 2024. The Court, having considered the Motion and the record in this proceeding, noting that no objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby

**ORDERED** that:

1. The Motion is **GRANTED**.

---

<sup>1</sup> As set forth in the Motion, Berger Singerman voluntarily reduced its fees during the period of May 12, 2023 through September 30, 2024, from \$1,000,966.00 to \$884,449.00 at the request of the Plaintiff. In addition, as set forth in the Motion, although Berger Singerman is requesting an award of fees in the amount of \$884,449.00 and expenses in the amount of \$11,588.99 incurred during the period of May 12, 2023 through September 30, 2024, at this time, Berger Singerman is only seeking an amount as agreed to of up to \$884,449.00 in fees and \$11,588.99 in expenses, with further payments to be subject to further Court Order.

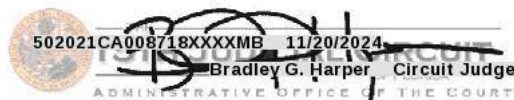
2. Berger Singerman is awarded fees in the amount of \$884,449.00 and expenses in the amount of \$11,588.99 for the period of May 12, 2023 through September 30, 2024.

3. Based upon the agreement with the Plaintiff, the Receiver is authorized to disburse the aggregate sum of \$1,500,000.00. The Receiver is authorized to pay Berger Singerman the sum of \$660,268.14 in fees and \$11,588.99 in expenses, for a total payment of \$671,857.13, subject to further payments on the amounts awarded herein at a later date.

4. The amount to be paid as referenced in paragraph 3 above is inclusive of the sum of \$153,483.62, which sum represents the unpaid fees approved and awarded pursuant to this Court's *Order Granting Berger Singerman LLP's Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022 Through May 11, 2023* entered on November 4, 2023.

5. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered by Berger Singerman for the benefit of the receivership estate.

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



502021CA008718XXXMB 11/20/2024  
Bradley G. Harper  
Circuit Judge

BRADLEY HARPER  
CIRCUIT COURT JUDGE

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# **EXHIBIT B**

**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,  
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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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**ORDER GRANTING RECEIVER, DANIEL J. STERMER'S  
MOTION FOR AUTHORIZATION TO PAY PREVIOUSLY AWARDED,  
BUT NOT YET PAID, FEES TO (I) RECEIVER, (II) DEVELOPMENT  
SPECIALISTS, INC., AND (III) BERGER SINGERMAN LLP**

**THIS CAUSE** came before the Court for hearing on \_\_\_\_\_, 2025, at 8:45 a.m., upon the *Receiver, Daniel J. Stermer's Motion for Authorization to Pay Previously Awarded, But Not Yet Paid, Fees to (i) Receiver, (ii) Development Specialists, Inc, and (iii) Berger Singerman LLP* (the "Motion") filed by the Receiver, Daniel J. Stermer (the "Receiver"). The Court, having considered the Motion and the record in this proceeding, noting that no objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby

**ORDERED** that:

1. The Motion is **GRANTED**.
2. The Receiver is authorized to pay the Receiver the sum of \$449,454.50, which represents previously awarded, but not yet paid, fees of the Receiver.
3. The Receiver is authorized to pay Development Specialists, Inc., as financial advisor to the Receiver, the sum of \$456,151.81, which represents previously awarded, but not yet paid, fees in the amount of \$456,032.00 and expenses in the amount of \$119.81, of Development Specialists, Inc.

4. The Receiver is authorized to pay Berger Singerman LLP, as counsel to the Receiver, the sum of \$377,664.48, which represents previously awarded, but not yet paid, fees of Berger Singerman LLP.

**DONE AND ORDERED** in Chambers at West Palm Beach, Florida this \_\_\_\_ day of \_\_\_\_\_, 2025.

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BRADLEY HARPER  
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Corporate Monitor

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