

**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.

RECEIVER'S MOTION FOR STATUS CONFERENCE

Receiver, Daniel J. Stermer, Receiver (“Receiver”), by and through undersigned counsel, respectfully requests the Court to conduct a status conference in this case so that the Receiver may provide the Court with the status of the remaining claims in this case as well as with respect to the claims remaining against certain of the defendants subject of the Supplementary Proceedings (as defined below). 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,¹
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,
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

¹ “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.

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.

9. On October 25, 2023, the Receiver commenced the following supplementary proceedings (collectively, the "Supplementary Proceedings"):

a. *Daniel J. Stermer, Receiver v. Jason Sussman, et al.*, Case No. 50-2023-CA-015245-XXXAMB;

b. *Daniel J. Stermer, Receiver v. Jeffrey Abramson*, Case No. 50-2023-CA-015224-XXXAMB;

c. *Daniel J. Stermer, Receiver v. Dean Emmets*, Case No. 50-2023-CA-015250XXXAMB;

d. *Daniel J. Stermer, Receiver v. Daniel Tepper*, Case No. 50-2023-CA-15241XXXAMB; and

e. *Daniel J. Stermer, Receiver v. Antonio Dicembrino*, Case No. 50-2023-CA-015228XXXAMB.

10. The Receiver has resolved his claims as to certain of the defendants subject of the

Supplementary Proceedings, but there are remaining claims against certain of the defendants that have not yet been resolved.

Relief Requested

11. By this Motion, the Receiver respectfully requests the Court conduct a status conference in this matter so that the Receiver may advise the Court of the current status of this case as well as the status of the claims against the remaining defendants in the Supplementary Proceedings.

WHEREFORE, the Receiver respectfully requests the Court to conduct a status conference in this matter, and granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

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By: /s/ Brian G. Rich

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 21, 2026, a true and correct copy of the foregoing was filed using the Florida E-filing Portal, which will in turn, send notice of electronic filing to all

electronic service parties on the attached Service List.

By: /s/ Brian G. Rich

Brian G. Rich

SERVICE LIST

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