

**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 INITIAL REPORT

Pursuant to Section XX. of the September 14, 2021 *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* (the "Order"), this Court's Corporate Monitor, Daniel J. Stermer (the "Corporate Monitor"), hereby provides this report ("Report" and "Initial Report") of the Corporate Monitor's non-exhaustive list of actions taken during the first thirty days of his appointment in this Monitorship action and states:

I. BACKGROUND.

A. Summary of Underlying Litigation.

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 (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")."

The Complaint alleges that Seeman and Holtz were assisted in the scheme and enterprise (the “SH Enterprise”) by Defendant, Brian J. Schwartz (“Schwartz”), who allegedly acted as the SH Enterprise’s untitled chief financial officer. The Complaint further alleges that as part of the SH Enterprise, Seeman, Holtz and Schwartz created and operated a myriad of corporate entities, certain of which are named as Defendants or Relief Defendants and certain of which are no longer active corporate entities; that the SH Enterprise raised more than \$400 Million in capital since 2011, through the sale of unregistered securities in the form of purportedly secured promissory notes which were purportedly secured by viaticated life settlement policies and other insurance-related assets; that investors were misled regarding the SH Enterprise’s profitability, the existence of sufficient life settlements and other assets securing their investments and the perfection of security interests in those assets; and that the SH Enterprise is a scheme in which new investor monies were commingled within the common enterprise and used to repay prior investors in the ongoing scheme thereby providing the appearance of profitability.¹

B. The Monitorship.

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”), seeking a temporary injunction against the Consenting Corporate Defendants and against Seeman and Schwartz (the “Consenting Individual Defendants”):

¹ The Corporate Monitor is aware that the Individual Defendants dispute the allegations. Further, the Consenting Corporate Defendants, while they consented to the entry of the Order, did not admit the allegations in the Complaint. *See* Order at ¶ 62 (“Nothing in this Order shall be construed as an admission by the Consenting Defendants, including but not limited to the Consenting Individual Defendants, to any of the allegations in the Complaint, nor shall in any way preclude the Consenting Defendants from contesting Plaintiff’s claims and allegations or raising any defenses and affirmative defenses to the same.”)

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, LLC²
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
27. CENTURION FUNDING SPV II LLC

On September 14, 2021, the Court entered the *Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief*, (the "Order") appointing the Corporate Monitor for the Consenting Corporate Defendants and their affiliates, subsidiaries, successors, and assigns. Pursuant to the Order, the Corporate Monitor was directed to perform an assessment of the viability of the Consenting Corporate Defendants as a going business enterprise and options and alternatives for their future, and to file and serve on the parties

² "Integrity Assets, LLC" as used in the caption is defined in the *Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and Other Statutory and Equitable Relief* (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.

to this matter, within thirty calendar days of the entry of the Order, a report of the Corporate Monitor's initial conclusions and recommendations. The Corporate Monitor hereby provides his Initial Report and will supplement his findings and recommendations in future reports to the Court.

II. RETENTION OF PROFESSIONALS.

By further Agreed Orders entered by the Court on September 18, 2021, the Corporate Monitor retained: (i) Berger Singerman LLP as counsel; (ii) e-Forensics Inc. to provide the Monitorship with digital forensics/e-discovery and cybersecurity services; and (iii) Development Specialists, Inc. to help the Corporate Monitor (a) review and analyze the financial records of the Consenting Corporate Defendants; (b) conduct financial analysis and forensic accounting services; and (c) assess the ongoing operations of the Consenting Corporate Defendants and provide input and guidance regarding the management and oversight of the day-to-day operations of the Consenting Corporate Defendants. All of the professionals have been working diligently to assist the Corporate Monitor in fulfilling his duties as set forth in the Order.

III. PRELIMINARY STATEMENT.

Immediately upon entry of the Order and receipt thereof by the Corporate Monitor, the Corporate Monitor undertook an extensive analysis of the Order itself in preparation for the commencement of the Monitorship.

First and foremost, the Corporate Monitor wishes to inform the Court of his efforts to efficiently manage the costs associated with the Monitorship. The Corporate Monitor and his team, including his attorneys, forensic accountants, and IT specialists, have made substantial efforts to administer the Order and the Corporate Monitor's obligations thereunder efficiently and as effectively as possible understanding the status and operations, if any, of the Consenting Corporate Defendants.

On September 15, 2021, in compliance with Section VI of the Order, the Corporate Monitor took control of the Consenting Corporate Defendants' financial accounts, books and records, electronically stored information ("ESI"), passcodes, and all other documents or instruments relating to the Consenting Corporate Defendants from the business premises located at 301 Yamato Road, Suite 2222, Boca Raton, Florida 33431 (the "Corporate Office"). The Corporate Monitor's on-site team initially included the Corporate Monitor, one attorney, and three IT specialists to collect, identify, and preserve Monitorship documents and assets swiftly and comprehensively. The Corporate Monitor's forensic accountants arrived after, to analyze the data collected by the Corporate Monitor's IT specialists and to conduct further investigation into the status of the Consenting Corporate Defendants' financial systems. Notably, the collections of ESI, which, given the volume of data to collect, required several days of collection and preservation and remains an ongoing task (*See* Section VII.A.4. – ESI Collection/Preservation).

Second, after the initial collection and preliminary review and analysis of documents and ESI, the Corporate Monitor wishes to inform the Court that the scope of the Monitorship is likely to become larger before it becomes smaller. Preliminary analyses of documents and ESI collected reveal shared expenses among entities which will require reconciliation, including non-Consenting Corporate Defendant entities, commingling of funds, and transfers by and between the Consenting Corporate Defendants, Relief Defendants, and other affiliated persons and non-parties. All of the transactions will need to be examined carefully. The financial data and information in this Initial Report is based upon the Corporate Monitor (and his professionals) review of the financial data and records that has been provided to him and which he has been able to obtain in the short period of time since his appointment. The data reflected herein is still subject of an ongoing investigation

and may change based upon the continued investigation and analysis and production/review of additional documents.

Last, and certainly not least, the Corporate Monitor and his team have engaged in substantial, daily communications and dialogue with Seeman, Schwartz, and their respective counsels, to assist in the duties delegated to him by the Court.

As the Corporate Monitor's analysis continues, he will provide the Court with further updates on the assets and liabilities of the Consenting Corporate Defendants pursuant to the terms of the Order.

IV. THE CONSENTING CORPORATE DEFENDANTS.

A. National Senior Insurance, Inc. d/b/a Seeman Holtz ("NSI").

The Consenting Corporate Defendants are related but distinct corporate entities with the first, NSI, operating as an insurance agency, originally selling and servicing life, health, and annuity products and financial services through insurance agents and advisors. NSI operated the website www.seemanholtz.com. NSI is distinct from Seeman Holtz Property & Casualty, LLC ("SHPC") which operates www.seemanholtzpc.com. SHPC is not a Consenting Corporate Defendant but is a Relief Defendant and the Corporate Monitor understands that SHPC continues to sell and service property and casualty insurance products as a separate and independent business.

Based upon his investigation to date, the Corporate Monitor understands that NSI has not operated at full-capacity as an insurance agency for over a year, in part due to the COVID-19 pandemic and, more recently, the death of Mr. Holtz. However, since his appointment, the Corporate Monitor and his team have dedicated substantial time and effort into evaluating whether there is a viable business to be developed from the foundations of NSI as an insurance agency, including the servicing of existing NSI clients, some of whom reach out requesting service, who purchased life, health, and annuity products from NSI's agents.

In this regard, the Corporate Monitor has worked to develop the prospect of a transparent business model which avoids violation of the Order’s injunction and is otherwise compliant with both Florida law and the regulatory framework governing insurance agencies. The Corporate Monitor has engaged in numerous discussions with Plaintiff’s counsel from the OFR and consulted an agency representative from the Florida Department of Financial Services, Division of Insurance Agent and Agency Services (“DFS”). To date, OFR and DFS have been generally receptive to the concept, subject to limitations on the specific insurance agents which may be involved in the renewed business activities of NSI and Court approval.

The foregoing remains in concept phase, and material challenges remain before the Corporate Monitor is able to present an update to the Court with his recommendation for the ongoing operations of NSI.

1. Errors & Omissions (“E&O”) Insurance.

Among the challenges facing the viability of NSI, in addition to the many lawsuits and claims filed against it, is the rescission of NSI’s E&O insurance policy by its E&O carrier.³ The Corporate Monitor must remain reticent at this time regarding the prospect of conducting any

³ In its letter dated August 31, 2021, Admiral Insurance Group (“Admiral”) wrote: “Because of these material misrepresentations, omissions, concealment of facts or incorrect statements Admiral must rescind National Senior Insurance Inc.’s insurance policy referenced above back to the inception date, October 2, 2020.” The August 31, 2021 letter continued: “Florida law is well settled that an insured’s misrepresentations, omissions, concealment of fact or incorrect statement on an application for insurance that is material to the acceptance of the risk or to the hazard assumed by the insurer will serve as a basis for rescission of the policy from the inception. As such, Admiral must rescind and void back to inception any and all coverage in any way related to the above noted policy.”

business through NSI without E&O coverage for future business and without either a renewal of the canceled coverage⁴ or the issuance of an Extended Reporting Policy.⁵

2. NSI's Client Base.

For purposes of this Report, assuming that NSI is able to resume business operations, the Corporate Monitor is uncertain whether customers of NSI will be willing to continue to do business with NSI or the independent insurance agents that the Corporate Monitor may enter into agreements with who were previously affiliated with NSI. As noted above, the Corporate Monitor sent the Order to insurance agents identified by Seeman as those who may be soliciting NSI's clients in violation non-solicitation obligations, however the scope and extent of the loss of NSI's client base remains unknown. Accordingly, the potential revenue that could be generated from these activities is unknown at this time.

3. NSI's Ability to Fund Payroll and Business Operations.

As noted above, Ms. Zamora and Ms. Jimenez continue to work for NSI and, since the appointment of the Corporate Monitor, have been paid by the income received by NSI from commissions paid from renewal premiums received by insurance companies or from advances made by Seeman. The income stream from the commissions on renewal premiums is both uncertain to continue and insufficient to support staffing, rents, and the operations of NSI, let alone the Monitorship.

⁴ By letter dated September 22, 2021, Berger Singerman partner, Gina Clausen Lozier, Esq., special insurance counsel to the Corporate Monitor, wrote to Admiral requesting with a certified copy of the Policy, a copy of the underwriting file in which Admiral is basing its decision as well as all information relied upon by Admiral supporting its position that Admiral "is now aware that National Security Senior Insurance engaged in, and has earned income from, the sales of securities."

⁵ The Corporate Monitor has had an application completed and submitted to various carriers seeking an Extended Reporting Period but has yet to receive any response from any potential carrier regarding the application.

Currently, the Corporate Monitor has not determined whether the prospective new business model can be operated to generate sufficient revenue to operate NSI independently as a going concern. The Corporate Monitor is concerned about incurring any liability without the ability to pay such liabilities.

B. The Private Placement Entities (“PPEs”).

The PPE’s are a group of private placement entities which sought to raise capital from investors to fund the purchases of life settlement insurance policies, including those policies acquired by Centurion (described below), in addition to other insurance-related investments. The PPEs subject of the Monitorship are as follows.

1. EMERALD ASSETS 2018, LLC (“Emerald 2018”)
2. INTEGRITY ASSETS 2016, LLC (“Integrity 2016”)
3. INTEGRITY ASSETS, LLC (“Integrity”)
4. PARA LONGEVITY 2014-5, LLC (“PL 2014-5”)
5. PARA LONGEVITY 2015-3, LLC (“PL 2015-3”)
6. PARA LONGEVITY 2015-5, LLC (“PL 2015-5”)
7. PARA LONGEVITY 2016-3, LLC (“PL 2016-3”)
8. PARA LONGEVITY 2016-5, LLC (“PL 2016-5”)
9. PARA LONGEVITY 2018-3, LLC (“PL 2018-3”)
10. PARA LONGEVITY 2018-5, LLC (“PL 2018-5”)
11. PARA LONGEVITY 2019-3, LLC (“PL 2019-3”)
12. PARA LONGEVITY 2019-5, LLC (“PL 2019-5”)
13. PARA LONGEVITY 2019-6, LLC (“PL 2019-6”)
14. PARA LONGEVITY VI, LLC (“PL VI”)
15. SH GLOBAL, LLC N/K/A PARA LONGEVITY V, LLC (“SH Global”)

C. Centurion and the Centurion Related Entities.

Centurion Insurance Services Group, LLC (“Centurion”) is owned by Altrai Global, LLC a/k/a Altrai Holdings, LLC (“Altrai”), Valentino Global Holdings, LLC (“Valentino”), and Ameritonian Enterprises, LLC (“Ameritonian”). Altrai is owned by the Estate of Eric Holtz, Valentino is owned by Seeman, and Ameritonian is owned by Schwartz.

Centurion was formed as an asset manager, consolidating the holdings and servicing of all life insurance policies acquired by the PPE’s through the use of financial institutions as securities

intermediaries, as discussed below. Once Centurion was formed, the PPE's began to provide funding to Centurion to purchase life insurance policies in the tertiary market and pay premiums on the policies.

The "Centurion Related Entities" subject of the Monitorship are:

1. Centurion Funding SPVI, LLC ("CF SPVI") previously owned certain life insurance policies and related single premium annuity contracts on the same insureds, is owned in part by Centurion ISG Holdings, LLC ("CISG Holdings").
2. Centurion ISG Holdings II, LLC ("CISG Holdings II") is part of the Teleios credit facility and is the guarantor to the various Teleios Agreements.
3. Centurion Funding SPVII, LLC ("CF SPVII") is an entitlement holder to insurance policies which are the subject policies for Centurion's credit facility.
4. Centurion ISG (Europe), Ltd., ("CISG Europe") was the original owner of the insurance policies and is no longer in operations. CF SPVII which is affiliated with Centurion's credit facility which pays premiums on the insurance policies, has taken its place.
5. Centurion ISG Services, LLC ("CISG Services") was set up to be the servicer to Centurion to pay premiums on the life insurance policies acquired and to perform other administrative activities. Its duties have been outsourced to a third-party servicer, MLF LexServ LP ("LexServ").
6. Centurion ISG Finance Group, LLC ("CISG Finance") is an entity which pursued capital from a small number of from independent investors (totaling 13) and was also the entity to which fund from Prime Short Term Credit, Inc. were invested.

The PPEs loaned funds directly to Centurion so Centurion, and the above listed Centurion Related Entities, could purchase, hold, and service the life settlement portfolio subject of the Monitorship.

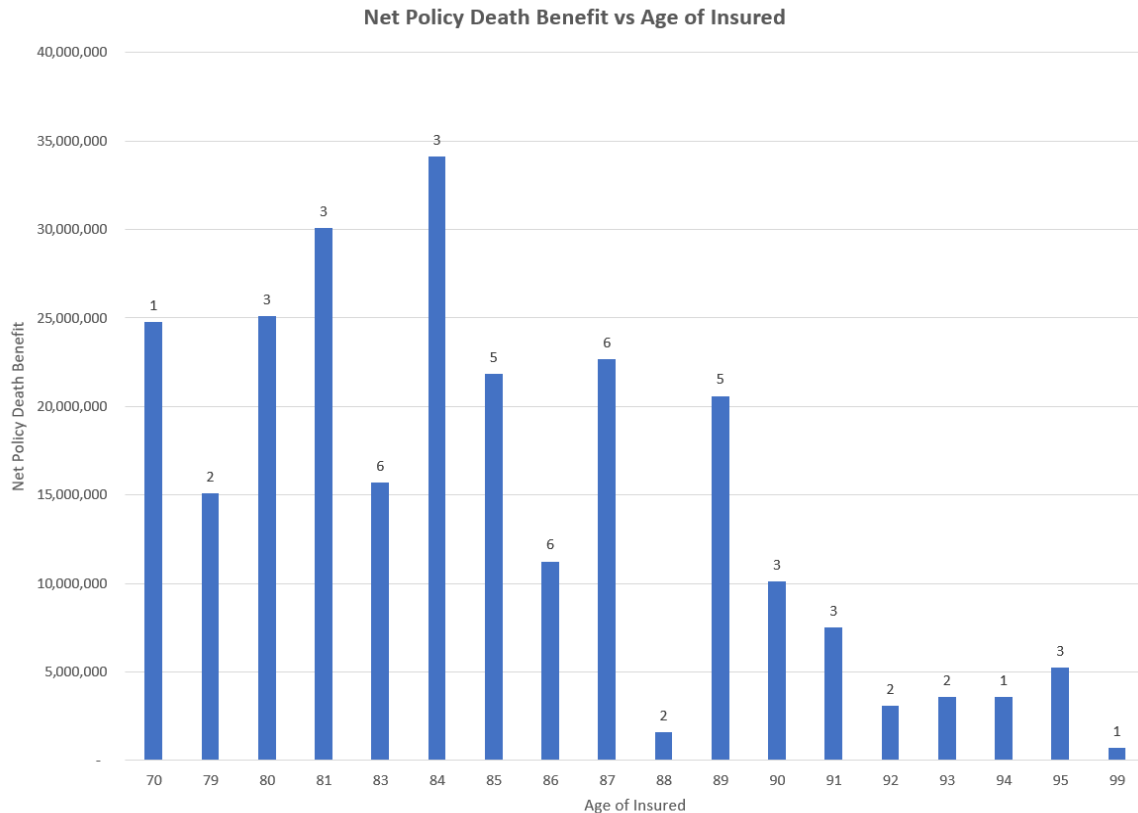
V. REPORT REGARDING CENTURION.

For the reasons explained in greater detail below, the Corporate Monitor has concerns about the ability of Centurion to repay the PPEs from proceeds from the sale and/or monetization of the life insurance policies in the portfolio owned by Centurion. Put simply, the carrying costs to pay premiums to maintain the portfolio of life insurance policies continues to grow each month and the cost of capital is extensive.

A. The Portfolio of Life Insurance Policies (the “Centurion Portfolio”).

Centurion and the Centurion Related Entities currently own 61 life insurance policies with the total net policy value of approximately \$255 Million. The last policy was purchased in 2018. There are no recent valuations of the Centurion Portfolio but, according to a valuation performed as of December 31, 2018, the 61 policies had a then net present value of approximately \$92 Million, when a discount rate of 8% was applied. The Corporate Monitor is in the process of having the Centurion Portfolio’s valuation updated by a third-party.

As shown in the chart below, the average age of the insured in the Centurion Portfolio is 86.6 years while the face weighted average age is 83.5 years. The average death benefit value of a policy by insured is \$4.5 Million. However, the median value of a policy by insured is only \$2.8 million as a result of the presence of a handful of larger policies with values up to \$30 million per insured.



Of material concern to the Corporate Monitor is the premium payments currently required to maintain the life insurance policies in the Centurion Portfolio which are approximately \$880,000 per month for the fourth quarter of 2021 and are projected to average \$940,000 per month for 2022.⁶ Premiums are projected to increase by approximately 11% per year for 2023 through 2025. Comparably, during 2020 and 2021 only one policy matured⁷ yielding approximately \$1.2 million in total policy proceeds. Presently, there is no ability to fund these premium payments solely from the operations of the Consenting Corporate Defendants without the credit facility.

B. Teleios LS Holdings V DE, LLC.⁸

The Corporate Monitor and his team have undertaken extensive discussion and negotiation with Centurion’s primary credit facility lender, Teleios LS Holdings V DE, LLC (“Teleios”)⁹ and its counsel, to continue to support the maintenance of the life insurance policies owned by the Centurion entities through advances to pay premiums and expenses for the policies. Notably, the premium payments necessary to maintain the current portfolio of life insurance policies is nearly \$1 Million per month.

The Teleios transaction closed on December 14, 2018 and was evidenced by a Credit Agreement (“CA”) and Preferred Units Purchase Agreement (“PUPA”) (collectively the “Teleios Transaction Documents”). The Teleios Transaction Documents contemplated a loan of \$22.5

⁶ The projected premiums could decrease based upon maturities, which would result in less active policies requiring premiums to be paid.

⁷ “Matured” in this context means the person insured by the respective life insurance policy died.

⁸ Defined terms in this Section not otherwise defined herein shall have the meaning ascribed to them in the Teleios Transaction Documents.

⁹ For purposes of this report, Teleios refers to Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC. Teleios LS Holdings V DE, LLC is the lender for the Centurion credit facility, and Teleios LS Holdings IV DE, LLC is the entity which advances funds against preferred units, which function like a loan but require payment of a preferred dividend rather than the repayment of interest and principal.

Million to be advanced in 4 tranches and sale and issuance of up to 7,500,000 preferred membership interests in Centurion Funding SPV II, LLC, for an aggregate purchase price of \$7,500,000.

The CA and PUPA generally operate in tandem, with the CA providing for 75% of the borrowings for repayment by the borrower and the PUPA providing for 25% of the borrowings in the form of preferred unit purchases for redemption by the seller.¹⁰ Both agreements provided for 4 tranches, namely, 4 loan advances and 4 issuances of preferred units; however, only 1 loan advance for \$7.5 Million under the CA and 1 issuance of 2.5 million preferred units in exchange for \$2.5 Million actually took place. The remainder and majority of the funds advanced were in the nature of protective advances under the CA and PUPA in order to pay premiums to insurance carriers for policies pledged as collateral, fund the reserve account, and pay fees and expenses of the Company as approved by Teleios. The protective advances were reflected in 17 amendments to the CA and PUPA¹¹ and an additional fee was charged for protective advances under the CA. The last amendment to the CA dated September 13, 2021 states that \$23,792,044.61 is owed but schedule 1 attached thereto does not list the last protective advance reflected on that amendment made on September 13, 2021 in the amount of \$956,006.25. The current balance, therefore, has risen to approximately \$26,176,232. The last amendment to the PUPA dated September 13, 2021 (called an acknowledgement) states that the value of the preferred units totals \$9,337,816. As of October 13, 2021, the balance rose to approximately \$9,522,011.

¹⁰ After the 14th amendment to the CA and PUPA, protective advances were only made under the CA and not, correspondingly, under the PUPA, as had been the case for earlier amendments.

¹¹ The amendments under the CA and PUPA were simultaneous and dated on the same dates (i.e., amendment no. 10 for the CA and PUPA were both dated September 21, 2020). All of the amendments were entered into prior to the appointment of the Corporate Monitor.

The indebtedness under the CA and the PUPA are secured by the following collateral:

As to the Teleios Lender:

(i) Pledge Agreement dated 12/14/18 between guarantor Centurion Holdings and the Teleios Lender, whereby Centurion Holdings pledged to the Teleios Lender (a) all membership interests of Company designated as common units held by Centurion Holdings (i.e., 100% of common units), all equity interests of Company held by Centurion Holdings, all substitutes and replacements of any collateral, all books and records pertaining to any collateral and all of Centurion Holdings other property/rights, with any investment property or securities received by Centurion Holdings and any cash proceeds of the collateral held in trust for the Teleios Lender.

(ii) Pledge and Security Agreement dated 12/14/18 between Company and Teleios Lender, whereby Company grants security interest to Teleios Lender in policies and security entitlements, policy documents and files, accounts, chattel paper, commercial tort claims, all types of bank accounts (i.e., collections, disbursement, operating reserve and other accounts), documents, general intangibles, goods, instruments, investment related property, letter of credit rights, money, fixtures, intellectual property, agreements, vehicles, collateral records and all substitutions, replacement or proceeds of the foregoing.

As to the Teleios Purchaser:

(i) Subordinated Pledge Agreement dated 12/14/18 between guarantor Centurion Holdings and the Teleios Purchaser, whereby Centurion Holdings pledged to the Teleios Purchaser (a) all membership interests of Company designated as common units held by Centurion Holdings (i.e., 100% of common units), all equity interests of Company held by Centurion Holdings, all substitutes and replacements of any collateral, all books and records pertaining to any collateral and all of Centurion Holdings other property/rights, with any investment property or securities received by Centurion Holdings and any cash proceeds of the collateral held in trust for the Teleios Purchaser.

(ii) Subordinated Pledge and Security Agreement dated 12/14/18 between Company and Teleios Purchaser, whereby Company grants security interest to Teleios Purchaser in policies and security entitlements, policy documents and files, accounts, chattel paper, commercial tort claims, all types of bank accounts (i.e., collections, disbursement, operating reserve and other accounts), documents, general intangibles, goods, instruments, investment related property, letter of credit rights, money, fixtures, intellectual property, agreements, vehicles, collateral records and all substitutions, replacement or proceeds of the foregoing.

Effectively, all of the policies in the Centurion Portfolio are pledged to Teleios. The Corporate Monitor is concerned about the availability and cost of capital necessary to continue to fund premium payments for the life insurance policies in the Centurion Portfolio, however, any

attempt to refinance or restructure the credit facility with Teleios is premature and would not be without additional costs, penalties, and fees which may limit the economic viability of making any change at this time. In order to prevent further default under the Teleios Transaction Documents, the Corporate Monitor entered into an 18th Amendment and Acknowledgement with Teleios on October 11, 2021, to provide for the payment of premiums due and for other expenses being advanced by Teleios totaling \$983,506.

C. LexServ.

MLF LexServ, L.P. (“LexServ”) is the servicer for the policies, performing four primary functions. First, LexServ engages in premium administration as a third-party administrator (“TPA”). Second, LexServ engages in insured tracking. On a quarterly basis, it contacts either the insured directly or a contact designated by the insured via mail or phone, per the insured’s preference. LexServ will make calls to understand the status of the insured from a medical perspective, such as whether the insured is still living in the same location or in an assisted living facility for example, whether any of the insured’s doctors have changed and the general health status of the insured. The quarterly contacts also allow for LexServ representatives to hear whether the insured sounds healthy or frail.

As servicer, LexServ also handles claims processing. When a policy matures, it collects the death certificate and prepares all required paperwork with the insurance carrier to have the death benefit paid. LexServ does this in tandem with Wells Fargo by making sure that Wells Fargo as the record owner signs the required documents and gives instructions as to which account the insurance carrier should pay the death benefit to. LexServ’s fourth role pertains to assisting the Company with updating its certified medical life expectancy reports. Only 4 or 5 companies in the industry engage in this work, which combines medical and actuarial sciences. LexServ facilitates the underlying data for this purpose by obtaining medical records from the insured’s doctors. As

such, during its quarterly contact with insureds, LexServ confirms an insured's physicians, makes sure that HIPAA forms are current and obtains releases of information authorizations from the insureds so that it can obtain medical records directly from their doctors and interface with the life expectancy companies to provide the data needed for updating the reports.

LexServ receives \$850 per year per insured and payments are made on a monthly basis. Separately, when LexServ requests medical records and interfaces with a life expectancy company, it receives additional fees.

On July 28, 2021, LexServ sent Centurion a letter regarding its Termination of Servicing Agreement. According to LexServ's letter, the termination will be effective as of October 29, 2021. The Corporate Monitor is working with Teleios to identify alternative servicers for the Centurion Portfolio of life insurance policies or delay the LexServ termination and will update the Court and the parties with additional information as it becomes available.

D. Wells Fargo Bank, N.A. as Securities Intermediary.

Wells Fargo Bank, N.A. ("Wells Fargo"), serves as the Securities Intermediary and holds the life insurance policies in the Centurion Portfolio. There are a series of accounts, including a collections account which receives proceeds from either the sale or maturity of an insurance policy in the Centurion Portfolio and a disbursement account through which the payment of premiums and other fees are made. Ultimately, tri-party authorizations (i.e., Centurion Funding SPV II, Teleios, and Wells Fargo) are required to move funds from Wells Fargo accounts, or to transfer any of the policies out of the Wells Fargo securities account.

The Corporate Monitor has been informed that Wells Fargo plans to discontinue providing securities intermediary services. The Corporate Monitor, however, has not identified a replacement for Wells Fargo at this time.

VI. THE PPEs AND ADDITIONAL CAPITAL RAISES.

A. The Private Placement Entities.

As described above, the PPE's are a group of private placement entities which sought to raise capital in order to fund the purchases and maintenance of life settlement insurance policies, including those policies acquired by Centurion, in addition to other insurance-related investments such as the acquisition of insurance agencies by Seeman Holtz Property & Casualty. In their most recent iteration, the PPE's purpose were "to raise capital through an offering and sale of [notes], use the net proceeds therefrom to make secured loans to its affiliate, Centurion (the 'Centurion Loans'), and collect payments on the Centurion loans from Centurion and use those funds to make interest payments and principal payments on the [n]otes."¹² Prior to the formation of Centurion in 2011, the PPE's purpose was more broadly to make loans to one or more other unrelated entities. Each of the legal entities is or was owned by Seeman and Holtz. In 2011, Centurion was formed as an asset manager, consolidating the holdings and servicing of all policies acquired by the PPE's through the use of financial institutions as securities intermediaries. Once Centurion was formed, the PPE's began to provide funding to Centurion to purchase life insurance policies in the tertiary market and pay premiums on the policies.

Based on the Corporate Monitor's review of the documents, each PPE appears to be a separate legal entity. Furthermore, according to the private placement memoranda sent to prospective investors, each entity is to be managed by a Managing Member who was ultimately controlled by Seeman and Holtz.

As mentioned above, to obtain the significant funds needed by Centurion to purchase the life insurance policies and pay the policy premiums and to lend money to other branches of the

¹² Para Longevity 2019-5, LLC Private Placement Memorandum: While each private placement memorandum reviewed may state the company's purpose differently, the underlying effects were all similar.

business, the PPE's entered into a series of private placement investments with investors ("Noteholders"). Many of these Noteholders were clients of Seeman Holtz. The value of principal and accrued interest attributable to the PPEs as of September 30, 2021 are estimated to be approximately \$300 Million. This amount is subject to revision based upon further analysis to be performed.

Each Noteholder entered into a promissory note with the PPE in which the PPE would pay interest over a certain period of time and, upon maturity of the note, return the principal to the Noteholder. The average annual interest rate ranged from 7.25% to 18.00%. Interest is payable either monthly or quarterly, although Noteholders may have elected to defer the periodic interest for a higher return. The maturity of the notes ranged from 4 to 60 months. Each promissory note was secured by the assets of the PPE.

Prior to mid-2019, the promissory notes were secured by collateral consisting of "all personal property and assets now or hereafter owned by the Debtor [the PPE] or in which Debtor has any rights, whether now existing or hereafter arising." After mid-2019, the promissory notes were secured by substantially all of the assets of Centurion, including (a) the Life Insurance Policy Portfolio and (b) Centurion's 77.5% direct or indirect controlling equity interest in SHPC." The Corporate Monitor believes that SHPC refers to SHPCLLC (Seeman Holtz Property & Casualty LLC). However, per the organization chart, SHPCLLC is owned by SHPC Holdings I, LLC and not Centurion and the shares of SHPC Holdings I, LLC have been pledged to Centurion.

The Corporate Monitor is aware of two pledge agreements. In the first agreement, dated January 22, 2017, SHPC Holdings, LLC pledged all of its ownership in SHPCINC to Centurion Insurance Services Group, LLC. In the second agreement, the Reimbursement and Limited Liability Company Membership Interest Pledge Agreement, SHPC Holdings I, LLC pledged its

ownership in SHPCLLC to Centurion Insurance Services Group, LLC. The Corporate Monitor is not aware of any guaranty of the principal and interest for each of the PPE and does not believe that the Noteholders may look to another entity or person should the interest or principal not be paid. The Corporate Monitor understands that it may be asserted that there are intercompany notes between Centurion and each of the PPEs whereby Centurion takes on the full obligation of the capital raised by the PPEs. The Corporate Monitor also understands that Centurion, as asset manager for the PPEs, continues to hold all of the PPEs' assets (e.g., policies and SHPC share pledge).

B. The Noteholders.

Many of the Noteholders to whom the PPEs sold the notes were clients of Seeman Holtz. Generally, each private placement memorandum stated that an investor must purchase \$50,000 or more in principal amount of a note although the Managing Member had the right to accept subscriptions for lesser amounts. In addition, an eligible investor was defined as individuals or entities that qualified as Accredited Investors as defined in Rule 501(a) of Regulation D of Securities Act of 1933, as amended.

C. Pelican Capital Management.

For several life insurance policies, Centurion is an "Option Holder" pursuant to an Option to Purchase Life Insurance Policy Agreement with Pelican Capital Management LLC ("Pelican"). Rather than own the insurance policy, Centurion has the right to purchase it, i.e., exercise an option at a scheduled price, depending upon the date the option is exercised. In turn, Centurion agreed to fund the policies' premiums while it held or holds the option contract. Presently, the Corporate Monitor has not determined the asset value of these option contracts.

Under other agreements between Pelican and Centurion, Centurion, through a Life Insurance Policy Beneficiary Designation Agreement, sold Pelican the right to up to 95% of the respective insurance policy's value upon maturity, subject to the priority interests of Teleios.

The Corporate Monitor is advised that Pelican funded in excess of \$2.6 Million to Centurion during 2020 and 2021, that Centurion made payments totaling in excess of \$250,000 during 2020 to Pelican, resulting a balance due from Centurion to Pelican of in excess of \$1.926 Million.

The Corporate Monitor continues to investigate the effect of these agreements on the present value of the Centurion Portfolio and will update the Court and the parties at a future date.

D. AAF SPV I, LLC.

The Corporate Monitor has become aware of a capital raise that was transacted in 2020 and 2021 in the name AAF SPV I, LLC ("AAF") and eight individuals and/or entities, during which AAF raised in excess of \$16.9 Million resulting in an outstanding obligation due to the individuals/entities, inclusive of interest ranging from 6% to 100%, in excess of \$25.5 Million.

These transactions were in the form of Preferred Units Purchase Agreements ("PUPA") wherein the Purchaser purchased authorized but unissued membership interests in AAF. Section 3.1, Grant of Security Interest, of the PUPA provided:

As a condition for Purchaser's agreement to invest in the Preferred Units, Marshal Seeman and Eric Holtz, members ("Members") of the Company and of SHPC Holdings I, LLC ("SHPC I"), a Delaware limited liability company, hereby grant to Purchaser, a security interest in the equity ("Collateral Securities") held by the Member in SHPC I. This security interest is granted to secure any and all payments which are due and may become due under this Agreement, including, without limitation, the costs of any enforcement action and actions to implement anything covered by this Section 3.1 and including attorneys' fee and expenses and court cost. . ."

Section 3.2, Disclosure, of the PUPA provided:

The Company hereby notifies the Purchaser of the following, namely that a party or parties affiliated with the Company ("Affiliates") have been the subject of an investigation

(“Investigation”) from 2017 by the Florida Office of Financial Regulation (“OFR”). Pursuant to the Investigation, the OFR has alleged that one or more of the Affiliates has violated section 517.12(1), Florida Statutes, which allegations by the OFR have been denied by each of the Affiliates. The OFR has concluded the Investigation and the Affiliates are in the process of resolving the matters raised by means of entering into a settlement agreement with the OFR.

Of the eight distinct Purchasers, three were Noteholders in the PPE, two of which were converted from their Note in one or more of the PPEs to the PUPA pursuant to a Cancellation of Promissory Note and Security Agreement and Preferred Units Conversion Agreement as well as entering into the Preferred Units Purchase Agreement with AAF.

The Corporate Monitor and his professionals are continuing to review documents and information that they recently became aware of and will report further on this issue in the future.

E. Grace Holdings Financial, LLC.¹³

In May 2019, Centurion was provided funding by Grace Holdings Financial, LLC (“Grace”), an unrelated entity that is a Delaware limited liability company and presently not one of the entities subject to the Monitor. Similar to the promissory notes directly with PPEs, individuals entered into a promissory note arrangement with Grace (“Grace Noteholders”) and then Grace provided funding to Centurion in exchange for Preferred Equity (Units) in Centurion. The promissory notes between various individuals and either Centurion or Grace were dated between May 2019 and October 2019. Grace was registered in the State of Delaware on May 8, 2019, approximately one week prior to the first promissory note. Centurion received approximately \$700,000 from Grace Holdings from November 1 to November 7, 2020. The

¹³ The Corporate Monitor has been and continues to be in discussions with Counsel for the Consenting Corporate Defendants regarding the Grace Noteholders and that the Consenting Corporate Defendants recognize that the Grace Noteholder obligation belongs with the Consenting Corporate Defendants and is working on a process by which the Grace Noteholder obligations would be transferred to one of the Consenting Corporate Defendants so that the Grace Noteholders would be included in any future process proposed by the Corporate Monitor to address amounts owed to Noteholders.

Corporate Monitor is informed that Centurion directed Grace Holdings to stop further solicitation of investment funds from October 31, 2020. The funds received by Centurion after October 31, 2019 may have been the result of timing differences between the funds being promised and the actual execution of the transfers by Grace.

The outstanding Grace related notes exceed \$27.6 Million and there appears to be 169 Grace Noteholders.

The Corporate Monitor continues to receive multiple inquiries from the Grace Noteholders regarding the status of repayment, the collateral that they believe is associated with the Grace notes, the applicability of the Monitorship to Grace and other related issues. The Corporate Monitor has been engaging in ongoing discussions with counsel for the Consenting Corporate Defendants regarding the “bringing in” of the Grace Noteholders and the Grace related debt into this case. Such discussions remain ongoing and will have a significant impact on this case.

F. Prime Short Term Credit, Inc.

On or about July 9, 2020, Centurion ISG Finance Group, LLC entered into a Preferred Units Purchase Agreement and Contribution Agreement with Prime Short Term Credit Inc. (“Prime”) wherein Prime agreed to provide certain financing/funding to Centurion. The PUPA and the CA were amended through a First Amendment (July 28, 2020) and a Second Omnibus Amendment on December 28, 2020. Through the PUPA and the CA, amended, Prime provided approximately \$5,500,000 in financing (the “Prime Lending”). The Prime Lending was purportedly secured by an amount equal to forty (40%) percent of the net death benefit for a number of life insurance policies being held by Wells Fargo as agent. Additionally, Prime received preferred membership units as part of the transaction.

The Corporate Monitor understands that a total of thirty-two investors entered into Preferred Unit Purchase Agreements directly with Prime, twenty-two of which were also Noteholders.

The Corporate Monitor and his professionals are continuing their review of the transactions with Prime to determine what assets were pledged, whether or not these assets have been pledged to other lenders, the use of the proceeds and any and all issues related to these transactions.

Based upon records available to the Corporate Monitor, it appears that Centurion ISG Finance Group, LLC owes Prime \$8,957,391.51 as per an invoice dated August 31, 2021 from Prime.

G. Merchant Cash Advance Agreements.^{14/15}

1. 24 Capital, LLC.

On April 14, 2021, National Seniors Insurance, Inc. d/b/a Seeman Holtz d/b/a National Senior Insurance, Centurion Insurance Service Gr LLC d/b/a Centurion Insurance Services Group, LLC, Seeman Holtz Property & Casualty d/b/a Health Care Division, Schwarz Insurance Agency, Inc. d/b/a Seeman Holtz Property & Casualty, Vincent Urban Walker and Associates, Inc. d/b/a Seeman Holts VUW, Seeman Holtz Property & Casualty, LLC d/b/a Goji Division, Schwartz Insurance Agency, Inc. d/b/a Ritman & Associates, Seeman Holtz Property & Casualty d/b/a National Insurance Solutions, Seeman Holtz Property & Casualty, LLC d/b/a Kaercher Campbell & Assoc Ins. Brokerage (“Seller”), and Eric Charles Holtz and Marshal Seeman (“Guarantors”) and 24 Capital, LLC (“Funder”) entered into a Future Receivables Sale and Purchase Agreement

¹⁴ Seeman and Holtz executed personal guaranties relative to each of the pending matters and their respective underlying agreements.

¹⁵ The various MCA Agreements referenced herein may have been originally entered into previous to the dates stated above but the final amendment/agreement upon which each enforcement action referenced herein is based upon an agreement/amendment dated as stated above and attached as an exhibit to each respective complaint.

which had the following pertinent terms: (i) Purchase Price - \$750,000; (ii) Purchase Amount - \$1,026,750; (iii) Fees - \$30,000; (iv) Net Funded - \$720,000; (v) Specified Percentage – 25%; and (iv) Scheduled Remit - \$27,750.

24 Capital, LLC commenced litigation on or about July 13, 2021 in the action *24 Capital, LLC v. National Seniors Insurance, Inc. et al.*, Docket No. HHD-CV-21-6145370-S, pending in the Superior Court, J.D. of Hartford, Connecticut. The Corporate Monitor understands, based upon a review of the pending complaint alleging default by the Seller, that Seller has an outstanding balance totaling \$804,730, anticipated legal fees/costs totaling \$25,000, resulting in a total due to Funder of \$829,730, as of July 13, 2021.

2. Business Advance Team LLC d/b/a Everyday Capital.

On April 14, 2021, National Senior Insurance, Inc. dba Seeman Holtz d/b/a National Seniors Insurance Inc., Centurion Insurance Service Group LLC d/b/a Centurion Insurance Services Group, LLC, Seeman Holtz Property & Casualty d/b/a Health Care Division, Goji Division, National Insurance Solutions, Kaercher Campbell & Assoc Ins Brokerage, Schwarz Insurance Agency, Inc. d/b/a Seeman Holtz Property & Casualty, Ritman & Associates, Vincent Urban Walker and Associates, Inc. d/b/a Seeman Holts VUW (“Seller”), and Eric Charles Holtz and Marshal Seeman (“Guarantors”) and Business Advance Team LLC d/b/a Everyday Capital (“Funder”) entered in to Future Receivables Sale and Purchase Agreement which had the following pertinent terms: (i) Purchase Price - \$3,000,000; (ii) Purchase Amount - \$4,107,000; (iii) Specified Percentage – 49%; and (iv) Initial Weekly Installment - \$111,000.

Business Advance Team LLC d/b/a Everyday Capital commenced litigation on or about July 21, 2021 in the action *Business Advance Team LLC d/b/a Everyday Capital v. National Senior Insurance, Inc. et al.*, Index No. 518091/2021, pending in Supreme Court of the State of New York, Kings County. The Corporate Monitor understands, based upon a review of the pending

complaint alleging default by the Seller, that Seller remitted \$666,000 under the Agreement leaving an unremitted balance as of July 21, 2021 of \$3,441,000 plus nine percent (9%) interest, costs, disbursements, and attorney's fees.

3. Newco Capital Group VI, LLC.

On April 19, 2021, National Senior Insurance, Inc. d/b/a Seeman Holtz Property & Casualty; Seeman Holtz; National Seniors Insurance, Inc.; Seeman Holtz Property & Casualty Insurance; Centurion Insurance Services Group LLC; Seeman Holtz Property And Casualty, LLC; Seeman Holtz Property And Casualty, Inc; Health Care Division; Schwarz Insurance Agency Inc.; Vincent, Urban, Walker And Associates Inc; Seeman Holtz VUW; Goji Division; Ritman & Associates; National Insurance Solutions; Kaercher Campbell & Assoc Ins. Brokerage ("Seller"), and Eric Charles Holtz and Marshal Seeman ("Guarantors") and Newco Capital Group VI, LLC ("Funder") entered into a Revenue Purchase Agreement which had the following pertinent terms: (i) Purchase Price - \$750,000; (ii) Purchase Percentage – 15%; (iii) Purchased Amount - \$1,027,500; (iv) Payment Frequency – Daily; and (v) Remittance - \$8,563.

Newco Capital Group VI, LLC commenced litigation on or about June 25, 2021, in the action *NewCo Capital Group VI LLC v. National Senior Insurance, Inc., et al.*, Index No. 808754/2021E, pending in the Supreme Court of the State of New York, Bronx County. The Corporate Monitor understands, based upon a review of the pending complaint alleging default by the Seller, that Seller remitted \$359,646 under the Agreement leaving an unremitted balance of \$667,854 in addition to NSF fees incurred totaling \$210, a default fee in the amount of \$2,500 and attorney's fees in the amount of \$200,356.20, resulting in a total amount due of \$870,920.20 plus interest, costs, disbursements and attorney's fees.

H. Beneficial Designation Agreements.

The Corporate Monitor has become aware that Centurion Insurance Services Group, LLC, a limited liability company formed in the state of Ohio in the United States of America, not in its individual capacity but solely as agent for Centurion ISG (Europe) Limited, a company organized under the laws of Ireland with registration number 514133 (hereinafter Centurion Insurance Services Group, LLC in its capacity as agent for Centurion ISG (Europe) Limited will be referred to as “CISG”) entered into a number of Life Insurance Policy Beneficiary Designation and Servicing Agreement with certain individuals and/or offshore single purpose entities, beginning in 2012 and continuing through 2020.

Information available to the Corporate Monitor details the four (4) different transactions which can be summarized as: (i) Principal Amount Raised - \$4,828,438; (ii) Interest - \$4,979,371; (iii) Total Principal and Interest - \$9,807,809; (iv) Outstanding Balance - \$9,410,184; and Outstanding Balance Less Premiums - \$8,457,984. Each of the Beneficial Designation Agreements contained an exhibit detailing the specific designated life insurance policies contemplated in each agreement, and which, in at least one agreement, obligates CISG to pay no less than 75% of the available policy proceeds deposited into a certain account of CISG through the Securities Intermediary after payment to the Secured Lender (Teleios) pursuant to a waterfall analysis.

The Corporate Monitor continues to investigate effect of these Life Insurance Policy Beneficiary Designation and Servicing Agreements on the marketability and value of the insurance policies related to each such transaction.

I. Summary of Encumbrances on the PPEs and the Centurion Portfolio.

The Corporate Monitor continues to discover the Consenting Corporate Defendants’ liabilities to lenders, merchant cash advance companies, judgment creditors, trader creditors,

current and former employees and/or contractors, and the Noteholders. Based upon the Corporate Monitor's investigation to date as described above, the current total known outstanding liabilities aggregates to in excess of \$440 Million.

VII. ACTIONS TAKEN AND INVESTIGATION BY CORPORATE MONITOR.

A. Administrative Matters.

1. Monitorship Website.

Immediately upon the entry of the Order, the Corporate Monitor took over control of the Consenting Corporate Defendants' websites and established a separate website for this matter to inform the parties, their lenders, investors, Noteholders, Grace Noteholders, and the public of the Monitorship's activities: <https://nationalseniormonitorship.com> (the "Website"). The Corporate Monitor has disabled the website www.seemanholtz.com pursuant to Section 13. BB. of the Order.¹⁶

The Corporate Monitor's website is comprised of a landing page, a Frequently Asked Questions page, and a Court Documents page where the Corporate Monitor is posting all filings in this Action.

¹⁶The Corporate Monitor also redirected certain previously obtained Seeman Holtz websites to the Corporate Monitor's website, including: www.seemanholtzcomplaints.com; www.seemanholtzinvestigation.com; www.seemanholtzlawsuit.com; and www.seemanholtzparalongevity.com.

Daniel J. Stermer, Corporate Monitor

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ MONITORSHIP
IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA | CIVIL DIVISION

CASE NO.: 50-2021-CA-008718-XXXX-MB/HON. ASHLEY C. ZUCKERMAN

List of Consenting Defendants

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ	PARA LONGEVITY 2019-3, LLC
MARSHAL SEEMAN	PARA LONGEVITY 2019-5, LLC
CENTURION INSURANCE SERVICES GROUP, LLC	PARA LONGEVITY 2019-6, LLC
BRIAN J. SCHWARTZ	PARA LONGEVITY 18, LLC
EMERALD ASSETS 2018, LLC	SH GLOBAL, LLC N/A PARA LONGEVITY V, LLC
INTERGITY ASSETS 2018, LLC	ALTRA GLOBAL, LLC A/K/A ALTRA HOLDINGS, LLC
INTERGITY ASSETS 1, LLC	WALVENTHO GLOBAL HOLDINGS, L.P.C.
PARA LONGEVITY 2014-5, LLC	AMERTONIAN ENTERPRISES, LLC
PARA LONGEVITY 2015-3, LLC	SEEMAN HOLTZ LOPDOLIRIG CORP.
PARA LONGEVITY 2015-5, LLC	CENTURION ISG Holdings, LLC
PARA LONGEVITY 2016-3, LLC	CENTURION ISG Holdings II, LLC
PARA LONGEVITY 2016-5, LLC	CENTURION ISG (Europe) Limited
PARA LONGEVITY 2018-3, LLC	CENTURION ISG SERVICES, LLC
PARA LONGEVITY 2018-5, LLC	CENTURION ISG FINANCE GROUP LLC
PARA LONGEVITY 2019-3, LLC	CENTURION FUNDING SPV I LLC
PARA LONGEVITY 2019-5, LLC	CENTURION FUNDING SPV II LLC

[Frequently Asked Questions](#) [Court Documents](#)

Overview	Initial Orders	Updates
<p>This site is published and maintained by the court-appointed Corporate Monitor, Daniel J. Stermer in the above mentioned civil case. It will serve to inform investors and the general public as information becomes available.</p> <p>In short, the Plaintiff (STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION) has requested a corporate</p>	<p>The State of Florida, Office of Financial Regulation filed a complaint on July 12, 2021 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT for violations related to securities fraud, <i>COMPLAINT FOR TEMPORARY AND PERMANENT INJUNCTION, APPOINTMENT OF RECEIVER, RESTITUTION, CIVIL PENALTIES, AND OTHER STATUTORY AND EQUITABLE RELIEF.</i></p>	<p>October 6, 2021 – Notice to Investors of Corporate Monitorship and Tax Matters</p>

Daniel J. Stermer, Corporate Monitor

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ MONITORSHIP
IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA | CIVIL DIVISION

CASE NO.: 50-2021-CA-008718-XXXX-MB/HON. ASHLEY C. ZUCKERMAN

FAQs

What is a Corporate Monitor?

A Corporate Monitor is a Court appointed fiduciary appointed to perform certain tasks and then to provide reports to the Court and to the Parties. A Corporate Monitor's role is typically to supervise rather than to directly manage, to make reports and recommendations and to otherwise comply with the Order of appointment.

Who employs the Corporate Monitor?

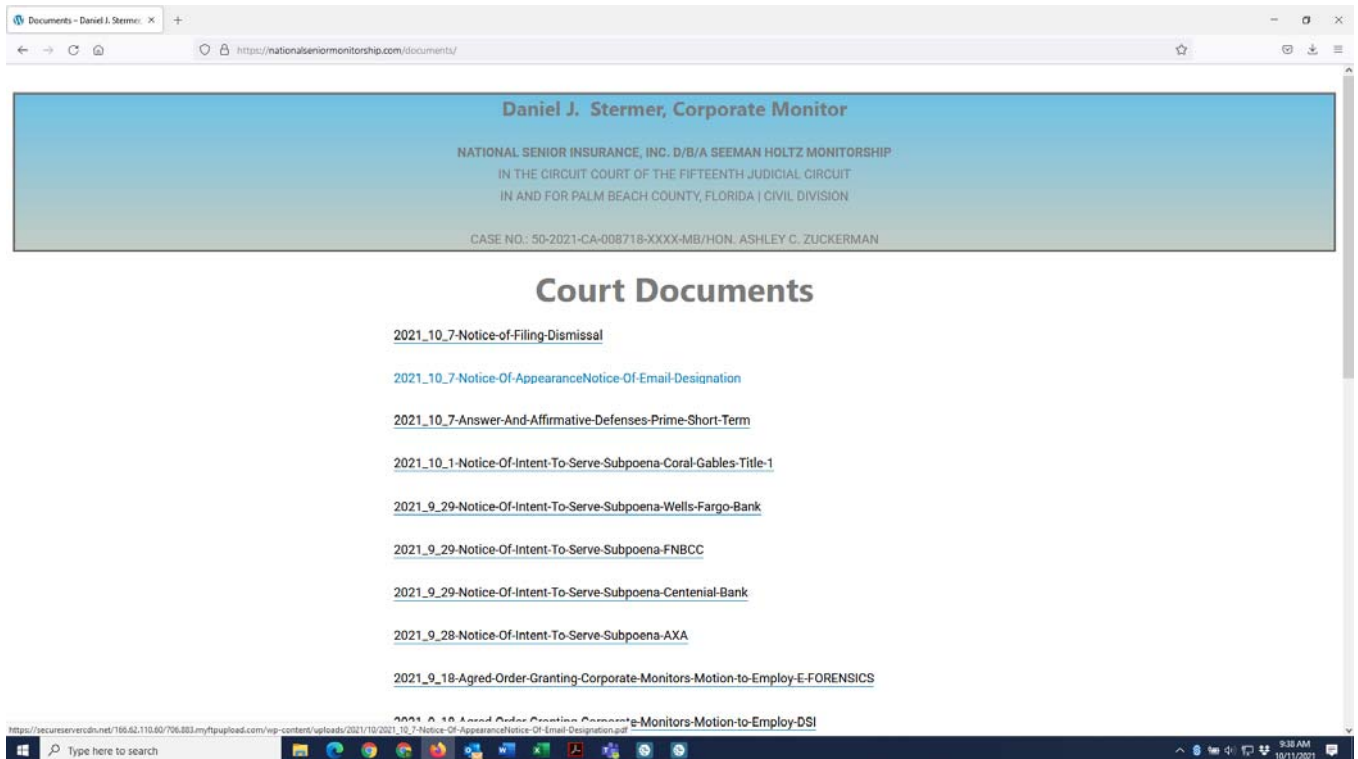
The Corporate Monitor is an agent of and reports to the Court.

What authority does the Corporate Monitor have?

The Corporate Monitor's duties and authority are set forth in the Court's September 14, 2021 Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief, which may be modified further by future Order(s) of the Court. The Court's September 14, 2021 Agreed Order available through the following link

What will happen to the Corporate Defendants who are subject to the Corporate Monitorship?

It is too soon to determine what will happen to the Consenting Corporate Defendants Entities. The Corporate Monitor is currently exploring various possibilities



2. Communications with Noteholders.

In addition to posting updates on the Website, the Corporate Monitor has undertaken efforts to notify the Noteholders utilizing a new email account, monitor@nationalseniormonitorship.com and through the previously utilized email account, “Paralongevity Information” info@paralongevity.com, including an initial introductory email and a subsequent email providing an update regarding tax related issues and required minimum distributions that may be required for certain Noteholders. The Corporate Monitor also posted the communication regarding tax related issues and required minimum distributions in the Update section of the Corporate Monitor’s website.

The Corporate Monitor will post this Initial Report on his Website once it is filed so that Noteholders and all parties in interest can read it and will send an email communication to Noteholders advising of the filing of this Initial Report and its being posted on the Website.

The Corporate Monitor and his professional team have received and responded to an avalanche of emails from the Noteholders, the Grace Noteholders, and their representatives seeking information about the status of their respective investments, seeking interest payments and distributions from the PPEs, and offering other, more dramatic statements.

Many of the Noteholders who are investors in the PPEs hold their interests in IRA accounts with Vantage (<https://www.vantageiras.com/>). The Corporate Monitor and his advisors have maintained an open dialogue with Vantage about the status of the Monitorship, the lack of liquidity to redeem Noteholders or to pay interest or distributions. Given the demographic makeup of the investor base, the Corporate Monitor has received numerous inquiries about the Noteholders' respective Required Minimum Distribution ("RMD") obligations from their respective IRAs. To that end, the Corporate Monitor recently updated the Website advising Noteholders to speak with their financial, tax and legal advisors regarding their respective options. Vantage's representatives advised the Corporate Monitor that it is providing similar responses to the Noteholders at this time.

By way of example, the Corporate Monitor has received and responded to more than fifty (50) emails from Noteholders, such as:

"I have received no payments of interest from Seeman Holtz on my IRA in 2021. How will my RMD be paid if there has been no distribution?"

"Is the receiver working with Vantage on accommodations for IRA required distribution as there is no access to the funds and a value of the asset cannot be determined at this time?"

"I am one of the investors with this case. I just would like to find out what we are supposed to do about our Required minimum withdrawal amounts when we are unable to even access to our accounts."

"My main question is in regards to status of fulfilling the IRS RMD requirements/payments & taxes for balance of 2021. Knowing there are 3 more months left in 2021 ~ what steps if any should I pursue?"

“I currently have a investment with Integrity assets Para Longevity Holdings 6 with my trad IRA in the amount of \$338,008.05. I am 75 years old and am required to take a RMD of \$15,365.19 for the year 2021. My monthly interest payments were more than enough to satisfy that requirement until they stoped (*sic.*) in may 2021. As of today I am short \$4,097.21 of my RMD due 12/31/2021. My entire IRA is tied up with Seeman/Holtz and have no way to access funds to pay this off without getting 2 months interest payments. I could owe the IRS \$2,050 in penalties. Time is of the essence in regard to this matter. I am sure there are other investors in this situation also. A response would be appreciated.”

“As you are well aware I and many others have invested a lifetime of our savings in these life policies. I have been informed that given enough time there is purportedly sufficient face value of life policy values to over time get all investors their investments back. If true, is it possible to restructure the Corporate Defendants lack of liquidity position by obtaining a lender (*sic.*) or other investor to provide such liquidity so as to accomplish that goal?”

“I am trying find out how much money my father’s account has and how we can move the money to another brokerage account.”

“I am in receipt of your SEP 21, 2021 correspondence below to all noteholders of Seeman & Holtz. Below is the email I sent to Seeman & Holtz which has not been responded until today. Please provide input on how soon I can obtain restitution for the \$60,000 currently held in assets held by Seeman & Holtz via PARA LONGEVITY 2018-5, LLC.”

“I have not seen anything on Grace could you please advise.”

“My wife & I have an investment with Grace Holdings Financial from Seeman Holtz of \$250,000. We have not received interest payments on it since May & it is due to mature on 5/15/2022. In your most recent update, Grace is not listed as being one of the investments that is being reviewed by the State, yet it was listed in the court documents. Please advise if this investment is under State review, as we have many concerns as Seeman Holtz has not been honest with interest payments as well as redemptions with our family. To date, my wife & I are owed \$205,000 from previous investments that have matured & our entire retirement is with Seeman Holtz. Needless to say, we are truly very concerned, as we have over 1 million dollars invested & have received nothing & know very little.”

3. Service of Order.

Pursuant to Sections XXII and XXIII of the Order, the Order was served upon numerous financial institutions, insurers, auditors, and accountants as well as numerous additional interested parties. *See Exhibit A.* The Corporate Monitor, through his attorneys, also prepared and served

letters upon thirty-six former employees and/or contractors of the Consenting Corporate Defendants, to provide notice of the entry of the Order and appointment of the Corporate Monitor.

4. Evidence Preservation Letters.

As of the filing of this Initial Report, the Corporate Monitor, through his attorneys, served evidence preservation letters upon the following parties: Daszkal Bolton LLP, Kasbar & DeLucia f/k/a Kasbar, Sanchez & DeLucia, HSCM, Hudson Structured Capital Management Ltd., HSCM F1 Master Fund Ltd., HSCM F1 Master Fund Ltd, HSCM Bermuda Fund Ltd., HS Select I, LLC, HS Santanoni LP, and Gary A. Woodfield, Esq., as Personal Representative of Relief Defendant, the Estate of Eric Charles Holtz (“Holtz Estate”). As the investigation continues, the Corporate Monitor expects to issue additional evidence preservation letters.

5. Subpoenas for Documents.

As of the filing of this Report, the Corporate Monitor, through his attorneys, prepared subpoenas directed to Wells Fargo Bank, N.A., FNBCC, and Centennial Bank demanding the production of various bank records, a subpoena directed to Coral Gables Collateral Agency, Inc. directing the production of various documents and records relating to its role as collateral agent for any collateral related to the Consenting Corporate Defendants, and a subpoena directed to AXA Equitable Life Insurance Co., directing the production of documents relating to Centurion ISG, *et al.* As required by Fla. R. Civ. P. 1.351(b), the Corporate Monitor filed notices of intent to serve these subpoenas and, absent the filing of objections to the notices, the Corporate Monitor will issue and serve the subpoenas. The Corporate Monitor expects that significant discovery will be required in this case.

6. ESI Collection/Preservation.

e-Forensics Inc.’s professionals performed an inventory of all electronic devices in the Corporate Offices, including computers, switches and routers, monitors/televisions,

printers/scanners/copiers, and telephones, recording the location of the device, the type of device, the make, model, and serial number of the device, and the size of hard drive in the device. The inventory includes: 19 computers (desktop and laptop), 2 servers, 10 switches and routers, 33 monitors/televisions, 12 printers/scanners/copies, and 34 telephones.

e-Forensics Inc. professionals forensically imaged all pertinent devices on site as well as the data center, and cloud-based sites that contained data related to the Consenting Corporate Defendants, including DropBox, QuickBooks, OneDrive, Office365, Exchange Server, and SharePoint, said data comprising over 7 terabytes of data. Note, as of today, the two data center servers are being collected up to a cloud backup source and is approximately 90% complete.

The Corporate Monitor and his professionals are assessing the best method to mount and review the data marshaled in order to make such data usable and searchable in order to carry out various of duties and responsibilities as required by the Order.¹⁷

The Corporate Monitor learned that the Personal Representative of the Holtz Estate is in the possession of a laptop used by Mr. Holtz and recovered from California following the passing of Mr. Holtz and a copy of the hard drive.¹⁸ The Corporate Monitor has requested a copy of the hard drive, which the Holtz Estate, through counsel, has yet to be provided but for which further negotiation is ongoing with the Personal Representative.

¹⁷ The Corporate Monitor has been advised that there may be certain data/materials contained within the imaged data that may be subject to one or more claim(s) of privilege. The Corporate Monitor is aware of this issue as well as provisions contained in the Order, particularly Paragraphs 14, 15, 22, 23, 31, 32, and 34.

¹⁸ In the matter styled In re: Estate of : Holtz, Eric Charles, Case No. PRC210003313-60J, pending in the Circuit Court of the 17th Judicial Circuit In and For Broward County, Florida, the Court, on August 27, 2021, entered its Agreed Order Granting Personal Representatives Motion for Order Directing the Turn Over of Personal Property, wherein the Court directed how the Personal Representative was to have a duplicate image made of the computer in California, have the computer shipped to Florida, and upon being advise of the receipt of the computer, the third-party provider would ship the duplicate hard drive to the Personal Representative.

Further, extensive ESI related to the Consenting Corporate Defendants, including email systems, databases, etc. were retained by Relief Defendant Seeman Holtz Property & Casualty, LLC (“SHPC”) when it was foreclosed at auction to an affiliate of Hudson Structured Capital Management (“HSCM”) in June 2021. As such, the Corporate Monitor and his IT specialists have undertaken substantial efforts to work with SHPC and HSCM to recover the ESI related to the Consenting Corporate Defendants.

7. Staff and Corporate Offices.

Upon entry into the Corporate Offices, the Corporate Monitor encountered Messrs. Seeman and Schwartz, two administrative assistants/managers, Jennifer Jimenez and Melissa Zamora, and a team of temporary individuals hired by Seeman to scan corporate records from paper into electronic format. Other individuals, including no more than four insurance agents, arrived, and departed from time to time. The actual business activity was very limited and included opening mail directed to insureds and insurance agents and the Consenting Corporate Defendants. The traditional corporate functions of accounting, human resources, and IT support were not present at the Corporate Offices. Upon investigation, it was determined that the employees who traditionally performed these corporate operations for NSI had either left the company or moved to the offices of SHPC under the control of HSCM post-foreclosure/sale, directly next door to the Corporate Offices.

Ms. Zamora and Ms. Jimenez continue to work onsite at the Corporate Offices and have assisted the Corporate Monitor in communicating with the investors/Noteholders, as well as to provide historical accounts of the business operations of the Consenting Corporate Defendants and the Relief Defendants and other day to day office related functions.

Seeman and Schwartz come into the Corporate Offices and are generally responsive to inquiries from the Corporate Monitor and his professionals. At this time, neither Seeman nor Schwartz are receiving compensation from the Corporate Monitor for their respective assistance.

8. Bank Accounts.

The Corporate Monitor has, to the best of his knowledge, obtained control of the Consenting Corporate Defendants' existing new bank accounts at U.S. Bank. Further, as explained in Section V.D., above, the Wells Fargo security accounts remain open and under the Corporate Monitor's control. The Corporate Monitor has been advised that the Consenting Corporate Defendants' other known bank accounts were closed prior to the commencement of the Monitorship. The Corporate Monitor will, as necessary, open additional bank account(s) as authorized by Section 13.X of the Order.

9. Corporate Offices – Landlord.

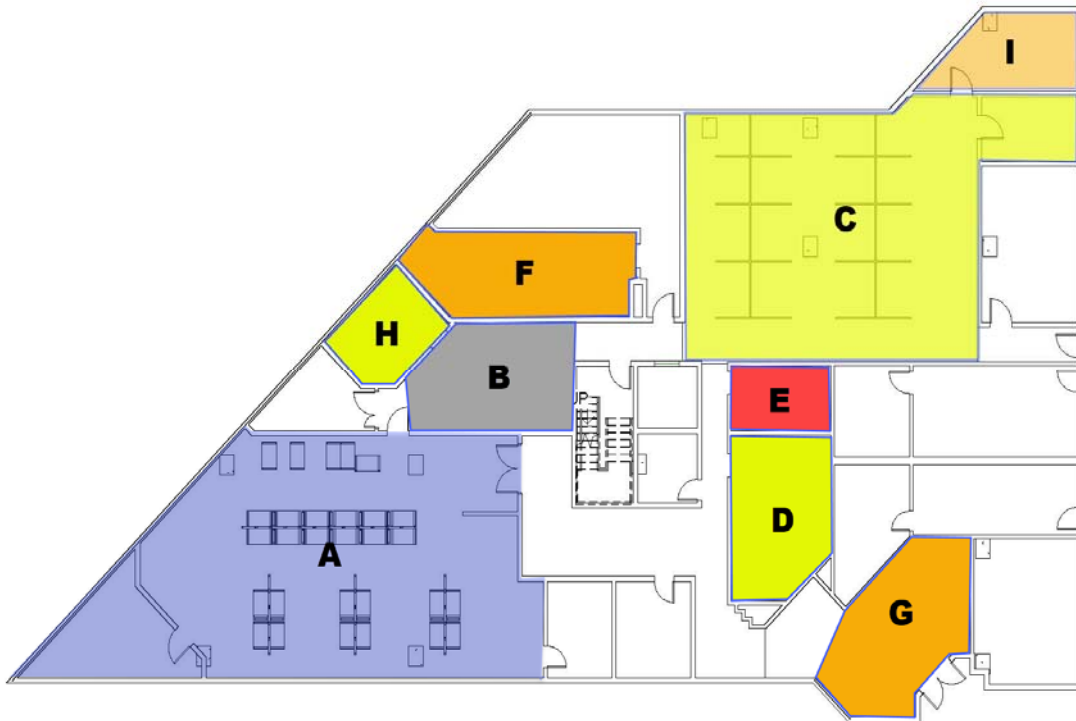
The Corporate Monitor has been in active discussions with counsel for the landlord (MCM 301 Yamato, LLC as successor to Arbern Investors IV, L.P.) of the Corporate Offices regarding issues of unpaid rent and the Corporate Monitor's intention of continued occupancy of the Corporate Offices. As of October 6, 2021, the landlord issued an invoice seeking \$85,189 for prior balances due for the months August, September, and October 2021, collectively.¹⁹

Discussions with the counsel for the landlord have been focused on the past due rent, ongoing rent obligations, signage on the building, and the prospect of the Corporate Monitor vacating the Corporate Offices and relocating to a smaller footprint within the building so that the landlord could relet the Corporate Offices to a new tenant thus mitigating any continuing amount

¹⁹ The Landlord and NSI entered into the Ninth Amendment to Office Lease Agreement on August 20, 2021 which addresses rent due for July 2021 and August 2021 and dates when same would be due and payable.

due to landlord for the Corporate Offices. The Corporate Monitor anticipates seeking Court approval in the future to resolve issues with the landlord and administer the physical assets at the Corporate Offices, such as furniture, computers, copiers, telephone equipment, etc., much of which is not currently being used given the absence of employees, insurance agents, and/or advisors working for the Consenting Corporate Defendants at this time.

The current Corporate Offices at Suite 2222 floorplan is²⁰:



B. Claims and Litigation Against the Consenting Corporate Defendants.

1. Notice of Order and Stay.

With the consent of the Corporate Monitor, counsel for certain Corporate Defendants and Seeman, Scott Orth, Esq., filed a Notice of Stay in nine (9) state court actions filed and pending in

²⁰ References within the above floorplan are for identification purposes for computer/IT equipment as identified by the Corporate Monitor's IT professional.

Palm Beach County and Collier County, Florida in which one or more Consenting Corporate Defendant is a named defendant. *See Exhibit B.*

2. *Millstein, et al. v. Marshal Seeman, et al.*, 21-CV-61179-RAR (S.D. Fla. 2021).

The Corporate Monitor negotiated a voluntary dismissal of the class action complaint against the Consenting Corporate Defendants and agreed to a tolling agreement with class counsel. The foregoing Stipulation of Dismissal was entered on October 6, 2021 in the matter pending before United States District Court Judge Rodolfo A. Ruiz II and filed in this Action via a Notice of Filing on October 7, 2021.

3. *NSI/SHPC – Invoices for Services and Intercompany Balances.*

The Corporate Monitor wishes to inform the Court that he has received several invoices for services provided to NSI and to NSI and SHPC, for joint services, such as utilities. The Corporate Monitor is continuing to investigate the scope and amount due from/to NSI for intercompany loans and/or transfers to the Consenting Corporate Defendants and/or the Relief Defendants and their respective assigns and affiliates, including but not limited to the prior payment of employees and related costs of the Relief Defendants.

VIII. IMMEDIATE NEXT STEPS AND OPEN ISSUES.

A. Funding of the Monitorship.

The Consenting Corporate Defendants' assets are highly illiquid and current cash-flows are extremely limited. The Corporate Monitor has undertaken initial discussions with existing lenders toward the prospect of a line of credit secured by the Centurion portfolio as collateral. At present, even if the Consenting Corporate Defendants were not in arrears with respect to rent expenses, there are insufficient funds to pay current monthly rents, utilities, and payroll, beyond the end of October 2021. The Consenting Corporate Defendants' past due rents, claims for unpaid

commissions by insurance agents, together with growing expense of the Monitorship's professionals' fees,²¹ and monthly fees and borrowing costs to pay the premiums of the insurance policies in the Centurion Portfolio, create an immediate need for an infusion of cash to fund the next phase of the Monitorship.

B. Investor Claims Process.

Currently, the Corporate Monitor is not authorized to make distributions to any investors. Indeed, the Order expressly states that the Corporate Monitor may not to make any preferential payments to investors. Instead, per Section 13. D., the Corporate Monitor may only “disburse funds to investors only upon further Order of the Court.” No such Court order has been requested nor entered. Moreover, per Section 13. DD. of the Order, the Corporate Monitor is not yet in a position to propose to the Court “a claims process for the determination of amounts owed to investors and other creditors, the determination of priorities among such claims, and a distribution plan for the return of funds.”

At this stage, it is too early to determine the extent of claims against the entities, the assets that may be available to fund distributions or the potential and amount of any recovery. The Corporate Monitor will continue his investigation into these issues.

IX. POTENTIAL LITIGATION.

To date, the Corporate Monitor has not commenced any litigation to recover monies and/or assets that may rightfully be the property of the Monitorship. If after completion of his investigation, receiving advice of counsel, and the exercise of his business judgment, it appears to the Corporate Monitor that commencement of litigation may be appropriate, the Corporate Monitor

²¹ The payment of the Corporate Monitor's professionals is a priority administrative expense, per Section XXI. of the Order.

will take appropriate action on behalf of the Monitorship Estate for the benefit of those determined to be rightfully owed monies from the Consenting Corporate Defendants.

CORPORATE MONITOR'S CERTIFICATION

I, Daniel J. Stermer, this Court's Corporate Monitor, hereby certify, under the penalties of perjury, that the forgoing Corporate Monitor's Report is true and accurate to the best of my personal knowledge and belief.

/s/ Daniel J. Stermer

Daniel J. Stermer

Dated: October 14, 2021

Respectfully submitted,

BERGER SINGERMAN LLP
Counsel for Corporate Monitor
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Tel. (561) 241-9500
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By: */s/ Gavin C. Gaukroger*

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DRT@bergersingerman.com

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on October 14, 2021, the foregoing was filed using the Florida E-Portal Filing System, 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 and first class, U.S. Mail upon all parties on the attached Service List.

By: /s/ Gavin C. Gaukroger
Gavin C. Gaukroger

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Twenty-six Defendant Entities

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Corporate Monitor

EXHIBIT A

EXHIBIT A

Parties Served With Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief, dated September 14, 2021 ("Order")

Name and Address	Date and Manner of Service of Order
Wells Fargo Bank, N.A. Attn: Corporation Service Company, Registered Agent 1201 Hayes Street Tallahassee, FL 32301-2525	September 16, 2021 First Class, U.S. Mail
Wells Fargo Bank, N.A. 420 Montgomery Street San Francisco, CA 94163	September 16, 2021 First Class, U.S. Mail
Bank of Utah Attn.: Douglas L. Defries, Registered Agent 2605 Washington Boulevard Ogden, UT 84401	September 16, 2021 First Class, U.S. Mail
Wilmington Trust Company 1100 N. Market Street Rodney Square North Wilmington, DE 19890	September 16, 2021 First Class, U.S. Mail
U.S. Bank 80 S. 8 th Street, Suite 224 Minneapolis, MN 55402	September 16, 2021 First Class, U.S. Mail
U.S. Bank 425 Walnut Street Cincinnati, OH 45202	September 16, 2021 First Class, U.S. Mail
U.S. Bank 800 Nicollet Mall Minneapolis, MN 55402-7000	September 16, 2021 First Class, U.S. Mail
U.S. Bank Attn.: CT Corporation Systems, Inc., Registered Agent 1010 Dale St. N. St. Paul, MN 55117-5603	September 16, 2021 First Class, U.S. Mail
DZ Bank, AG 60265 Frankfurt am Main Germany	September 16, 2021 First Class, U.S. Mail
FNBCC 301 Yamato Road, Suite 1111 Boca Raton, FL 33431	September 16, 2021 First Class, U.S. Mail
Centennial Bank Attn.: CT Corporation System, Registered Agent 1200 South Pine Island Road Plantation, FL 33324	September 16, 2021 First Class, U.S. Mail
Centennial Bank 620 Chestnut Street Conway, AR 72032	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
AIG Bank of America Financial Center 701 Brickell Ave., Ste. 1900 Miami, FL 33131	September 16, 2021 First Class, U.S. Mail
AIG 1271 Avenue of the Americas FL 41 New York, NY 10020-1304	September 16, 2021 First Class, U.S. Mail
Ameritas Life Ins. Corp. 5900 O Street Lincoln, NE 68501-1889	September 16, 2021 First Class, U.S. Mail
AXA Equitable Life Insurance Co. 1290 Avenue of the Americas New York, NY 10104	September 16, 2021 First Class, U.S. Mail
Columbus Life Insurance Co. 400 E. Fourth Street Cincinnati, OH 45202	September 16, 2021 First Class, U.S. Mail
Companion Life Ins. of NY c/o Mutual of Omaha Insurance Co. 3300 Mutual of Omaha Plaza Omaha, NE 68175	October 7, 2021 First Class, U.S. Mail
General American Life Ins. Co. 700 Market Street St. Louis, MO 63101	September 16, 2021 First Class, U.S. Mail
The Hartford Insurance One Hartford Plaza Hartford, CT 06155	September 16, 2021 First Class, U.S. Mail
ING Cedar Bijlmerdreef 106 1102 CT Amsterdam The Netherlands	September 16, 2021 First Class, U.S. Mail
John Hancock Insurance Co. P.O. Box 55979 Boston, MA 02205	September 16, 2021 First Class, U.S. Mail
Lincoln Financial Group/Lincoln National Radnor Financial Center 150 N. Radnor Chester Road Radnor, PA 19087	September 16, 2021 First Class, U.S. Mail
Lincoln Benefit 1221 N. Street, Suite 200 Lincoln, NE 68508	September 16, 2021 First Class, U.S. Mail
Lincoln Benefit 5600 N. River Road, Suite 300 Columbia Centre I Rosemont, IL 60018	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
Lincoln Benefit Attn.: Chief Financial Officer, Registered Agent 200 E. Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Manufacturers Life Ins. Co. 601 Congress Street, 8 th Floor Boston, MA 02210	September 16, 2021 First Class, U.S. Mail
MetLife, Inc. 200 Park Avenue New York, NY 10166	September 16, 2021 First Class, U.S. Mail
New York Life Insurance 51 Madison Avenue New York, NY 10010	September 16, 2021 First Class, U.S. Mail
Pacific Life 700 Newport Center Dr. Newport Beach, CA 92660	September 16, 2021 First Class, U.S. Mail
Penn 4400 Computer Drive Westborough, MA 01581	September 16, 2021 First Class, U.S. Mail
Penn Mutual Life Insurance Co. 600 Dresher Road Horsham, PA 19044	September 16, 2021 First Class, U.S. Mail
Penn Mutual Life Insurance Co. Attn.: Chief Financial Officer, Registered Agent 200 E. Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Phoenix Life and Annuity Company Attn.: Chief Financial Officer, Registered Agent 1200 South Pine Island Road Plantation, FL 33324	September 16, 2021 First Class, U.S. Mail
Phoenix Life and Annuity Company One American Row Hartford, CT 06103	September 16, 2021 First Class, U.S. Mail
Principal 711 High Street Des Moines, IA 50392-0001	September 16, 2021 First Class, U.S. Mail
Pruco Life Insurance 213 Washington Street Newark, NJ 07102-2917	September 16, 2021 First Class, U.S. Mail
Pruco Life Insurance Attn.: Chief Financial Officer, Registered Agent 200 E. Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Reliastar Life Ins. Co. of NY 1000 Woodbury Road, #208 Woodbury, NY 11797	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
Reliastar Life Insurance of New York c/o Chief Financial Officer, Registered Agent P.O. Box 32314-6200 200 E. Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Reliastar Life Insurance of New York 5780 Powers Ferry Road NW Atlanta, GA 30327	September 16, 2021 First Class, U.S. Mail
Reliastar Life Insurance of New York 230 Park Avenue New York, NY 10169	September 16, 2021 First Class, U.S. Mail
Security Life of Denver Insurance Company 7535 East Hampden Avenue Suite 400, Room 446 Denver, CO 80231	September 16, 2021 First Class, U.S. Mail
Security Life of Denver Insurance Company 5770 Powers Ferry Road NW Atlanta, GA 30327	September 16, 2021 First Class, U.S. Mail
Security Life of Denver Insurance Company Attn.: Chief Financial Officer, Registered Agent 200 East Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Security Life of Denver Insurance Company 1475 Dunwoody Drive West Chester, PA 19380	September 16, 2021 First Class, U.S. Mail
Transamerica Life Insurance Company Attn.: Corporate Secretarial/Legal Dept. 4333 Edgewood Road NE Cedar Rapids, IA 52499	September 16, 2021 First Class, U.S. Mail
Transamerica Life Insurance Company Attn.: Chief Financial Officer, Registered Agent P.O. Box 6200 (32314-6200) 200 E. Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Transamerica Life Insurance Company 100 Light Street Baltimore, MD 21202	September 16, 2021 First Class, U.S. Mail
West Coast Life Insurance Co. P.O. Box 2606 Birmingham, AL 35202	September 16, 2021 First Class, U.S. Mail
West Coast Life Insurance Co. 10306 Regency Parkway Drive Omaha, NE 68114	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
West Coast Life Insurance Co. Attn.: Chief Financial Officer, Registered Agent 200 E. Gaines Street Tallahassee, FL 32399	September 16, 2021 First Class, U.S. Mail
Wilton Reassurance Life of NY 20 Glover Avenue, 4 th Floor Norwalk, CT 06850	September 16, 2021 First Class, U.S. Mail
Seeman Holtz Property and Casualty, LLC 301 Yamato Road, Suite 2250 Boca Raton, FL 33431 Attn.: Rocco Serrecchia Attn.: Agents, Dave Coyman & Tom Ortzman Attn.: Staff, Melissa Zamora & Jennifer Jimenez	September 15, 2021 Hand-Delivery
Daszkal Bolton LLP 2401 NW Boca Raton Blvd. Boca Raton, FL 33431	September 16, 2021 First Class, U.S. Mail
Kasbar & DeLucia f/k/a Kasbar, Sanchez & DeLucia 3880 Sheridan Street Hollywood, FL 33021	September 29, 2021 First Class, U.S. Mail
Consumers United, Inc. d/b/a Goji c/o The Corporation Trust Company, Registered Agent 1209 Orange St. Wilmington, DE 19801	September 16, 2021 First Class, U.S. Mail
Consumers United, Inc. d/b/a Goji 31 St. James Ave. Boston, MA 02116	September 16, 2021 First Class, U.S. Mail
Goji Insurance 31 St. James Ave. Boston, MA 02116	September 16, 2021 First Class, U.S. Mail
Seeman Holtz Private Client Group, LLC Attn.: Jeffrey L. Baxter, Registered Agent 9100 S. Dadeland Blvd., Suite 700 Miami, FL 33156	September 16, 2021 First Class, U.S. Mail
Seeman Holtz Private Client Group, LLC 301 Yamato Road, Suite 2250 Boca Raton, FL 33431	September 16, 2021 First Class, U.S. Mail
JRA, LLC 301 Yamato Road, Suite 2250 Boca Raton, FL 33431	September 16, 2021 First Class, U.S. Mail
JRA, LLC Attn.: Corporation Service Company 135 North Pennsylvania Street, Suite 1610 Indianapolis, IN 46204	September 16, 2021 First Class, U.S. Mail
Jennifer Ritman Ritman & Associates 1154 Conner St. Noblesville, IN 46060	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
Primera Capital Tax and Auto Services, LLC 204 E. Main Street, Suite A Tomball, TX 77375	September 16, 2021 First Class, U.S. Mail
Primera Capital Tax and Auto Services, Inc. 4729 Egret Street Mesquite, TX 75181	September 16, 2021 First Class, U.S. Mail
Primera Capital Tax and Auto Services, Inc. Attn.: Anthony Davis 2424 W. Illinois Avenue Dallas, TX 75233	September 16, 2021 First Class, U.S. Mail
JEMS, LLC c/o Corporation Service Company, Registered Agent 251 Little Falls Drive Wilmington, DE 19808	September 16, 2021 First Class, U.S. Mail
Lotus Life Management, LLC Attn.: Cogency Global, Inc., Registered Agent 850 New Burton Road, Suite 201 Dover, DE 19904	September 16, 2021 First Class, U.S. Mail
Centurion Insurance Services Group, LLC 50 W. Broad Street, Suite 1800 Columbus, OH 43215	September 16, 2021 First Class, U.S. Mail
Centurion Insurance Services Group, LLC 201 East 5 th Street, 19 th Floor Cincinnati, OH 45202	September 16, 2021 First Class, U.S. Mail
HSCM 2187 Atlantic Street, 4 th Floor Stamford, CT 06902	September 16, 2021 First Class, U.S. Mail
Hudson Structured Capital Management Ltd. Attn.: Ajay Mehra, Esq., Chief Legal Officer 2187 Atlantic St., Fourth Floor Stamford, CT 06902 Ajay.mehra@hscm.com Peterbreitstone1@gmail.com	September 29, 2021 Electronic Mail and First Class, U.S. Mail
HSCM F1 Master Fund Ltd. 2187 Atlantic Street, 4 th Floor Stamford, CT 06902	September 16, 2021 First Class, U.S. Mail
HSCM F1 Master Fund Ltd. Wellesley House South – First Floor 90 Pitts Bay Road Pembroke, HM08 Bermuda	September 29, 2021 First Class, U.S. Mail
HSCM Bermuda Fund Ltd. One Dock Street, Suite 404 Stamford, CT 06902	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
HSCM Bermuda Fund Ltd. Wellesley House South – First Floor 90 Pitts Bay Road Pembroke, HM08 Bermuda	September 29, 2021 First Class, U.S. Mail
HS Select I, LLC Riverwood 200 3300 Riverwood Parkway, Suite 1075 Atlanta, GA 30339	September 29, 2021 First Class, U.S. Mail
HS Santanoni LP Wellesley House South First Floor 90 Pitts Bay Road Pembroke HM08, Bermuda	September 29, 2021 First Class, U.S. Mail
Teleios LS Holdings V DE, LLC Attn: Corporation Service Company, Registered Agent 251 Little Falls Drive Wilmington, DE 19808	September 16, 2021 Electronic Mail
Oak Street Funding LLC 11350 N Meridian Street Suite 600 Carmel, IN 46032 Charlotte.graham@oakstreetfunding.com	September 15, 2021 Electronic Mail September 16, 2021 First Class, U.S. Mail
Consumers United Inc., 31 St. James Place, Suite 1050 Boston MA 02116 Belle.Smirnoff@dlapiper.com	September 15, 2021 Electronic Mail September 16, 2021 First Class, U.S. Mail
HSCM Bermuda Fund Ltd. Wellesley House South, First Floor 90 Pitts Bay Road Pembroke, Bermuda HM08 BM	September 16, 2021 First Class, U.S. Mail
HSCM Bermuda Fund Ltd. c/o Thomas A. Ansley, Esq. Dentons Sirote 2311 Highland Avenue South Birmingham, AL 35205 Tom.Ansley@dentons.com	September 15, 2021 Electronic Mail September 16, 2021 First Class, U.S. Mail
Coral Gables Title and Escrow, Inc. n/k/a Coral Gables Collateral Agency, Inc. Attn: Jeffrey L. Baxter, Registered Agent One Dattran Centre 9100 S. Dadeland Blvd., Suite 700 Miami, FL 33156	September 16, 2021 First Class, U.S. Mail

Name and Address	Date and Manner of Service of Order
Bryan Cave Leighton Paisner LLP Southeast Financial Center 200 South Biscayne Boulevard, Suite 400 Miami, FL 33131-05354	September 17, 2021 First Class, U.S. Mail
Bryan Cave Leighton Paisner LLP Attn.: CSC-Lawyers Incorporating Service Company, Reg. Agent 221 Bolivar Street Jefferson City, MO 65101	September 17, 2021 First Class, U.S. Mail
Vantage Retirement Plans 20860 N. Tatum Blvd., Suite 240 Phoenix, AZ 85050	September 23, 2021 First Class, U.S. Mail
Gary A. Woodfield, Esq., as Personal Representative of the Estate of Eric Charles Holtz c/o Ellen L. Regnery, Esq. Nason Yeager Gerson Harris & Fumero, P.A. 3001 PGA Boulevard, Suite 305 Palm Beach Gardens, FL 33410 gwoodfield@nasonyeager.com eregnery@nasonyeager.com	September 29, 2021 Electronic Mail and First Class, U.S. Mail

EXHIBIT B

EXHIBIT B

List of Notices of Stay filed in Palm Beach County and Collier County State Court Actions

Caption of State Court Action and Case Number	Date of Filing of Notice of Stay
<i>Ralph Blythe, individually and jointly with Jessica Blyth, et al. v. National Senior Insurance, Inc., et al.</i> . Palm Beach County Circuit Court Case Number: 50-2021-CA-005724-B	September 14, 2021
<i>Barbara Wohlwend, as Trustee of the Barbara Wohlwend Living Trust and as Trustee of the Ronald J. Wohlwend Revocable Living Trust v. Marshal Seeman, Eric Holtz, et al.</i> , Palm Beach County Circuit Court Case Number: 50-2021-CA-004978-XXXX-MB	September 15, 2021
<i>Carol Briner Packard, individually and successor to Trustee and as beneficiary of Jerry and Thelma Briner and the Jerome Briner a/k/a Jerry Briner Restated and Amended Revocable Trust Agreement v. Para Longevity 2015-5, LLC, et al.</i> , Collier County Circuit Court Case Number: 11-2021-CA-001426-0001-XX	September 15, 2021
<i>Ravindra Sankarlall v. Marshal Seeman, Eric Holtz, et al.</i> , Palm Beach County Circuit Court Case Number: 50-2021-CA-006413-XXXX-MB	September 15, 2021
<i>Leonard K. Lucenko, individually and as Trustee of the Trust Agreement of Leonard K. Lucenko v. Para Longevity 2016-56, LLC, et al.</i> , Collier County Circuit Court Case Number: 11-2021-CA-001402-0001-XX	September 15, 2021
<i>Daniel M. Abramson, as Trustee of the Daniel M. Abramson Trust v. Marshal Seeman, Eric Holtz, et al.</i> , Palm Beach County Circuit Court Case Number: 50-2020-CA-014206-XXXX-MB	September 15, 2021
<i>Paul Omdoll v. Para Longevity 2016-5, LLC, et al.</i> , Collier County Circuit Court Case Number: 11-2021-CA-001403-0001-XX	September 15, 2021 Refiled on September 27, 2021
<i>Martha Ralston and Jack Ralston a/k/a Thomas Wayne Ralston v. Marshal Seeman, Estate of Eric Holtz, et al.</i> , Palm Beach County Circuit Court Case Number: 50-2021-CA-009398-XXXMB	September 16, 2021
<i>Wayne Carson and Ulrike Carson v. Para Longevity 2016-3, LLC, et al.</i> , Palm Beach County Circuit Court Case Number: 50-2021-CA-009263-MB	September 17, 2021