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IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

STATE OF FLORIDA,
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

vs. 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,

FILED: PALM BEACH COUNTY, FL, JOSEPH ABRUZZO, CLERK, 09/14/2021 12:09:46 PM

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.
_____/

AGREED ORDER GRANTING PLAINTIFF'S
CONSENT MOTION FOR APPOINTMENT OF CORPORATE MONITOR
AND RELATED INJUNCTIVE RELIEF

THIS CAUSE comes before the Court upon Plaintiff State of Florida, Office of Financial Regulation's ("Plaintiff's") Consent Motion for Appointment of Corporate Monitor (the "Motion"), and upon the consent and agreement of natural-person Defendants Marshal Seeman and Brian J. Schwartz (the "Consenting Individual Defendants") and on the consent and agreement by an authorized Consenting Individual Defendant for each of the following twenty-seven (27) corporate-entity Defendants (the "Consenting Corporate Defendants"):

NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ,
CENTURION INSURANCE SERVICES GROUP, LLC,
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,
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, and
CENTURION FUNDING SPV II LLC.

The Court, having reviewed the relevant pleadings, been apprised of the consent and agreement by the Consenting Individual Defendants and the Consenting Corporate Defendants (collectively, the "Consenting Defendants"), and being otherwise advised in the premises,

IT IS THEREFORE ORDERED AND ADJUDGED as follows:

I. Consenting Defendants' Consent to Service and Jurisdiction

1. The Court finds that the Consenting Defendants have waived service of the Complaint, acknowledged receipt of the Complaint, have entered a general appearance, and have admitted the Court's jurisdiction.

2. This Court has subject matter jurisdiction over this action and personal jurisdiction over the Consenting Defendants pursuant to Section 517.191, Florida Statutes. Venue properly lies in this Court.

II. Appointment of Corporate Monitor

3. Plaintiff has requested a corporate monitor to, among other things, confirm what assets the Consenting Corporate Defendants previously had and currently have; confirm what the Consenting Corporate Defendants' investors are currently owed; take and maintain care, possession and control over whatever rights, title, or interest the Consenting Corporate Defendants have in said assets to ensure the Consenting Corporate Defendants' investors are repaid; marshal, safeguard, and liquidate assets; ensure that preferential payments to investors do not occur at the expense of other investors; ensure that the Consenting Corporate Defendants' investors are repaid

in a fair and equitable manner; and evaluate and file ancillary actions to recover monies or assets for the benefit of the Corporate Defendants' investors.

4. Plaintiff has submitted the credentials of a candidate, Daniel J. Stermer, to be appointed as corporate monitor ("Corporate Monitor") for the Corporate Defendants, including Corporate Monitor for their assets, properties, books and records and other items of the Corporate Defendants as described below, and the candidate is prepared to assume this responsibility if so ordered by this Court. Plaintiff and the Consenting Defendants acknowledge that Daniel J. Stermer's firm, Development Specialists, Inc. ("DSI"), was previously engaged by the Consenting Defendants as an independent third-party examiner, and produced a report in 2020 identifying certain historic activities by certain of the Consenting Corporate Defendants and certain other Consenting Defendants, which had received investor funds. The report was produced to the Defendants and the Plaintiff. Plaintiff and the Consenting Defendants further maintain that Daniel J. Stermer is qualified to serve as Corporate Monitor and generally familiar with the Consenting Corporate Defendants' business structure.

5. Plaintiff and the Consenting Defendants have agreed to the terms of this Agreed Order on Plaintiff's Motion for Appointment of Corporate Monitor and Related Injunctive Relief.

6. The Court finds that the appointment of a Corporate Monitor for the Consenting Corporate Defendants is appropriate.

7. Until further Order of this Court, Daniel J. Stermer is hereby approved and appointed to serve as the Corporate Monitor for the Consenting Corporate Defendants and their affiliates, subsidiaries, successors, and assigns. The Corporate Monitor may apply to the Court for an Order expanding the scope of the monitorship over other entities, assets or accounts.

III. Assets Subject to Monitorship

8. This Court hereby confers possession of the assets, of whatever kind and wherever situated, of the Consenting Corporate Defendants to the Corporate Monitor for the purpose of preserving and maintaining their assets.

9. Except as otherwise specified herein or until further Order of this Court, all assets of the Consenting Corporate Defendants may not be transferred, set off, received, charged, sold, pledged, assigned, liquidated, dissipated, or otherwise disposed of, or withdrawn. Accordingly, all persons and entities with direct or indirect control over any assets of the Consenting Corporate Defendants, other than the Corporate Monitor, are hereby restrained and enjoined from directly or indirectly transferring, setting off, receiving, changing, selling, pledging, assigning, liquidating, dissipating or otherwise disposing of, or withdrawing, such assets without express written approval from the Corporate Monitor. This shall include, but not be limited to, all assets of the Consenting Corporate Defendants that are on deposit or in safe deposit boxes with financial institutions such as banks, cryptocurrency exchanges, brokerage firms, clearing firms, intermediaries, financial institutions or any other third party. However, upon express written approval from the Corporate Monitor, solely based on the rights transferred to the Corporate Monitor based on the terms of the Centurion Funding SPV II credit facility agreement, a third-party lender/creditor to the Consenting Corporate Defendants may sell an asset per the terms of the credit agreement in place to cover the cost of the premiums of insurance policies.

IV. General Powers and Duties

10. The Corporate Monitor shall have all powers, authorities, rights and privileges heretofore possessed by the owners, officers, directors or member managers of the Consenting Corporate Defendants over the Consenting Corporate Defendants, under applicable state and

federal law, as well as by the Consenting Corporate Defendants' governing charters, by-laws, articles and/or agreements, and including, but not limited to, the right to sue, defend and assert all legal claims, rights or privileges held by the Consenting Corporate Defendants.

11. The powers of the owners, officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians of the Consenting Corporate Defendants are hereby suspended and exclusively vested in the Corporate Monitor, except to the extent as may hereafter be delegated or granted by the Corporate Monitor to a natural person or corporate entity to assist the Corporate Monitor in fulling the Corporate Monitor's duties, or as expressly provided by this Order or by further Order of this Court. The Corporate Monitor shall assume and control the operations of the Consenting Corporate Defendants and shall, subject to the Corporate Monitor's reasonable discretion, pursue and preserve all of the Consenting Corporate Defendants' claims.

12. No natural person or corporate entity holding or claiming any position of any sort with the Consenting Corporate Defendants shall possess any authority to act by or on behalf of the Consenting Corporate Defendants, unless so instructed by the Corporate Monitor or further Order of this Court.

13. The Corporate Monitor shall have the following general powers to perform the following duties in good faith, with reasonable diligence, and with reasonable discretion:

A. To determine the nature, location and value of all property interests of the Consenting Corporate Defendants, including, but not limited to, life settlement insurance policies, monies, funds, securities, cryptocurrencies, credits, effects, goods, chattels, lands, premises, leases, claims, rights and other assets, together with all rents, profits, dividends, interest or other income attributable thereto, of whatever kind, which the Consenting Corporate Defendants own, possess, have a beneficial interest in, or control directly or indirectly;

B. To immediately assume authority, possession, and control over all of the Consenting Corporate Defendants' property interests, including, but not limited to,

business premises, personal and real property, and records relevant thereto; to sue for and collect, recover, receive and take into possession from third parties all property of the Consenting Corporate Defendants and records relevant thereto;

C. To manage and supervise the Consenting Corporate Defendants and assume authority and control over all property of the Consenting Corporate Defendants possession, custody, or control, pending further Order of this Court, unless provided below;

D. To disburse funds to investors only upon further Order of this Court;

E. To use property of the Consenting Corporate Defendants, making payments and disbursements and incurring expenses as deemed necessary, appropriate or advisable in the ordinary course of business while maintaining the ordinary operations of the Consenting Corporate Defendants.;

F. To take any action which, prior to the entry of this Order, could have been taken by the officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians of the Consenting Corporate Defendants with respect to maintaining the Consenting Corporate Defendants ordinary operations;

G. To continue the normal day-to-day operations of the Consenting Corporate Defendants, or alternatively to suspend, wind down or stop their operations including the termination of all sales and rollovers of promissory note investments and securities of any kind;

H. To take control over the Consenting Corporate Defendants' rights, possession, and ownership of all life settlement insurance policies, monies, funds, cryptocurrencies, property, and other assets owned by, in the possession of, or under the control of, the Consenting Corporate Defendants, wherever situated. The Corporate Monitor shall have full power to sue for, collect, receive and take possession of all goods, chattels, rights, credits, moneys, effects, land, leases, books, records, work papers, and records of accounts, including computer-maintained information and digital data and other papers and documents. Title to all of the above items wherever located are vested by operation of law in the Corporate Monitor; however, such will not preclude the Corporate Monitor's discretion to retain Defendant Brian J. Schwartz ("Schwartz"), for purposes of not triggering certain loan default conditions, in the day-to-day management of Centurion Funding SPV II, LLC's policies and direction. Such activities by Schwartz will be under the strict supervision of the Corporate Monitor and without compensation or reimbursement of expenses, unless compensation or reimbursement is determined to be appropriate by the Corporate monitor;

I. To enter and inspect the business premises of the Consenting Corporate Defendants and to take and maintain documents or other property owned or controlled by the

Consenting Corporate Defendants, including establishing or maintaining chain of custody;

J. To preserve, hold and manage all monitorship assets, and perform all acts deemed necessary and appropriate to preserve the value of those assets, in order to prevent any loss, damage or injury to investors of the Consenting Corporate Defendants;

K. To take such action as deemed necessary and appropriate by the Corporate Monitor for the preservation of property of the Consenting Corporate Defendants or to prevent the dissipation or concealment of property of the Consenting Corporate Defendants by any Defendant or other natural person or corporate entity, to include, but not be limited to, seeking an asset freeze, injunction or other remedy;

L. To prevent the withdrawal or misapplication of funds entrusted to the Consenting Corporate Defendants, and otherwise protect the interests of investors of the Consenting Corporate Defendants;

M. To collect all money owed to the Consenting Corporate Defendants;

N. To pursue, resist and defend, as deemed necessary and appropriate, all suits, actions, claims and demands which may now be pending or which may be brought by or asserted against the Consenting Corporate Defendants;

O. To claim, assert or waive attorney-client privilege held by the Consenting Corporate Defendants. Any dispute involving the Corporate Monitor's authority to terminate a joint defense agreement to which a Consenting Corporate Defendant is a party may be brought solely before this Court for resolution on the motion by any other party to the agreement;

P. To seek permission and obtain approval from the Court before effectuating any settlement, consent judgment or allowing any default or default judgment against the Consenting Corporate Defendants, or before releasing legal claims or causes of action the Consenting Corporate Defendants may have against other parties;

Q. To initiate, defend, compromise, adjust, intervene in, dispose of, or become a party to, as deemed necessary and appropriate, any lawsuits or arbitrations in state, federal or foreign jurisdictions necessary to preserve or increase the assets of the Consenting Corporate Defendants and/or on behalf of the Consenting Corporate Defendants and for the benefit of their investors against: (1) those individuals and/or entities which the Corporate Monitor may claim have wrongfully, illegally or otherwise improperly appropriated, transferred or received any assets, properties, life settlement insurance policies, monies, proceeds or other items of value directly or indirectly traceable from the Consenting Corporate Defendants, including the Consenting Corporate Defendants and their officers, directors, member managers, employees, agents or any natural persons acting in concert or participation with

them; or (2) any transfers of assets, properties, life settlement insurance policies, monies, proceeds or other items of value directly or indirectly traceable from the Consenting Corporate Defendants investors. Such actions may include, but not be limited to, seeking imposition of constructive trusts, seeking imposition of equitable liens, disgorgement of profits, recovery and/or avoidance of fraudulent transfers under Florida Statute § 726.101, *et. seq.* or otherwise, rescission and restitution, the collection of debts, and such Orders or other relief supported in law or equity from this Court as may be necessary to enforce this Order;

R. To request permission from this Court to extend the monitorship over any corporate entity, or to apply for equitable relief over the assets of any corporate entity or natural person which or who is reasonably believed to have received or to be holding assets or proceeds or other items of value derived from the Consenting Corporate Defendants or their investors;

S. To seek a stay of any court proceeding or order transferring, liquidating, disposing or impacting any of the Defendants' assets, properties, life settlement insurance policies, monies, proceeds or other items of value derived from the Consenting Corporate Defendants or their investors;

T. To seek an injunction prohibiting the sale, transfer, liquidation, disposition or other activity impacting any of the Defendants' assets, properties, life settlement insurance policies, monies, proceeds or other items of value derived from the Consenting Corporate Defendants or their investors;

U. To choose, engage, and employ attorneys, accountants and other reasonable agents or professionals, as the Corporate Monitor deems advisable or necessary in the performance of the Corporate Monitor's duties and responsibilities. The Corporate Monitor and the Corporate Monitor's professionals shall be entitled to reasonable compensation from the assets now held by the Consenting Corporate Defendants or ultimately secured by the Corporate Monitor. Said compensation shall be commensurate with their duties and obligations under the circumstances, and subject to approval of this Court;

V. To file tax returns for the Consenting Corporate Defendants, unless a filing by another natural person on behalf of the Consenting Corporate Defendants is expressly authorized in writing by the Corporate Monitor or upon further Order of this Court. The Consenting Individual Defendants are permitted to voluntarily, and without expectation of fees, costs or expense reimbursements, submit to the Corporate Monitor proposed tax returns, for tax years prior to the issuance of this Order, for the Consenting Corporate Defendants; however, all fees, costs, and expense reimbursements for tax preparation work by natural persons or corporate entities engaged or employed by the Corporate monitor are subject to approval of this Court;

W. To issue subpoenas to obtain documents pertaining to the monitorship and conduct discovery in this action on behalf of the monitorship estate. The Corporate Monitor is authorized to seek expedited discovery from the Consenting Defendants and nonparties with regard to identifying, locating, and taking possession of the Consenting Corporate Defendants' property and/or to determine compliance with this Order. The Consenting Defendants and nonparties shall produce documents, sit for deposition, answer interrogatories and/or answer requests for admissions within ten (10) calendar days of service of the Corporate Monitor's discovery requests, unless extended by the agreement of the Corporate Monitor or the Court for good cause shown. The Corporate Monitor is authorized to serve subpoenas on nonparties through electronic means (including electronic mail and/or facsimile transmission), U.S. Mail, Federal Express, other commercial overnight service, or personal service to facilitate expedited discovery;

X. To open one or more bank account or any other type of account as designated depositories for funds or assets of the Consenting Corporate Defendants. The Corporate Monitor shall deposit all funds of the Consenting Corporate Defendants in such designated accounts and shall make all payments and disbursements from the monitorship estate from such accounts, subject to Court approval if otherwise specified herein. The Corporate Monitor is authorized to invest monitorship funds in U.S. Treasury securities, money market funds or other interest-bearing accounts as appropriate in the Corporate Monitor's judgment;

Y. To apply to this Court for authority to make payments and disbursements from the monitorship estate that are necessary or advisable for carrying out of the day-to-day operations of the monitorship consistent with the authority granted by this Order;

Z. To apply to this Court for authority to enter contracts consistent with the authority granted by this Order;

AA. To close out all outstanding securities positions and hold such proceeds without further Order of this Court;

BB. To close, disable or otherwise shut down, as deemed necessary and appropriate, the Consenting Corporate Defendants' current websites and re-direct to, or create, a new website for purposes of the monitorship;

CC. To propose to this Court an operational plan addressing the viability of the day-to-day and long-term operations of the Consenting Corporate Defendants' business;

DD. To propose to this 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;

EE. To cooperate with regulatory and other government authorities with regard to any inquiry and to provide access and produce records upon request with or without subpoena;

FF. To advise this Court should it be determined that additional powers are necessary to protect the interests or assets of the Consenting Corporate Defendants, to protect the investors, or to facilitate a proposed re-distribution of assets to the investors;

GG. To review and consider, as deemed reasonable and appropriate by the Corporate Monitor, plans or proposals prepared by the Consenting Individual Defendants to refinance or inject liquidity and/or assets into the Consenting Corporate Defendants for the benefit of its investors. If the Corporate Monitor believes that such a plan or modified plan would be in the best interest of the Consenting Corporate Defendants and its investors, the Corporate Monitor will seek approval of this Court to implement the same; however, the disclosure or release of any of the Corporate Defendants' non-public or confidential information or any confidential components of a business plan prepared pursuant to paragraph CC immediately above, shall be solely at the discretion of the Corporate Monitor or upon further Order of this Court; and

HH. To take such other action as may be approved by further Order of this Court.

V. Access to Information

14. The Consenting Corporate Defendants and their past and/or present officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, custodians as well as those acting in their place, are hereby ordered and directed to preserve and turn over to the Corporate Monitor forthwith all paper and electronic information of, and/or relating to, the Consenting Corporate Defendants and/or their property and business premises; such information shall include, but not be limited to, books, records, documents, accounts, electronically stored information, passcodes, passwords, legal authority for access, keys and combinations to business premises locks, computer access codes of all computers used to conduct the Consenting Corporate Defendants' business, access to (including but not limited to execution of any documents necessary for access to and forensic imaging of) any data stored, hosted or otherwise maintained by an electronic data host, storage area access information, and all other

instruments and papers as well as the location of all such paper and electronic information. This requirement shall not impinge on any natural person's or corporate entity's right to assert applicable constitutional or legal privileges and nothing in this requirement shall be construed to require that any natural person or corporate entity abandon or waive any constitutional or legal privilege which they may have available to them.

15. The Consenting Corporate Defendants' past and/or present officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians shall promptly and with all due haste answer as directed by the Corporate Monitor all questions which the Corporate Monitor or the Corporate Monitor's professionals or agents may put to them, shall cooperate, shall provide truthful answers, and produce all documents as required by him regarding the business of the Consenting Corporate Defendants, or any other matter relevant to the operation or administration of the Consenting Corporate Defendants. This requirement shall not impinge on any natural person's or corporate entity's right to assert applicable constitutional or legal privileges and nothing in this requirement shall be construed to require that any natural person or corporate entity abandon or waive any constitutional or legal privilege which they may have available to them. The Corporate Monitor may provide such information obtained to regulatory and other government authorities as the Corporate Monitor deems necessary and appropriate.

VI. Access to Books, Records and Accounts

16. The Corporate Monitor is authorized to take immediate possession of any and all accounts, including financial accounts, books and records, electronically stored information, passcodes, and all other documents or instruments relating to the Consenting Corporate Defendants. The Consenting Individual Defendants, upon reasonable request and good cause being shown to the Corporate Monitor, and as deemed reasonable and appropriate by the Corporate

Monitor, shall be entitled, to: inspect and copy existing records obtained by and in the possession or control of the Corporate Monitor, upon payment of reasonable research and copying costs and subject to other reasonable conditions imposed by the Corporate Monitor to assure custody and control of the existing documents.. The Consenting Individual Defendants may apply to the Court, upon a showing of good cause, for an Order directing the Corporate Monitor to provide periodic or special reports of the operations of the Corporate Monitor.

17. Any natural persons or corporate entities receiving notice of this Order by personal service, electronic mail, facsimile transmission, or otherwise, having possession of the property, business, books, records, accounts, electronically stored information, passcodes, or assets of the Consenting Corporate Defendants are hereby directed to immediately deliver the same to the Corporate Monitor or the Corporate Monitor's agents, attorneys or employees.

18. All banks, cryptocurrency exchanges, clearing firms, brokerage firms, financial institutions, and other natural persons or corporate entities which have possession, custody or control of any assets, life settlement insurance policies, monies, cryptocurrencies, funds or accounts held by, in the name of, or for the benefit of, directly or indirectly, the Consenting Corporate Defendants that receive actual notice of this Order by personal service, electronic mail, facsimile transmission or otherwise shall:

A. Not liquidate, move, sell, convey or otherwise transfer any assets, life settlement insurance policies, monies, cryptocurrencies, funds, and/or accounts in the name of the Consenting Corporate Defendants or for the benefit of their investors, except upon written instructions from the Corporate Monitor;

B. Not exercise any form of set-off, alleged set-off, lien, or any form of self-help whatsoever, or refuse to transfer any assets, life settlement insurance policies, monies, cryptocurrencies, funds, and/or accounts to the Corporate Monitor's control without the written permission of the Corporate Monitor or upon further Order of this Court; and

C. Cooperate expeditiously in providing information and assets, life settlement insurance policies, monies, cryptocurrencies, funds, and/or accounts to the Corporate Monitor or at the direction of the Corporate Monitor.

VII. Access to Business Premises and Personal Property

19. The Corporate Monitor is authorized to take immediate possession of all business premises and personal property of the Consenting Corporate Defendants, wherever located, including, but not limited to, offices, storage facilities, electronically stored information, passcodes, keys, PINs, computers, laptops, hard drives, external storage drives, and any other such memory, media or electronic storage devices, books, papers, data processing records, evidence of indebtedness, bank records and accounts, cryptocurrency exchange records and accounts, clearing firm records and accounts, savings records and accounts, brokerage records and accounts, life settlement insurance policies, cryptocurrencies, certificates of deposit, stocks, bonds, debentures, investments, contracts, mortgages, furniture, office supplies and equipment. All records of the Consenting Corporate Defendants shall be made available to the Corporate Monitor.

20. The Corporate Monitor is authorized to open all mail – including electronic mail – directed to or received by or at the Consenting Corporate Defendants' business premises, offices, post office boxes or electronic mail domains, and to inspect all mail opened prior to the entry of this Order, to determine whether items or information therein fall within the mandates of this Order.

21. Upon the request of the Corporate Monitor, the Sheriff, in any judicial district, in order to keep the peace and maintain security, is hereby ordered to assist the Corporate Monitor in carrying out the Corporate Monitor's duties to take possession, custody and control of, or identify the location of, any business premises and property of the Consenting Corporate Defendants, including, but not limited to, assets, life settlement insurance policies, monies, cryptocurrencies,

funds, accounts, records, electronically stored information, or other materials belonging to the Consenting Corporate Defendants. If requested by the Corporate Monitor, such law enforcement personnel shall provide appropriate and necessary assistance to the Corporate Monitor to implement this Order, including the Break Order provisions described below, and are authorized to use any necessary and reasonable force to do so. If entry into any of these premises is refused or otherwise not forthcoming, or no one is at the location at the time of enforcement of the Court's Order, such law enforcement personnel shall use the force of the County to break and enter that premises or any structure or enclosure located at that premises as described above in this Section, to execute this Order and to remove all natural persons from said premises during such immediate access.

VIII. Delivery to Corporate Monitor

22. Immediately upon service of this Order upon them, and subject to applicable attorney-client and work product privileges exclusive of those held by the Corporate Monitor for the Consenting Corporate Defendants and any other natural person or corporate entity served with a copy of this Order shall, immediately or within such time as permitted by the Corporate Monitor in writing, deliver over to the Corporate Monitor:

A. All rights, control, and authority held by the Consenting Corporate Defendants over all assets, life settlement insurance policies, monies, cryptocurrencies, funds and/or accounts belonging to the Consenting Corporate Defendants or their investors;

B. Possession and custody of documents of the Consenting Corporate Defendants, including, but not limited to, all books and records of accounts, all financial and accounting records, balance sheets, income statements, bank records (including monthly statements, canceled checks, records of wire transfers, and check registers), investor lists, loan documents, title documents, electronically stored information, and other papers;

C. All keys, computer passwords, entry codes, PIN numbers and combinations to locks necessary to gain or to secure access to any of the assets, life settlement insurance policies, monies, cryptocurrencies, funds, accounts and/or documents of the

Consenting Corporate Defendants, including, but not limited to, access to business premises, means of communication, accounts, computer systems, websites, or other property; and

D. Information identifying the accounts, employees, properties or other assets or obligations of the Consenting Corporate Defendants.

IX. Cooperation with Corporate Monitor

23. The Consenting Corporate Defendants, their officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, custodians and all other natural persons or corporate entities served with a copy of this Order, shall cooperate fully with and assist the Corporate Monitor in the performance of the Corporate Monitor's duties. This cooperation and assistance shall include, but not be limited to, providing any information to the Corporate Monitor that the Corporate Monitor deems necessary to exercising the authority and discharging the responsibilities of the Corporate Monitor under this Order; and advising all natural persons and corporate entities who owe money to the Consenting Corporate Defendants that all debts should be paid directly to the Corporate Monitor. This requirement does not impinge on any natural person's right to assert applicable privileges and nothing in this requirement shall be construed to require that any natural person abandon or waive any constitutional or legal privilege which they may have available to them.

24. Any officers, directors or member managers, shareholders, employees, affiliates agents, servants, attorneys and custodians of the Consenting Corporate Defendants will be available to assist and advise the Corporate Monitor, but will not exercise their traditional functions or assume their traditional duties during the period that the Corporate Monitor is appointed, unless retained or engaged by the Corporate Monitor.

25. Nothing in this Order shall be read to bar Mr. Scott Orth from continuing to serve as counsel for Defendant Marshal Seeman in this or other matters.

X. Accounting Information

26. The Consenting Individual Defendants shall identify, submit in writing to the Corporate Monitor, and provide as detailed below, within sixty (60) calendar days of this Order, the following accounting information for the period of January 1, 2015, to the date of submission, which will:

A. Identify all banks, brokerage, financial and cryptocurrency institutions, including account numbers and passcodes/login information, which hold or have held life settlement insurance policies, monies, cryptocurrencies, funds, commodity interests, assets, liabilities, and other property currently and previously owned or controlled (legally, equitably or otherwise) directly or indirectly by the Consenting Corporate Defendants, whether individually or jointly;

B. Identify all life settlement insurance policies, monies, funds, cryptocurrencies, commodity interests, real estate, assets, liabilities, and other property currently or previously owned or controlled (legally, equitably or otherwise) directly or indirectly by the Consenting Corporate Defendants, whether individually or jointly;

C. Identify all life settlement insurance policies, monies, cryptocurrencies, funds, commodity interests, real estate, assets, liabilities, and other property received directly or indirectly by the Consenting Corporate Defendants, describing the source, amount, disposition, and current location of each listed item;

D. Identify all life settlement insurance policies, monies, cryptocurrencies, funds, commodity interests, real estate, assets, liabilities, and other property transferred or otherwise disposed of directly or indirectly by the Consenting Corporate Defendants, describing the source, amount, disposition, and current location of each listed item, including accounts or assets of the Consenting Corporate Defendants held by any bank, cryptocurrency exchange, clearing firm, brokerage firm or other financial institution located inside and/or outside the territorial United States;

E. Identify all investors of the Consenting Corporate Defendants, including name, address, telephone number and email, account number, deposit and withdrawal dates and amounts, and amounts owed to them by the Consenting Corporate Defendants;

F. Identify the name and last known address of each bailee, debtor or other natural person or corporate entity currently holding any life settlement insurance policies, monies, cryptocurrencies, funds, commodity interests, real estate, assets, liabilities, and other property owned or controlled (legally, equitably or otherwise) by the Consenting Corporate Defendants, whether individually or jointly;

G. Identify all salaries, wages, bonusses, loans, distributions, or remunerations for services provided, in any form and in any amount paid directly or indirectly to each of the Consenting Individual Defendants, by, for or on behalf of each Consenting Corporate Defendant, to include date, amount, and payor; and,

H. Identify all expense reimbursements and other transfers of assets of any kind greater in value than $10,000.00, including, but not limited to, each transfer of a life settlement policy or interest in a life settlement policy or structured settlement, whether received or transferred, paid directly or indirectly to each of the Consenting Individual Defendants, by, for or on behalf of each Consenting Corporate Defendant, to include date, description of asset, asset value, reason for transfer, and transferor.

XI. Repatriation of Foreign Assets and Documents

27. The Consenting Corporate Defendants and their past and/or present officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians as well as those acting in their place, are hereby ordered and directed to immediately preserve, to immediately transfer within the State of Florida, and to immediately turn over to the Corporate Monitor all property, including, but not limited to, all assets, documents, electronic information in any form, related to, or held directly or indirectly, of the Consenting Corporate Defendants held outside the territorial United States.

28. The Consenting Individual Defendants shall provide the Corporate Monitor an accounting of the Consenting Corporate Defendants' property transferred in or out of the territorial limits of the United States, for the period of January 1, 2015, to present. The accounting shall submit the accounting to the Corporate Monitor within ten (10) calendar days of this Order.

XII. Notice to Third Parties

29. The Corporate Monitor shall promptly give notice of this appointment as the Corporate Monitor deems necessary or advisable to effectuate the operation of the monitorship.

30. All natural persons and corporate entities owing any obligation or debt to the Consenting Corporate Defendants shall, until further ordered by this Court, pay all such obligations

in accordance with the terms thereof to the Corporate Monitor and the Corporate Monitor's receipt for such payments shall have the same force and effect as if the Consenting Corporate Defendants had received such payment.

31. The Corporate Monitor is authorized to instruct the United States Postmaster to hold and/or reroute mail which is related, directly or indirectly, to the business, operations or activities of the Consenting Corporate Defendants (the "Corporate Monitor's Mail"), including all mail addressed to, or for the benefit of, the Consenting Corporate Defendants. The Postmaster shall not comply with, and shall immediately report to the Corporate Monitor, any change of address or other instruction given by anyone other than the Corporate Monitor concerning the Corporate Monitor's Mail. The Consenting Corporate Defendants shall not open any of the Corporate Monitor's Mail and shall immediately turn over such mail, regardless of when received, to the Corporate Monitor. All personal mail of any individual, and/or any mail appearing to contain privileged information, and/or any mail not falling within the mandate of the Corporate Monitor, shall be released to the named addressee by the Corporate Monitor. The foregoing instructions shall apply to any proprietor, whether individual or entity, of any private mail box, depository, business or service, or mail courier or delivery service, hired, rented or used by the Consenting Corporate Defendants. Defendants, their officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians shall not open a new mailbox, or take any steps or make any arrangements to receive mail in contravention of this Order, whether through the U.S. Mail, a private mail depository or courier service.

32. The Corporate Monitor is authorized to instruct the Consenting Corporate Defendants' website hosting company and ISP to hold and/or reroute any and all electronic mail which is related, directly or indirectly, to the business, operations or activities of the Consenting

Corporate Defendants (the "Corporate Monitor's Electronic Mail"), including all electronic mail addressed to, or for the benefit of, the Consenting Corporate Defendants or any of the Consenting Corporate Defendants' officers, directors, member managers, managers, agents or employees in their capacity as such for the Consenting Corporate Defendants. The website hosting company and ISP shall not comply with, and shall immediately report to the Corporate Monitor, any change of Internet or e-mail address or other instruction given by anyone other than the Corporate Monitor concerning the Corporate Monitor's Electronic Mail. The Consenting Corporate Defendants shall not open any of the Corporate Monitor's Electronic Mail and shall immediately turn over such electronic mail, regardless of when received, to the Corporate Monitor. All personal electronic mail of any individual, and/or any electronic mail appearing to contain privileged information, and/or any electronic mail not falling within the mandate of the Corporate Monitor, shall be released to the named addressee by the Corporate Monitor. The foregoing instructions shall apply to any proprietor, whether individual or entity, of any private electronic mail box, depository, business or service, or electronic mail service provider hired or used by the Consenting Corporate Defendants. The Consenting Corporate Defendants shall not open a new electronic mailbox, or take any steps or make any arrangements to receive electronic mail in contravention of this Order.

33. The Corporate Monitor is authorized to assert, prosecute and/or negotiate any claim under any insurance policy held by or issued on behalf of the Consenting Corporate Defendants for the benefit of the Consenting Corporate Defendants, their officers, directors, member managers, employees or agents, and to take any and all appropriate steps in connection with such policies.

XIII. Temporary Injunction against Interference

34. Pending final determination of this action, the Consenting Defendants, their officers, directors, member managers, shareholders, employees, affiliates, agents, servants, custodians, those in active concert or participation with any of the foregoing and any other natural person concerned in or in any way participating in or about to participate with them, and all natural persons receiving notice of this Order by personal service, electronic mail, facsimile transmission or otherwise, and subject to the exercise of any privileges provided for under the U.S. Constitution and/or federal and state law, hereby are restrained and enjoined from directly or indirectly taking any action or causing any action to be taken, without the express written agreement of the Corporate Monitor, which would:

A. Interfere with the Corporate Monitor's efforts to take control, possession, or management of any of the Consenting Corporate Defendants' property; such prohibited actions include, but are not limited to, using self-help or executing or issuing or causing the execution or issuance of any court attachment, subpoena, replevin, execution, or other process for the purpose of impounding or taking possession of or interfering with or creating or enforcing a lien upon any of the Consenting Corporate Defendants' property;

B. Hinder, obstruct or otherwise interfere with the Corporate Monitor in the performance of monitorship duties; such prohibited actions include, but are not limited to, concealing, destroying or altering records or information;

C. Dissipate or otherwise diminish the value of any of the Consenting Corporate Defendants' property; such prohibited actions include, but are not limited to, releasing claims or disposing, transferring, exchanging, assigning or in any way conveying any of the Consenting Corporate Defendants' property, enforcing judgments, assessments or claims against the Consenting Corporate Defendants or their property, attempting to modify, cancel, terminate, call, extinguish, revoke or accelerate (the due date), of any lease, loan, mortgage, indebtedness, security agreement or other agreement executed by the Consenting Corporate Defendants or which otherwise affects any of their property;

D. Dissipate, withdraw, transfer, remove, dispose or conceal any cash, cashier's checks, funds, assets or other property of, or within the custody, control or actual or constructive possession of the Consenting Corporate Defendants, including, but not limited to, all funds, personal property, life settlement insurance policies,

monies, funds, cryptocurrencies, or securities held in the Consenting Corporate Defendants' name, jointly or individually, whether held or maintained in safety deposit boxes, and including all funds on deposit in any bank, cryptocurrency exchange, clearing firm, brokerage firm or other financial institution, futures commission merchant, bank or savings and loan account held by, under the actual or constructive control, or in the name of the Consenting Corporate Defendants, jointly or individually, funds or property of the Consenting Corporate Defendants' investors, wherever located, whether held in the name of the Consenting Corporate Defendants, jointly or individually, or any other entity owned or controlled by the Consenting Corporate Defendants, jointly or individually;

E. Destroy, mutilate, conceal, alter or dispose of, in any manner, any of the books and records, documents, correspondence, brochures, manuals, electronically stored data, tape records or other property of the Consenting Corporate Defendants wherever located, including all such records concerning the Consenting Corporate Defendants' business operations; or

F. Interfere with or harass the Corporate Monitor, or interfere in any manner with the exclusive jurisdiction of this Court over the Consenting Corporate Defendants.

35. The Consenting Defendants, their officers, directors, member managers, shareholders, employees, affiliates, agents, servants, and custodians and all other natural persons or corporate entities served with a copy of this Order, shall cooperate with and assist the Corporate Monitor in the performance of the Corporate Monitor's duties.

36. The Corporate Monitor shall promptly notify this Court of any failure or apparent failure of any natural person or corporate entity to comply in any way with the terms of this Order.

37. The injunctive provisions of this Order shall be binding on the Consenting Defendants, upon any natural person insofar as he or she is acting in the capacity of officers, directors, member managers, employees, servants, agents, and upon any person who receives actual notice of this Order by personal service, electronic mail, facsimile transmission or otherwise, including Federal Express or other commercial overnight service.

38. The Plaintiff is authorized to verify compliance with this Order and promptly notify this Court of any failure or apparent failure of any natural person or corporate entity to comply in

any way with the terms of this Order. The Plaintiff, when verifying compliance, is also authorized to engage in expedited discovery under the same terms, conditions, and time-frames provided to the Corporate Monitor in Section 13.V., above.

XIV. Temporary Injunction as to Securities Law Violations

39. Pending final determination of this action, the Consenting Defendants and their officers, directors, member managers, shareholders, employees, affiliates, agents, servants, and custodians, those in active concert or participation with any of the foregoing, and any other person concerned in or in any way participating in or about to participate with them, and all persons receiving notice of this Order by personal service, electronic mail, facsimile transmission or otherwise, hereby are restrained and enjoined from directly or indirectly taking the following actions or causing any of the following actions to be taken:

A. Offering to sell or selling any security or investment in violation of the anti-fraud provisions of § 517.301, Florida Statutes;

B. Offering to sell or selling any security in or from offices within the State of Florida or to persons in this state in violation of the registration provisions of § 517.12(1), Florida Statutes;

C. Engaging in the business of an investment adviser, associated person of an investment adviser or as a federal covered adviser in the State of Florida, or rendering investment advice in this state, in violation of the registration provisions of § 517.12(4), Florida Statutes;

D. Offering to sell or selling any unregistered security in violation of § 517.07, Florida Statutes; or

E. Doing any other act or acts in furtherance of or in direct violation of Chapter 517, Florida Statutes.

XV. Directives to Financial Institutions

40. Pending further Order of this Court, any bank, cryptocurrency exchange, clearing firm, brokerage firm or other financial institution, corporate entity, or natural person that holds, controls, or maintains custody of any life settlement insurance policies, monies, cryptocurrencies,

funds, accounts, commodity interests, real estate, assets, liabilities, electronically stored information, and other property of any kind owned, controlled, managed, or held by, on behalf of, or for the benefit of the Consenting Corporate Defendants or their investors, or has held, controlled, or maintained custody of any life settlement insurance policies, monies, cryptocurrencies, funds, accounts, commodity interests, real estate, assets, liabilities, and other property of any kind owned, controlled, managed, or held by, on behalf of, or for the benefit of the Consenting Corporate Defendants or their investors at any time since, shall:

A. Provide to the Corporate Monitor, within ten (10) calendar days of receiving a copy of this Order, a statement setting forth: (a) the identification number of each and every such account or asset titled in the name, individually or jointly, of the Consenting Corporate Defendants, or owned, controlled, managed, or held by, on behalf of, or for the benefit of the Consenting Corporate Defendants or their investors; (b) the balance of each such account, or a description of the nature and value of such asset as of the close of business on the day on which this Order is served, and, if the account or other asset has been closed or removed, the date closed or removed, the total funds removed in order to close the account, and the name of the natural person or corporate entity to whom such account or other asset was remitted; and (c) the identification of any safe deposit box that is either titled in the name, individually or jointly, of the Consenting Corporate Defendants or is otherwise subject to access by the Consenting Corporate Defendants; and

B. Upon request by the Corporate Monitor, promptly provide him with copies of all records or other documentation pertaining to such account or asset, including, but not limited to, originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instructions or slips, currency transactions reports, 1099 forms, and safe deposit box logs;

C. Prohibit the Consenting Defendants and any natural person other than the Corporate Monitor from withdrawing, removing, assigning, transferring, pledging, encumbering, disbursing, dissipating, converting, selling or otherwise disposing of any asset of the Consenting Corporate Defendants, including, but not limited to, life settlement insurance policies, monies, cryptocurrencies, funds, accounts, records, electronically stored information, or other materials belonging to the Consenting Corporate Defendants, except with the express consent of the Corporate Monitor or as directed by further Order of this Court;

D. Deny the Consenting Defendants and any natural person other than the Corporate Monitor access to any safe deposit box that is titled in the name of the Consenting

Corporate Defendants, either individually or jointly; or otherwise subject to access by the Defendants; and

E. Cooperate with all reasonable requests of the Corporate Monitor relating to implementation of this Order, including producing records related to the Consenting Corporate Defendants' accounts and business(es).

41. The Corporate Monitor is further authorized to provide statements and other records and documentation upon request of the Plaintiff within five (5) calendar days of such request.

XVI. Stay of Litigation

42. Except for the instant action and any police or governmental actions, whether civil or criminal, related to the Consenting Corporate Defendants or their officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians, the following State Court proceedings are stayed pursuant to section 517.191(2), Florida Statutes, until further Order of this Court:

> All past, present and future civil legal proceedings of any nature, including, but not limited to, arbitration proceedings, foreclosure actions, default proceedings, or other actions of any nature involving: (a) the Corporate Monitor, in the Corporate Monitor's capacity as such; (b) any of the Consenting Corporate Defendants' property or property derived from the Consenting Corporate Defendants' or their investors' funds, wherever located; (c) the Consenting Corporate Defendants, including subsidiaries, successors, assigns, and entities owned or controlled by the Consenting Corporate Defendants; or (d) the Consenting Corporate Defendants, including any of the Consenting Corporate Defendants' past or present officers, directors, member managers, shareholders, employees, affiliates, agents, servants, attorneys, and custodians sued for, or in connection with, any action taken by them while acting in such capacity of any nature, whether as plaintiff, defendant, third-party plaintiff, third-party defendant, or otherwise (such proceedings are hereinafter referred to as "Ancillary Proceedings").

43. The parties to any and all Ancillary Proceedings are enjoined from commencing or continuing any such legal proceeding, or from taking any action, in connection with any such proceeding, including, but not limited to, the issuance or employment of process.

44. All Ancillary Proceedings are stayed in their entirety, and all courts, arbitration tribunals or other fora having any jurisdiction thereof are enjoined from taking or permitting any action until further Order of this Court. Further, as to a cause of action accrued or accruing in favor of the Consenting Corporate Defendants against a third person or party, any applicable statute of limitation is tolled during the period in which this injunction against commencement of legal proceedings is in effect as to that cause of action.

45. This litigation stay/injunction shall cease upon termination of the monitorship by Order of this Court.

XVII. Managing Assets

46. The Corporate Monitor may establish one or more custodial accounts at a federally insured bank to receive and hold all funds of the Consenting Corporate Defendants. Such deposit accounts shall be titled in the Corporate Monitor's name.

XVIII. Conflicts of Interest

47. The Corporate Monitor has a continuing duty to ensure that there are no conflicts of interest between himself and the Consenting Corporate Defendants; however, nothing in this Order shall prevent or prohibit the Corporate Monitor from communicating and interacting with the Consenting Corporate Defendants' officers, directors, management, and employees towards the goal of recovering, realizing, or increasing the value or extent of assets, claims and collateral for the monitorship.

XIX. Limitations on Liability of Corporate Monitor and Corporate Monitor's Agents

48. Until further Order of this Court, the Corporate Monitor shall not be required to post bond or give an undertaking of any type in connection with the Corporate Monitor's fiduciary obligations in this matter.

49. The Corporate Monitor and all natural persons or corporate entity hired by Corporate Monitor are entitled to rely on all outstanding rules of law and Orders, and shall not be liable to anyone for their own good faith compliance with any Order, rule, law, judgment or decree. In no event shall the Corporate Monitor or natural persons or corporate entities hired by Corporate Monitor be liable to anyone (1) with respect to the performance of their duties and responsibilities as Corporate Monitor or as natural persons or corporate entities hired by Corporate Monitor, or (2) for any actions taken or omitted by them, except upon a finding by this Court that they acted or failed to act as a result of malfeasance, bad faith, gross negligence, or in reckless disregard of their duties. Nothing in this provision is intended to provide a defense against liability for any actions taken by the Consenting Defendants or their personnel prior to the appointment of the Corporate Monitor.

50. This Court shall retain jurisdiction over any action filed against the Corporate Monitor or the Corporate Monitor' agents based upon acts or omissions committed in their representative capacities.

51. In the event the Corporate Monitor decides to resign, the Corporate Monitor shall first give written notice to the Plaintiff's and the Consenting Defendants' counsel of record and this Court of this intention, and the resignation shall not be effective until this Court appoints a successor Corporate Monitor. The Corporate Monitor shall then follow such instructions as this Court may provide.

XX. Recommendations and Reports

52. Upon appointment, the Corporate Monitor shall perform an assessment of the viability of the Consenting Corporate Defendants as a going business enterprise and options and alternatives for their future.

53. Within thirty (30) calendar days of the entry date of this Order, the Corporate Monitor shall file with this Court and serve on the parties a report of the Corporate Monitor's initial conclusions and recommendations.

54. The Corporate Monitor shall maintain written accounts, itemizing receipts and expenditures, describing properties held or managed, and naming the depositories of monitorship funds; make such written accounts and supporting documentation available to Plaintiffs and other the Consenting Corporate Defendants investors for inspection, and, within ninety (90) calendar days of the first report and every ninety (90) calendar days thereafter file with this Court and serve on the parties a report summarizing efforts to marshal and collect assets, administer the monitorship estate, and otherwise perform the duties mandated by this Order.

XXI. Fees, Expenses, and Accountings

55. The Corporate Monitor need not obtain Court approval prior to the disbursement of the Consenting Corporate Defendants' funds for expenses in the ordinary course of the administration and management of the Consenting Corporate Defendants of $25,000.00 or less, as the Corporate Monitor deems reasonable and appropriate. Further, prior Court approval is not required for payments of applicable federal, state or local taxes. Except as otherwise specified in this Order, payments, disbursements or the incurring of expenses in excess of $25,000.00, must each be approved by Order of this Court. The Corporate Monitor, however, may without approval by this Court, authorize and approve the direction of payments of insurance policy premiums on existing life insurance policies from Centurion Funding SPV II's credit facility, which may exceed $25,000.00.

56. The Corporate Monitor and all professionals he retains are entitled to compensation deemed to be reasonable and appropriate for their work. The Corporate Monitor's standard hourly

rate is currently $500.00, but the Corporate Monitor has agreed to reduce this hourly rate in this regulatory proceeding to $425.00. The Corporate Monitor is authorized to file motions with this Court to seek approval to employ professionals, such as attorneys and/or accountants, whose rates will be disclosed in same.

57. The Corporate Monitor and the Corporate Monitor's professionals, such as attorneys and/or accountants, shall file with this Court a periodic fee application for payment of reasonable fees and reimbursement of actual incurred costs. The fee/cost applications shall be filed at a time that the Corporate Monitor deems appropriate in his discretion. The Corporate Monitor and the professionals shall include in the fee/cost applications their statements for services for the relevant months of work and shall serve same on counsel for parties in this action. Both the Corporate Monitor's and the professionals' statements shall contain itemized time entries with the daily hours spent on monitorship matters.

58. The compensation of the Corporate Monitor and the Corporate Monitor's professionals shall be entitled to priority as administrative expenses. The Corporate Monitor shall not increase the hourly rates used as the bases for such fee applications without prior approval of this Court.

XXII. Service of This Order

59. Copies of this Order may be served by any means, including by way of personal service, Federal Express or other commercial overnight service, U.S. mail, electronic mail or facsimile transmission, upon any financial institution or any other corporate entity or any other natural person that may have possession, custody, or control of any documents or assets of the Consenting Corporate Defendants or that may be subject to any provision of this Order. The Corporate Monitor and the Corporate Monitor's attorneys or agents are hereby specially appointed

to serve process, and/or effectuate service of process, including this Order and all other papers in this cause. Copies of this Order may also be served by the Plaintiff by any means, including by way of personal service, Federal Express or other commercial overnight service, U.S. mail, electronic mail or facsimile transmission, upon any financial institution or any other corporate entity or other natural person that may have possession, custody, or control of any documents or assets of the Consenting Corporate Defendants or that may be subject to any provision of this Order.

XXIII. Duty to Distribute This Order

60. The Corporate Monitor shall promptly give notice of his appointment to all known officers, directors, agents, employees, shareholders, contractors, banks, financial institutions creditors, debtors, managers and general and limited partiers of the Consenting Corporate Defendants, as the Corporate Monitor deems necessary or advisable to effectuate the monitorship. . Each Consenting Defendant, upon being provided with a copy of this Order by the Court, or by service by the Corporate Monitor or Plaintiff, or by receipt from Counsel for the Consenting Individual Defendants, shall: (a) immediately provide a copy of this Order to each of its parent companies, holding companies, divisions, subsidiaries, affiliates, successors, assigns, directors, officers, managers, employees, agents, affiliates, servants, attorneys, independent contractors, spouses, other family members employed by or in any way affiliated with the Consenting Corporate Defendants, representatives and authorized signatories to bank accounts; and (b) within five (5) business days from such receipt or service.

XXIV. Preservation of Rights and Privileges

61. Nothing in this Order shall be construed to require that any natural person or corporate entity abandon or waive any constitutional or legal privilege which they may have available to them.

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. Moreover, the Consenting Individual Defendants reserve the right to seek dissolution of the Corporate Monitor if Plaintiff's claims against the Individual Consenting Defendants are dismissed or otherwise resolved.

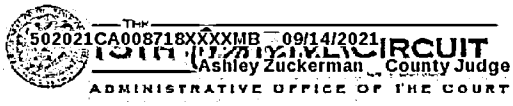
XXV. No Bond

63. The Corporate Monitor is appointed without bond.

XXVI. Court Maintains Jurisdiction

64. This Order shall remain in full force and effect during the pendency of this case, or until further Order of this Court, upon application, notice and an opportunity to be heard, and that this Court retains jurisdiction of this matter for all purposes related to this action.

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



502021CA008718XXXXMB 09/14/2021
Ashley Zuckerman
County Judge

HON. ASHLEY C. ZUCKERMAN
DIVISION AE

Copies to: Counsel of Record and Corporate Monitor

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