

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

START CONNECTING LLC, d/b/a USA
Student Debt Relief, a Florida limited
liability company;

START CONNECTING SAS, d/b/a USA
Student Debt Relief, a Colombia
corporation;

DOUGLAS R. GOODMAN, individually
and as an officer of START
CONNECTING LLC;

DORIS E. GALLON-GOODMAN,
individually and as an officer of START
CONNECTING LLC; and

JUAN S. ROJAS, individually and as an
officer of START CONNECTING LLC
and START CONNECTING SAS,

Defendants.

Case No. 8:24-cv-1626-KKM-AAS

FILED UNDER SEAL

**PLAINTIFF'S CERTIFICATE OF PARTIAL COMPLIANCE
REGARDING SERVICE OF THE TEMPORARY RESTRAINING
ORDER AND OTHER FILINGS ON DEFENDANTS**

Plaintiff, the Federal Trade Commission ("FTC"), submits this
certificate of partial compliance pursuant to Section XXIV of the Temporary

Restraining Order (“TRO”) entered by the Court on July 11, 2024, regarding its efforts to personally serve Defendants with the TRO and contemporaneously filed pleadings, documents, and exhibits:

A. Florida-Based Defendants

On July 11, 2024, the three Defendants who reside in this District—Douglas R. Goodman, Doris E. Gallon-Goodman, and Start Connecting LLC—were personally served with copies of the TRO; contemporaneously filed pleadings, documents, and exhibits; and the complaint and summons.

Personal service was effectuated at 1412 Pine Bay Drive, Sarasota, Florida 34231 by the Sarasota County Sheriff’s Office. Returns of service for these three Defendants were filed on the docket. *See* (Doc. 14–16).

B. Colombia-Based Defendants

Although the Colombia-based Defendants, Juan S. Rojas and Start Connecting SAS, have been in contact with the FTC and the Court-appointed Receiver via both phone and email and the FTC has been actively engaged in efforts to effectuate personal service on them, the FTC has been unable to do so by the July 17, 2024 deadline set forth in Section XXIV of the TRO.

Contemporaneously with this certificate, the FTC is filing a motion seeking waiver of the TRO’s personal-service requirement as to the two Colombia-based Defendants or, in the alternative, an extension of the TRO’s July 17, 2024 deadline for personal service.

As explained in the FTC's motion, the Colombia-based Defendants have confirmed actual notice of the TRO. *See generally* (Doc. 18-1) (FTC declaration summarizing evidence of actual notice). Actual notice is the only type of notice required for the TRO to become binding, *see* Fed. R. Civ. P. 65(d)(2), and for a preliminary injunction to issue, *see* Fed. R. Civ. P. 65(a)(1). *See also* (Doc. 18) (citing cases construing Rule 65's notice requirement). While the FTC will continue attempting to effectuate personal service in Colombia upon the two Colombia-based Defendants, it submits that those Defendants already have sufficient notice of the TRO and underlying proceedings for purposes of Federal Rule of Civil Procedure 65, even absent personal service of the TRO and all contemporaneous filings by a law enforcement agency or private process server authorized to effect personal service in Colombia.

Respectfully submitted,

Dated: July 17, 2024

/s/ Nathan H. Nash
Nathan Nash
D'Laney Gielow
Karen D. Dodge
Federal Trade Commission
Midwest Region
230 S. Dearborn, Suite 3030
Chicago, Illinois 60604
Phone: (312) 960-5624
E-mail: nnash@ftc.gov
 dgielow@ftc.gov
 kdodge@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

I certify that, on or about July 17, 2024, I sent a copy of this Certificate of Partial Compliance to the following parties:

Jared J. Perez, Esq.
jared.perez@jaredperezlaw.com

Douglas R. Goodman
1412 Pine Bay Drive
Sarasota, FL 34231

Start Connecting LLC
1412 Pine Bay Drive
Sarasota, FL 34231

Doris E. Gallon-Goodman
1412 Pine Bay Drive
Sarasota, FL 34231

Start Connecting SAS
Calle 16 #6N-21 Edificio Roldan
Oficina 401
Cali VC 760045
Colombia

Juan S. Rojas
Calle 13N #6-41 BIS, Apt. 1001,
Cali, VC 760045
Colombia

/s/ Nathan H. Nash
Attorney for Plaintiff FTC