

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

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

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

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.

_____ /

THE RECEIVER'S PRELIMINARY INTERIM REPORT

On July 11, 2024, the Court appointed the undersigned, Jared J. Perez,
as temporary receiver (the "**Receiver**") over (1) START CONNECTING LLC,
d/b/a USA Student Debt Relief; (2) START CONNECTING SAS, d/b/a both

USA Student Debt Relief and Start Connecting; and (3) any other entity that has conducted any business related to the defendants' marketing of debt relief services, including the receipt of assets derived from any such business, that I determine is owned or controlled by any defendant (collectively, the "**Receivership Entities**"). *See generally* Doc. 13 (the "**TRO**").

Pursuant to Section XX of the TRO, the Court directed me to file a report "on or before the date set for a hearing on whether a Preliminary Injunction should issue" addressing six principal topics. The Court also scheduled a case management conference for July 24, 2024 at 9:30 a.m. *See* TRO § XXVI. While that conference is not a preliminary injunction hearing, I nevertheless believe it prudent to advise both the Court and the parties about the steps I have taken to implement the TRO and to gain control of the Receivership Entities so that any disputes can be addressed in a timely and efficient manner. To conserve resources, I have attempted to make this preliminary report succinct, despite the substantial efforts in which my retained professionals (*see infra* § I.A.; TRO § XII.F.) and I have engaged since the afternoon of July 11, 2024.

I. STEPS TAKEN TO IMPLEMENT THE TRO

First, Section XX(1) of the TRO directs me to identify the steps I have taken to implement its terms. The most relevant terms are set forth in Section XII (Duties and Authority of Receiver), Section XIII (Transfer of Receivership Property to Receiver), and Section XXI (Immediate Access to

Business Records and Assets). During the first 12 days of this Receivership (*i.e.*, July 11, 2024, through the filing of this report on July 23, 2024), my retained professionals and I have engaged in the following activities:

- Conducted an “immediate access to business records and assets” pursuant to Section XXI of the TRO at certain defendants’ home office in Sarasota, Florida;
- Served the TRO and related correspondence containing detailed compliance instructions on more than 60 individuals and entities associated with the defendants;
- Reviewed, negotiated, analyzed, or otherwise processed hundreds of communications in response to those service efforts, including requests for more information, statements of assets, and productions of responsive documents;
- Identified approximately \$300,000 in funds belonging to Receivership Entities, mostly reserve funds held by various credit card processors and their affiliates;
- Identified approximately \$1,000,000 in funds belonging to the individual defendants as well as various noncash assets;
- Sent additional correspondence with detailed instructions and requests for information to more than 50 individuals associated with the Receivership Entities’ call center in Cali, Colombia;
- Created forensic images of 23 sources of electronically stored information, including computers, smartphones, cloud-based accounts like Google Workspace, websites, and social media accounts used to promote the debt relief business, including Facebook, Instagram, YouTube, and Tik-Tok;
- Opened a mailing address (distinct from the Sarasota home office) dedicated to the Receivership Entities and redirected their domestic mail: PO Box 60, Clearwater, FL 33757.
- Begun efforts to open a Receivership bank account to take possession of the Receivership Entities’ funds; and

- Begun efforts to establish a Receivership website to keep customers and other interested parties apprised of developments in this litigation and other relevant matters.

Again, to identify any potential disputes while this Receivership is still in its infancy and before more funds are expended, certain of these mandated tasks are explained in more detail below.

A. Retention Of Professionals

As authorized by TRO Section XII.F., I have retained or am retaining several professionals to assist in the execution of my mandate. Specifically, I have retained [Matt Mueller](#) of Fogarty Mueller Harris, PLLC as my counsel.¹ Mr. Mueller is a trial attorney and former prosecutor who has experience with receivership matters. *See* Doc. 5-2 (identifying Mr. Mueller and his firm as potential counsel). [Angelo Troncoso](#) of Chase & Associates, Inc. has experience working with Mr. Mueller and served as an investigator for the Internal Revenue Service for almost 30 years. Mr. Troncoso is fluent in Spanish, which is important because the FTC alleges (and my observations have confirmed)

¹ Although I am an attorney admitted to practice before this Court, a receiver does not act as an advocate for a client but as an arm of the court that appointed him. *See, e.g., S.E.C. v. N. Am. Clearing, Inc.*, 2015 WL 13389926, at *3 (M.D. Fla. Jan. 12, 2015) (describing receiver as an officer of the court), *aff'd* 656 F. App'x 969 (11th Cir. 2016); *S.E.C. v. Nadel*, 2010 WL 146832, at *1 (M.D. Fla. Jan. 11, 2010) (same). As such, receivers typically engage their own counsel. For example, I have represented and still represent receiver Burton W. Wiand, also an attorney, in enforcement actions both concluded and pending before the United States District Court for the Middle District of Florida. *See, e.g., F.T.C. v. Nat'l Solutions, LLC et al.*, Case No. 6:11-cv-1131-ORL-22-GJK (M.D. Fla.); *F.T.C. v. Resort Solution Trust, Inc., et al.*, Case No. 8:13-cv-1329-T-33TBM (M.D. Fla.); *S.E.C. v. A. Nadel et al.*, Case No. 8:09-cv-87-T-26TBM (M.D. Fla.); *S.E.C. v. Davison et al.*, Case No. 8:20-cv-325-MSS-AEP (M.D. Fla.); *C.F.T.C. v. Oasis Intl. Group, Ltd. et al.*, Case No. 8:19-cv-886-T-33SPF (M.D. Fla.).

that the Receivership Entities' call center is based in Cali, Colombia and has historically targeted, among others, Spanish-speaking student loan borrowers in the United States and Puerto Rico. Finally, I have retained [E-Hounds, Inc.](#), the premier local computer forensics firm ("**E-Hounds**"), to assist with the collection and preservation of electronically stored information ("**ESI**"). Forensic preservation and analysis of ESI is one of the most important tasks early in a receivership to ensure that vital evidence is not deleted or otherwise lost. This benefits all parties. As explained below, these professionals have already proven invaluable to the execution of my Court-ordered mandate.²

B. Immediate Access to Business Records and Assets

On July 11, 2024 – mere hours after the Court entered the TRO and pursuant to Section XXI – my professionals and I gained “immediate access” to the records and assets located at the Receivership Entities' domestic business premises: 1412 Pine Bay Drive, Sarasota, FL 34231. That address is also the residence of defendants Douglas and Doris Goodman. They operate the Receivership Entities from a small room within their residence. I was accompanied by three deputies from the Sarasota County Sheriff's Office, Mr. Troncoso, and three forensic technicians from E-Hounds. Upon arrival, we encountered defendants Douglas and Doris Goodman. The Sheriff's deputies

² I am also in the process of retaining a local tax and accounting firm to assist with financial matters and will provide further details on that potential engagement in my next report.

served the Goodmans and the companies they represent with process and other documents.³ I identified myself as the Court-appointed Receiver and asked if we could enter the residence to further explain and discuss matters. The Goodmans acquiesced and invited those present into the premises.

Pursuant to Section XXI of the TRO, I asked the Goodmans for any “Documents, Assets, and hardware” used to conduct the business of the Receivership Entities. Guided by their responses and my directions, E-Hounds created forensic images of a laptop computer and smartphone belonging to Douglas Goodman, a desktop computer and smartphone belonging to Doris Goodman, and several cloud-based accounts.⁴

Douglas and Doris Goodman each maintained a desk in their home office. They claimed that Mr. Goodman typically operated the Receivership Entities from his desk, while Mrs. Goodman performed a business development job from her desk for an unrelated company. I reviewed the paper files in both locations and obtained and removed three boxes of documents from Mr. Goodman’s desk.

³ I expressly told the Goodmans that (1) the allegations against them were not criminal in nature, (2) the Sheriff’s deputies were present to serve process and to keep the peace pursuant to Section XXI.B. of the TRO, (3) the Sheriff’s deputies were not present to arrest anyone for the conduct underlying the allegations, (4) neither the Sheriff’s deputies nor anyone else was present to serve or execute any search warrant, and (5) my professionals and I would only identify and collect the documents required by the TRO.

⁴ In total, E-Hounds collected and preserved 23 sources of ESI but that number includes cloud-based accounts and social media. The individual defendants only identified four local devices, which were imaged as described above.

I explained the provisions of the TRO to the Goodmans (while also stating that, as the Receiver, I could not provide them with legal advice), but they claimed ignorance of many matters and referred me to defendant Juan Rojas (the son of Doris Goodman), who resides in Colombia. I asked Mrs. Goodman to contact Mr. Rojas, and she did so via WhatsApp. Mr. Rojas called Mrs. Goodman, and she allowed me to speak with him. I introduced myself, explained the asset freeze as well as the most important components of the TRO, and then turned the call over to Mr. Troncoso. Mr. Rojas confirmed to Mr. Troncoso that he had received a copy of the TRO, and they continued to communicate for at least 45 minutes. As required or contemplated by Sections XII.E., XIII.F., XV., and XXI.C., Mr. Rojas promised to provide Mr. Troncoso with important login credentials and other information about the Receivership Entities' Colombian operations. Over the following days, Mr. Troncoso attempted to contact Mr. Rojas by phone and email numerous times, but Mr. Rojas never responded. This and other of the individual defendants' failures to comply with the TRO are discussed below in Section VI of this preliminary report.

After completing the tasks described above over approximately three hours, my professionals and I left the premises, although the "immediate access" was only the beginning of our efforts to implement the TRO.

C. Notice To Nonparties, Implementation Of Asset Freeze, And Collection of Documents

While I was performing the “immediate access” to the Receivership Entities’ business premises in Sarasota along with my investigator and computer forensic professionals from E-Hounds, Mr. Mueller and his staff (primarily his paralegal to conserve resources) were drafting, customizing, and sending letters from me to dozens of different entities and individuals, providing specific instructions and attaching the TRO. Based on newly discovered evidence, we have continued to send additional letters to nonparties almost every day since the “immediate access.” From July 11, 2024, through the date of this preliminary report, we have received, analyzed, and organized hundreds of emails requesting more information, confirming implementation of the asset freeze, stating account balances, providing documents, and more.⁵ This work is ongoing.

Finally, we sent a letter by email to more than 50 individuals believed to be employees of Receivership Entities in Colombia instructing them to cease operations until further notice and to provide their personal contact

⁵ My professionals and I have coordinated with the FTC in these efforts, as that agency sent its own asset freeze and document preservation letters separate from those sent by me and my counsel. The nonparties’ responses to the letters have been erratic. Sometimes they respond to the FTC but not me; other times they respond to me but not the FTC. Sometimes they only respond to Mr. Mueller and/or his paralegal. Coordination and reconciliation of information is consistent with the TRO and also avoids wasting Receivership resources due to the duplication of efforts.

information (should the Receivership Entities' computer systems be frozen or disabled) as well as certain information about their role with the Receivership Entities, including their title, job description, manager(s), and compensation. To date, no employees have replied to my correspondence.

D. Lack Of Access To Colombian Operations And Employees

In consultation with the FTC, I determined not to attempt to physically seize control of the Receivership Entities' call center in Cali, Colombia for numerous reasons. Financially, sending a team to Colombia for an undetermined period of time would have been cost-prohibitive. This is not likely to be a large estate. Logistically, any such team could not afford to wait in Colombia for the Court to enter the TRO, and if the team delayed departure until after entry of that order, the element of surprise could have been lost, allowing the potential transfer of assets or destruction of data and thus defeating the purpose of the "immediate access" authorizations. I explored the use of local assets, but even under those circumstances, the professionals I consulted would have required assistance from locations outside Cali like Bogota or Brazil. And finally, from a security perspective, the TRO authorizes me to obtain the assistance of law enforcement (*see* TRO § XII.H.), but domestic law enforcement obviously cannot operate internationally, and the cooperation of local law enforcement in Cali, Colombia could not be assured.

Given these factors, I determined to implement the TRO with respect to the Colombian call center by freezing or severing its ties with the United States. As mentioned above, I sent a letter to all employees for which I had an email address, but to date, no one has responded. In addition, the individual defendants have obligations to repatriate assets and documents to the United States, but they have not complied with any of their repatriation obligations. *See* TRO § VI; *infra* § VI. Defendant Rojas initially promised cooperation during his telephone call with Mr. Troncoso, but he has since failed to respond to communications from both me and the investigator. In an email dated July 16, 2024, Mr. Rojas told the FTC that he would cooperate after he consults an attorney. He has now retained counsel, but in the meantime, many TRO deadlines have lapsed, and the potential for the dissipation of assets and spoliation of documents has only grown.

II. THE VALUE OF ALL LIQUIDATED AND UNLIQUIDATED ASSETS OF THE RECEIVERSHIP ENTITIES

Second, given the early stage of this Receivership and the individual defendants' lack of compliance to date with their obligations under the TRO, an accurate accounting of Receivership assets is not yet possible. *See* TRO § XX(2); *infra* § VI. As preliminary report, the cash identified in bank accounts belonging to Receivership Entities is limited. The cash identified in reserve accounts with credit card processors and their affiliates belonging to

Receivership Entities is more substantial. In total, I estimate that the Receivership Entities' estate might contain approximately \$300,000. The individual defendants, however, have substantial assets, including cash and securities worth more than \$1,000,000 and a mortgage-free house worth approximately \$1,797,600 (per Zillow). As of this report, none of assets mentioned above have been liquidated or otherwise transferred. They are frozen at their respective institutions and/or custodians. At the appropriate time, I will begin moving eligible funds into a Receivership bank account.

III. THE SUM OF ALL LIABILITIES OF RECEIVERSHIP ENTITIES

Third, at this point, I am unable to estimate the sum of all liabilities of Receivership Entities. *See* TRO § XX.(3). Most significantly, if the FTC prevails in this action, the Receivership Entities and the individual defendants could be jointly and severally liable for millions of dollars in penalties, restitution, and/or disgorgement. I am not aware of any other active litigation against the Receivership Entities. In 2023, the defendants settled state enforcement actions in California and Minnesota regarding the debt relief operation, and there could be ongoing obligations under those settlement agreements.

IV. THE STEPS THE RECEIVER INTENDS TO TAKE IN THE FUTURE

Fourth, given that this Receivership has existed for less than two weeks, there are numerous steps my professionals and I intend to take in the future, including (briefly and at minimum) the following:

- Ensure all assets and accounts are frozen;
- Continue to collect and preserve documents as necessary and cost-efficient;
- Review and analyze collected documents to trace additional, potential assets;
- Review and analyze collected documents to make a final determination prior to any preliminary injunction hearing whether the Receivership Entities can be operated lawfully and profitably;
- Transfer cash assets of Receivership Entities to a Receivership bank account;
- Establish a Receivership website, dedicated email address, and mailing list, if logistically feasible and affordable (this enterprise involved thousands of Student Borrowers and tens of thousands of other solicited parties) to provide information about the status of the Receivership;
- Attempt to further investigate operations in Colombia, given the silence of Juan Rojas and all of the Colombian employees as well as the Goodmans' purported lack of knowledge about almost anything occurring in that call center; and
- Investigate related nonparties and companies to determine whether the Receivership should be expanded.

Eventually, should the circumstances dictate, my counsel and I will evaluate whether the Receivership Entities have claims (independent of the FTC)

against any parties or nonparties who may have participated in or aided and abetted the allegedly unlawful debt forgiveness operation. No such actions will be brought without first obtaining the approval of this Court.

V. WHETHER THE BUSINESS OF THE RECEIVERSHIP ENTITIES CAN BE OPERATED LAWFULLY AND PROFITABLY

Fifth, the Court directed me to report “whether the business of the Receivership Entities can be operated lawfully and profitably.” TRO § XX.(5). The Court also directed and authorized me to “[s]uspend business operations of the Receivership Entities if in the judgment of the Receiver such operations cannot be continued legally and profitably.” *Id.* § XII.T. Because the Receivership has existed for less than two weeks, I have not made a final determination regarding the legality of the Receivership Entities’ operations, and for that reason, this preliminary report does not address that matter.

I have, however, suspended business operations (to the best of my ability, given the limitations discussed herein) because, among other reasons, the Receivership Entities cannot operate profitably at the moment. Specifically, the TRO generally prohibits me from collecting money from consumers who might be victims of deceptive acts or other practices. *See id.* § XII.D. (“But the Receiver shall not attempt to collect any amount from a consumer if the Receiver believes the consumer’s debt to the Receivership Entities has resulted from the deceptive acts or practices or other violations of law alleged in the

Complaint in this matter, without prior Court approval.”). I am not aware of any source of income for any Receivership Entity that does not arise from the debt relief practices alleged in the Complaint, and given the foregoing, I do not intend to move the Court for approval to collect money from consumers. Further, the TRO’s asset freeze would render any attempt to continue the Receivership Entities’ operations futile. My efforts to date have focused on the preservation of assets and documents. If and when the Court sets a preliminary injunction hearing, I will file a more conclusive and comprehensive report regarding the legality and profitability of the Receivership Entities’ business operations pursuant to TRO § XX.(5).

VI. OTHER MATTERS FOR THE COURT’S ATTENTION

Sixth, the TRO directs me to report “any other matters that the Receiver believes should be brought to the Court’s attention.” TRO § XX.6. It also authorizes me and my counsel to file a motion seeking to hold noncompliant parties and nonparties in contempt. *See id.* § XIII.F. (“In the event that any person or entity fails to deliver or transfer any Asset or Document, or otherwise fails to comply with any provision of this Section, the Receiver may file an Affidavit of Non-Compliance regarding the failure and a motion seeking compliance or a contempt citation.”). Contempt sanctions are likely premature at this point, but the parties and the Court should be aware of the defendants’ lapsed TRO deadlines and unfulfilled requirements:

- **Financial Disclosures:** The individual defendants have failed to submit any financial disclosures, including those attached as Exhibits A through C to the TRO. *See* TRO § V.
- **Foreign Asset Repatriation:** The individual defendants have taken no steps whatsoever to comply with Section VI of the TRO. No defendant has executed and returned Exhibit D. These requirements are crucial, given the existence of the Colombian call center, the use of at least three Colombian banks, and the employment of dozens of foreign employees.
- **Websites:** The individual defendants have failed to provide me with credentials for the Receivership Entities' websites. This has caused me, my professionals, and the FTC to expend unnecessary time and resources interacting with a website hosting company, which appears to be based in Lithuania and Cyprus but does not appear to be acting in good faith. *See, e.g.*, TRO § XII.I. (requiring the preservation of websites); *see also* §§ XII.E., XIII.F., and XV.
- **Social Media:** The individual defendants have failed to provide me with credentials for the Receivership Entities' social media accounts. This has required me to direct E-Hounds to preserve the public-facing pages, which expended Receivership time and resources. It has also required numerous conversations between me and/or Mr. Mueller, on the one hand, and teams of outside lawyers for Meta (*i.e.*, Facebook/Instagram) and Google. *See id.*
- **@usastudentdebtre relief.com:** This is the primary email domain used by the telemarketers in Colombia. I understand that it is hosted by the same company that hosts the Receivership websites. The individual defendants have not provided any credentials for this crucial email account. *See id.*
- **TRO Section XV. (Cooperation):** The individual defendants have failed to provide me with all "keys, codes, usernames, and passwords required to access any computers, electronic devices, mobile devices, other machines (onsite or remotely), and any cloud account (including specific method to access account) or electronic file in any medium." *See* TRO § XV.

- **TRO Section XIV.A. (Affiliated Accounts):** The individual defendants have failed to provide a list of affiliated assets and accounts as contemplated by Section XIV.A. of the TRO.
- **TRO Section XIV.B. (Employees and Agents):** The individual defendants have failed to provide a list of employees and other agents. One former attorney for the Receivership Entities, however, contacted me to identify herself and other former attorneys. That lawyer also provided certain information regarding the requirements of Section XIV.C.
- **TRO Section XXII. (Distribution of Order by Defendants):** The individual defendants have failed to provide the required sworn statement of distribution and related information.⁶

By email, Juan Rojas and Doris Goodman have promised to cooperate with the FTC once they retain counsel (although Mr. Rojas has never responded to my communications or those of Mr. Troncoso after their initial conversation on July 11, 2024). On July 22, 2024, several attorneys appeared in this matter on behalf of the defendants. *See* Docs. 22-25. Now that the individual defendants have retained counsel, I hope these deficiencies will be remedied as soon as possible.

⁶ *See* TRO § XXII. (“Defendants shall immediately provide a copy of this Order to each affiliate, Telemarketer, marketer, sales entity, successor, assign, member, officer, director, employee, agent, independent contractor, client, attorney, spouse, subsidiary, division, and representative of any Defendant, and shall, within ten (10) days from the date of entry of this Order, and provide Plaintiff and the Receiver with a sworn statement that this provision of the Order has been satisfied, which statement shall include the names, physical addresses, phone number, and email addresses of each such person or entity who received a copy of the Order.”).

CONCLUSION

As explained above, this report is preliminary. The first weeks of any receivership are extremely active, as the receiver and retained professionals work to effectuate the appointing court's mandate. I am filing this preliminary report now to inform the Court and the parties as to my activities to date and, generally, my future intentions. Should the Court or any party object to the activities described herein, my counsel and I can be contacted using the information below. I will provide a full response to TRO Section XX prior to any preliminary injunction hearing, if not sooner.

Dated this 23rd day of July 2024.

Respectfully submitted,

s/ Jared J. Perez

Jared J. Perez, Receiver

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on July 23, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served all counsel of record.

s/ Jared J. Perez

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