

**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.

---

**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

I hereby disclose the following pursuant to this Court's interested persons order:

1.) the name of each person, attorney, association of persons, firm, law firm, partnership, corporation, limited liability company, subsidiary, conglomerate, affiliate, member, and any other identifiable legal entity that has, or might have, an interest in the outcome of this action, including through any ownership however small of a party's shares or stock, as well as all other identifiable legal entities related to any

party in the case:

*Plaintiff:*

Federal Trade Commission

*Counsel for Plaintiff:*

Nathan Nash, Esq.  
D'Laney Gielow, Esq.  
Karen D. Dodge, Esq.

*Defendants:*

Start Connecting LLC, d/b/a USA Student Debt Relief  
Start Connecting SAS, d/b/a USA Student Debt Relief  
Douglas R. Goodman  
Doris E. Gallon-Goodman  
Juan S. Rojas

*Counsel for Defendants:*

John A. Schifino, Esq.  
Matthieu S. Goddeyne, Esq.  
Melanie B. Senosiain, Esq.  
Gregory L. Pierson, Esq.  
Gunster, Yoakley & Stewart, P.A.

*Other:*

Jared J. Perez, Esq.  
Matthew J. Mueller, Esq.  
Fogarty Mueller Harris, PLLC

2.) the name of every other entity with publicly-traded stock, equity, or debt that may be affected by the outcome of the proceedings:

None.

3.) the name of every other entity which is likely to be an active participant in the proceedings, including the debtor and members of the creditors' committee (or twenty largest unsecured creditors) in bankruptcy cases:

None.

4.) the name of each victim (individual or corporate) of civil and criminal conduct alleged to be wrongful, including every person who is arguably eligible for restitution:

As alleged, “thousands of consumers” whom Defendants have purportedly harmed. Doc. 1 at ¶5.

I hereby certify that, except as disclosed above, I am unaware of any actual or potential conflict of interest affecting the district judge or the magistrate judge assigned to this case, and I will immediately notify the Court in writing on learning of any such conflict.

Dated: July 23, 2024

Respectfully submitted,

/s/ John A. Schifino

John A. Schifino, Esq.

Florida Bar Number 72321

Matthieu Goddeyne, Esq.

Florida Bar Number 122189

Melanie B. Senosiain, Esq.

Florida Bar Number 118904

Gregory L. Pierson, Esq.

Florida Bar Number 123905

**GUNSTER, YOAKLEY & STEWART,  
P.A.**

401 E. Jackson Street, Suite 1500

Tampa, Florida 33602

Telephone: (813) 228-9080

Facsimile: (813) 228-6739

Primary email: [jschifino@gunster.com](mailto:jschifino@gunster.com)

Primary email: [mgoddeyne@gunster.com](mailto:mgoddeyne@gunster.com)

Primary email: [msenosiain@gunster.com](mailto:msenosiain@gunster.com)

Primary email: [gpierson@gunster.com](mailto:gpierson@gunster.com)

*Attorneys for Juan S. Rojas*

**CERTIFICATE OF SERVICE**

I certify that on July 23, 2024, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ John A. Schifino  
Attorney