

**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

**PLAINTIFF'S MOTION FOR THE CLERK OF COURT TO SERVE  
THE COLOMBIA-BASED DEFENDANTS UNDER RULE 4(f)(2)(C)(ii)**

Plaintiff, the Federal Trade Commission ("FTC"), moves for an order directing the Clerk of Court to effectuate service of process on the Colombia-

based Defendants Start Connecting SAS and Juan S. Rojas by mail, pursuant to Federal Rule of Civil Procedure 4(f)(2)(C)(ii). Provided that “international agreement allows but does not specify other means” of service, Rule 4(f)(C)(2)(ii) authorizes parties in foreign countries to be served “using any form of mail that the clerk addresses and sends to the individual and that requires a signed receipt,” unless such service is “prohibited by the foreign country’s law.” Fed. R. Civ. P. 4(f)(2)(C)(ii); *see also* Fed. R. Civ. P. 4(h)(2). International agreement allows service by mail in Colombia and does not specify other means of service, and Colombian law does not prohibit service by mail. *See State Farm Mut. Auto. Ins. Co. v. LaRocca*, 2022 WL 19561965, at \*2 (M.D. Fla. July 15, 2022) (authorizing service on a defendant in Colombia under Rule 4(f)(2)(C)(ii)). The Clerk of Court has informed FTC counsel that an order from this Court is required for the Clerk to undertake service under Rule 4(f)(2)(C)(ii).

Accordingly, pursuant to Rule 4(f)(2)(C)(ii), the FTC requests that this Court issue an order directing the Clerk to mail the summons and complaint to Defendants Start Connecting SAS and Juan Rojas at the following three Colombian addresses via a method that requires a signed receipt:

Juan S. Rojas  
Calle 13N #6-41 Apt 1203  
Cali, Valle del Cauca 760045  
Colombia

Start Connecting SAS  
Attn: Juan S. Rojas  
Calle 13N #6-41 Apt 1203  
Cali, Valle del Cauca 760045  
Colombia

Start Connecting SAS  
Attn: Juan S. Rojas  
Calle 16 #6N-21, Oficina 401  
Cali, Valle del Cauca 760045  
Colombia

Respectfully submitted,

Dated: July 23, 2024

/s/ Nathan H. Nash  
Nathan Nash  
D'Laney Gielow  
Karen D. Dodge  
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Midwest Region  
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Chicago, Illinois 60604  
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Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

**LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), I certify that I sent an email to Defendants requesting their position on the relief requested in this motion on July 22, 2024, but did not receive a response. In the evening of July 23, 2023, after learning that Defendants were represented by counsel, I sent an email to counsel for Defendants requesting their position on the relief requested in this motion, but have not yet received a response. I will continue to try diligently to contact Defendants' counsel and will supplement this certification once I learn Defendants' position.

/s/ Nathan H. Nash  
Attorney for Plaintiff FTC