

**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.

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**THE RECEIVER'S FIRST CASH ACCOUNTING REPORT**

On July 11, 2024, the Court appointed the undersigned, Jared J. Perez, as temporary receiver (the “**Receiver**” and the “**Receivership**”) over, in relevant part, (1) START CONNECTING LLC, d/b/a USA Student Debt Relief

(“**SC LLC**”); and (2) **START CONNECTING SAS**, d/b/a both USA Student Debt Relief and Start Connecting (“**SC SAS**” and, collectively with SC LLC, the “**Receivership Entities**”). See Doc. 13 (the “**TRO**”). Section XII.L. of the TRO directs me to “[m]ake an accounting, as soon as practicable, of the Assets and financial condition of the receivership and file the accounting with the Court and deliver copies thereof to all parties.”<sup>1</sup> Pursuant to that directive, a cash accounting report of Receivership income and expenditures between July 11, 2024, and August 15, 2024, is attached as **Exhibit A**. This accounting report is subject to the following notes, explanations, and clarifications.

**No Forensic Analysis of Receivership Entities.** Exhibit A is the Receivership’s cash accounting report. It is not the Receivership Entities’ general ledger, balance sheet, or profit and loss statement. While I have access to certain QuickBooks data, I have not retained a forensic accountant or attempted to reconstruct or reconcile that data with bank statements and other primary source documents. I do not know whether the QuickBooks data is reliable or accurate, and at present, I do not believe this matter requires the expenditure of funds necessary to perform such forensic analysis.

**Certain Funds Transferred in Violation of the Asset Freeze Have Been Recovered.** Deputies from the Sarasota County Sheriff’s Office and I

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<sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the TRO.

served defendant Douglas R. Goodman with the TRO on the afternoon of the July 11, 2024. Later that day and on the morning of July 12, 2024, in violation of the TRO and the asset freeze imposed by this Court, Mr. Goodman transferred \$86,000.00 to his personal account at Truist Bank (“**Truist**”) from two business accounts at Truist that belonged to SC LLC. Fortunately, Truist froze Mr. Goodman’s personal account before he could further transfer or otherwise dissipate the misappropriated funds. Mr. Goodman also violated the TRO and asset freeze by withdrawing \$7,000.00 in cash from various accounts, including at least two business accounts at Truist that belonged to SC LLC. Importantly, Mr. Goodman never disclosed these transfers to me or the FTC. When we eventually and independently learned of the transfers, the FTC and I took immediate steps to obtain confirmatory evidence from Truist, raised the issue with Mr. Goodman’s counsel, and demanded the return of the money. Mr. Goodman agreed to return the funds to the Receivership, and pursuant to that agreement, I instructed Truist to issue a check in the amount of \$86,000 to the me, as Receiver, from Mr. Goodman’s frozen personal account. My counsel also collected \$7,000 in cash from Mr. Goodman’s counsel. On August 14, 2024, I deposited those amounts into the Receivership account at ServisFirst Bank, and they are included in Exhibit A.

**Other Funds Transferred in Violation of the Asset Freeze Have Not Yet Been Recovered.** Defendant Juan Rojas was also served with a copy

of the TRO on the afternoon of July 11, 2024. He confirmed that fact during a telephone conversation with my investigator, Angelo Troncoso. He also told Mr. Troncoso that Receivership Entities maintained accounts at three Colombian banks – BBVA, Bancolombia, and Banco Davivienda – and he promised to provide me and Mr. Troncoso with login credentials for those accounts later that same day, as required by numerous provisions in the TRO. Since July 11, 2024 – more than a month ago – defendant Rojas has ignored numerous follow-up communications from me and Mr. Troncoso.

On August 2, 2024, counsel for defendant Rojas finally sent me login credentials for BBVA, where SC SAS maintains at least three accounts. Relevant bank statements show that defendant Rojas drained tens of millions of Colombian pesos from those BBVA accounts in the days following July 11, 2024. Through counsel, defendant Rojas has claimed that the misappropriated funds were used, at least in part, to pay employees of SC SAS, but even if true, that conduct nevertheless violated the TRO and asset freeze.

On August 15, 2024, counsel for the defendants submitted certain transaction records to me and the FTC that appear to have been obtained from BBVA. To the extent defendant Rojas expects those documents to excuse his violations of the TRO and asset freeze, his expectation is misplaced because they have the opposite effect. Specifically, the documents demonstrate that defendant Rojas paid himself at least 2,215,838 Colombian pesos after he was

served with the TRO, which is indefensible. Because counsel for the defendants intend to withdraw from their representation of defendant Rojas and SC SAS as soon as permitted by pertinent Local Rules (*see* Doc. 45), counsel claim to be unable to provide any additional context or to otherwise explain the documents. At present, the BBVA accounts are essentially empty, as they each contain a few hundred USD or less. The FTC and I will continue to pursue the recovery of the misappropriated funds, but they are not currently included within the Receivership or Exhibit A.

**The Defendants Have Failed to Provide Credentials for Other Colombian Bank Accounts.** Despite numerous requests and despite having been represented by counsel since at least July 22, 2024 (*i.e.*, more than three weeks), the defendants have failed to provide credentials for Bancolombia and Banco Davivienda (in addition to numerous other service providers). As such, any funds held by those banks are not included within the Receivership or Exhibit A. Given the violations of the TRO by, at minimum, defendants Rojas and Douglas Goodman, it is likely that any such funds have been misappropriated or otherwise dissipated. If that likelihood proves true, I will seek appropriate sanctions from the Court. *See, e.g., F.T.C. v. NPB Advertising, Inc., et al.*, Case No. 8:14-cv-1155-SDM-TGW (M.D. Fla.) (Doc. 261) (holding FTC defendant residing in the Bahamas in contempt for failing to provide financial and other information, issuing arrest warrant, and directing the U.S.

Marshal to “locate and arrest [defendant] and return him in custody to answer for his contempt”) (Merryday, J.); *see also* NPB Doc. 252 (order to show cause); NPB Doc. 251 (receiver’s motion for order to show cause).

**Unpaid Professional Fees Not Included.** The TRO directs me to file my first fee application within 60 days of my appointment. My professionals and I will file the appropriate motion at that time, but any disbursements will not be reflected in this cash accounting report until approved and paid.

**Other Miscellaneous Assets Not Included.** This report does not include any noncash assets, although I am not aware of any such material assets at this time. It also does not include any uncollected cash assets like those held in the names of related entities or various small accounts, but to the best of my current knowledge, those assets are *de minimis*. Finally, it does not include the individual defendants’ personal assets or any assets that may have been fraudulently transferred from the Receivership Entities to the individual defendants and others.

Dated this 15th day of August 2024.

Respectfully submitted,

**s/ Jared J. Perez**  
Jared J. Perez, Receiver

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 15, 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** \_\_\_\_\_

Jared J. Perez, Receiver

[Jared.Perez@JaredPerezLaw.com](mailto:Jared.Perez@JaredPerezLaw.com)

Tel: 727-641-6562

PO Box 60

Clearwater, FL 33757

(Receivership PO Box)

*and*

Matthew J. Mueller, FBN: 0047366

FOGARTY MUELLER HARRIS, PLLC

501 E. Kennedy Blvd.

Suite 1030

Tampa, Florida 33602

Tel: 813-682-1730

Fax: 813-682-1731

Email: [matt@fmhlegal.com](mailto:matt@fmhlegal.com)

*Counsel for Receiver, Jared J. Perez*

# **EXHIBIT A**



**USASDR RECEIVERSHIP CASH ACCOUNTING REPORT****From July 11, 2024 to August 15, 2024**

<b>Beginning Balance</b>		<b>\$ <u><u>-</u></u></b>
<b>Increases In Fund Balance</b>		
Interest Income	\$	-
Truist Accounts for SC LLC	\$	20,940.92
Doug Goodman Asset Freeze Violation - Truist	\$	86,000.00
Doug Goodman Asset Freeze Violation - Cash	\$	7,000.00
FFB Bank - Maverick Reserve Funds	\$	25,000.00
FFB Bank - PayArc Reserve Funds	\$	135,214.93
Cliq, Inc. Reserve Funds	\$	86,771.22
Electronic Merchant Services Reserve Funds	\$	80,469.84
North American Bancard Reserve Funds	\$	3,169.46
<b>Total Increase In Fund Balance</b>	<b>\$</b>	<b>444,566.37</b>
<b>Decreases In Fund Balance</b>		
Bank Charges	\$	10.00
<b>Professional Fees</b>		
Jared J. Perez, Receiver		TBD
Chase and Associates, Inc.		TBD
Fogarty Mueller Harris, PLLC		TBD
PDR CPAs & Advisors		TBD
E Hounds, Inc.		TBD
<b>Total Professional Fees</b>	<b>\$</b>	<b>-</b>
<b>Total Decrease In Fund Balance</b>	<b>\$</b>	<b><u><u>10.00</u></u></b>
<b>Net Increase (Decrease) From Inception to August 15, 2024</b>	<b>\$</b>	<b>444,556.37</b>
<b>Total Cash on Hand as of August 15, 2024</b>		<b>\$ <u><u>444,556.37</u></u></b>