

**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.

_____/

**NOTICE OF EXPANSION OF RECEIVERSHIP
TO INCLUDE LEADSR4US, LLC**

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;

and (2) START CONNECTING SAS, d/b/a both USA Student Debt Relief and Start Connecting. *See* Doc. 13 (the “**TRO**”). According to the TRO, “**Receivership Entities**’ means Corporate Defendants as well as any other entity that has conducted any business related to Defendants’ marketing of Debt Relief Services, including receipt of Assets derived from any activity that is the subject of the Complaint in this matter, and that the Receiver determines is controlled or owned by any Defendant.”¹ *Id.* at p. 9 ¶ M. “**Corporate Defendant(s)**’ means Start Connecting LLC, also d/b/a as USA Student Debt Relief, Start Connecting SAS, and each of their subsidiaries, affiliates, successors, and assigns.” *Id.* at p. 7 ¶ C.

Similarly, TRO Section XII.U. governs the expansion of the Receivership and provides as follows.

If the Receiver identifies a nonparty entity as a Receivership Entity, promptly notify the entity as well as the parties, and inform the entity that it can challenge the Receiver's determination by filing a motion with the Court. But the Receiver may delay providing such notice until the Receiver has established control of the nonparty entity and its Assets and records, if the Receiver determines that notice to the entity or the parties before the Receiver establishes control over the entity may result in the destruction of records, dissipation of Assets, or any other obstruction of the Receiver’s control of the entity.

¹ Capitalized terms not defined herein have the meanings ascribed to them in the TRO. On August 15, 2024, I filed a notice expanding the Receivership to include Zage Group, LLC. Doc. 47. As such, Zage Group, LLC is a Receivership Entity. Similarly, on August 27, 2024, I filed a notice expanding the Receivership to include G&G International Consultants SAS. Doc. 53. As such, G&G International Consultants SAS is also a Receivership Entity.

Id. § XII.U. In other words, a company qualifies as a Receivership Entity under the TRO if it (1) conducted any business related to Debt Relief Services or received Assets derived from the matters alleged in the Complaint and (2) is owned or controlled by any Defendant.

For the reasons set forth below, I have determined that LEADSR4US, LLC (“LEADSR4US”) qualifies as a Receivership Entity under the TRO. On August 15, 2024, Doris Gallon-Goodman submitted financial disclosures to the FTC and me in which she identified LEADSR4US in response to the section of the relevant form entitled “Non-Public Business and Financial Interests.” She stated that she owns 100% of the LLC and described her role as “Member & Registered Agent.” In a cover letter accompanying the disclosures, her counsel wrote, in relevant part:

The revised financial statement reflects Mrs. Gallon-Goodman’s position as sole member of LEADSR4US LLC. LEADSR4US LLC was created at the beginning of 2024 for the sole purpose of developing organic leads on Google. LEADSR4US LLC has a bank account which was largely unfunded for the first few months of its existence. According to bank records which are produced herewith, there was an initial deposit of \$1,000 in January 2024 and another deposit of \$9,000 in May 2024. That money was used to place Google advertisements.

Letter from M. Goddeyne, dated August 15, 2024.² Documents produced along with the financial disclosures corroborate Mrs. Gallon-Goodman’s ownership

² Because these disclosures contain personal financial information, they have not been attached as exhibits, but all parties have copies of the relevant documents. If requested by the Court, redacted versions can be filed as a supplement to this notice.

of LEADSR4US, including articles of organization, an operating agreement, and certain bank records.

In addition, LEADSR4US both conducted business related to Debt Relief Services and received Assets derived from the matters alleged in the Complaint. As referenced in counsel's letter and excerpted above, a withdrawal ticket, dated May 7, 2024, shows that \$9,000 was withdrawn from an account at Truist Bank belonging to Start Connecting LLC and deposited in an account owned by LEADSR4US. As such, LEADSR4US received Assets derived from the matters alleged in the Complaint. It also participated in Debt Relief Services by placing Google advertisements for student loan forgiveness programs. One such advertisement exclaims: "Don't wait – receive a free consultation to jumpstart you student loan success!" A copy of a report from the Google Ads Transparency Center is attached as **Exhibit A**. LEADSR4US thus qualifies as a Receivership Entity under the TRO because it both conducted business related to Debt Relief Services and received Assets derived from the matters alleged in the Complaint. If Ms. Gallon-Goodman wishes to challenge this determination, she must promptly file a motion with the Court pursuant to TRO Section XII.U.

Unless and until the Court grants any such motion, the parties must treat LEADSR4US as a Receivership Entity under the TRO and comply with all attendant requirements. Specifically, Douglas and Doris Goodman must

immediately deliver all Assets and Documents of LEADSR4US to me and/or my counsel. Such Assets are otherwise frozen and, given the violations of the TRO to date by, at minimum, defendants Juan Rojas and Douglas Goodman (*see, e.g.*, Doc. 46), I will seek sanctions from the Court for any dissipation of such Assets. *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* Doc. 252 (order to show cause); Doc. 251 (receiver’s motion for order to show cause).

Dated this 27th day of August 2024.

Respectfully submitted,

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 27, 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

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(Receivership PO Box)

and

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Counsel for Receiver, Jared J. Perez

EXHIBIT A



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Based in: the United States



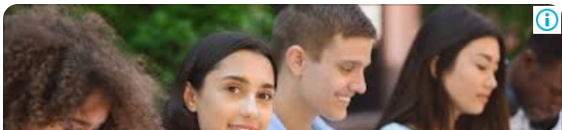
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