

**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-1627-KKM-AAS

FILED UNDER SEAL

PLAINTIFF'S *EX PARTE* RECOMMENDATION OF RECEIVER

The Federal Trade Commission ("FTC"), pursuant to its Emergency *Ex Parte* Motion for a Temporary Restraining Order, Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to Show

Cause Why a Preliminary Injunction Should Not Issue (the “TRO Motion”), proposes that the Court appoint Jared J. Perez, Esq. as temporary receiver in this case.¹

Mr. Perez has indicated to FTC counsel that he is ready and able to serve as the receiver in this matter.² He has the necessary experience and qualifications for the position, including more than thirteen years of experience successfully representing receiverships in complex governmental actions brought by the FTC, the Commodity Futures Trading Commission, the Securities and Exchange Commission, the Florida Office of Financial Regulation, and the Office of the Attorney General of Florida. *See, e.g., CFTC v. Oasis Int’l Grp., Ltd.*, Case No. 8:19-CV-886-VMC-SPF (M.D. Fla.); *FTC v. Resort Sol. Trust, Inc.*, Case No. 8:13-cv-1329-VMC-TBM (M.D. Fla.); *FTC v. Nat’l Sols., LLC*, Case No. 6:11-cv-1131-ACC-GJK (M.D. Fla.). He is also a member of the National Association of Federal Equity Receivers. His office is located in Clearwater, Florida, which is located within driving distance of both this Court and the proposed Receivership Entities’ domestic business headquarters in Sarasota, Florida.

¹ The grounds for the appointment of a temporary receiver are described in the FTC’s concurrently filed TRO Motion.

² Mr. Perez been informed of all parties to this case and has confirmed to FTC counsel that he has no conflicts of interest.

A document prepared by Mr. Perez outlining his experience and qualifications is attached as Attachment A, along with a letter he wrote to FTC counsel in support of this recommendation is attached as Attachment B. Mr. Perez has proposed a reduced hourly rate of \$350 for work on this receivership, which will substantially reduce the associated costs. Mr. Perez anticipates doing most of the receivership work himself. If necessary, and if funds allow, however, Mr. Perez also has capacity to hire outside counsel, forensic accountants, tax accountants, information technology specialists, real estate agents, and asset managers.

Respectfully submitted,

Dated: July 9, 2024

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

FTC v. Start Connecting LLC et al.
Ex Parte Receivership Recommendation

Attachment A
Jared Perez's Experience
and Qualifications



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Jared Perez concentrates his practice on business and commercial litigation with a focus on financial services and securities matters, including securities fraud litigation, SEC and FINRA investigations, shareholder derivative litigation, and federal equity receiverships. Jared has represented receivers appointed by state and federal courts at the request of the Securities and Exchange Commission, Commodity Futures Trading Commission, Federal Trade Commission, Florida Office of Financial Regulation, and the Office of the Florida Attorney General, including:

- www.oasisreceivership.com
- www.equialtreceivership.com
- www.nadelreceivership.com
- www.trimedreceivership.com

Jared has also represented companies and/or individuals in “business divorce” cases – *i.e.*, disputes or litigation among partners or shareholders of closely-held entities. Such cases require experience and special attention because the parties have often worked with each other for many years or founded a company together, which can raise complicated factual and legal issues regarding invested capital, management authority, and distribution of profits.

For example, Jared represented the Special Litigation Committee appointed by the Honorable Paul L. Huey of Florida’s Thirteenth Judicial Circuit Court in *Taneja v. Saraiya*, 290 So. 3d 602 (Fla. 2d DCA 2020). The Committee was asked to determine whether a shareholder derivative action should proceed in connection with a failed real estate development but ultimately determined the action was not in the best interests of the company. Florida’s Second District Court of Appeal affirmed the trial judge and the Committee, concluding, “Quite simply, our record reflects a textbook example of how a SLC should proceed.” *Id.*

Before founding Jared J. Perez P.A. in 2022, Jared was a shareholder at Guerra King P.A. (f/k/a Wiand Guerra King P.A.) for more than a decade and an associate at Cadwalader, Wickersham & Taft LLP in New York, NY. Jared is a Tampa native and graduated from Florida State University, cum laude, in 2002. He received his law degree in 2005 from Columbia Law School. At Columbia, Jared served as the Managing Editor of the Science & Technology Law Review. He also interned with the Rackets Bureau of the Manhattan District Attorney’s Office, the Hon. Robert Patterson, Jr., of the United States District Court for the Southern District of New York, and the Hon. Sonia Sotomayor, then of the Second Circuit Court of Appeals and, presently, a member of the United States Supreme Court.

FTC v. Start Connecting LLC et al.
Ex Parte Receivership Recommendation

Attachment B

Jared Perez's 4/19/24 Letter
to FTC About Receivership
Opportunity



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April 19, 2024

VIA EMAIL

Nathan Nash, Esq. (NNash@ftc.gov)
D'Laney Gielow, Esq. (dgielow@ftc.gov)
Federal Trade Commission
230 S. Dearborn, Ste. 3030
Chicago, IL 60604

Re: Potential FTC Receivership Opportunity

Dear Mr. Nash and Ms. Gielow:

Thank you for contacting me about the opportunity to serve as a receiver in an upcoming FTC enforcement action and for speaking with me on April 16, 2024. As discussed, I am writing to provide you with information about the receiverships on which I have worked as well as a list of references and other pertinent information.

I have practiced law for almost 20 years and have more than 13 years of experience representing receivers in state and federal courts at the request of virtually every relevant enforcement agency, including the Securities and Exchange Commission, Commodity Futures Trading Commission, Federal Trade Commission, Florida Office of Financial Regulation, and the Office of the Attorney General of Florida. The underlying investment schemes involved a variety of fraudulent products and practices, ranging from limited partnership interests in hedge funds and promissory notes purportedly backed by medical accounts receivable or real estate to foreign exchange trading pools and timeshare resale scams. I am a member of the National Association of Federal Equity Receivers and sit on both its *amicus curiae* and regulatory outreach committees. I am also a member of the Commercial Receivers Association. Specifically, I have worked on the following matters and have served as lead counsel or substitute lead counsel on most of them:

- *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.);

- *Florida Office of Financial Regulation v. Tri-Med Corporation et al.*, Case No. 14-CA-001695 (Fla. 6th Cir.);
- *Florida Office of Financial Regulation v. Universal Luxury Coaches*, Case No. 04-CA-2130-16-W (Fla. 18th Cir.);
- *Office of the Attorney General, State of Florida, Department of Legal Affairs v. MAP Destinations, LLC, et al.*, Case No. 2015-CA-011413-O (Fla. 9th Cir.); and
- *Blue Water Holding USA, LLC and Syed Raza v. Blue Horizon Holdings Group, LLC, Nazim Ali, and VC One, LLC*, Case No. 2021-CA-962 (Fla. 10th Cir.).

Most recently, I have served as lead counsel representing receiver Burton W. Wiand in *C.F.T.C. v. Oasis International Group, Ltd. et al.*, Case No. 8:19-cv-886-T-33SPF (M.D. Fla.), a Ponzi scheme that involves approximately \$80 million raised from more than 700 victims throughout the United States, purportedly to invest in foreign exchange trading pools through companies located in Florida, the Cayman Islands, Belize, New Zealand, and the United Kingdom (the “**Oasis Receivership**”). I am responsible for, among other things, drafting all of the interim reports, which are available on the [receivership website](#).

In addition, I have prosecuted numerous clawback actions, including *Wiand v. Lee*, 753 F.3d 1194 (11th Cir. 2014), a case that made important and favorable law regarding the application of the Florida Uniform Fraudulent Transfer Act to Ponzi schemes. *See, e.g., id.* at 1201 (“We now clarify that, under FUFTA’s actual fraud provision, proof that a transfer was made in furtherance of a Ponzi scheme establishes actual intent to defraud under § 726.105(1)(a) without the need to consider the badges of fraud.”). In May 2024, I obtained a favorable decision in a case I briefed and argued before the United States Court of Appeals for the Eleventh Circuit, which reaffirmed *Lee* and reversed a district court’s dismissal of fraudulent transfer claims worth approximately \$20 million. *See Wiand v. ATC Brokers Ltd.*, 96 F.4th 1303 (2024).

I also have substantial experience seizing and liquidating real estate. *See, e.g., Lee v. Wiand*, 603 B.R. 161 (M.D. Fla. 2018) (imposing a constructive trust and equitable lien on homestead property purchased and improved with funds traceable to Ponzi scheme). As reflected in the interim reports linked above, the Oasis Receivership involved several parcels of luxury real estate, which were sold for a total of almost \$8.8 million. I obtained court approval of the sales and, along with title counsel, facilitated the closings to the extent required.

Additionally, I have experience with the nonlegal components of receiverships, including initial entry procedures, freezing bank accounts, coordination with state and federal law enforcement, retaining appropriate professionals, identifying, valuing, and selling assets, preserving records, including ESI and data stored on personal devices or in the cloud, and other similar matters.

Finally, I understand that assets in this potential receivership could be minimal. I have assisted the Federal Trade Commission with two smaller receiverships involving timeshare resale scams. These “businesses” typically operate from boiler rooms, and assets are often limited to

whatever money can be frozen upon initial entry. As such, I have experience operating efficiently with limited funds.

Rates and Professionals

I bill on an hourly basis and would expect to do much if not most of the work required on this receivership myself. My standard rate for commercial litigation is \$400 per hour, which I discount to \$350 for receivership engagements. Because I value this type of work, I can likely offer additional flexibility if necessary. I also have access to a broad range of complementary professionals, including outside counsel, forensic accountants, tax accountants, information technology specialists, real estate agents, and asset managers. Through a combination of these professionals, I can provide prompt, efficient, and economical services in receivership matters. Below, please find a list of firms and individuals I might retain depending on the nature of this receivership opportunity, as I learn more about the case and its requirements.

- [James Sallah](#), Sallah Astarita & Cox, LLC (receiver, receiver's counsel, former SEC enforcement attorney)
- [Matt Mueller](#), Fogarty Mueller Harris, PLLC (receiver's counsel, former Department of Justice prosecutor and Assistant U.S. Attorney)
- [Maya Lockwood](#), Guerra & Partners, P.A. (receiver's counsel, claims process specialist)
- [KapilaMukamal](#) (highly experienced forensic accountants, including present and former receivers and bankruptcy trustees)
- [PDR CPAs + Advisors](#) (experienced tax accounts who worked on many of the receiverships identified above)
- [E-Hounds, Inc.](#) (computer forensics firm capable of preserving data upon initial entry)

These firms are experienced with the receivership process, including quarterly billing cycles and the need to offer discounted rates. I am also cognizant of the potential need for fluent Spanish-speaking assistance. Some of the firms mentioned above have in-house capabilities, and I am in the process of identifying other resources.

References

In addition to the attorneys identified above, please feel free to contact any of the individuals listed below, who include clients, colleagues, and regulators.

- [Burton W. Wiand](#) (receiver, former partner, current client)
- [Charlene Koonce](#) (receiver, receiver's counsel, current co-counsel)
- [Kacy Donlon](#) (receiver, receiver's counsel, current co-counsel)
- Abel Putnam (private/nonenforcement receiver, former client)

- aap@putnampa.com, (863) 682-1178
- Greg Melchior (Chief Counsel – Securities, Florida Office of Financial Regulation)
 - Greg.Melchior@flofr.gov, (813) 218-5327
- J. Alison Auxter (Senior Trial Attorney, CFTC Division of Enforcement)
 - aauxter@cftc.gov, (816) 960-7718
- Jeff Le Riche (Chief Trial Attorney, CFTC Division of Enforcement)
 - jleriche@cftc.gov, (816) 960-7700
- Alise Johnson (Senior Trial Counsel, SEC Division of Enforcement)
 - johnsonali@sec.gov, (786) 626-7399

And as discussed, you already know that I worked with Harold Kirtz on *F.T.C. v. Resort Solution Trust, Inc., et al.*, Case No. 8:13-cv-1329-T-33TBM (M.D. Fla.) and with Bill Hodor on *F.T.C. v. Nat'l Solutions, LLC et al.*, Case No. 6:11-cv-1131-ORL-22-GJK (M.D. Fla.). Please let me know if you require any additional references.

In summary, I believe I have sufficient experience and resources to serve as a receiver at the request of the Federal Trade Commission and would appreciate the opportunity. Although we discussed many of the issues on your questionnaire during our call, please let me know if you would like me to submit formal responses. I have also enclosed an informal CV that has some additional information about me, including my educational background. Thank you for your consideration.

Respectfully,

Jared J. Perez

Jared J. Perez, Esq.

Enclosure