

**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.

**THE RECEIVER'S UNOPPOSED MOTION FOR AN ORDER
DIRECTING GODADDY.COM TO TRANSFER
RECEIVERSHIP ENTITIES' DOMAINS TO RECEIVER'S CONTROL**

On July 11, 2024, the Court appointed Jared J. Perez as temporary receiver (the “**Receiver**”) 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**”). By endorsed order dated July 24, 2024, the Court extended the TRO to September 23, 2024. Doc. 37.

On September 11 and 19, 2024, the Court entered a Preliminary Injunction that appointed Mr. Perez as the Receiver over Start Connecting LLC, Start Connecting SAS, Zage Group, LLC, G&G International Consultants SAS, and LEADSR4US, LLC (collectively, the “**Receivership Entities**”). *See* Docs. 69 & 78 (the “**Preliminary Injunctions**”). With no opposition from the participating parties, the Receiver, through undersigned counsel, moves the Court for an order directing GoDaddy.com, LLC (“**GoDaddy**”) to transfer the following domains and any and all related subdomains to the Receiver’s control:

- www.usastudentdebtrelief.com;
- puertorico.usastudentdebtrelief.com;
- forgiveness.usastudentdebtrelief.com;
- studentloan.usastudentdebtrelief.com;
- startconnecting.co;
- intranet.startconnecting.co;
- services.startconnecting.co;
- zagegroup.com;

- leads-4-us.com;
- gginternationalconsultants.com;
- start-connecting.com; and
- any other domain or subdomain owned by or affiliated with (1) any Receivership Entity, (2) any individual defendant in this action, or (3) any other person acting on behalf of or otherwise affiliated with any Receivership Entity or individual defendant.

These domains are registered with GoDaddy, but contrary to the plain language of the TRO and Preliminary Injunctions, as excerpted below, that company has refused to transfer them to the Receiver. Instead, GoDaddy has informed the Receiver that it will only transfer the domains if it receives a Court order listing specific domain names and expressly directing GoDaddy to effectuate the transfers. Rather than filing a motion for an order to show cause or undertaking other punitive measures, the Receiver believes it most efficient and economical to seek the requested order from the Court.

BACKGROUND

Section XII of the Preliminary Injunctions directs the Receiver to “[t]ake exclusive custody, control, and possession of all Assets and Documents of, or in the possession, custody, or under the control of, the Stipulating Corporate Defendant and any non-party Receivership Entity, wherever situated.” Doc. 69 at 25; *see also* Doc. 78 at 24. The Court also directed the Receiver to

[o]btain, conserve, hold, manage, and prevent the loss
of all Documents of the Stipulating Corporate

Defendant and non-party Receivership Entities, and perform all acts necessary or advisable to preserve such Documents. The Receiver shall: divert mail; preserve all Documents of the Stipulating Corporate [Defendants] and non-party Receivership Entities that are accessible via electronic means (such as online access to financial accounts and access to electronic Documents held onsite or by Electronic Data Hosts) by changing usernames, passwords or other log-in credentials; take possession of all electronic Documents of the Stipulating Corporate Defendant and non-party Receivership Entities stored onsite or remotely; [and] take whatever steps necessary to preserve all such Documents; . . .

Doc. 69 at 26; *see also* Doc. 78 at 25-26. The Court's orders further direct the Receiver to "[t]ake all steps necessary to prevent the modification, destruction, or erasure of any web page or website registered to and operated, in whole or in part, by the Stipulating Corporate Defendant or any non-party Receivership Entity, . . ." Doc. 69 at 28; *see also* Doc. 78 at 28.

The Court also ordered that

any other person with possession, custody or control of property of, or records relating to, the Receivership Entities shall, upon notice of this Order by personal service or otherwise, fully cooperate with and assist the Receiver in taking and maintaining possession, custody, or control of the Assets and Documents of the Receivership Entities and immediately undertake all reasonable efforts to transfer or deliver to the Receiver possession, custody, and control of the following: . . .

F. All keys, codes, usernames, and passwords necessary to gain or to secure access to any Assets or Documents of or pertaining to the Receivership Entities, including access to their non-residential

business premises, means of communication, accounts, computer systems (onsite and remote), Electronic Data Hosts, or other property.

Doc. 69 at 31-32. These directives were first put into effect with the issuance of the TRO on July 11, 2024, and they continue through the date of this filing pursuant to the Preliminary Injunctions. *See* Docs. 13, 69, 78.

ARGUMENT

The Court's power to supervise an equity receivership and to determine the appropriate actions to be taken in the administration of the receivership is extremely broad. *S.E.C. v. Elliott*, 953 F.2d 1560, 1566 (11th Cir. 1992); *S.E.C. v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986). The Court's wide discretion derives from the inherent powers of an equity court to fashion relief. *Elliott*, 953 F.2d at 1566; *S.E.C. v. Safety Finance Service, Inc.*, 674 F.2d 368, 372 (5th Cir. 1982). A court imposing a receivership assumes custody and control of all assets and property of the receivership, and it has broad equitable authority to issue all orders necessary for the proper administration of the receivership estate. *See S.E.C. v. Credit Bancorp Ltd.*, 290 F.3d 80, 82-83 (2d Cir. 2002); *S.E.C. v. Wencke*, 622 F.2d 1363, 1370 (9th Cir. 1980). A court may enter such orders as may be appropriate and necessary for a receiver to fulfill his duty to preserve and maintain the property and funds within the receivership estate. *See, e.g., Official Comm. Of Unsecured Creditors of Worldcom, Inc. v. S.E.C.*, 467 F.3d 73, 81 (2d Cir. 2006). Any action taken by a district court in the

exercise of its discretion is subject to great deference by appellate courts. *See United States v. Branch Coal*, 390 F.2d 7, 10 (3d Cir. 1969). Such discretion is especially important considering that one of the ultimate purposes of a receiver's appointment is to provide a method of gathering, preserving, and ultimately liquidating assets to return funds to creditors. *See S.E.C. v. Safety Fin. Serv., Inc.*, 674 F.2d 368, 372 (5th Cir. 1982) (court overseeing equity receivership enjoys "wide discretionary power" related to its "concern for orderly administration") (citations omitted).

The Receiver and his counsel sent GoDaddy a copy of the TRO on July 11, 2024. The Receiver and his counsel have communicated with representatives of GoDaddy requesting that GoDaddy transfer control of the domains to the Receiver. GoDaddy has responded that it will not transfer control of the subject domains to the Receiver without a Court order expressly requiring the transfer, writing:

To the extent you seek to initiate the transfer of or otherwise secure access to the domain referenced in the correspondence below, you will need to provide a court order that (1) specifically identifies the domain registration(s) at issue; and (2) specifically directs GoDaddy to take a specific action with regard to the domain registration(s) at issue.

Exhibit 1, Email from GoDaddy.

The Receiver believes GoDaddy's position is wrong. The TRO and Preliminary Injunctions require GoDaddy to cooperate by transferring all

assets and documents of the Receivership Entities as well as all “keys, codes, user names and passwords” necessary to gain or to secure access to “means of communication, accounts, computer systems (onsite and remote), [and] Electronic Data Hosts.” *See, e.g.*, Doc. 69 at 31-32. To obtain control of the domains without further delay, however, the Receiver brings this motion to expressly require GoDaddy to transfer control of the domains to the Receiver. As a result of GoDaddy’s refusal to provide the Receiver administrative login access to the domains, he has been unable to redirect some of the associated websites to the receivership webpage, which posts copies of the TRO, Preliminary Injunctions, and other relevant information about the Receivership, and to complete other necessary tasks.¹

Local Rule 3.01(g) certification

Counsel representing the Plaintiff FTC and Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman informed undersigned counsel that their respective clients do not oppose the motion. Defendants Juan S. Rojas, who is named individually and as an officer of Start Connecting LLC and Start Connecting SAS, was contacted by email on September 24, 2024 for his position on the motion and has not responded to date. The Receiver will update this certification if Mr. Rojas responds, however,

¹ *See* www.usastudentdebtreliereceivership.com.

his former counsel has withdrawn, and Mr. Rojas has never been responsive to any communications from the Receiver.

CONCLUSION

For the foregoing reasons, the Receiver moves the Court to for an order expressly directing GoDaddy to transfer ownership and administrative control of the following domains and any and all related subdomains to the Receiver:

1. www.usastudentdebtrelief.com;
2. puertorico.usastudentdebtrelief.com;
3. forgiveness.usastudentdebtrelief.com;
4. studentloan.usastudentdebtrelief.com;
5. startconnecting.co;
6. intranet.startconnecting.co;
7. services.startconnecting.co;
8. zagegroup.com;
9. leads-4-us.com;
10. gginternationalconsultants.com;
11. start-connecting.com; and
12. any other domain or subdomain owned by or affiliated with (1) any Receivership Entity, (2) any individual defendant in this action, or (3) any other person acting on behalf of or otherwise affiliated with any Receivership Entity or individual defendant.

Respectfully Submitted,

s/ Matthew J. Mueller

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

Counsel for Receiver, Jared J. Perez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 30, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served all counsel of record. Defendants Juan S. Rojas and Start Connecting SAS were served by email.

s/ Matthew J. Mueller

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

Counsel for Receiver, Jared J. Perez

From: Courtdisputes@godaddy.com
To: Courtdisputes@godaddy.com; jared.perez@jaredperezlaw.com
Cc: [Matthew Mueller](mailto:Matthew.Mueller)
Subject: RE: Temporary Restraining Order in F.T.C. v. Start Connecting LLC et al., Case No. 8:24-cv-01626 (M.D. Fla.)
Date: Thursday, August 29, 2024 4:07:38 PM
Attachments: [image002.png](#)

Hello,

Thank you for your email.

To the extent you seek to initiate the transfer of or otherwise secure access to the domain referenced in the correspondence below, you will need to provide a court order that (1) specifically identifies the domain registration(s) at issue; and (2) specifically directs GoDaddy to take a specific action with regard to the domain registration(s) at issue.

Once you are able to provide a court order meeting these requirements, you will also need to advise our team of the specific GoDaddy account into which the domain registration(s) should be deposited by identifying the GoDaddy customer account number; for security purposes, this information does not need to be included in the court order. Please be advised that GoDaddy cannot transfer the domains directly into a third-party registrar account.

We understand that the requirements set forth above may require you to seek a new court order; unfortunately, we must insist that we receive such an order prior to effectuating the requested transfer.

Regards,
Court Disputes

From: Jared Perez <jared.perez@jaredperezlaw.com>
Sent: Monday, August 26, 2024 10:43 AM
To: compliancemgr@godaddy.com
Cc: Matthew Mueller <matt@fmhlegal.com>
Subject: Fwd: Temporary Restraining Order in F.T.C. v. Start Connecting LLC et al., Case No. 8:24-cv-01626 (M.D. Fla.)

You don't often get email from jared.perez@jaredperezlaw.com. [Learn why this is important](#)

Caution: This email is from an external sender. Please do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspicious emails to isitbad@.

Good afternoon, I am the Court-appointed Receiver for several entities in *FTC v. USA Student Debt Relief*, which is pending in the United States District Court for the Middle District of Florida. I never received a response from GoDaddy to the attached

correspondence, which was sent more than 6 weeks ago. I need to obtain control over several domains hosted by GoDaddy. Please contact me as soon as possible.

----- Forwarded message -----

From: **Hannah Yohnk** <hannah@fmhlegal.com>

Date: Thu, Jul 11, 2024 at 2:42 PM

Subject: Temporary Restraining Order in F.T.C. v. Start Connecting LLC et al., Case No. 8:24-cv-01626 (M.D. Fla.)

To: compliancemgr@godaddy.com <compliancemgr@godaddy.com>

Cc: Jared Perez <jared.perez@jaredperezlaw.com>, Matthew Mueller <matt@fmhlegal.com>, Angelo Troncoso (<atroncoso@chaseandassociates.com> <atroncoso@chaseandassociates.com>

Good afternoon:

Please see the attached correspondence from Jared J. Perez, as the Court-appointed Receiver for START CONNECTING LLC, d/b/a USA Student Debt Relief, and START CONNECTING SAS, d/b/a Start Connecting.



Hannah Yohnk | Fogarty Mueller Harris, PLLC

Paralegal

Office: (813) 549-4490

Fax: (813) 441-8288

Email: hannah@fmhlegal.com

501 E. Kennedy Boulevard, Suite 1030

Tampa, Florida 33602

www.fmhlegal.com

Confidentiality Statement: This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fogarty Mueller Harris by replying to this email and delete the original and reply emails. Thank you.