

**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 UNOPPOSED MOTION FOR AN ORDER  
DIRECTING HOSTINGER TO TRANSFER ACCOUNTS RELATED TO  
RECEIVERSHIP ENTITIES 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 Preliminary Injunctions 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 expressly directing Hostinger, UAB and/or Hostinger International Ltd. (collectively, “**Hostinger**”) to transfer control of the Virtual Private Server (server.startconnecting.co) created by defendant Juan Rojas on September 28, 2022, and identified in the Hostinger report attached as **Exhibit 1**, to the Receiver along with all associated login credentials, data, and documents.

In addition, to the extent Hostinger provides website hosting or other services in connection with any of the domains listed below, the Receiver also requests that the Court expressly order Hostinger to transfer control of the accounts corresponding to those services to the Receiver along with all associated login credentials, data, and documents:

- [usastudentdebtrelief.com](http://usastudentdebtrelief.com);
- [puertorico.usastudentdebtrelief.com](http://puertorico.usastudentdebtrelief.com);
- [forgiveness.usastudentdebtrelief.com](http://forgiveness.usastudentdebtrelief.com);
- [studentloan.usastudentdebtrelief.com](http://studentloan.usastudentdebtrelief.com);
- [start-connecting.com](http://start-connecting.com);
- [startconnecting.co](http://startconnecting.co);
- [intranet.startconnecting.co](http://intranet.startconnecting.co);
- [services.startconnecting.co](http://services.startconnecting.co);
- [zagegroup.com](http://zagegroup.com);
- [leads-4-us.com](http://leads-4-us.com);
- [gginternationalconsultants.com](http://gginternationalconsultants.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.

Either through the Virtual Private Server or other means, Hostinger provided both website hosting and email services for Receivership Entities. Hostinger is based in Lithuania and Cyprus. Both the FTC and the Receiver have engaged in extensive negotiations and communications with Hostinger since the inception of the Receivership, but the company has expressed concerns about its ability to transfer the pertinent account(s) to the Receiver or to otherwise afford the Receiver access to relevant information due to its

policies and procedures as well as various European data protection laws. The Receiver believes that he and Hostinger have finally reached an agreement to transfer the pertinent account(s) to the Receiver if Hostinger is provided with a Court order expressly directing it to effectuate the transfer(s). 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 Hostinger a copy of the TRO on July 11, 2024. The Receiver and his counsel have communicated with representatives of Hostinger’s compliance and legal departments, requesting that it transfer control of the Virtual Private Server and any other accounts or services associated with the Receivership Entities to the Receiver. As mentioned above, Hostinger has expressed concerns about its ability to transfer the pertinent account(s) to the Receiver or to otherwise afford the Receiver access to relevant information due to its policies and procedures as well as various European data protection laws.

The Receiver believes Hostinger’s position is wrong. The TRO and Preliminary Injunctions require Hostinger 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 Virtual Private Server and any other account(s) without further delay, however, the Receiver brings this motion to expressly require Hostinger to transfer control of the Virtual Private Server and any other account(s)

associated with Receivership Entities to the Receiver. The Receiver believes he has preserved much of the data maintained by Hostinger by other means, including gigabytes of emails associated with the Colombian call center, but to ensure all data is properly recovered and preserved, the Receiver requires access to the Virtual Private Server and any other accounts maintained by Hostinger in connection with Receivership Entities.

**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, 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 Hostinger to transfer control of the Virtual Private Server (server.startconnecting.co) created by defendant Juan Rojas on September 28,



2022, and identified in the Hostinger report attached as **Exhibit 1**, to the Receiver along with all associated login credentials, data, and documents.

In addition, to the extent Hostinger provides website hosting or other services in connection with any of the domains listed below, the Receiver also requests that the Court expressly order Hostinger to transfer control of the accounts corresponding to those services to the Receiver along with all associated login credentials, data, and documents:

- [usastudentdebtrelief.com](https://usastudentdebtrelief.com);
- [puertorico.usastudentdebtrelief.com](https://puertorico.usastudentdebtrelief.com);
- [forgiveness.usastudentdebtrelief.com](https://forgiveness.usastudentdebtrelief.com);
- [studentloan.usastudentdebtrelief.com](https://studentloan.usastudentdebtrelief.com);
- [start-connecting.com](https://start-connecting.com);
- [startconnecting.co](https://startconnecting.co);
- [intranet.startconnecting.co](https://intranet.startconnecting.co);
- [services.startconnecting.co](https://services.startconnecting.co);
- [zagegroup.com](https://zagegroup.com);
- [leads-4-us.com](https://leads-4-us.com);
- [gginternationalconsultants.com](https://gginternationalconsultants.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.

Respectfully Submitted,

**s/ Matthew J. Mueller**

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*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**

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*Counsel for Receiver, Jared J. Perez*



2024-07-25, Larnaca, Cyprus

**ANSWER TO THE REPORT RECEIVED**

We would like to report that our company, Hostinger International Ltd, is an administrator of free and paid web hosting provider www.hostinger.com on which the owner(-s) of virtual private server(-s) server.startconnecting.co is using paid VPS plan. Our paid service is being provided by the law of Cyprus.

Below we provide you all information that we have collected about website owner(s) (All times are GMT time zone):

**Name:** John Rojas  
**Email:** usdrads2021@gmail.com  
**Country:** US  
**Signup Date:** 2022-09-28 19:07:28

The account has been active since 2022-09-28 22:23:46.

Below we provide IP logs to control panel:

2023-10-12 22:37:57	CO	desktop	181.79.11.26	63108
2023-05-31 20:50:50	ES	desktop	139.47.81.4	
2023-05-30 16:14:30	ES	desktop	139.47.81.4	
2023-05-30 14:02:58	ES	desktop	139.47.81.4	
2023-05-29 16:56:54	ES	desktop	139.47.81.4	
2023-04-26 17:18:52	ES	desktop	139.47.83.210	
2023-03-06 00:29:38	CO	desktop	181.234.30.92	
2023-03-02 15:23:47	CO	desktop	186.113.219.107	
2023-02-17 15:02:18	CO	desktop	186.113.222.47	
2023-02-16 18:41:32	CO	desktop	186.113.222.47	
2023-02-09 22:27:16	CO	desktop	186.113.61.132	
2023-02-09 19:23:49	CO	desktop	186.113.61.132	
2023-02-03 16:33:50	CO	desktop	186.113.61.132	
2023-01-28 16:00:20	CO	desktop	179.32.203.79	
2023-01-27 21:36:37	CO	desktop	179.32.203.79	
2023-01-26 19:37:01	CO	desktop	186.119.79.170	
2023-01-20 22:35:50	CO	desktop	186.119.79.170	
2023-01-17 13:06:46	CO	desktop	186.119.79.170	
2022-10-27 13:17:34	CO	desktop	186.119.64.245	
2022-09-30 20:50:36	CO	desktop	179.32.211.36	
2022-09-28 21:50:43	CO	desktop	186.115.92.186	
2022-09-28 19:15:56	US	desktop	74.208.211.229	
2022-09-28 19:07:28	US	desktop	74.208.211.229	

Below we provide payment information:

<b>Date</b>	<b>Transaction ID</b>	<b>Gateway</b>	<b>Amount</b>	<b>Currency</b>
2024-05-09 19:02:12	H_10176617	PayPal CC	930.48	USD
2024-02-06 14:18:25	H_7375609	PayPal CC	85.92	USD
2023-05-30 14:01:16	H_1669340	PayPal CC	455.4	USD
2022-09-28 19:20:35	old_40015159	PayPal CC	131.88	USD

Should you need any further information, please do not hesitate and contact us directly at [abuse@hostinger.com](mailto:abuse@hostinger.com).

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