

**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-1626-KKM-AAS

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT  
AGAINST DEFENDANTS START CONNECTING SAS  
& JUAN S. ROJAS**

Plaintiff Federal Trade Commission (the "FTC"), pursuant to Federal  
Rule of Civil Procedure 55(a) and Middle District Local Rule 1.10(b), hereby

moves the Clerk of Court to enter a default against Defendants Start Connecting SAS and Juan S. Rojas. As detailed below and in the accompanying declaration of FTC counsel, these defendants have failed to plead or otherwise defend this action and, therefore, should be entered in default.

In support of its motion, the FTC states as follows:

1. On July 9, 2024, the FTC filed its Complaint for Permanent Injunction, Monetary Judgment, and Other Relief against Defendants Start Connecting, LLC, Start Connecting SAS, Douglas R. Goodman, Doris E. Gallon-Goodman, and Juan S. Rojas. (Doc. 1.)

2. As detailed in the attached declaration of FTC counsel, then-counsel for Defendants Start Connecting SAS and Juan S. Rojas (collectively, the “Colombia Defendants”) accepted service on their behalf at a Rule 16 Conference held on July 24, 2024. (Doc. 36.) On July 26, 2024, waivers of service were filed on the docket. (Docs. 39 & 40).

3. The Court initially set a deadline of August 16, 2024 for the Colombia Defendants to respond to the Complaint. (Doc. 36). After defense counsel indicated that they intended to seek leave to withdraw as to the

Colombia Defendants,<sup>1</sup> (Doc. 45), the Court extended the answer deadline to September 16, 2024, (Doc. 48).

4. As of the date of this filing, the Colombia Defendants have not submitted a responsive pleading or other filing.

5. The FTC now seeks entry of default as to the Colombia Defendants. The request is timely filed under Local Rule 1.10(b), as fewer than 28 days have passed since the September 16, 2024 answer deadline.

WHEREFORE, the FTC moves for entry of a Clerk's Default against Defendants Start Connecting SAS and Juan S. Rojas.

Respectfully submitted,

Dated: October 11, 2024

/s/ D'Laney Gielow  
Nathan Nash  
D'Laney Gielow  
Taylor Arana  
Federal Trade Commission  
Midwest Region  
230 S. Dearborn, Suite 3030  
Chicago, Illinois 60604  
Phone: (312) 960-5624  
E-mail: nnash@ftc.gov  
dgielow@ftc.gov  
tarana@ftc.gov

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

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<sup>1</sup> The Court granted defense counsel leave to withdraw as to the Colombia Defendants on August 29, 2024. Since that time, the Colombia Defendants have not retained new counsel, and Defendant Rojas has not responded to the FTC's repeated attempts to contact him.

**LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), I certify that I emailed Defendant Juan S. Rojas (in his individual capacity and as the sole representative of Defendant Start Connecting SAS) requesting his position on the relief requested in this motion on October 9, October 10, and October 11, 2024. He has not responded. I also consulted with the Court-appointed Receiver, who indicated that he has no objection to the FTC's request for entry of default.

/s/ D'Laney Gielow  
Attorney for Plaintiff FTC

**CERTIFICATE OF SERVICE**

I certify that, on or about October 11, 2024, I filed this Motion using the Court's electronic filing system, which will deliver a copy of this filing to all counsel of record. I further certify that I am causing a copy of this motion to be sent via FedEx and electronic mail to the following party:

Juan S. Rojas  
[jayrojas423@gmail.com](mailto:jayrojas423@gmail.com)  
Calle 16 N # 6N-21  
Oficina (401)  
Cali, VC 760045  
Colombia  
(*Pro Se* Defendant)

/s/ D'Laney Gielow  
Attorney for Plaintiff FTC

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JUAN S. ROJAS, individually and as an  
officer of START CONNECTING LLC  
and START CONNECTING SAS,

Defendants.

Case No. 8:24-cv-1626-KKM-AAS

**DECLARATION OF COUNSEL FOR PLAINTIFF  
FEDERAL TRADE COMMISSION IN SUPPORT OF  
MOTION FOR CLERK'S ENTRY OF DEFAULT**

I, D'Laney Gielow, certify and declare as follows:

1. I am an attorney employed by the Federal Trade Commission (“FTC”), and I am one of the attorneys representing the FTC in this case. My business address is 230 South Dearborn Street, Suite 3030, Chicago, Illinois, 60604. I am a member in good standing of the State of Illinois bar, and I am authorized to practice in this Court on behalf of the FTC pursuant to Local Rule 2.01(a). The following facts are within my personal knowledge, and if called as a witness, I could competently testify thereto.

2. On July 9, 2024, the FTC filed its Complaint in the United States District Court for the Middle District of Florida (Doc. 1) naming five defendants, among them Colombia-based corporation Start Connecting SAS and its principal, Colombian national Juan S. Rojas (collectively, the “Colombia Defendants”). The Clerk of Court issued summonses that same day. (Doc 7).

3. Following the issuance of the Temporary Restraining Order in this case on July 11, 2024, (Doc. 13), FTC staff sent copies of that Order along with the Complaint, summonses, and accompanying filings to the Colombia Defendants via email and FedEx. On July 16, 2024, Defendant Rojas acknowledged receipt of these documents via an email sent at 10:38 am CDT evincing a desire to cooperate with the FTC pending his retention of counsel. A copy of that email is attached hereto as **Gielow Attachment A**.

4. On July 22, 2024, attorneys from the law firm of Gunster, Yoakley & Stewart, P.A. filed appearances on behalf of all five Defendants. *See* (Docs. 22–25).

5. At a Rule 16 Conference held on July 24, 2024, attorney John A. Schifino indicated that Gunster would accept service on behalf of the Colombia Defendants. Based on that representation, the Court deemed service to have been effectuated and set an answer deadline of August 16, 2024. *See* (Doc. 36).

6. The Colombia Defendants also executed waivers of service pursuant to Federal Rule of Civil Procedure 4(d), which were filed on the docket on July 26, 2024. *See* (Docs. 39–40).

7. On August 15, 2024, defense counsel filed a motion indicating that they intended to seek leave to withdraw as to the Colombia Defendants and asking that the Colombia Defendants' answer deadline be extended to September 16, 2024. *See* (Doc. 45). The Court granted the requested extension. (Doc. 48).

8. Defense counsel moved to withdraw as counsel for the Colombia Defendants on August 27, 2024, (Doc. 55), and the Court granted leave to withdraw on August 29, 2024, (Doc. 56). In its Order, the Court noted that a corporation cannot represent itself and set a deadline of September 30, 2024 for Start Connecting SAS to retain counsel. *Id.*

9. The Colombia Defendants did not file a responsive pleading or other filing by the September 16, 2024 answer deadline or at any time thereafter.

10. The Colombia Defendants did not retain counsel by September 30, 2024 deadline set by the Court. The FTC's repeated attempts to contact Defendant Rojas via email seeking to confer about various matters under Local Rule 3.01(g) have been met with no response.

11. The facts above establish that the Colombia Defendants were properly notified of this action and failed to file any response, answer, or other pleading with the Clerk of Court by their September 16, 2024 answer deadline or at any time thereafter.

12. Defendant Rojas is not a minor, incompetent person, or person in military service or who is otherwise exempted from default judgment under the Soldiers' and Sailors' Civil Relief Act of 1940.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on: October 11, 2024

  
\_\_\_\_\_  
D'Laney Gielow



**From:** [Juan Rojas](#)  
**To:** [Gielow, D'Laney](#); [Doris Goodman](#)  
**Subject:** Re: Response Required: Temporary Restraining Order entered in Federal Trade Commission v. Start Connecting LLC, et al. (Civil Case No. 8:24-cv-1626 (M.D. Fla. July 11, 2024))  
**Date:** Tuesday, July 16, 2024 10:38:42 AM

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Good morning Gielow D'Laney,

After speaking with Doris yesterday I will fully cooperate with anything you need as soon as I get a chance to speak with an attorney as it is our right.

Thank you very much for the understanding and know that as soon as I get a chance to speak with an attorney I will gather all required docs as requested.

Cordially,

On Mon, Jul 15, 2024 at 3:36 PM Gielow, D'Laney <[dgielow@ftc.gov](mailto:dgielow@ftc.gov)> wrote:

Dear Mr. Rojas:

I'm writing regarding *FTC v. Start Connecting LLC, et al.*, Case No. 8:24-cv-1626. As you may have seen, Section XXIV of the Temporary Restraining Order emailed to you by FTC investigator Chris Carson on July 11, 2024 requires that the FTC effectuate personal service of the Order, underlying motion, and accompanying pleadings to you by this Thursday, July 17, 2024. I've re-attached a copy of that Order here for your convenience, along with additional copies of the complaint and summons.

Please contact us as soon as possible so that we can confer about the logistics of personal service. You can reach me via email at this address, or via phone at (202) 215-7074.

Best,

**D'Laney Gielow**

Attorney, Federal Trade Commission – Midwest Region

Office: (312) 960-5595 / Cell: (202) 215-7074

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**From:** Carson, Christine  
**Sent:** Thursday, July 11, 2024 2:48 PM  
**To:** [attorney@start-connecting.com](mailto:attorney@start-connecting.com); [jobs@startconnecting.co](mailto:jobs@startconnecting.co);  
[johnr@usastudentdebtrelief.com](mailto:johnr@usastudentdebtrelief.com)  
**Subject:** Email 1 - Temporary Restraining Order entered in Federal Trade Commission v. Start Connecting LLC, et al. (Civil Case No. 8:24-cv-1626 (M.D. Fla. July 11, 2024))

Mr. Rojas,

Please be advised that the Federal Trade Commission has filed the above-referenced civil case against Start Connecting LLC, *et al.* Attached to the next several emails, please find the following documents for service:

- (1) Temporary Restraining Order;
- (2) Complaint;
- (3) Summons;
- (4) Counsel Declaration;
- (5) Motion to seal;
- (6) Receiver recommendation; and
- (7) TRO motion and exhibits (indexes and three volumes of exhibits)

Chris Carson | Investigator

Federal Trade Commission | Midwest Region

230 South Dearborn Street, Suite 3030 | Chicago, IL 60604

312-960-5594 (direct) | 202-660-8903 (cell)

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**Juan Sebastian Rojas**  
**[Jayrojas423@gmail.com](mailto:Jayrojas423@gmail.com)**  
***Cel 3188234462***