

**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 LEAVE
TO FILE INTERIM REPORT EXCEEDING 25 PAGES**

On July 11, 2024, the Court appointed Jared J. Perez as 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 Connecting¹ (collectively, the “**Receivership**” or “**Receivership Entities**”), which Receivership was continued by orders dated September 11 and 19, 2024. *See* Doc. 13 (the “**TRO**”); *see also* Docs. 69 & 78 (the “**Preliminary Injunctions**”).

On July 23, 2024, the Receiver filed his Preliminary Status Report (Doc. 26) (the “**Preliminary Report**”), and on August 15, 2024, he filed his First Cash Accounting Report (Doc. 46) (the “**Accounting Report**”). Pursuant to the Preliminary Injunctions, the Receiver:

. . . shall periodically report to this Court regarding (1) the steps taken by the Receiver to implement the terms of this Order; (2) the value of all liquidated and unliquidated Assets of the Receivership Entities; (3) the sum of all liabilities of the Receivership Entities; (4) the steps the Receiver intends to take in the future to (a) prevent any diminution in the value of Assets of the Receivership Entities, (b) pursue receivership Assets from third parties, and (c) adjust the liabilities of the Receivership Entities, if appropriate; (5) whether the business of the Receivership Entities can be operated lawfully and profitably; and (6) any other matters that the Receiver believes should be brought to the Court’s attention.

Doc. 78 at 38.

¹ On August 15, 2024, the Receiver filed a Notice of Expansion of Receivership to Include Zage Group, LLC. Doc. 47. On August 27, 2024, the Receiver filed Notices of Expansion to include G&G International Consultants SAS and LeadsR4US, LLC. Docs. 53, 54.

The Receiver is in the process of drafting his Second Interim Report, which will cover the six-month period between the filing of the Preliminary Report and February 24, 2025. Due to the complexity of this case and the various efforts the Receiver has undertaken to fulfill his duties, the Receiver expects that the report will need to exceed the 25-page limit for motions under Local Rule 3.01(a). While (1) that rule does not expressly apply to “reports,” and (2) the Receiver has filed interim reports exceeding 25 pages in other cases² without first seeking leave from the supervising court, the Receiver nevertheless seeks leave of Court here, in an abundance of caution, given the recent spate of filings that fail to comply with the Local Rules and/or the Federal Rules of Civil Procedure. The Receiver makes this request in good faith because he reasonably believes the excess pages are needed to adequately inform the Court and other interested parties about the Receiver’s activities over the last six months.

With no opposition from the FTC or the participating defendants, the Receiver, through undersigned counsel, respectfully requests that he be allotted up to 40 pages (not counting a cover/caption page, a certificate of service, and certain exhibits) for his Second Interim Report.

² See e.g., www.oasisreceivership.com/receiver-reports/, interim reports filed in connection with *C.F.T.C. v. Oasis Intl. Group, Ltd. et al.*, Case No. 8:19-cv-886-T-33SPF (M.D. Fla.).

The additional 15 pages of discussion are needed given the six required topics and six month timeframe. In particular, the Receiver intends to expand on the Preliminary Report regarding whether the Receivership Entities could have been operated lawfully and profitably, which conclusion, importantly, also impacts the Court's direction and authorization in the Preliminary Injunctions "to wind up the business affairs" of the Receivership Entities. *See* Doc. 69 § XII.W. & Doc. 78 § XII.W.; *see also* TRO § XII.T. (directing and authorizing the Receiver to "[s]uspend business operations of the Receivership Entities if in the judgment of the Receiver such operations cannot be continued legally and profitably").

LOCAL RULE 3.01(G) CERTIFICATION

Neither the FTC nor the participating defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman object to the request for excess pages. The Receiver has not consulted with defendant Rojas, who is in default and who does not respond to the Receiver's communications in any event. The Receiver has also not consulted with Hamlet Garcia, Jr., who, as the Court has correctly and repeatedly noted, is not a party to this action.

CONCLUSION

For the foregoing reasons, the Receiver moves the Court, in an abundance of caution, for leave to file an interim report of no more than 40 pages, excluding the cover page, certificate of service, and exhibits.

Respectfully Submitted,

s/ Matthew J. Mueller

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on September 5, 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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