

**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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**NOTICE OF LEGAL THREATS BY HAMLET GARCIA JR.  
AGAINST THE RECEIVER, COURT, CLERK, AND COUNSEL**

On July 11, 2024, the Court appointed Jared J. Perez as receiver (the  
“**Receiver**” and the “**Receivership**”) 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**”); *see also* Docs. 69, 78 (the “**Preliminary Injunctions**”). Pursuant to Section XX(6) of the Preliminary Injunctions, the Receiver files this notice to advise the Court of legal threats by Hamlet Garcia Jr. (“**Garcia**”) against the Receiver, the Court, the Clerk of the Court, and the parties’ counsel.

On Saturday March 29, 2025, Garcia sent three emails (at least) threatening to sue almost everyone involved in this action “as a collective” for, among other things, (1) antitrust and RICO violations; (2) fraud, misrepresentations, and defamation; and (3) “Constitutional [v]iolations.” Garcia accuses the proposed defendants of membership in an “ABA-aligned legal cartel,” which is conspiring to deprive him of his rights and property. Copies of the emails are attached to this notice as **Exhibits A through C**.<sup>1</sup>

More specifically, the Receiver files this notice for five independent reasons. First, although Chief Judge Marcia Morales Howard, this District’s Local Rules Committee, and the Administrative Office of the United States Courts were copied on Exhibits B and C, the Court and the Clerk of the Court

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<sup>1</sup> On Sunday March 30, 2025, Garcia sent the Receiver and others five additional emails, frivolously claiming that portions of the Second Interim Report are incorrect and defamatory. Copies of those documents are attached as **Composite Exhibit D**.

were not. The Receiver believes the Court should be aware of this proposed activity so that it may take any steps it deems necessary and equitable.

Second, the Court has enjoined Garcia from filing any documents in this action “unless signed by a member of the Florida bar who is in good standing and eligible to practice before courts in the Middle District of Florida.” Doc. 156 at 3. Garcia appears to believe that he can circumvent the Court’s injunction by filing a separate lawsuit against the proposed defendants, but the Receiver believes that any such filing should be treated as an intentional, contemptuous violation of the Court’s order.

Third, although Exhibit A appears to invite a discussion, the Receiver has made his position clear, and all direct communications with Garcia have proven counterproductive. For example, in the Second Interim Report, the Receiver explained as follows:

Sections XVII of the Preliminary Injunctions prohibit a wide range of parties and nonparties “from taking action that would interfere with the exclusive jurisdiction of this Court over the Assets or Documents of the Receivership Entities, including [c]ommencing, prosecuting, or continuing a judicial, administrative, or other action or proceeding against the Receivership Entities, including the issuance or employment of process against the Receivership Entities....” *See* PI §§ XVII.B.; *see also id.* §§ XVI (prohibiting interference with the Receiver and the Receivership Entities).... If Garcia sues the Receiver and/or the Receivership Entities in a separate action, the Receiver will, pursuant to well-established precedent from other federal equity receiverships, seek appropriate relief from the Court, including enforcement of the Court’s injunction against ancillary litigation, dismissal of the

competing action, and the imposition of harsh sanctions against Garcia for a willful violation of the Preliminary Injunctions.

See Doc. 151 at 36-38. If Garcia proceeds with his threatened course of action, the Receiver will brief and file the relevant motions at the appropriate time.<sup>2</sup>

Fourth, neither the Receiver nor his undersigned counsel will charge the Receivership for drafting or submitting this notice, but if Garcia files a lawsuit that implicates the Receiver and/or the Receivership, the defense of that lawsuit will necessarily reduce the funds available for consumer restitution. As an appointed fiduciary, the Receiver believes the Court and the parties should be aware of the possible financial impact of Garcia's proposed actions.

Fifth, Garcia's behavior continues to be inscrutable and troubling. For example, Exhibits A and B are signed "Enkidu." According to [Wikipedia](#), "Enkidu ... was a legendary figure in ancient Mesopotamian mythology, wartime comrade and friend of Gilgamesh, king of Uruk."<sup>3</sup> Garcia then begins Exhibit C, "Following up on Enkidu's statement...", as if all three emails were not clearly drafted by Garcia himself. The Receiver cannot offer any further insight or even speculation but believes such references should be noted. If

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<sup>2</sup> In Exhibit A, Garcia refers to Student Solution Service as "my independent business." As explained in the Second Interim Report, that company willfully and contemptuously violated the TRO and Preliminary Injunctions. See Doc. 151 § I.B; see also *id.* at 12 fn. 7. The Receiver will also likely seek sanctions for this misconduct.

<sup>3</sup> See <https://en.wikipedia.org/wiki/Enkidu>, last accessed March 29, 2025. The emails from "Enkidu" were sent from [plugpresents@gmail.com](mailto:plugpresents@gmail.com), which identifies itself as "Plug App." Garcia has previously sent multiple communications from that email address. See, e.g., Doc. 151-22, Ex. U at 13 (purporting to be "CORE").

Garcia persists with his proposed course of action, the Receiver will seek appropriate relief from the Court, including but not limited to sanctions, for violations of the TRO and Preliminary Injunctions.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on March 30, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served all counsel of record.

**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](mailto:matt@fmhlegal.com)

*Counsel for Receiver, Jared J. Perez*

# **EXHIBIT A**

**From:** [Plug App](#)  
**To:** [Jared Perez](#); [Matthew Mueller](#)  
**Subject:** Final Notice – Intent to File Lawsuit Against Jared Perez on Monday, March 31, 2025  
**Date:** Saturday, March 29, 2025 5:31:54 PM

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Hi Jared & Matt

It appears there are no remaining barriers to proceeding with the lawsuit. Looking forward to reviewing your counterarguments.

That being said.....

This notice serves as a **formal warning** of my intent to file a **federal lawsuit** against you on **Monday, March 31, 2025**, for **fraudulent misrepresentation, defamation, deprivation of property without due process, and constitutional violations** arising from your actions as a **court-appointed receiver**.

## Legal Violations & Personal Liability

### 1. Fraudulent Misrepresentation & Defamation

- You **falsely labeled my independent business as a “successor entity”** on the receivership website, knowingly misrepresenting facts and causing reputational and financial harm.
- You engaged in **deceptive conduct** by mischaracterizing my legal status, undermining my rights, and misleading the public about my involvement.

### 2. Unlawful Deprivation of Property & Stakeholder Suppression

- You **wrongfully seized and controlled intellectual property, marketing materials, and client leads**, despite my established rights as a **stakeholder and creditor** in **USA Student Debt Relief**.
- You deliberately **ignored my claims, obstructed my rights, and concealed material facts** to advance a **preconceived narrative** that denied me rightful standing.

### 3. Immunity Challenges – No Shield from Liability

- **You are not entitled to absolute immunity.** Court-appointed receivers **do not enjoy judicial immunity** when acting beyond their scope, engaging in misconduct, or violating constitutional rights.
- **You cannot claim qualified immunity.** Your actions as a receiver, **functioning under federal authority**, subjected you to **direct liability** under **Bivens v. Six Unknown Named Agents, 403 U.S. 388 (1971)** for due process deprivations and unlawful takings.

- **Receivership does not shield intentional torts.** The **Federal Tort Claims Act (FTCA)** does not protect against **fraud, defamation, or unconstitutional takings**, all of which you knowingly committed.

### **Final Legal Warning**

This will serve as your **final opportunity** to rectify these violations before **Monday, March 31, 2025**, when formal litigation will be initiated. Any attempt to invoke improper immunity defenses will be **met with direct legal challenges**, and you will be **held personally accountable** for your actions.

**Sincerely,**

**Enkidu**



# **EXHIBIT B**

**From:** [Plug App](#)  
**To:** [Nash, Nathan](#); [Carson, Christine](#); [Gielow, D'Laney](#); [Matthew Mueller](#); [Jared Perez](#); [contact@usasdr-receivership.com](#); [FLMD\\_Local\\_Rules@fimd.uscourts.gov](#); [chambers\\_fimd\\_howard@fimd.uscourts.gov](#); [jadler\\_ftc.gov](#); [Schifino, John](#); [Arana, Taylor](#); [Goddeyne, Matthieu](#); [Pierson, Gregory](#); [daniel\\_mccormick@paed.uscourts.gov](#); [gmurphy@gunster.com](#); [AO\\_OJI@ao.uscourts.gov](#)  
**Subject:** Notice of Legal Action: Unveiling the ABA Cartel & Systemic Collusion  
**Date:** Saturday, March 29, 2025 5:49:05 PM

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This formal notice informs you that on April 1, 2025, a lawsuit will be filed exposing your coordinated effort to monopolize legal proceedings, obstruct competition, and misappropriate proprietary interests—all in furtherance of a cartelized scheme designed to consolidate control over both the legal and economic landscape.

### ***Cartelization & Monopolization of the Legal System***

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**FTC & Federal Actors:** Orchestrated an illegitimate receivership takeover, knowingly disregarding rightful stakeholder claims and suppressing competitive businesses through selective enforcement and legal distortions.

- 

**Judge & Clerk Elizabeth Warren:** Complicit in procedural corruption, employing bad-faith rulings to obstruct due process, silence rightful claims, and shield entrenched interests from scrutiny.

- 

**Jared Nash & Receivership Misconduct:** Seized and misappropriated assets outside of lawful authority, engaged in defamatory mischaracterization, and participated in an orchestrated effort to erase rightful claims to ownership and control.

- 

**John Schifino (Defense Counsel Misconduct):** Concealed, misappropriated, and weaponized legal strategy, akin to the unethical legal manipulation seen in high-profile cases such as Meek Mill's counsel betrayal by Joe Tacopina—a blatant violation of ethical obligations and a contributing factor to this conspiracy.

### **Legal Action & Implications**

The forthcoming lawsuit will establish:

- 1.

**Antitrust & RICO Violations** – Deliberate cartelization through legal monopolization, obstructing free market competition via fraudulent receivership practices and court-aided suppression.

2.

**Fraud, Misrepresentation & Defamation** – Intentional dissemination of false claims to neutralize opposition and discredit rightful stakeholders.

3.

**Constitutional Violations** – Denial of due process, suppression of fundamental rights, and collusion to obstruct justice for personal and institutional gain.

Your coordinated legal and economic conspiracy is fully documented, and the scope of this lawsuit will extend to interstate agencies and actors complicit in the broader scheme. Expect full exposure.

**Proceed accordingly, *Enkidu***

**Side Note:** This case is just the beginning. The deeper this unfolds, the clearer it becomes that this is part of a larger, coordinated effort within the ABA-aligned legal cartel—a system designed to shield itself from accountability. Interesting to see how BAR members will handle being sued as a collective, only to find themselves before a BAR member judge, represented by BAR member attorneys—a conflict of interest they can't escape. Dismissal attempts will only further expose the monopoly at play, making the case stronger with every move they make.

# **EXHIBIT C**

**From:** [Hamlet Garcia](#)  
**To:** [Plug App](#)  
**Cc:** [Nash, Nathan](#); [Carson, Christine](#); [Gielow, D'Laney](#); [Matthew Mueller](#); [Jared Perez](#); [contact@usasdr-receivership.com](#); [FLMD\\_Local\\_Rules@fimd.uscourts.gov](#); [chambers\\_fimd\\_howard@fimd.uscourts.gov](#); [jadler\\_ftc.gov](#); [Schifino, John](#); [Arana, Taylor](#); [Goddeyne, Matthieu](#); [Pierson, Gregory](#); [daniel\\_mccormick@paed.uscourts.gov](#); [gmurphy@gunster.com](#); [AO\\_OJI@ao.uscourts.gov](#)  
**Subject:** Re: Notice of Legal Action: Unveiling the ABA Cartel & Systemic Collusion  
**Date:** Saturday, March 29, 2025 6:14:46 PM

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Following up on Enkidu's statement—this extends far beyond receivership abuse—Bar Association members and affiliated entities have systematically monopolized legal access, manipulating procedural rules to exclude independent litigants and retaliate against challengers. Through group boycotts, anti-competitive agreements, inflated legal fees, and collusive suppression, they have entrenched a system where only bar-certified attorneys—licensed under the ABA's monopolistic structure—control legal advocacy. Courts, prosecutors, and defense attorneys operate within this cartel, leveraging their positions to obstruct non-member participation, misappropriate strategies, and financially cripple adversaries. Seeking treble damages under antitrust law for those denied access, subjected to exclusionary practices, or financially harmed—dismissal attempts will only reinforce the case.

{More information will be given in due time}

Have a great weekend everyone

On Sat, 29 Mar 2025 at 4:48 PM Plug App <[plugpresents@gmail.com](mailto:plugpresents@gmail.com)> wrote:

This formal notice informs you that on April 1, 2025, a lawsuit will be filed exposing your coordinated effort to monopolize legal proceedings, obstruct competition, and misappropriate proprietary interests—all in furtherance of a cartelized scheme designed to consolidate control over both the legal and economic landscape.

### ***Cartelization & Monopolization of the Legal System***

- 

**FTC & Federal Actors:** Orchestrated an illegitimate receivership takeover, knowingly disregarding rightful stakeholder claims and suppressing competitive businesses through selective enforcement and legal distortions.

- 

**Judge & Clerk Elizabeth Warren:** Complicit in procedural corruption, employing bad-faith rulings to obstruct due process, silence rightful claims, and shield entrenched interests from scrutiny.

- 

**Jared Nash & Receivership Misconduct:** Seized and misappropriated assets

outside of lawful authority, engaged in defamatory mischaracterization, and participated in an orchestrated effort to erase rightful claims to ownership and control.

- **John Schifino (Defense Counsel Misconduct):** Concealed, misappropriated, and weaponized legal strategy, akin to the unethical legal manipulation seen in high-profile cases such as Meek Mill's counsel betrayal by Joe Tacopina—a blatant violation of ethical obligations and a contributing factor to this conspiracy.

## Legal Action & Implications

The forthcoming lawsuit will establish:

1. **Antitrust & RICO Violations** – Deliberate cartelization through legal monopolization, obstructing free market competition via fraudulent receivership practices and court-aided suppression.
2. **Fraud, Misrepresentation & Defamation** – Intentional dissemination of false claims to neutralize opposition and discredit rightful stakeholders.
3. **Constitutional Violations** – Denial of due process, suppression of fundamental rights, and collusion to obstruct justice for personal and institutional gain.

Your coordinated legal and economic conspiracy is fully documented, and the scope of this lawsuit will extend to interstate agencies and actors complicit in the broader scheme. Expect full exposure.

**Proceed accordingly, Enkidu**

**Side Note:** This case is just the beginning. The deeper this unfolds, the clearer it becomes that this is part of a larger, coordinated effort within the ABA-aligned legal cartel—a system designed to shield itself from accountability. Interesting to see how BAR members will handle being sued as a collective, only to find themselves before a BAR member judge, represented by BAR member attorneys—a conflict of interest they can't escape. Dismissal attempts will only further expose the monopoly at play, making the case stronger with every move they make.

# **COMPOSITE EXHIBIT D**

**From:** [Hamlet Garcia](#)  
**To:** [Nash, Nathan](#); [Carson, Christine](#); [jadler.ftc.gov](#); [Tabor, April](#); [Office of Public Affairs](#); [Matthew Mueller](#); [Jared Perez](#)  
**Subject:** Clarification on Additional Defendants in FTC v. Start Connecting (2:24-CV-01626)  
**Date:** Sunday, March 30, 2025 11:16:14 AM

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The March 28 FTC press release confirms the addition of defendants in FTC v. Superior Servicing (2:24-CV-02163-GMN-MDC). Given this, I am seeking clarification on whether additional defendants will be named in FTC v. Start Connecting (2:24-CV-01626). My prior attempt to intervene as a defendant was denied, yet the agency continues expanding cases against others in similar matters. Excluding my entity despite prior acknowledgments of involvement raises due process concerns and suggests selective enforcement. Please confirm whether further additions are anticipated in Start Connecting and whether my entity remains under consideration.

Kind regards

<https://www.ftc.gov/news-events/news/press-releases/2025/03/ftc-names-additional-defendants-student-loan-debt-relief-case>



**From:** [Hamlet Garcia](#)  
**To:** [Jared Perez](#); [Matthew Mueller](#)  
**Subject:** Mischaracterization of Case History in Footnote 21 (Doc. 121)  
**Date:** Sunday, March 30, 2025 12:23:17 PM  
**Attachments:** [image.png](#)

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**Jared,**

In reviewing your status report for the upcoming litigation, I revisited Footnote 21 in **Doc. 121** mischaracterizes my litigation history by selectively citing prior dismissals while omitting critical procedural context.

- **Garcia v. Bucks County** was dismissed **on procedural grounds**, not merits. Presenting it as frivolous disregards the actual disposition.
- **Garcia v. Temple University** involved **evidence tampering and judicial misconduct**, facts that were provable but ignored. If such a dismissal qualifies as frivolous in your assessment, it reflects a misunderstanding of due process and judicial integrity.
- Several cited cases resulted from **bias-driven rulings** that suppressed material evidence, a fact that will be addressed when revisited.

A fair representation of case history requires **accuracy and context**, not selective citation designed to construct a misleading narrative. Misrepresenting procedural dismissals as substantive findings of frivolousness is, at best, careless—at worst, defamatory. Consider this a **formal objection** to the mischaracterization in Footnote 21.

**Regards,**  
Hamlet Garcia Jr.

A side note: These cases are nearly eight years old, and my legal acumen has evolved considerably. Cases I have successfully handled or contributed to—including Commonwealth v. Williams (King’s Bench Petition)—demonstrate that my approach today is vastly more advanced. If you believe citing decade-old dismissals gives you an advantage, that assumption will soon be disproven. The 20-year-old version of me is a mere fragment of the advocate I am today.

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<sup>21</sup> Garcia has a long history of frivolous and vexatious litigation. See *Garcia v. United States*, 2020 WL 4226471, at \*1 (E.D. Pa. July 23, 2020) (noting that “Garcia’s submission is nonsensical” and his claims are “frivolous”); Doc. 2, at 2-3, *Garcia v. County of Burlington*, Case No. 1:17-cv-12964-RMB-JS (D.N.J. Feb. 27, 2018) (noting the court’s attempt “to labor through the incomprehensible, and apparently overlapping, factual allegations contained in the filings”); *Garcia v. Bank of Am. Corp.*, 2017 WL 6520537, at \*2 n.3 (E.D. Pa. Dec. 20, 2017) (noting “Mr. Garcia’s red fingerprint and his belief that he is proceeding as a prosecutor”); *Garcia v. Temple Univ.*, 2017 WL 6327574 (E.D. Pa. Dec. 11, 2017) (dismissing three separate complaints by Garcia as “frivolous” and noting that Garcia was advised by the court that “any claims based on legal theories related to his alleged secured party status or sovereign citizen status are entirely frivolous”); *Garcia v. County of Bucks*, 2017 WL 4844293, at \*2 (E.D. Pa. Oct. 26, 2017) (describing Garcia’s complaint as “the epitome of legally frivolous”); *Garcia v. Bucks Cty. Justice Ctr.*, 2017 WL 4126349, at \*3 (E.D. Pa. Sept. 18, 2017) (“The Court will dismiss as frivolous all claims based on treaties, declarations, and resolutions predicated on [Garcia’s] Moorish heritage.”).

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**From:** [Hamlet Garcia](#)  
**To:** [Jared Perez](#); [Matthew Mueller](#)  
**Subject:** Re: Mischaracterization of Case History in Footnote 21 (Doc. 121)  
**Date:** Sunday, March 30, 2025 12:44:40 PM  
**Attachments:** [image.png](#)

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.... Allowing a sure victory to slip away due to lack of knowledge and persistence was a mistake—one I will not repeat.

On Sun, 30 Mar 2025 at 11:22 AM Hamlet Garcia <[hamletgarciajr@gmail.com](mailto:hamletgarciajr@gmail.com)> wrote:

**Jared,**

In reviewing your status report for the upcoming litigation, I revisited Footnote 21 in **Doc. 121** mischaracterizes my litigation history by selectively citing prior dismissals while omitting critical procedural context.

- **Garcia v. Bucks County** was dismissed **on procedural grounds**, not merits. Presenting it as frivolous disregards the actual disposition.
- **Garcia v. Temple University** involved **evidence tampering and judicial misconduct**, facts that were provable but ignored. If such a dismissal qualifies as frivolous in your assessment, it reflects a misunderstanding of due process and judicial integrity.
- Several cited cases resulted from **bias-driven rulings** that suppressed material evidence, a fact that will be addressed when revisited.

A fair representation of case history requires **accuracy and context**, not selective citation designed to construct a misleading narrative. Misrepresenting procedural dismissals as substantive findings of frivolousness is, at best, careless—at worst, defamatory. Consider this a **formal objection** to the mischaracterization in Footnote 21.

**Regards,**  
Hamlet Garcia Jr.

A side note: These cases are nearly eight years old, and my legal acumen has evolved considerably. Cases I have successfully handled or contributed to—including Commonwealth v. Williams (King's Bench Petition)—demonstrate that my approach today is vastly more advanced. If you believe citing decade-old dismissals gives you an advantage, that assumption will soon be disproven. The 20-year-old version of me is a mere fragment of the advocate I am today.

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<sup>21</sup> Garcia has a long history of frivolous and vexatious litigation. See *Garcia v. United States*, 2020 WL 4226471, at \*1 (E.D. Pa. July 23, 2020) (noting that “Garcia’s submission is nonsensical” and his claims are “frivolous”); Doc. 2, at 2-3, *Garcia v. County of Burlington*, Case No. 1:17-cv-12964-RMB-JS (D.N.J. Feb. 27, 2018) (noting the court’s attempt “to labor through the incomprehensible, and apparently overlapping, factual allegations contained in the filings”); *Garcia v. Bank of Am. Corp.*, 2017 WL 6520537, at \*2 n.3 (E.D. Pa. Dec. 20, 2017) (noting “Mr. Garcia’s red fingerprint and his belief that he is proceeding as a prosecutor”); *Garcia v. Temple Univ.*, 2017 WL 6327574 (E.D. Pa. Dec. 11, 2017) (dismissing three separate complaints by Garcia as “frivolous” and noting that Garcia was advised by the court that “any claims based on legal theories related to his alleged secured party status or sovereign citizen status are entirely frivolous”); *Garcia v. County of Bucks*, 2017 WL 4844293, at \*2 (E.D. Pa. Oct. 26, 2017) (describing Garcia’s complaint as “the epitome of legally frivolous”); *Garcia v. Bucks Cty. Justice Ctr.*, 2017 WL 4126349, at \*3 (E.D. Pa. Sept. 18, 2017) (“The Court will dismiss as frivolous all claims based on treaties, declarations, and resolutions predicated on [Garcia’s] Moorish heritage.”).

**From:** [Hamlet Garcia](#)  
**To:** [Jared Perez](#); [Matthew Mueller](#); [contact@usasdr-receivership.com](mailto:contact@usasdr-receivership.com)  
**Cc:** [Carson, Christine](#); [Nash, Nathan](#); [Arana, Taylor](#); [jadler\\_ftc.gov](mailto:jadler_ftc.gov)  
**Subject:** Formal Objection to Footnote 7 in Doc. 151  
**Date:** Sunday, March 30, 2025 1:08:01 PM  
**Attachments:** [image.png](#)

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Jared,

Your misrepresentation in Footnote 7 of Doc. 151 falsely frames conditional language as an admission. The quoted statement—"it may be that I have, in some manner, acted in contravention"—is **not** an admission but a conditional expression, making your assertion factually and legally unsound. Selectively distorting statements to fit a false narrative constitutes **bad faith litigation conduct** and raises serious ethical concerns.

This mischaracterization violates:

- **Duty of Candor (ABA Model Rule 3.3)** – Knowingly presenting misleading claims to the court.
- **FRCP 11(b)** – Making factual contentions without evidentiary support.
- **Due Process Rights** – Prejudicing judicial determinations through factual distortion.
- **Defamation & False Light** – Implying unlawful conduct without basis.
- **Professional Misconduct** – Repeated misrepresentations warrant ethical scrutiny.

As established in **United States v. Shaffer Equip. Co., 11 F.3d 450 (4th Cir. 1993)**, courts do not tolerate advocacy that undermines judicial integrity. Your conduct is noted for future proceedings.

Correct the record.

Regards,  
Hamlet Garcia Jr.

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<sup>7</sup> In December 2023, Hamlet Garcia Jr. accused both the Receiver and Doug Goodman (through defense counsel) of defamation based on the contents of the warning to consumers. See *infra* Comp. Ex. U. In related communications, Garcia claimed to be the "registrar of the domain name and creator of the *Student Solution Service* brand" (*id.* at 26), but he also admitted to violating the TRO and/or Preliminary Injunctions (*id.* at 37) ("It is with heavy heart I admit that, though no ill intent guided my course, it may be that I have, in some manner, acted in contravention to the Court's clear and just decree."). Garcia also asked the Receiver to report his "breach" to the Court *Id.* ("[A]s a steward of this Court, entrusted with oversight, [the Receiver] is bound to report such breach to the Almighty Judge, whose justice cannot abide concealment.").

**From:** [Hamlet Garcia](#)  
**To:** [Jared Perez](#); [Matthew Mueller](#)  
**Cc:** [Carson, Christine](#); [Nash, Nathan](#); [Gielow, D'Laney](#); [Arana, Taylor](#)  
**Subject:** Formal Objection – Misrepresentation of Facts in Doc. 151  
**Date:** Sunday, March 30, 2025 1:17:54 PM  
**Attachments:** [image.png](#)

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Jared,

Labeling me as a “purported former affiliate” is a deliberate mischaracterization. The record—**Doc. 151 at 380, 394, 395**—establishes my status as a **stakeholder and creditor**, which you have acknowledged yet failed to properly reflect. Suppressing material facts while selectively citing communications distorts the truth and undermines due process.

This misrepresentation raises serious concerns, including:

- **Bad faith litigation tactics** – Misstating known facts to alter judicial perception.
- **FRCP 11(b) violations** – Factual misstatements without evidentiary support.
- **Fraud on the court** – Concealing critical details to obstruct fair proceedings.
- **Due process interference** – Depriving a rightful creditor of recognition.

As the Supreme Court made clear in **Precision Instrument Mfg. Co. v. Auto. Maint. Mach. Co., 324 U.S. 806 (1945)**, courts do not tolerate deception that undermines judicial integrity. The record must be corrected immediately.

This serves as a formal objection and notice.

Hamlet Garcia Jr.

- Navigated myriad attempts by Hamlet Garcia Jr. (“Garcia”), a purported former affiliate of Start Connecting SAS, to disrupt the Receivership, including a baseless request for a “wellness check” by the Tampa Police Department on the Receiver (*see infra* § VI.A.);