

**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 SECOND AMENDED NOTICE OF RELATED ACTIONS

In accordance with Local Rule 1.07(c) and the Case Initiation Order, *see* (Doc. 11 at 1, 5), I certify that there are now two pending civil cases related to this one, both of which were filed by Hamlet Garcia, Jr., who is proceeding

pro se: (1) a case pending in the Pinellas County Small Claims Court that was filed on April 3, 2025, against the Court-appointed Receiver, Jared J. Perez, *see Garcia v. Perez*, Case No. 25-003322-SC (Fla. Pinellas Cty. Ct. filed Apr. 3, 2025); (Docs. 177-1, 177–2); and (2) a case pending in the U.S. District Court for the Middle District of Florida that was filed on April 7, 2025, against “Kathryn Kimball Mizzle [*sic*],” “Elizabeth Warren,” and “DOES 1-10.” Compl. at 1, Dkt. 1, *Garcia v. Mizelle*, Case No. 8:25-cv-857-TPB-NHA (M.D. Fla. filed Apr. 7, 2025).

1. Pinellas County Small Claims Case

As previously discussed in the FTC’s First Amended Notice of Related Action, Mr. Garcia’s small claims lawsuit claiming defamation from a post on the Receivership website is related to this case as an improper challenge to actions taken by the Receiver pursuant to his appointment by this Court, *see* (Docs. 13, 69, 78), an unlawful end-run around this Court’s filing restriction, *see* (Doc. 156), and a clear violation of multiple provisions of the preliminary injunction orders, *see* (Doc. 69 at 34–35); (Doc. 78 at 35–36). *See generally* (Doc. 177) (explaining that this Court may enjoin the small claims lawsuit).

2. Pending Middle District of Florida Case

Mr. Garcia’s new federal lawsuit against the Clerk of Court and the presiding judge seeks substantially the same relief as is sought by his pending Eleventh Circuit appeal, *FTC v. Garcia*, Case No. 25-10809 (11th

Cir.); *see also* (Doc. 168) (finding that the appeal “is not taken in good faith”). *Compare* (Doc. 165 at 2–3) (Mr. Garcia noticing appeal of, among other orders, the denial of his request for a disability accommodation and his filing restriction in this case), *with* Compl. at 10–11, Dkt. 1, *Garcia v. Mizelle*, Case No. 8:25-cv-857-TPB-NHA (M.D. Fla. Apr. 7, 2025) (Mr. Garcia’s new complaint asserting claims challenging the denial of his request for a disability accommodation and his filing restriction in this case). Mr. Garcia’s pending federal suit is therefore another facially improper effort to circumvent the Court’s filing restriction—as well as the orderly appellate process—and further harass individuals entitled to judicial immunity. *See Bolin v. Story*, 225 F.3d 1234, 1239–42 (11th Cir. 2000); *Hyland v. Kolhage*, 267 F. App’x 836, 842–43 (11th Cir. 2008).

Respectfully submitted,

Dated: April 8, 2025

/s/ Nathan H. Nash
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

I certify that, on or about April 8, 2025, I filed this notice 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 notice to be sent via email to the following *pro se* defaulted Defendant:

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/s/ Nathan H. Nash
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