

**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.

**NOTICE OF EXPANSION OF RECEIVERSHIP
TO INCLUDE ZAGE GROUP, LLC**

On July 11, 2024, the Court appointed the undersigned, Jared J. Perez,
as temporary 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**”). According to the TRO, “**Receivership Entities**’ means Corporate Defendants as well as any other entity that has conducted any business related to Defendants’ marketing of Debt Relief Services, including receipt of Assets derived from any activity that is the subject of the Complaint in this matter, and that the Receiver determines is controlled or owned by any Defendant.”¹ *Id.* at p. 9 ¶ M. “**Corporate Defendant(s)**’ means Start Connecting LLC, also d/b/a as USA Student Debt Relief, Start Connecting SAS, and each of their subsidiaries, affiliates, successors, and assigns.” *Id.* at p. 7 ¶ C.

Similarly, TRO Section XII.U. governs the expansion of the Receivership and provides as follows.

If the Receiver identifies a nonparty entity as a Receivership Entity, promptly notify the entity as well as the parties, and inform the entity that it can challenge the Receiver's determination by filing a motion with the Court. But the Receiver may delay providing such notice until the Receiver has established control of the nonparty entity and its Assets and records, if the Receiver determines that notice to the entity or the parties before the Receiver establishes control over the entity may result in the destruction of records, dissipation of Assets, or any other obstruction of the Receiver's control of the entity.

Id. § XII.U. In other words, a company qualifies as a Receivership Entity under the TRO if it (1) conducted any business related to Debt Relief Services or

¹ Capitalized terms not defined herein have the meanings ascribed to them in the TRO.

received Assets derived from the matters alleged in the Complaint and (2) is owned or controlled by any Defendant.

For the reasons set forth below, I have determined that Zage Group, LLC (“**Zage Group**”) qualifies as a Receivership Entity under the TRO. According to the Florida Department of State, defendant Doris Goodman is a manager of Zage Group, and defendant Douglas Goodman is the company’s President. A copy of pertinent corporate filings is attached as **Exhibit A**. In addition, Zage Group both conducted business related to Debt Relief Services and received Assets derived from the matters alleged in the Complaint. *See* Doc. 3-4 ¶¶ 21-22, 98, 101, 102. As such, Zage Group qualifies as a Receivership Entity under the TRO. If Douglas and/or Doris Goodman wish to challenge this determination, they must promptly file a motion with the Court pursuant to TRO Section XII.U.

Unless and until the Court grants any such motion, the parties must treat Zage Group as a Receivership Entity under the TRO and comply with all attendant requirements. Specifically, Douglas and Doris Goodman must immediately deliver all of Zage Group’s Assets and Documents to me and/or my counsel. Such Assets are otherwise frozen and, given the violations of the TRO to date by, at minimum, defendants Juan Rojas and Douglas Goodman (*see, e.g.*, Doc. 46), I will seek sanctions from the Court for any dissipation of such Assets. *See, e.g., F.T.C. v. NPB Advertising, Inc., et al.*, Case No. 8:14-cv-

1155-SDM-TGW (M.D. Fla.) (Doc. 261) (holding FTC defendant residing in the Bahamas in contempt for failing to provide financial and other information, issuing arrest warrant, and directing the U.S. Marshal to “locate and arrest [defendant] and return him in custody to answer for his contempt”) (Merryday, J.); *see also* Doc. 252 (order to show cause); Doc. 251 (receiver’s motion for order to show cause).

Dated this 15th day of August 2024.

Respectfully submitted,

s/ Jared J. Perez
Jared J. Perez, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 15, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served all counsel of record.

s/ Jared J. Perez _____

Jared J. Perez, Receiver

Jared.Perez@JaredPerezLaw.com

Tel: 727-641-6562

PO Box 60

Clearwater, FL 33757

(Receivership PO Box)

and

Matthew J. Mueller, FBN: 0047366

FOGARTY MUELLER HARRIS, PLLC

501 E. Kennedy Blvd.

Suite 1030

Tampa, Florida 33602

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Counsel for Receiver, Jared J. Perez

EXHIBIT A

2024 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

FILED

DOCUMENT# L09000004308

Apr 15, 2024

Entity Name: ZAGE GROUP, LLC

**Secretary of State
6726446177CC**

Current Principal Place of Business:

1412 PINE BAY DRIVE
SARASOTA, FL 34231

Current Mailing Address:

1412 PINE BAY DRIVE
SARASOTA, FL 34231 US

FEI Number: 26-4054764

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

ZAGE GROUP LLC
1412 PINE BAY DR
SARASOTA, FL 34231 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGR	Title	PRESIDENT
Name	GOODMAN, DORIS	Name	GOODMAN, DOUGLAS R
Address	1412 PINE BAY DRIVE	Address	1412 PINE BAY DRIVE
City-State-Zip:	SARASOTA FL 34231	City-State-Zip:	SARASOTA FL 34231

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: DORIS GOODMAN

MANAGER

04/15/2024

Electronic Signature of Signing Authorized Person(s) Detail

Date