

**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.

**RECEIVER'S FIRST APPLICATION FOR ORDER
AWARDING FEES, COSTS, AND REIMBURSEMENT OF COSTS
TO RECEIVER AND HIS PROFESSIONALS**

On July 11, 2024, the Court appointed Jared J. Perez as temporary 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 Connecting. *See* Doc. 13 (the “**TRO**”). By endorsed order dated July 24, 2024, the Court extended the TRO through September 23, 2024. Doc. 37. On September 11 and 19, 2024, the Court entered Preliminary Injunctions that appointed or reappointed Mr. Perez as the Receiver over Start Connecting LLC, Start Connecting SAS, Zage Group, LLC, G&G International Consultants SAS, and LEADSR4US, LLC (collectively, the “**Receivership**,” “**Receivership Entities**,” or “**Receivership Estate**”). *See* Docs. 69, 78 (the “**Preliminary Injunctions**”).

With no opposition from Plaintiff FTC or the participating defendants, the Receiver, through undersigned counsel, respectfully submits this first fee application to the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and his professionals. This application covers all fees and costs incurred from July 11, 2024, through August 30, 2024. As explained in more detail below, courts in the Middle District of Florida have granted similar fee applications involving the Receiver and his professionals on numerous prior occasions. *See, e.g., F.T.C. v. Nat’l Solutions, LLC et al.*, Case No. 6:11-cv-1131-ORL-22-GJK (M.D. Fla.) (final fee application); *F.T.C. v. Resort Solution Trust, Inc., et al.*, Case No. 8:13-cv-1329-T-33TBM (M.D. Fla.) (three fee applications); *F.T.C. v. NPB Advertising, Inc., et al.*, Case No. 8:14-cv-1155-SDM-TGW (M.D. Fla.) (10 fee applications); *S.E.C. v. A. Nadel et al.*, Case No. 8:09-cv-87-T-26TBM (M.D. Fla.) (24 fee applications); *S.E.C. v.*

Davison et al., Case No. 8:20-cv-325-MSS-AEP (M.D. Fla.) (18 fee applications);
C.F.T.C. v. Oasis Intl. Group, Ltd. et al., Case No. 8:19-cv-886-T-33SPF (M.D. Fla.) (21 fee applications).

Case Background and Status

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**”).¹ These documents contain comprehensive and detailed information regarding, among other things, the background and status of this case; the recovery of cash and noncash assets; certain financial information about Receivership Entities; and the Receiver’s proposed course of action regarding the Receivership Estate. The Receiver incorporates the Preliminary Report and the Accounting Report into this application and has attached a true and correct copy of each as **Exhibit 1** and **Exhibit 2**, respectively, for the Court’s convenience. The Preliminary Report and the Accounting Report address most of the activity that resulted in the fees and costs sought in this motion. Other highlights and developments since the filing of those documents include the following:

- Recovered a total of \$444,556.37 in cash from various banks and credit card processors;
- Created www.usastudentdebtrelietreceivership.com so that consumers and others can follow the progress of the case;

¹ The Receiver intends to file future interim reports on a quarterly basis.

- Created Contact@USASDR-Receivership.com to field questions and other communications from consumers;
- Used customer relationship management software to send an email to approximately 18,000 consumers informing them about the litigation and the Receivership website;
- Corresponded with over 100 consumers and provided instructions about how to identify their student loan servicer, as many individuals were misled to believe that USA Student Debt Relief was a loan servicer and that payments made to that company were loan payments as opposed to fees and other illegal charges;
- Expanded the Receivership to include Zage Group, LLC;
- Expanded the Receivership to include G&G International Consultants SAS;
- Expanded the Receivership to include LEADSR4US, LLC;
- Continued efforts to serve the TRO and/or Preliminary Injunctions on nonparty asset and document custodians;
- Continued efforts to access and preserve documents and accounts belonging to the Receivership Entities, given the complete and total lack of cooperation by defendant Juan Rojas and almost all employees of the Colombian call center; and
- Began investigations regarding Student Solution Service and affiliated entities, which appears to be a successor scam to USA Student Debt Relief, potentially operated by many of the same managers and telemarketers.

Professional Services Rendered and Costs Incurred

The TRO and the Preliminary Injunctions authorize the Receiver to “[c]hoose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities” (*see*

e.g. Doc. 69 § XII.F) and state that “[t]he Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this [o]rder and for the cost of actual out-of-pocket expenses incurred by them, from the [a]ssets now held by, in the possession or control of, or which may be received by” Receivership Entities, subject to approval by the Court (*id* § XVIII).

As authorized by TRO Section XII.F. (and similar provisions in the Preliminary Injunctions), the Receiver retained several professionals to assist in the execution of my mandate. First, the Receiver retained [Matt Mueller](#) of Fogarty Mueller Harris, PLLC (“**FMH**”) as my counsel. Mr. Mueller is a trial attorney and former prosecutor who has experience with receivership matters. See Doc. 5-2 (identifying and disclosing Mr. Mueller and his firm as potential counsel). Second, the Receiver retained [Angelo Troncoso](#) of Chase & Associates, Inc. (“**Chase**”) who has experience working with Mr. Mueller and served as an investigator for the Internal Revenue Service for almost 30 years. Mr. Troncoso is fluent in Spanish, which is important because the Receivership Entities’ call center was based in Cali, Colombia and historically targeted, among others, Spanish-speaking student loan borrowers in the United States and Puerto Rico. Third, the Receiver retained [E-Hounds, Inc.](#), the premier local computer forensics firm (“**E-Hounds**”), to assist with the collection and preservation of

electronically stored information (“ESI”). Forensic preservation and analysis of ESI is one of the most important tasks early in a receivership to ensure that vital evidence is not deleted or otherwise lost. This benefits all parties. Fourth and finally, the Receiver retained [PDR CPAs + Advisors](#) (“PDR”), a local tax and accounting firm with extensive receivership experience, to assist with financial matters. The Receiver has not previously sought reimbursement of any fees or costs in this matter.

As shown in the Preliminary Report and Accounting Report, these professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and recover additional assets, and analyze consumer information. These services are for the benefit of aggrieved consumers, creditors, and other interested parties.

I. The Receiver.

The Receiver requests the Court award him fees for services rendered and costs incurred through August 30, 2024, in the amounts of \$52,570.00 and \$2,065.00, respectively.² The standard hourly rate the Receiver charges clients in private litigation is \$400. However, the Receiver agreed, for purposes of his

² The vast majority of the reimbursable costs incurred and advanced by the Receiver were for a one-year lease on a Receivership Post Office Box and website development and hosting costs for www.usastudentdebtreliereceivership.com. See Ex. 3.

appointment as the Receiver, that his hourly rate would be reduced to \$350, representing a 12.5% discount off the standard hourly rate which he charges clients in comparable, non-receivership matters. This rate was set forth in the Receiver's submission to the FTC and the Court. *See* Doc. 5, Ex. B at p. 3 (“My standard rate for commercial litigation is \$400 per hour, which I discount to \$350 for receivership engagements.”); *see also* *C.F.T.C. v. Oasis Intl. Group, Ltd. et al.*, Case No. 8:19-cv-886-T-33SPF (M.D. Fla.) (“**Oasis Receivership**”) Doc. 87 (motion to retain professionals, including Mr. Perez as trial counsel); Doc. 98 (order granting motion); *S.E.C. v. Davison et al.*, Case No. 8:20-cv-325-MSS-AEP (M.D. Fla.) (“**EquiAlt Receivership**”) Doc. 639 at 1-2 (order granting motion to retain Mr. Perez as counsel); Doc. 1229 at 21 (“I find the hours expended and the hourly rate [*i.e.*, \$350] fair and reasonable given Mr. Perez's experience and the work he performed.”).

The Receiver commenced billable services immediately upon his appointment.³ For the time covered by this motion, the work of the Receiver focused on investigating the alleged misleading practices and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and analyzing consumer

³ In fact, the Receiver engaged in substantial pre-appointment efforts to assemble his team and to prepare to execute his mandate, but the Receiver has not billed for any time incurred before July 11, 2024 – *i.e.*, the date the Court entered the TRO.

information. These activities of the Receiver are set forth above and in the Preliminary Report and Accounting Report. *See* Exs. 1 & 2. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as **Exhibit 3**.

II. Fogarty Mueller Harris, PLLC

The Receiver requests the Court award FMH fees for professional services rendered and costs incurred through August 30, 2024, in the amounts of \$16,935.00 and \$547.97, respectively.⁴ The Receiver identified FMH as potential counsel in his submission to the FTC and the Court. *See* Doc. 5, Ex. B at p. 3. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, Mr. Mueller has agreed to reduce his standard rate from \$600 per hour to \$450 per hour, representing a discount of 25%. FMH began providing services immediately upon the appointment of the Receiver. The activities of FMH for the time covered by this motion are set forth in the Preliminary Report and Accounting Report. *See* Exs. 1 & 2. As discussed above, at this early stage of the Receivership, the work of the Receiver and FMH focused on investigating the alleged misleading practices and related activities, locating and taking control of Receivership assets, investigating and

⁴ The vast majority of the reimbursable costs incurred and advanced by the FMH were for domestic and international postage used to serve the TRO on dozens of document and asset custodians *See* Ex. 3.

pursuing additional assets for the Receivership, and analyzing consumer information. *See id.* A copy of the statement summarizing the services rendered and costs incurred by FMH through August 30, 2024, is attached as **Exhibit 4**.

III. PDR CPAs.

The Receiver requests the Court award PDR fees for professional services rendered and costs incurred through August 30, 2024, in the amount of \$227.50. PDR is an accounting firm that specializes in tax matters and has extensive experience with the tax treatment of settlement funds. PDR is assisting the Receiver with internal Receivership accounting, financial reporting, and tax preparation and filing. PDR started providing services for the Receivership on July 23, 2024. The Receiver identified PDR in his submission to the FTC and the Court. *See* Doc. 5, Ex. B at p. 3. Copies of the statements summarizing the services rendered and costs incurred by PDR for the pertinent period are attached as **Exhibit 5**.

IV. E-Hounds, Inc.

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred through August 30, 2024, in the amount of \$29,509.98. E-Hounds is a computer forensics firm that assists the Receiver in securing and analyzing electronic data. The Receiver identified E-Hounds in his submission to the FTC and the Court. *See* Doc. 5, Ex. B at p. 3. E-Hounds

started providing services for the Receivership on July 11, 2024. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 6**.

Notably, E-Hounds incurred the vast majority of its costs and fees in July 2024. Its invoice for August 2024 was only \$1,433.48. This is common because receivers and their professionals typically have little to no information about defendants' computer systems until after obtaining "immediate access" to relevant business premises following the receiver's appointment. *See, e.g.,* EquiAlt Receivership, Doc. 172 (awarding \$34,054.38 in first fee application). For example, the Receiver here did not know, among other things, (1) the number of computers and mobile devices at issue, (2) whether any security, encryption, or autodelete software was enabled, (3) whether the defendants used local or cloud-based servers, and (4) the number of websites and social media accounts to be preserved. As such, it was necessary to bring several technicians to the defendants' premises in Sarasota, Florida, on July 11, 2024. A log of all the devices and accounts identified and preserved by E-Hounds is attached as **Exhibit 7** for additional context. Now that these tasks have been accomplished, the Receiver expects that E-Hounds' invoices will be materially smaller in the future.

V. **Chase & Associates, Inc.**

The Receiver requests the Court award Chase and Mr. Troncoso fees for professional services rendered and costs incurred through August 30, 2024, in the amount of \$2,254.40. This amount includes \$2,700 in fees and \$94.40 in costs minus a 20% discount as an accommodation to the Receiver and to conserve Receivership resources. Mr. Troncoso started providing services to the Receiver shortly before his appointment in July 11, 2024. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 8**.

MEMORANDUM OF LAW

It is well-settled that this Court has the power to appoint a receiver and to award the receiver and those retained by him fees and costs for their services. *See, e.g., S.E.C. v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties); *Donovan v. Robbins*, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) (“[T]he receiver diligently and successfully discharged the responsibilities placed upon him by the Court and is entitled to reasonable compensation for his efforts.”); *S.E.C. v. Custable*, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); *S.E.C. v. Mobley*, 1317RCC, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 2000) (court awarded reasonable fees for the receiver and his professionals); *see also, e.g., Doc. 69*

§ XVIII. The determination of fees to be awarded is largely within the discretion of the trial court. *See Monaghan v. Hill*, 140 F.2d 31, 34 (9th Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and his Professionals, the Court should consider the circumstances surrounding the Receivership. *See Elliot*, 953 F.2d at 1577.

Here, because of the nature of this case, it is necessary for the Receiver to employ attorneys and accountants experienced and familiar with financial and consumer frauds, federal receiverships, banking, and credit card processing. Further, to perform the services required and achieve the results obtained to date, the skills and experience of the Receiver and the Professionals in the areas of fraud, consumer protection, computer and accounting forensics, and financial transactions are indispensable.

As discussed above, the Receiver and FMH have discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the attorneys and paralegals are at or below those charged by attorneys and paralegals of comparable skill from other law firms in the Middle District of Florida.

This case has been time-intensive for the Receiver and his Professionals because of the need to resolve many issues rapidly and efficiently. The attached exhibits detail the time, nature, and extent of the professional services rendered by the Receiver and his Professionals for the benefit of consumers,

creditors, and other interested parties. The Receiver anticipates that additional funds might be obtained through the Receiver's negotiations or litigation with third parties.

While the Receiver is sensitive to the need to conserve the Receivership Entities' assets, he believes the fees and costs expended to date were reasonable, necessary, and benefited the Receivership. Notably, the FTC has no objection to the relief sought in this motion. *Cf. Custable*, 1995 WL 117935 at *7 ("In securities law receiverships, the position of the SEC in regard to the awarding of fees will be given great weight.").

CONCLUSION

Under the TRO and Preliminary Injunctions, the Receiver, among other things, is authorized and empowered to engage professionals to assist him in carrying out his duties and obligations. Those orders further provide that he apply to the Court for authority to pay himself and his Professionals for services rendered and costs incurred. In exercising his duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interests of the Receivership.

WHEREFORE, Jared J. Perez, the Court-appointed Receiver, respectfully requests that this Court award the following sums and direct that payment be made from Receivership assets:

Jared J. Perez, Receiver	\$54,635.00
Fogarty Mueller Harris, PLLC	\$17,482.97
PDR CPAs	\$227.50
E-Hounds, Inc.	\$29,509.98
Chase & Associates	\$2,254.40

LOCAL RULE 3.01(g) CERTIFICATION

The Receiver has conferred with counsel for the FTC and is authorized to represent to the Court that the FTC does not oppose the relief requested in this application.

Undersigned counsel conferred with counsel for Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman and is authorized to represent to the Court that the participating defendants do not oppose the relief requested in this application.

Respectfully submitted,

s/ Matthew J. Mueller

Matthew J. Mueller, FBN: 0047366

FOGARTY MUELLER HARRIS, PLLC

501 E. Kennedy Blvd., Suite 1030

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Attorney for the Receiver, Jared J. Perez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 10, 2020, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court through the CM/ECF system, which served counsel of record. Defendants Juan S. Rojas and Start Connecting SAS were served by email.

s/ Matthew J. Mueller

Matthew J. Mueller, FBN: 0047366

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Fax: 813-682-1731

Email: matt@fmhlegal.com

Attorney for the Receiver, Jared J. Perez

RECEIVER'S CERTIFICATION

The Receiver has reviewed this First Fee Application for Order Awarding Fees, Costs, and Reimbursement of Costs to Receiver and His Professionals (the "**Application**").

To the best of the Receiver's knowledge, information, and belief formed after reasonable inquiry, the Application and all fees and expenses herein are true and accurate.

All fees contained in the Application are reasonable, necessary, and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

The Receiver has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay.

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Application were incurred in the best interests of the Receivership Estate.

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

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

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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 PRELIMINARY INTERIM REPORT

On July 11, 2024, the Court appointed the undersigned, Jared J. Perez,
as temporary receiver (the “**Receiver**”) over (1) START CONNECTING LLC,
d/b/a USA Student Debt Relief; (2) START CONNECTING SAS, d/b/a both

USA Student Debt Relief and Start Connecting; and (3) any other entity that has conducted any business related to the defendants' marketing of debt relief services, including the receipt of assets derived from any such business, that I determine is owned or controlled by any defendant (collectively, the "**Receivership Entities**"). *See generally* Doc. 13 (the "**TRO**").

Pursuant to Section XX of the TRO, the Court directed me to file a report "on or before the date set for a hearing on whether a Preliminary Injunction should issue" addressing six principal topics. The Court also scheduled a case management conference for July 24, 2024 at 9:30 a.m. *See* TRO § XXVI. While that conference is not a preliminary injunction hearing, I nevertheless believe it prudent to advise both the Court and the parties about the steps I have taken to implement the TRO and to gain control of the Receivership Entities so that any disputes can be addressed in a timely and efficient manner. To conserve resources, I have attempted to make this preliminary report succinct, despite the substantial efforts in which my retained professionals (*see infra* § I.A.; TRO § XII.F.) and I have engaged since the afternoon of July 11, 2024.

I. STEPS TAKEN TO IMPLEMENT THE TRO

First, Section XX(1) of the TRO directs me to identify the steps I have taken to implement its terms. The most relevant terms are set forth in Section XII (Duties and Authority of Receiver), Section XIII (Transfer of Receivership Property to Receiver), and Section XXI (Immediate Access to

Business Records and Assets). During the first 12 days of this Receivership (*i.e.*, July 11, 2024, through the filing of this report on July 23, 2024), my retained professionals and I have engaged in the following activities:

- Conducted an “immediate access to business records and assets” pursuant to Section XXI of the TRO at certain defendants’ home office in Sarasota, Florida;
- Served the TRO and related correspondence containing detailed compliance instructions on more than 60 individuals and entities associated with the defendants;
- Reviewed, negotiated, analyzed, or otherwise processed hundreds of communications in response to those service efforts, including requests for more information, statements of assets, and productions of responsive documents;
- Identified approximately \$300,000 in funds belonging to Receivership Entities, mostly reserve funds held by various credit card processors and their affiliates;
- Identified approximately \$1,000,000 in funds belonging to the individual defendants as well as various noncash assets;
- Sent additional correspondence with detailed instructions and requests for information to more than 50 individuals associated with the Receivership Entities’ call center in Cali, Colombia;
- Created forensic images of 23 sources of electronically stored information, including computers, smartphones, cloud-based accounts like Google Workspace, websites, and social media accounts used to promote the debt relief business, including Facebook, Instagram, YouTube, and Tik-Tok;
- Opened a mailing address (distinct from the Sarasota home office) dedicated to the Receivership Entities and redirected their domestic mail: PO Box 60, Clearwater, FL 33757.
- Begun efforts to open a Receivership bank account to take possession of the Receivership Entities’ funds; and

- Begun efforts to establish a Receivership website to keep customers and other interested parties apprised of developments in this litigation and other relevant matters.

Again, to identify any potential disputes while this Receivership is still in its infancy and before more funds are expended, certain of these mandated tasks are explained in more detail below.

A. Retention Of Professionals

As authorized by TRO Section XII.F., I have retained or am retaining several professionals to assist in the execution of my mandate. Specifically, I have retained [Matt Mueller](#) of Fogarty Mueller Harris, PLLC as my counsel.¹ Mr. Mueller is a trial attorney and former prosecutor who has experience with receivership matters. *See* Doc. 5-2 (identifying Mr. Mueller and his firm as potential counsel). [Angelo Troncoso](#) of Chase & Associates, Inc. has experience working with Mr. Mueller and served as an investigator for the Internal Revenue Service for almost 30 years. Mr. Troncoso is fluent in Spanish, which is important because the FTC alleges (and my observations have confirmed)

¹ Although I am an attorney admitted to practice before this Court, a receiver does not act as an advocate for a client but as an arm of the court that appointed him. *See, e.g., S.E.C. v. N. Am. Clearing, Inc.*, 2015 WL 13389926, at *3 (M.D. Fla. Jan. 12, 2015) (describing receiver as an officer of the court), *aff'd* 656 F. App'x 969 (11th Cir. 2016); *S.E.C. v. Nadel*, 2010 WL 146832, at *1 (M.D. Fla. Jan. 11, 2010) (same). As such, receivers typically engage their own counsel. For example, I have represented and still represent receiver Burton W. Wiand, also an attorney, in enforcement actions both concluded and pending before the United States District Court for the Middle District of Florida. *See, e.g., F.T.C. v. Nat'l Solutions, LLC et al.*, Case No. 6:11-cv-1131-ORL-22-GJK (M.D. Fla.); *F.T.C. v. Resort Solution Trust, Inc., et al.*, Case No. 8:13-cv-1329-T-33TBM (M.D. Fla.); *S.E.C. v. A. Nadel et al.*, Case No. 8:09-cv-87-T-26TBM (M.D. Fla.); *S.E.C. v. Davison et al.*, Case No. 8:20-cv-325-MSS-AEP (M.D. Fla.); *C.F.T.C. v. Oasis Intl. Group, Ltd. et al.*, Case No. 8:19-cv-886-T-33SPF (M.D. Fla.).

that the Receivership Entities' call center is based in Cali, Colombia and has historically targeted, among others, Spanish-speaking student loan borrowers in the United States and Puerto Rico. Finally, I have retained [E-Hounds, Inc.](#), the premier local computer forensics firm ("**E-Hounds**"), to assist with the collection and preservation of electronically stored information ("**ESI**"). Forensic preservation and analysis of ESI is one of the most important tasks early in a receivership to ensure that vital evidence is not deleted or otherwise lost. This benefits all parties. As explained below, these professionals have already proven invaluable to the execution of my Court-ordered mandate.²

B. Immediate Access to Business Records and Assets

On July 11, 2024 – mere hours after the Court entered the TRO and pursuant to Section XXI – my professionals and I gained “immediate access” to the records and assets located at the Receivership Entities' domestic business premises: 1412 Pine Bay Drive, Sarasota, FL 34231. That address is also the residence of defendants Douglas and Doris Goodman. They operate the Receivership Entities from a small room within their residence. I was accompanied by three deputies from the Sarasota County Sheriff's Office, Mr. Troncoso, and three forensic technicians from E-Hounds. Upon arrival, we encountered defendants Douglas and Doris Goodman. The Sheriff's deputies

² I am also in the process of retaining a local tax and accounting firm to assist with financial matters and will provide further details on that potential engagement in my next report.

served the Goodmans and the companies they represent with process and other documents.³ I identified myself as the Court-appointed Receiver and asked if we could enter the residence to further explain and discuss matters. The Goodmans acquiesced and invited those present into the premises.

Pursuant to Section XXI of the TRO, I asked the Goodmans for any “Documents, Assets, and hardware” used to conduct the business of the Receivership Entities. Guided by their responses and my directions, E-Hounds created forensic images of a laptop computer and smartphone belonging to Douglas Goodman, a desktop computer and smartphone belonging to Doris Goodman, and several cloud-based accounts.⁴

Douglas and Doris Goodman each maintained a desk in their home office. They claimed that Mr. Goodman typically operated the Receivership Entities from his desk, while Mrs. Goodman performed a business development job from her desk for an unrelated company. I reviewed the paper files in both locations and obtained and removed three boxes of documents from Mr. Goodman’s desk.

³ I expressly told the Goodmans that (1) the allegations against them were not criminal in nature, (2) the Sheriff’s deputies were present to serve process and to keep the peace pursuant to Section XXI.B. of the TRO, (3) the Sheriff’s deputies were not present to arrest anyone for the conduct underlying the allegations, (4) neither the Sheriff’s deputies nor anyone else was present to serve or execute any search warrant, and (5) my professionals and I would only identify and collect the documents required by the TRO.

⁴ In total, E-Hounds collected and preserved 23 sources of ESI but that number includes cloud-based accounts and social media. The individual defendants only identified four local devices, which were imaged as described above.

I explained the provisions of the TRO to the Goodmans (while also stating that, as the Receiver, I could not provide them with legal advice), but they claimed ignorance of many matters and referred me to defendant Juan Rojas (the son of Doris Goodman), who resides in Colombia. I asked Mrs. Goodman to contact Mr. Rojas, and she did so via WhatsApp. Mr. Rojas called Mrs. Goodman, and she allowed me to speak with him. I introduced myself, explained the asset freeze as well as the most important components of the TRO, and then turned the call over to Mr. Troncoso. Mr. Rojas confirmed to Mr. Troncoso that he had received a copy of the TRO, and they continued to communicate for at least 45 minutes. As required or contemplated by Sections XII.E., XIII.F., XV., and XXI.C., Mr. Rojas promised to provide Mr. Troncoso with important login credentials and other information about the Receivership Entities' Colombian operations. Over the following days, Mr. Troncoso attempted to contact Mr. Rojas by phone and email numerous times, but Mr. Rojas never responded. This and other of the individual defendants' failures to comply with the TRO are discussed below in Section VI of this preliminary report.

After completing the tasks described above over approximately three hours, my professionals and I left the premises, although the "immediate access" was only the beginning of our efforts to implement the TRO.

C. Notice To Nonparties, Implementation Of Asset Freeze, And Collection of Documents

While I was performing the “immediate access” to the Receivership Entities’ business premises in Sarasota along with my investigator and computer forensic professionals from E-Hounds, Mr. Mueller and his staff (primarily his paralegal to conserve resources) were drafting, customizing, and sending letters from me to dozens of different entities and individuals, providing specific instructions and attaching the TRO. Based on newly discovered evidence, we have continued to send additional letters to nonparties almost every day since the “immediate access.” From July 11, 2024, through the date of this preliminary report, we have received, analyzed, and organized hundreds of emails requesting more information, confirming implementation of the asset freeze, stating account balances, providing documents, and more.⁵ This work is ongoing.

Finally, we sent a letter by email to more than 50 individuals believed to be employees of Receivership Entities in Colombia instructing them to cease operations until further notice and to provide their personal contact

⁵ My professionals and I have coordinated with the FTC in these efforts, as that agency sent its own asset freeze and document preservation letters separate from those sent by me and my counsel. The nonparties’ responses to the letters have been erratic. Sometimes they respond to the FTC but not me; other times they respond to me but not the FTC. Sometimes they only respond to Mr. Mueller and/or his paralegal. Coordination and reconciliation of information is consistent with the TRO and also avoids wasting Receivership resources due to the duplication of efforts.

information (should the Receivership Entities' computer systems be frozen or disabled) as well as certain information about their role with the Receivership Entities, including their title, job description, manager(s), and compensation. To date, no employees have replied to my correspondence.

D. Lack Of Access To Colombian Operations And Employees

In consultation with the FTC, I determined not to attempt to physically seize control of the Receivership Entities' call center in Cali, Colombia for numerous reasons. Financially, sending a team to Colombia for an undetermined period of time would have been cost-prohibitive. This is not likely to be a large estate. Logistically, any such team could not afford to wait in Colombia for the Court to enter the TRO, and if the team delayed departure until after entry of that order, the element of surprise could have been lost, allowing the potential transfer of assets or destruction of data and thus defeating the purpose of the "immediate access" authorizations. I explored the use of local assets, but even under those circumstances, the professionals I consulted would have required assistance from locations outside Cali like Bogota or Brazil. And finally, from a security perspective, the TRO authorizes me to obtain the assistance of law enforcement (*see* TRO § XII.H.), but domestic law enforcement obviously cannot operate internationally, and the cooperation of local law enforcement in Cali, Colombia could not be assured.

Given these factors, I determined to implement the TRO with respect to the Colombian call center by freezing or severing its ties with the United States. As mentioned above, I sent a letter to all employees for which I had an email address, but to date, no one has responded. In addition, the individual defendants have obligations to repatriate assets and documents to the United States, but they have not complied with any of their repatriation obligations. *See* TRO § VI; *infra* § VI. Defendant Rojas initially promised cooperation during his telephone call with Mr. Troncoso, but he has since failed to respond to communications from both me and the investigator. In an email dated July 16, 2024, Mr. Rojas told the FTC that he would cooperate after he consults an attorney. He has now retained counsel, but in the meantime, many TRO deadlines have lapsed, and the potential for the dissipation of assets and spoliation of documents has only grown.

II. THE VALUE OF ALL LIQUIDATED AND UNLIQUIDATED ASSETS OF THE RECEIVERSHIP ENTITIES

Second, given the early stage of this Receivership and the individual defendants' lack of compliance to date with their obligations under the TRO, an accurate accounting of Receivership assets is not yet possible. *See* TRO § XX(2); *infra* § VI. As preliminary report, the cash identified in bank accounts belonging to Receivership Entities is limited. The cash identified in reserve accounts with credit card processors and their affiliates belonging to

Receivership Entities is more substantial. In total, I estimate that the Receivership Entities' estate might contain approximately \$300,000. The individual defendants, however, have substantial assets, including cash and securities worth more than \$1,000,000 and a mortgage-free house worth approximately \$1,797,600 (per Zillow). As of this report, none of assets mentioned above have been liquidated or otherwise transferred. They are frozen at their respective institutions and/or custodians. At the appropriate time, I will begin moving eligible funds into a Receivership bank account.

III. THE SUM OF ALL LIABILITIES OF RECEIVERSHIP ENTITIES

Third, at this point, I am unable to estimate the sum of all liabilities of Receivership Entities. *See* TRO § XX.(3). Most significantly, if the FTC prevails in this action, the Receivership Entities and the individual defendants could be jointly and severally liable for millions of dollars in penalties, restitution, and/or disgorgement. I am not aware of any other active litigation against the Receivership Entities. In 2023, the defendants settled state enforcement actions in California and Minnesota regarding the debt relief operation, and there could be ongoing obligations under those settlement agreements.

IV. THE STEPS THE RECEIVER INTENDS TO TAKE IN THE FUTURE

Fourth, given that this Receivership has existed for less than two weeks, there are numerous steps my professionals and I intend to take in the future, including (briefly and at minimum) the following:

- Ensure all assets and accounts are frozen;
- Continue to collect and preserve documents as necessary and cost-efficient;
- Review and analyze collected documents to trace additional, potential assets;
- Review and analyze collected documents to make a final determination prior to any preliminary injunction hearing whether the Receivership Entities can be operated lawfully and profitably;
- Transfer cash assets of Receivership Entities to a Receivership bank account;
- Establish a Receivership website, dedicated email address, and mailing list, if logistically feasible and affordable (this enterprise involved thousands of Student Borrowers and tens of thousands of other solicited parties) to provide information about the status of the Receivership;
- Attempt to further investigate operations in Colombia, given the silence of Juan Rojas and all of the Colombian employees as well as the Goodmans' purported lack of knowledge about almost anything occurring in that call center; and
- Investigate related nonparties and companies to determine whether the Receivership should be expanded.

Eventually, should the circumstances dictate, my counsel and I will evaluate whether the Receivership Entities have claims (independent of the FTC)

against any parties or nonparties who may have participated in or aided and abetted the allegedly unlawful debt forgiveness operation. No such actions will be brought without first obtaining the approval of this Court.

V. WHETHER THE BUSINESS OF THE RECEIVERSHIP ENTITIES CAN BE OPERATED LAWFULLY AND PROFITABLY

Fifth, the Court directed me to report “whether the business of the Receivership Entities can be operated lawfully and profitably.” TRO § XX.(5). The Court also directed and authorized me to “[s]uspend business operations of the Receivership Entities if in the judgment of the Receiver such operations cannot be continued legally and profitably.” *Id.* § XII.T. Because the Receivership has existed for less than two weeks, I have not made a final determination regarding the legality of the Receivership Entities’ operations, and for that reason, this preliminary report does not address that matter.

I have, however, suspended business operations (to the best of my ability, given the limitations discussed herein) because, among other reasons, the Receivership Entities cannot operate profitably at the moment. Specifically, the TRO generally prohibits me from collecting money from consumers who might be victims of deceptive acts or other practices. *See id.* § XII.D. (“But the Receiver shall not attempt to collect any amount from a consumer if the Receiver believes the consumer’s debt to the Receivership Entities has resulted from the deceptive acts or practices or other violations of law alleged in the

Complaint in this matter, without prior Court approval.”). I am not aware of any source of income for any Receivership Entity that does not arise from the debt relief practices alleged in the Complaint, and given the foregoing, I do not intend to move the Court for approval to collect money from consumers. Further, the TRO’s asset freeze would render any attempt to continue the Receivership Entities’ operations futile. My efforts to date have focused on the preservation of assets and documents. If and when the Court sets a preliminary injunction hearing, I will file a more conclusive and comprehensive report regarding the legality and profitability of the Receivership Entities’ business operations pursuant to TRO § XX.(5).

VI. OTHER MATTERS FOR THE COURT’S ATTENTION

Sixth, the TRO directs me to report “any other matters that the Receiver believes should be brought to the Court’s attention.” TRO § XX.6. It also authorizes me and my counsel to file a motion seeking to hold noncompliant parties and nonparties in contempt. *See id.* § XIII.F. (“In the event that any person or entity fails to deliver or transfer any Asset or Document, or otherwise fails to comply with any provision of this Section, the Receiver may file an Affidavit of Non-Compliance regarding the failure and a motion seeking compliance or a contempt citation.”). Contempt sanctions are likely premature at this point, but the parties and the Court should be aware of the defendants’ lapsed TRO deadlines and unfulfilled requirements:

- **Financial Disclosures:** The individual defendants have failed to submit any financial disclosures, including those attached as Exhibits A through C to the TRO. *See* TRO § V.
- **Foreign Asset Repatriation:** The individual defendants have taken no steps whatsoever to comply with Section VI of the TRO. No defendant has executed and returned Exhibit D. These requirements are crucial, given the existence of the Colombian call center, the use of at least three Colombian banks, and the employment of dozens of foreign employees.
- **Websites:** The individual defendants have failed to provide me with credentials for the Receivership Entities' websites. This has caused me, my professionals, and the FTC to expend unnecessary time and resources interacting with a website hosting company, which appears to be based in Lithuania and Cyprus but does not appear to be acting in good faith. *See, e.g.*, TRO § XII.I. (requiring the preservation of websites); *see also* §§ XII.E., XIII.F., and XV.
- **Social Media:** The individual defendants have failed to provide me with credentials for the Receivership Entities' social media accounts. This has required me to direct E-Hounds to preserve the public-facing pages, which expended Receivership time and resources. It has also required numerous conversations between me and/or Mr. Mueller, on the one hand, and teams of outside lawyers for Meta (*i.e.*, Facebook/Instagram) and Google. *See id.*
- **@usastudentdebtrelief.com:** This is the primary email domain used by the telemarketers in Colombia. I understand that it is hosted by the same company that hosts the Receivership websites. The individual defendants have not provided any credentials for this crucial email account. *See id.*
- **TRO Section XV. (Cooperation):** The individual defendants have failed to provide me with all "keys, codes, usernames, and passwords required to access any computers, electronic devices, mobile devices, other machines (onsite or remotely), and any cloud account (including specific method to access account) or electronic file in any medium." *See* TRO § XV.

- **TRO Section XIV.A. (Affiliated Accounts):** The individual defendants have failed to provide a list of affiliated assets and accounts as contemplated by Section XIV.A. of the TRO.
- **TRO Section XIV.B. (Employees and Agents):** The individual defendants have failed to provide a list of employees and other agents. One former attorney for the Receivership Entities, however, contacted me to identify herself and other former attorneys. That lawyer also provided certain information regarding the requirements of Section XIV.C.
- **TRO Section XXII. (Distribution of Order by Defendants):** The individual defendants have failed to provide the required sworn statement of distribution and related information.⁶

By email, Juan Rojas and Doris Goodman have promised to cooperate with the FTC once they retain counsel (although Mr. Rojas has never responded to my communications or those of Mr. Troncoso after their initial conversation on July 11, 2024). On July 22, 2024, several attorneys appeared in this matter on behalf of the defendants. *See* Docs. 22-25. Now that the individual defendants have retained counsel, I hope these deficiencies will be remedied as soon as possible.

⁶ *See* TRO § XXII. (“Defendants shall immediately provide a copy of this Order to each affiliate, Telemarketer, marketer, sales entity, successor, assign, member, officer, director, employee, agent, independent contractor, client, attorney, spouse, subsidiary, division, and representative of any Defendant, and shall, within ten (10) days from the date of entry of this Order, and provide Plaintiff and the Receiver with a sworn statement that this provision of the Order has been satisfied, which statement shall include the names, physical addresses, phone number, and email addresses of each such person or entity who received a copy of the Order.”).

CONCLUSION

As explained above, this report is preliminary. The first weeks of any receivership are extremely active, as the receiver and retained professionals work to effectuate the appointing court's mandate. I am filing this preliminary report now to inform the Court and the parties as to my activities to date and, generally, my future intentions. Should the Court or any party object to the activities described herein, my counsel and I can be contacted using the information below. I will provide a full response to TRO Section XX prior to any preliminary injunction hearing, if not sooner.

Dated this 23rd day of July 2024.

Respectfully submitted,

s/ Jared J. Perez

Jared J. Perez, Receiver

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on July 23, 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

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Email: matt@fmhlegal.com

Counsel for Receiver, Jared J. Perez

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 FIRST CASH ACCOUNTING REPORT

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

("SC LLC"); and (2) START CONNECTING SAS, d/b/a both USA Student Debt Relief and Start Connecting ("SC SAS" and, collectively with SC LLC, the "**Receivership Entities**"). See Doc. 13 (the "**TRO**"). Section XII.L. of the TRO directs me to "[m]ake an accounting, as soon as practicable, of the Assets and financial condition of the receivership and file the accounting with the Court and deliver copies thereof to all parties."¹ Pursuant to that directive, a cash accounting report of Receivership income and expenditures between July 11, 2024, and August 15, 2024, is attached as **Exhibit A**. This accounting report is subject to the following notes, explanations, and clarifications.

No Forensic Analysis of Receivership Entities. Exhibit A is the Receivership's cash accounting report. It is not the Receivership Entities' general ledger, balance sheet, or profit and loss statement. While I have access to certain QuickBooks data, I have not retained a forensic accountant or attempted to reconstruct or reconcile that data with bank statements and other primary source documents. I do not know whether the QuickBooks data is reliable or accurate, and at present, I do not believe this matter requires the expenditure of funds necessary to perform such forensic analysis.

Certain Funds Transferred in Violation of the Asset Freeze Have Been Recovered. Deputies from the Sarasota County Sheriff's Office and I

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

served defendant Douglas R. Goodman with the TRO on the afternoon of the July 11, 2024. Later that day and on the morning of July 12, 2024, in violation of the TRO and the asset freeze imposed by this Court, Mr. Goodman transferred \$86,000.00 to his personal account at Truist Bank (“**Truist**”) from two business accounts at Truist that belonged to SC LLC. Fortunately, Truist froze Mr. Goodman’s personal account before he could further transfer or otherwise dissipate the misappropriated funds. Mr. Goodman also violated the TRO and asset freeze by withdrawing \$7,000.00 in cash from various accounts, including at least two business accounts at Truist that belonged to SC LLC. Importantly, Mr. Goodman never disclosed these transfers to me or the FTC. When we eventually and independently learned of the transfers, the FTC and I took immediate steps to obtain confirmatory evidence from Truist, raised the issue with Mr. Goodman’s counsel, and demanded the return of the money. Mr. Goodman agreed to return the funds to the Receivership, and pursuant to that agreement, I instructed Truist to issue a check in the amount of \$86,000 to the me, as Receiver, from Mr. Goodman’s frozen personal account. My counsel also collected \$7,000 in cash from Mr. Goodman’s counsel. On August 14, 2024, I deposited those amounts into the Receivership account at ServisFirst Bank, and they are included in Exhibit A.

Other Funds Transferred in Violation of the Asset Freeze Have Not Yet Been Recovered. Defendant Juan Rojas was also served with a copy

of the TRO on the afternoon of July 11, 2024. He confirmed that fact during a telephone conversation with my investigator, Angelo Troncoso. He also told Mr. Troncoso that Receivership Entities maintained accounts at three Colombian banks – BBVA, Bancolombia, and Banco Davivienda – and he promised to provide me and Mr. Troncoso with login credentials for those accounts later that same day, as required by numerous provisions in the TRO. Since July 11, 2024 – more than a month ago – defendant Rojas has ignored numerous follow-up communications from me and Mr. Troncoso.

On August 2, 2024, counsel for defendant Rojas finally sent me login credentials for BBVA, where SC SAS maintains at least three accounts. Relevant bank statements show that defendant Rojas drained tens of millions of Colombian pesos from those BBVA accounts in the days following July 11, 2024. Through counsel, defendant Rojas has claimed that the misappropriated funds were used, at least in part, to pay employees of SC SAS, but even if true, that conduct nevertheless violated the TRO and asset freeze.

On August 15, 2024, counsel for the defendants submitted certain transaction records to me and the FTC that appear to have been obtained from BBVA. To the extent defendant Rojas expects those documents to excuse his violations of the TRO and asset freeze, his expectation is misplaced because they have the opposite effect. Specifically, the documents demonstrate that defendant Rojas paid himself at least 2,215,838 Colombian pesos after he was

served with the TRO, which is indefensible. Because counsel for the defendants intend to withdraw from their representation of defendant Rojas and SC SAS as soon as permitted by pertinent Local Rules (*see* Doc. 45), counsel claim to be unable to provide any additional context or to otherwise explain the documents. At present, the BBVA accounts are essentially empty, as they each contain a few hundred USD or less. The FTC and I will continue to pursue the recovery of the misappropriated funds, but they are not currently included within the Receivership or Exhibit A.

The Defendants Have Failed to Provide Credentials for Other Colombian Bank Accounts. Despite numerous requests and despite having been represented by counsel since at least July 22, 2024 (*i.e.*, more than three weeks), the defendants have failed to provide credentials for Bancolombia and Banco Davivienda (in addition to numerous other service providers). As such, any funds held by those banks are not included within the Receivership or Exhibit A. Given the violations of the TRO by, at minimum, defendants Rojas and Douglas Goodman, it is likely that any such funds have been misappropriated or otherwise dissipated. If that likelihood proves true, I will seek appropriate sanctions from the Court. *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* NPB Doc. 252 (order to show cause); NPB Doc. 251 (receiver’s motion for order to show cause).

Unpaid Professional Fees Not Included. The TRO directs me to file my first fee application within 60 days of my appointment. My professionals and I will file the appropriate motion at that time, but any disbursements will not be reflected in this cash accounting report until approved and paid.

Other Miscellaneous Assets Not Included. This report does not include any noncash assets, although I am not aware of any such material assets at this time. It also does not include any uncollected cash assets like those held in the names of related entities or various small accounts, but to the best of my current knowledge, those assets are *de minimis*. Finally, it does not include the individual defendants’ personal assets or any assets that may have been fraudulently transferred from the Receivership Entities to the individual defendants and others.

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

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Tel: 813-682-1730

Fax: 813-682-1731

Email: matt@fmhlegal.com

Counsel for Receiver, Jared J. Perez

EXHIBIT



INVOICE

Invoice # 32
 Date: 10/08/2024
 Due On: 11/07/2024

Law Office of Jared J. Perez

301 Druid Rd W
 Clearwater, Florida 33756

Start Connecting Receivership Estate
 301 Druid Rd W
 Clearwater, Florida 33756

00010-Start Connecting Receivership Estate

Receivership of Start Connecting, LLC et al.

Type	Date	Notes	Quantity	Rate	Total
Service	07/03/2024	NO CHARGE: Review updated draft of TRO (.9); draft template letter to financial institutions regarding freezing accounts and obtaining records (2.2); draft letter to employees regarding instructions for implementing TRO, communicating with Receiver, and other applicable duties (2.4); draft email to M. Mueller regarding implementation of immediate access (.2).	5.70	\$0.00	\$0.00
Service	07/06/2024	NO CHARGE: Continue to draft plan for immediate access and instructions to team per draft order appointing receiver (2.9).	2.90	\$0.00	\$0.00
Service	07/08/2024	NO CHARGE: Continue preparations for "immediate access" to premises, including work on template letters and other necessary documents as well as communications with team and FTC (4.6).	4.60	\$0.00	\$0.00
Service	07/09/2024	NO CHARGE: Continue preparations for "immediate access" to premises, including work on template letters and other necessary documents as well as communications with team and FTC (6.0).	6.00	\$0.00	\$0.00
Service	07/10/2024	NO CHARGE: Continue preparations for "immediate access" to premises, including work on template letters and other necessary documents as well as communications with team and FTC (5.5).	5.50	\$0.00	\$0.00
Service	07/11/2024	Conduct "immediate access" to premises, including interviews of defendants, efforts to freeze accounts and collect documents, review of paper documents and electronic devices on premises, and direct team regarding same (6.7).	6.70	\$350.00	\$2,345.00

Service	07/12/2024	Attention to post- "immediate access" tasks, including preservation of Instagram and other social media accounts and communications with team and nonparty custodians like Edward Jones, Magnify Payments, Nuso, American Express, Chase, BBVA, Itellas, Microsoft, Zage Group, G&G International Consultats, Oscar Rojas, Fidelity, Acuity CFO, EMS, and others (6.6); draft email to Juan Rojas regarding TRO and obligations thereunder (.3).	6.90	\$350.00	\$2,415.00
Service	07/14/2024	Review and analyze additional emails received in response to service of temporary restraining order and notice letters (1.1); draft prioritized list of tasks to be completed following immediate access and to continue implementation of the temporary restraining order (.9); communicate with bankers regarding establishment of receivership bank accounts (.1); communicate with PDR regarding establishment of employer identification number for receivership estate and retention for tax and accounting assistance (.2).	2.30	\$350.00	\$805.00
Service	07/15/2024	Generally undertake and implement follow-up tasks from immediate access to premises, including numerous email and telephone communications with recipients of notice letters and the temporary restraining order; receive, review, and analyze records produced by such recipients; direct and communicate with E-Hounds regarding ongoing and upcoming ESI preservation efforts; direct and communicate with counsel regarding follow-up activities and new notice letters to be sent; consider methods to redirect mail; and other related activities (4.3). Obtain access to customer relationship management software and review selected data and customer call recordings, including numerous telephone and email communications with company representatives (2.2); prepare for and participate in Zoom call with Gibson Dunn attorneys as counsel for Meta (Facebook and Instagram) regarding access to company social media accounts (.7); update call regarding implementation of temporary restraining order with FTC (1.2); continue to draft and revise prioritized list of tasks to be completed following immediate access to implement the temporary restraining order (.6); communicate with bankers regarding establishment of receivership bank accounts (.1); communicate with PDR regarding establishment of employer identification number for receivership estate and retention for tax and accounting assistance (.2).	8.30	\$350.00	\$2,905.00
Service	07/16/2024	Generally undertake and implement follow-up tasks from immediate access to premises, including attempts to access or communicate with Colombian banks and communications with or about FFB Bank, Itellas, VICIDial and others (2.4); communications with and about former counsel for Receivership Entities	4.00	\$350.00	\$1,400.00

		(.7); communicate with E-Hounds and plan various document review options (.9).			
Service	07/17/2024	Generally undertake and implement follow-up tasks from immediate access to premises, including numerous email and telephone communications with recipients of notice letters and TRO (e.g., PayArc, Fidelity, Luisa Rojas, Rex Direct, S. Ramos/Acquity CFO, Chase Bank, Itellas, TSYS, FFB Bank, etc.); receive, review, and analyze voluminous records produced by such recipients; direct and communicate with E-Hounds regarding ongoing and upcoming ESI preservation efforts; direct and communicate with counsel regarding follow-up activities and new notice letters to be sent; consider methods to redirect mail; and other related activities (5.2); continue to plan, draft, and revise prioritized list of tasks to be completed following immediate access to implement the temporary restraining order (.8); begin draft of preliminary report (5.9).	11.90	\$350.00	\$4,165.00
Service	07/18/2024	Review FTC's pleadings regarding service of process and the defendants' actual notice of the TRO (.3); review and analyze documents produced by call spoofing company Itellas in connection with purported debt relief operation (1.0); continue to correspond with nonparties and FTC regarding implementation of TRO, including review and analysis of incoming information and documents (1.4); review messages to and from Douglas Goodman regarding transfers of money to Colombia and other operational issues (.8); continue draft of preliminary report (2.5); review paper documents obtained from home office pursuant to TRO to identify any additional accounts or assets (1.5).	7.50	\$350.00	\$2,625.00
Service	07/19/2024	Communicate with E-Hounds regarding engagement (.2); direct H. Yohnk regarding filtering of tracking spreadsheet to identify unresponsive TRO recipients (.2); review filtered spreadsheet identifying approximately 30 entities, cross-reference Receiver's files and communications, and update priority follow-up list and notes (3.2); telephone conference with FTC to discuss TRO implementation, unresponsive entities, and coordination to prevent duplication of efforts, among other issues (1.2); telephone conference and email communications with potential developer of Receivership website (.3); follow-up with Sakari, obtain production, and review documents (.4); follow-up with Citibank regarding accounts and documents, including providing Citibank with detailed new information and telephone conference with the escalation line (.6); attempt to contact Acuity CFO by phone, website chat, and other methods to procure compliance with TRO (.3); review letter from Bancolumbia refusing to comply with TRO (.1); communicate with Baker McKenzie attorneys regarding obtaining documents from Google	6.80	\$350.00	\$2,380.00

		and taking control of YouTube channel (.3).			
Service	07/22/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including FFB, Intuit, Google, various Colombian banks, Meta, Citibank, Discover, Synovus Bank, and North American Bancard (4.6); Zoom conference with outside counsel for Meta (.3); telephone calls with FTC to discuss implementation of the TRO (.5); communicate with USPS to open Receivership PO Box and to divert Receivership mail from Sarasota office to PO Box (.9).	6.30	\$350.00	\$2,205.00
Expense	07/22/2024	USPS PO Box: Receivership PO Box rental cost for 6 months.	1.00	\$200.00	\$200.00
Service	07/23/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including Hostinger, Paynada, Mastercard, and Google (2.2); prepare for and participate in video call with outside counsel for Google (.7); revise list of needed login credentials and provide to M. Mueller to convey to defendants' counsel (.4); communicate with accountants regarding obtaining EIN number for Receivership estate (.2); communicate with bankers regarding opening Receivership bank account (.2); draft, finalize, and file preliminary report (4.5).	8.20	\$350.00	\$2,870.00
Service	07/24/2024	Prepare for and participate in case management hearing (2.0); perform initial review of documents produced by defendants (.3).	2.30	\$350.00	\$805.00
Service	07/25/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including Truist Bank, Mastercard, Paynada, Bancolumbia, Slack, Rex Direct, Hostinger, and BMO Harris (4.4); complete required documents and open Receivership bank account (.5); communicate with website development and hosting company regarding creation of Receivership website and related issues (.9); attempt to access CRM software by employee in Colombia (.4); attention to potential violation of asset freeze by Doug Goodman, including review of banking and accounting documents and numerous communications with Acuity CFO, FTC, and Truist Bank (1.6).	7.80	\$350.00	\$2,730.00
Expense	07/25/2024	Website Expense: Invoice 1110 - Website hosting and related services.	1.00	\$50.00	\$50.00
Expense	07/25/2024	Website Expense: Invoice 1111 - Receivership website creation and design.	1.00	\$1,500.00	\$1,500.00
Service	07/26/2024	Review and analyze productions from Truist Bank, Acuity CFO/QuickBooks, Chase, and others (2.3).	2.30	\$350.00	\$805.00

Service	07/27/2024	Analyze receivership financial situation and plan efforts to recover cash from banks and credit card processors (1.9).	1.90	\$350.00	\$665.00
Service	07/29/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including Truist Bank, FFB Bank, Hostinger, Disputifier, TriSource, and Electronic Payment Exchange (1.9); attention to potential violation of asset freeze by Doug Goodman, including review of banking and accounting documents and numerous communications with M. Mueller and the parties (1.1); participate in Zoom call with the FTC and counsel for the defendants regarding the asset freeze and other matters (.7); telephone conference with the FTC to discuss implementation of the TRO and related issues (.7); begin drafting letters to credit card processors to transfer funds to Receivership bank account (.5).	4.90	\$350.00	\$1,715.00
Service	07/30/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including Hostinger, Acuity CFO, Madera Digital, Microsoft, and Visa (1.5); draft and send letter to Truist Bank requesting the transfer of funds to the receivership bank account (.9); communicate with and direct E-Hounds regarding preservation of QuickBooks account (.3); communicate with accountant regarding next steps and potential tax issues (.2).	2.90	\$350.00	\$1,015.00
Service	07/31/2024	Draft and send letters to EMS, Cliq, North American Bancard, and FFB Bank requesting reserve funds be transferred to the receivership bank account (2.5); review and analyze financial statements submitted by Doris Goodman and Start Connecting LLC and direct counsel to serve the TRO and related correspondence on additional nonparties identified (1.0); consider issues relating to the expansion of the receivership (.7); consider privilege issues, including proposed review protocol and related communications (1.2).	5.40	\$350.00	\$1,890.00
Expense	08/01/2024	Website Expense: Invoice 1231 - Website hosting and related services.	1.00	\$90.00	\$90.00
Service	08/01/2024	Communicate with team and counsel for Google regarding ads account and removal of ads (.8); attention to Receivership website (.6); test credentials provided by defendants and plan preservation efforts (1.0).	2.40	\$350.00	\$840.00
Service	08/02/2024	Attention to Receivership website (.7); test credentials provided by defendants and plan preservation efforts (1.2); download and analyze BBVA statements (.5); draft and send letters to credit card processors requesting transfers of money (1.0).	3.40	\$350.00	\$1,190.00

Service	08/05/2024	Telephone conference with FTC to discuss defendants' violation of TRO in Colombia and related matters (.3).	0.30	\$350.00	\$105.00
Service	08/06/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including Truist Bank, Symetra, Cliq, Google, and Webpros/cPanel (1.2); research attorney-client privilege issue (.5); review communications regarding deficiencies in financial disclosures (.4); consider issues relating to expansion of Receivership and begin drafting letter to counsel (1.0); communicate with bankers regarding wires and checks to Receivership account (.2).	3.30	\$350.00	\$1,155.00
Service	08/07/2024	Prepare for (.3) and participate in Teams conference with all counsel regarding privilege and other related issues (.8); review first live version of Receivership website (.2); attention to banking matters (.2).	1.50	\$350.00	\$525.00
Service	08/08/2024	Attention to Receivership website (.5); download and analyze additional BBVA statements (.9); follow up on letters to credit card processors requesting transfers of money (.5).	1.90	\$350.00	\$665.00
Service	08/09/2024	Follow up on letters to credit card processors requesting transfers of money (1.0); communicate with National Data Solutions regarding plan to send mass email to consumers and begin draft of email (.8).	1.80	\$350.00	\$630.00
Service	08/12/2024	Draft motion memorializing agreements with Gunster regarding defense of Receivership Entities and begin Local Rule 3.01(g) process (4.7).	4.70	\$350.00	\$1,645.00
Service	08/13/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including JP Morgan Securities, Comenity Bank, VICI Dial, Pacific Life, North American Bancard, Chase Bank, Truist Bank, Repay Management Services, TextNow, and Deft Payment Systems (3.3); communicate with R. During regarding backup of usastudentdebtrelief.com (.2); draft Receiver's first accounting report (2.7); correspond with consumer who made contact through Receivership website (.2).	6.40	\$350.00	\$2,240.00
Service	08/14/2024	Attention to banking matters, including collection and deposit of \$7,000 cash and checks from Truist Bank (2.0); telephone call with counsel for cPanel (.3); telephone call with FTC regarding Colombian banks and other asset collection matters (.3); revise first cash accounting report (.6); draft notice of expansion of Receivership to include Zage Group, LLC (.9); draft text for notice email to consumers regarding Receivership and FTC action and send to CRM software provider (.9).	5.00	\$350.00	\$1,750.00

Service	08/15/2024	Communicate with counsel and revise motion memorializing agreements with Gunster regarding defense of Receivership Entities (.3); draft and file notice of expansion of Receivership to include Zage Group, LLC (1.0); consider expansion to Receivership to include other entities and communicate with counsel (1.1).	2.40	\$350.00	\$840.00
Service	08/16/2024	Communicate with counsel and revise motion memorializing agreements with Gunster regarding defense of Receivership Entities (.2); Zoom call with R. During to discuss update process for Receivership website (1.0).	1.20	\$350.00	\$420.00
Service	08/21/2024	Continue to investigate and analyze issues and to communicate with TRO recipients regarding assets and documents, including WorldPermit, Intuit, Acuity CFO, BBVA, cPanel, and Slack (1.9); communicate with M. Mueller regarding defendants' requests for documents and begin preparations for production (.4).	2.30	\$350.00	\$805.00
Service	08/22/2024	Attention to miscellaneous document collection and ESI issues (1.0).	1.00	\$350.00	\$350.00
Service	08/23/2024	Attention to miscellaneous document collection and ESI issues (1.0).	1.00	\$350.00	\$350.00
Service	08/26/2024	Analyze and reconcile various issues pertaining to the Receivership Entities' electronic documents, including potential unauthorized access of cPanel website from Colombian IP address and related call with E-Hounds, attempts to change or obtain passwords for numerous online accounts, test and evaluate credentials sent by counsel for the defendants, address problems caused by two-factor authentication, and related matters (5.9); communicate with consumers through Receivership website (.3); telephone call with former employee of Start Connecting SAS (.8).	7.00	\$350.00	\$2,450.00
Service	08/27/2024	Review and revise two drafts of stipulated preliminary injunction (1.8); telephone conference with FTC regarding preliminary injunction provisions affecting Receivership (.2); review and analyze documents and draft and file notice expanding Receivership to include G&G International Consultants SAS (2.0); review and analyze documents and draft and file notice expanding Receivership to include LEADSR4US, LLC (2.0); communicate with S. Osborn regarding email to consumers (.2).	6.20	\$350.00	\$2,170.00
Service	08/28/2024	Attention to issues related to G&G International Consultants (.8).	0.80	\$350.00	\$280.00
Service	08/29/2024	Attention to Receivership website issues, including drafting FAQ (.8); communicate with counsel for Slack (.2); communicate with counsel for National Data Systems regarding mass email to consumers (.2).	1.20	\$350.00	\$420.00

Expense	08/30/2024	Website Expense: Invoice 1231 - Website hosting and related services.	1.00	\$225.00	\$225.00
				Total	\$54,635.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due	
32	11/07/2024	\$54,635.00	\$0.00	\$54,635.00	
				Outstanding Balance	\$54,635.00
				Total Amount Outstanding	\$54,635.00

Please make all amounts payable to: Law Office of Jared J. Perez

Please pay within 30 days.

Law Office of Jared J. Perez

301 Druid Rd W
Clearwater, Florida 33756

INVOICE

Invoice # 32
Date: 10/08/2024
Due On: 11/07/2024



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.

EXHIBIT

Fogarty Mueller Harris, PLLC
 501 E. Kennedy Blvd.
 Suite 1030
 Tampa, FL 33602
 United States
 (813) 549-4490



Jared Perez

Balance \$17,482.97
Invoice # 03346
Invoice Date September 4, 2024
Payment Terms Due on Receipt
Due Date September 04, 2024

Perez, Jared -- Receiver (00647-24)

For services rendered between
 July 01, 2024 and August 31, 2024

Securely pay online



<https://fogarty-law-llc.mycase.com/xcakkpng>

Time Entries

DATE	EE	ACTIVITY	DESCRIPTION	RATE	HOURS	LINE TOTAL
07/08/2024	HY	Conference Call	Zoom meeting with J. Perez, A. Sharp, & R. Rohr to discuss logistics.	\$175.00	0.6	\$105.00
07/08/2024	HY	Review and Analyze	Review FTC provided financial account contact information; Research financial accounts and compile and verify contact information.	\$175.00	3.4	\$595.00
07/09/2024	MJM	Conference	Teleconference with J. Perez re: initial steps.	\$450.00	0.2	\$90.00
07/09/2024	HY	Research	Continue researching and verifying contact information for financial institutions; Revise letter to financial institutions to prepare for mail merge; Prepare spreadsheet of contacts for mail merge.	\$175.00	3.2	\$560.00
07/10/2024	MJM	Conference	Teleconference with H. Yohnk to discuss preparation of bank letters and related matters (0.4); email correspondence with H. Yohnk and D. Tinnirello re: same (0.1).	\$450.00	0.5	\$225.00
07/10/2024	HY	Document Preparation	Prepare Letters to Financial Institutions; Emails w J. Perez re same; Revise letters.	\$175.00	1.7	\$297.50
07/10/2024	HY	Conference Call	Call with M. Mueller re receivership and letters.	\$175.00	0.4	\$70.00
07/11/2024	HY	Review and Revise	Finalize receivership letters.	\$175.00	1.0	\$175.00
07/11/2024	HY	Correspondence	Email and fax receivership letters.	\$175.00	2.0	\$350.00
07/11/2024	HY	Time and Attention	Prepare and update response spreadsheet.	\$175.00	1.5	\$262.50
07/11/2024	HY	Correspondence	Email instructions to D. Tinnirello; Call with D. Tinnirello re same	\$175.00	0.6	\$105.00
07/11/2024	HY	Research	Research shipping methods and customs forms for Colombia	\$175.00	0.5	\$87.50

07/11/2024	HY	Correspondence	Phone call with J. Perez re receivership.	\$175.00	0.1	\$17.50
07/11/2024	MJM	Conference	Teleconference and emails with H. Yohnk to coordinate TRO notice letters.	\$450.00	0.3	\$135.00
07/12/2024	HY	Conference Call	Call with JPMorgan Chase re Asset Freeze status.	\$175.00	0.4	\$70.00
07/12/2024	HY	Correspondence	Phone call with J. Varrone at Edward Jones; Follow up email re same.	\$175.00	0.3	\$52.50
07/12/2024	HY	Correspondence	Emails with J. Perez re various financial institutions.	\$175.00	0.6	\$105.00
07/12/2024	HY	Time and Attention	Review read receipts and responses from letters emailed on 7/11; Update spreadsheet regarding responses	\$175.00	3.0	\$525.00
07/12/2024	HY	Document Preparation	Research Edward Jones contact information; Prepare and send Edward Jones Receivership Letter	\$175.00	0.5	\$87.50
07/12/2024	HY	Conference Call	Call with D. Tinnirello re updates to mailing list.	\$175.00	0.2	\$35.00
07/12/2024	HY	Document Preparation	Prepare spreadsheet of account numbers and balances.	\$175.00	0.2	\$35.00
07/12/2024	HY	Correspondence	Respond to multiple receivership letter responses.	\$175.00	0.4	\$70.00
07/12/2024	MJM	Time and Attention	Teleconference with J. Perez (0.2); email correspondence with H. Yohnk re: update on task list (0.2).	\$450.00	0.4	\$180.00
07/12/2024	HY	Time and Attention	Research contact information for Electronic Merchant System; Email letter to EMS; Back and forth emails with EMS.	\$175.00	0.8	\$140.00
07/15/2024	MJM	Correspondence	Email correspondence with D. Feinstein, counsel for Meta.	\$450.00	0.2	\$90.00
07/15/2024	MJM	Conference	Teleconference with J. Perez to prep for call with Meta (0.1); zoom call with counsel for Meta (0.3); teleconference with B. Schmidt (Synchrony) leaving voicemail (0.1).	\$450.00	0.5	\$225.00
07/15/2024	MJM	Conference Call	Zoom call with J. Perez and counsel for FTC.	\$450.00	1.0	\$450.00
07/15/2024	HY	Time and Attention	Review and process responses to TRO; Update spreadsheets.	\$175.00	2.4	\$420.00
07/15/2024	HY	Document Preparation	Prepare additional bank letters with TRO.	\$175.00	0.3	\$52.50
07/16/2024	HY	Document Preparation	Research Colombian banks for addresses; Revise letters to two Colombian banks; Prepare letter to Paynada; Email letters.	\$175.00	1.1	\$192.50
07/16/2024	MJM	Conference	Teleconference with B. Schmidt from Synchrony Bank (0.1); confer with H. Yohnk re: same (0.1).	\$450.00	0.2	\$90.00
07/16/2024	HY	Document Preparation	Research contact information for Intuit; Prepare letter to Synchrony Bank and Intuit; Send letters to Synchrony and Intuit.	\$175.00	0.4	\$70.00
07/17/2024	MJM	Correspondence	Email correspondence with P. Laffey, Global Payments.	\$450.00	0.1	\$45.00
07/17/2024	HY	Time and Attention	Review incoming responses to TRO; Save statements and emails to network; Update response tracker spreadsheet; Update account balance spreadsheet.	\$175.00	0.9	\$157.50
07/17/2024	HY	Correspondence	Email TRO to Bancolombia.	\$175.00	0.1	\$17.50

07/18/2024	HY	Time and Attention	Review responses to TRO; Update response spreadsheet and account balance spreadsheet.	\$175.00	2.1	\$367.50
07/19/2024	HY	Time and Attention	Review TRO responses; Prepare TRO follow-up list.	\$175.00	1.3	\$227.50
07/19/2024	HY	Time and Attention	Revise TRO response spreadsheet; Revise account balance spreadsheet.	\$175.00	0.5	\$87.50
07/22/2024	MJM	Conference	Teleconference with Receiver J. Perez.	\$450.00	0.2	\$90.00
07/22/2024	MJM	Review	Review order appointing receiver, prepare for status conference.	\$450.00	0.5	\$225.00
07/22/2024	HY	Time and Attention	Review new TRO responses; Revise response spreadsheet; Research contact information and prepare letters to Synovus & North American Bancard; Update account balance spreadsheet	\$175.00	6.0	\$1,050.00
07/22/2024	MJM	Meeting	Teams meeting with J. Perez and counsel for Meta.	\$450.00	0.4	\$180.00
07/23/2024	MJM	Review and Revise	Review and revise Receiver preliminary report.	\$450.00	0.5	\$225.00
07/23/2024	MJM	Conference	Teleconferences with Receiver J. Perez re: status conference and related matters.	\$450.00	0.2	\$90.00
07/23/2024	HY	Time and Attention	Review new TRO responses; Revise Response Spreadsheet; Revise Account Balance Spreadsheet	\$175.00	6.3	\$1,102.50
07/23/2024	HY	Time and Attention	Download new pleadings	\$175.00	0.3	\$52.50
07/23/2024	MJM	Correspondence	Draft email to defendants' counsel re: login and admin credentials.	\$450.00	0.5	\$225.00
07/24/2024	MJM	Court Hearing	Attend status conference (2.2) and prepare for same (0.3); teleconference with Receiver J. Perez (0.2).	\$450.00	2.7	\$1,215.00
07/25/2024	HY	Correspondence	Prepare and send TRO letter to Slack.	\$175.00	0.3	\$52.50
07/26/2024	MJM	Conference	Teleconference with Receiver J. Perez re: requests from defense counsel (0.2); draft email to defense counsel re: same (0.2).	\$450.00	0.4	\$180.00
07/26/2024	HY	Time and Attention	Review new TRO responses; Save responsive documents to client file; Revise TRO response spreadsheet and account balance spreadsheet.	\$175.00	0.5	\$87.50
07/29/2024	MJM	Conference Call	Conference call with J. Perez and counsel for FTC.	\$450.00	0.6	\$270.00
07/29/2024	MJM	Review and Analyze	Review Truist bank statements re: post-TRO transfers.	\$450.00	0.4	\$180.00
07/29/2024	HY	Time and Attention	Review file for recipient information related to Telos Legal Corp.	\$175.00	0.2	\$35.00
07/30/2024	MJM	Correspondence	Email correspondence with counsel for Microsoft re: TRO and records (0.1); email correspondence with Receiver J. Perez re: same (0.1).	\$450.00	0.2	\$90.00
07/31/2024	MJM	Correspondence	Email correspondence with Receiver J. Perez re: outstanding requests to defendants (0.1); draft email to defendants' counsel re: outstanding requests (0.2).	\$450.00	0.2	\$90.00
07/31/2024	MJM	Review and Analyze	Review D. Goodman financial disclosures; email correspondence with Receiver J. Perez re: same.	\$450.00	0.3	\$135.00
07/31/2024	HY	Time and Attention	Review TRO responses; Update TRO Response Spreadsheet; Prepare TRO letters.	\$175.00	1.1	\$192.50

08/01/2024	MJM	Conference Call	Conference call with counsel for FTC, counsel for defendants, and Receiver J. Perez.	\$450.00	0.5	\$225.00
08/01/2024	MJM	Conference	Teleconference with Receiver J. Perez to prepare for conference call with FTC and counsel for defendants.	\$450.00	0.3	\$135.00
08/01/2024	HY	Time and Attention	Report Start Connecting Google Ads.	\$175.00	0.8	\$140.00
08/02/2024	MJM	Conference	Review credentials letter and emails with FTC and Receiver J. Perez re: same (0.2); email correspondence with Receiver J. Perez and H. Yohnk re: receivership website (0.2).	\$450.00	0.4	\$180.00
08/02/2024	HY	Document Preparation	Research contact information for JP Morgan Securities and Pacific Life; Prepare letters to same; Send letters to same.	\$175.00	0.8	\$140.00
08/02/2024	MJM	Time and Attention	Review email correspondence from Receiver J. Perez and FTC re: BBVA account (0.2); review bank BBVA bank statements (0.3).	\$450.00	0.5	\$225.00
08/05/2024	HY	Correspondence	Emails with J. Perez re receivership pleadings for website.	\$175.00	0.2	\$35.00
08/05/2024	HY	Correspondence	Email copy of TRO to WebPros.	\$175.00	0.1	\$17.50
08/06/2024	HY	Correspondence	Phone call with WebPros re TRO.	\$175.00	0.1	\$17.50
08/07/2024	MJM	Conference Call	Teams meeting with counsel for FTC, counsel for defendants, and J. Perez re: privilege and other matters.	\$450.00	0.8	\$360.00
08/08/2024	MJM	Time and Attention	Meeting with M. Goodeyne to take custody of U.S. currency (0.4); travel to and from Gunster Tampa office for same (0.1).	\$450.00	0.5	\$225.00
08/12/2024	MJM	Review	Review draft motion to approve agreements (0.2); emails with Receiver J. Perez re: same (0.1).	\$450.00	0.3	\$135.00
08/12/2024	HY	Time and Attention	Review new TRO responses; Revise TRO response spreadsheet and balance spreadsheet.	\$175.00	1.4	\$245.00
08/14/2024	HY	Conference Call	Call with WebPro General Counsel re TRO; Email to M. Mueller and J. Perez re same.	\$175.00	0.2	\$35.00
08/16/2024	MJM	Review and Revise	Review and make final revisions to motion to approve agreements relating to receivership entities.	\$450.00	0.5	\$225.00
08/16/2024	HY	Conference Call	Conference call with R. Doring & J. Perez re Receivership Website.	\$175.00	0.7	\$122.50
08/21/2024	HY	Time and Attention	Update Response Tracker Spreadsheet; General file maintenance for new responses.	\$175.00	0.2	\$35.00
08/21/2024	HY	Conference Call	Phone call with M. Mueller re Tampa Legal copy project.	\$175.00	0.2	\$35.00
08/21/2024	MJM	Correspondence	Email correspondence with Receiver J. Perez and counsel for Defendants re: production of records.	\$450.00	0.2	\$90.00
08/21/2024	MJM	Conference	Teleconference with H. Yohnk re: documents in Receiver's possession.	\$450.00	0.2	\$90.00
08/22/2024	MJM	Conference	Teleconference with Receiver J. Perez re: document production and depositions.	\$450.00	0.2	\$90.00
08/22/2024	HY	Correspondence	Email to Tampa Legal re scan project.	\$175.00	0.2	\$35.00
08/22/2024	HY	Correspondence	Phone call with Tampa Legal; Correspondence with J. Perez re same.	\$175.00	0.2	\$35.00

08/26/2024	HY	Correspondence	Review email from Tampa Legal; Email M. Mueller and J. Perez re same.	\$175.00	0.1	\$17.50
08/26/2024	MJM	Correspondence	Email correspondence with H. Yohnk re: document processing.	\$450.00	0.1	\$45.00
08/27/2024	MJM	Review and Analyze	Review redline proposed preliminary injunction (0.7); email correspondence with Receiver J. Perez re: same (0.1).	\$450.00	0.8	\$360.00
08/27/2024	MJM	Correspondence	Email correspondence with M. Senosiain re: document processing.	\$450.00	0.1	\$45.00
08/27/2024	HY	Time and Attention	Update Receivership website including uploading and coding new pleadings and revising party qualifiers.	\$175.00	0.8	\$140.00
08/27/2024	HY	Conference Call	Phone call with Tampa Legal re copy project; Email to M. Mueller and J. Perez re same.	\$175.00	0.2	\$35.00
08/28/2024	MJM	Conference	Teleconference with Receiver J. Perez re: G&G expansion.	\$450.00	0.2	\$90.00
08/28/2024	MJM	Correspondence	Review Doc. 53, notice expanding receivership, and draft email to counsel for defendants Doris Gallon-Goodman and Douglas Goodman regarding proposed meeting to discuss notice.	\$450.00	0.5	\$225.00
08/28/2024	HY	Time and Attention	Upload new pleadings to receivership website.	\$175.00	0.4	\$70.00
08/28/2024	MJM	Conference Call	Conference call with Receiver J. Perez and counsel for FTC re: TRO and other matters.	\$450.00	0.4	\$180.00
08/28/2024	MJM	Correspondence	Email correspondence with counsel for defendants re: schedule meeting to discuss G&G.	\$450.00	0.1	\$45.00
08/30/2024	HY	Document Preparation	Review letters re Certegy; Review TRO; Prepare letter to M. Blackwell re debt collection.	\$175.00	0.8	\$140.00
08/30/2024	HY	Time and Attention	Upload new pleadings to Receivership Website.	\$175.00	0.2	\$35.00
				Totals:	69.9	\$16,935.00

Expenses

DATE	EE	ACTIVITY	DESCRIPTION	COST	QUANTITY	LINE TOTAL
07/11/2024	DTT	FedEx	International shipping to Colombia	\$51.56	1.0	\$51.56
07/12/2024	DTT	Postage-Stamps.com	Postage sending specific letters	\$4.27	23.0	\$98.21
07/12/2024	DTT	Postage-Stamps.com	Postage and Certified mail with return receipt	\$12.32	1.0	\$12.32
07/12/2024	DTT	FedEx	FedEx letter to BBVA NY	\$103.23	1.0	\$103.23
07/12/2024	DTT	Postage-Stamps.com	Postage sending general letters	\$4.27	23.0	\$98.21
07/12/2024	DTT	Postage-Stamps.com	Postage sending general letters out of country	\$48.68	1.0	\$48.68
07/12/2024	DTT	Postage-Stamps.com	Postage and Certified mail with return receipt	\$12.32	1.0	\$12.32
07/16/2024	DTT	Postage-Stamps.com	Postage sending letters	\$54.70	1.0	\$54.70
07/16/2024	DTT	Postage-Stamps.com	Postage sending out letters	\$9.82	1.0	\$9.82

07/22/2024	DTT	Postage-Stamps.com	Postage sending letters	\$9.82	2.0	\$19.64
07/22/2024	DTT	Postage-Stamps.com	Postage sending out a letter	\$4.91	1.0	\$4.91
07/25/2024	DTT	Postage-Stamps.com	Postage sending out letters	\$4.91	1.0	\$4.91
07/31/2024	DTT	Postage-Stamps.com	Postage sending out letter	\$9.82	1.0	\$9.82
08/02/2024	DTT	Postage-Stamps.com	Postage sending 2 letters	\$4.91	2.0	\$9.82
08/05/2024	DTT	Postage-Stamps.com	Postage sending general letter	\$4.91	1.0	\$4.91
08/30/2024	DTT	Postage-Stamps.com	Postage sending Letter	\$4.91	1.0	\$4.91
Expense Total:						\$547.97

Time Entry Sub-Total: \$16,935.00

Expense Sub-Total: \$547.97

Sub-Total: \$17,482.97

Total: \$17,482.97

Amount Paid: \$0.00

BALANCE DUE: \$17,482.97

EXHIBIT



4023 Tampa Road, Suite 2000
 Oldsmar, FL 34677
 Phone (727) 785-4447 Fax (727) 784-5491
www.pdr-cpa.com

**Jared J. Perez as Receiver, Start Connecting LLC et al
 August 1, 2024 through August 31, 2024**

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
7/23/2024	Accounting & Auditing	SAO	Applied for a new EIN	1.00	\$ 175.00	\$ 175.00
7/25/2024	Accounting & Auditing	SAO	Set up a new Quickbooks fle	0.30	\$ 175.00	\$ 52.50
	Total Accounting & Auditing			1.30		\$ 227.50

Total Perez as Receiver

1.30 **\$ 227.50**

EXHIBIT



All funds payable to:

E-Hounds, Inc.

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10685)	Terms
07/01/2024	07/31/2024	55559	\$28087.50	FTC Receivership (TBD)	Due on Receipt

Invoice to:
 Jared J. Perez, P.A.
 301 DRUID ROAD WEST
 CLEARWATER, FL 33756

Case Contact:
 Jared J. Perez, P.A.
 Jared Perez
 727-641-6562

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
.7	07/11/2024	●	Expert Configuration Add SuperAdmin to Google Workspace (Receiver)	RTR	\$400.00	\$280.00
1	07/11/2024		Intake/Collection/Preservation E10685-1 (HP Laptop)	HMC	\$400.00	\$400.00
1	07/11/2024		Intake/Collection/Preservation E10685-3 (Dell Desktop)	HMC	\$400.00	\$400.00
1	07/11/2024		Intake/Collection/Preservation (Mobile Device) E10685-2 (Doris Phone)	ERC	\$795.00	\$795.00
1	07/11/2024		Intake/Collection/Preservation (Mobile Device) E10685-4 (Doug Phone)	ERC	\$795.00	\$795.00
1	07/11/2024		Intake/Collection/Preservation (Email) E10685-5 (dorisegman@aol.com)	RTR	\$400.00	\$400.00
1	07/11/2024		Intake/Collection/Preservation (Email) E10685-6 (xunidg@aol.com)	RTR	\$400.00	\$400.00
7.25	07/11/2024		Technician Hours E. Rojas	ERC	\$250.00	\$1812.50
7.25	07/11/2024		Technician Hours H. Copeland	HMC	\$250.00	\$1812.50
6.75	07/11/2024		Expert Receivership Coordination A. Sharp	ADS	\$400.00	\$2700.00
1	07/11/2024		Intake/Collection/Preservation (Google Takeout) E10685-15 (doug.goodman@zanegroup.com)	RTR	\$400.00	\$400.00
.3	07/11/2024		Production Compilation File Prep and Upload to Kiteworks (AOL Email Accounts)	RTR	\$250.00	\$75.00
5	07/11/2024		Intake/Collection/Preservation (Google Workspace) E10685-8 through E10685-12	ADS	\$400.00	\$2000.00
1	07/12/2024		Intake/Collection/Preservation E10685-13 (Instagram)	RTR	\$795.00	\$795.00
1	07/12/2024		Intake/Collection/Preservation (Google Takeout) E10685-16 (dorisegman1@gmail.com)	RTR	\$400.00	\$400.00
1	07/12/2024		Apricorn Aegis 500 Encrypted Drive E10685-14 Stock Drive (FTC)	HMC	\$250.00	\$250.00
1	07/12/2024		Production Compilation E10685-1/3 Forensic Images (FTC)	HMC	\$250.00	\$250.00
1	07/12/2024		Intake/Collection/Preservation E10685-17 (YouTube w Video) PageVault Public Facing	RTR	\$795.00	\$795.00
1	07/12/2024		Intake/Collection/Preservation E10685-18 (FB-Expanded) PageVault Public Facing	RTR	\$1195.00	\$1195.00
1	07/12/2024		Intake/Collection/Preservation E10685-19 Website (PageVault) Public Facing	RTR	\$795.00	\$795.00
1	07/12/2024		Intake/Collection/Preservation E10685-20 (StartConnecting Website) PageVault	RTR	\$795.00	\$795.00
1	07/12/2024		Intake/Collection/Preservation E10685-21 (StartConnecting TikTok) Page and Media Capture	RTR	\$795.00	\$795.00
1	07/12/2024		Intake/Collection/Preservation E10685-22 (StartConnecting Instagram) Capture and Media	RTR	\$795.00	\$795.00
1	07/12/2024		Intake/Collection/Preservation E10685-23 (StartConnecting FB) Expand and Capture	RTR	\$1195.00	\$1195.00
1	07/15/2024		Triage - Full Workup (USB/Int hist/del data/use profiling/data movement) E10685-3 (Doris Goodman)	RTR	\$1500.00	\$1500.00
1	07/15/2024		Triage - Full Workup (USB/Int hist/del data/use profiling/data movement) E10685-1 (Doug Goodman)	RTR	\$1500.00	\$1500.00
2.5	07/15/2024		User Data Cull E10685-1 and E10685-2 (Computers)	RTR	\$195.00	\$487.50

All balances are due upon receipt. Thank you!

SUBTOTAL **\$28087.50**

Payments Applied	

TOTAL **\$28087.50**

Balance Due \$28087.50

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 1/2/2018

Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts:



All funds payable to:

E-Hounds, Inc.

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10685)	Terms
08/01/2024	08/31/2024	55823	\$1433.48	FTC Receivership (TBD)	Due on Receipt

Invoice to:
 Jared J. Perez, P.A.
 301 DRUID ROAD WEST
 CLEARWATER, FL 33756

Case Contact:
 Jared J. Perez, P.A.
 Jared Perez
 727-641-6562

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	08/01/2024		Intake/Collection/Preservation Google Ads (Public Facing - PageVault)	RTR	\$300.00	\$300.00
1	08/20/2024		Production Drive Aegis Apricorn Padlock 512GB	HMC	\$199.00	\$199.00
1	08/20/2024		Production Compilation	HMC	\$195.00	\$195.00
1	08/23/2024		Intake, Imaging, Storage and Secure Maintenance FTC Collected Data (cPanel Email)	RTR	\$300.00	\$300.00
1	08/30/2024		FedEx Overnight Production Drive for Defendants	RTR	\$46.98	\$46.98
1	08/30/2024		1tb Transport Drive (Production)	RTR	\$100.00	\$100.00
1.5	08/30/2024		Project Management Tech Hours for Production Drive Compilation (Defendants Copy)	RTR	\$195.00	\$292.50

All balances are due upon receipt. Thank you!

SUBTOTAL **\$1433.48**

Payments Applied	

TOTAL **\$1433.48**

Balance Due \$1433.48

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 1/2/2018

Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts:    

EXHIBIT



E10685 Inventory Report

(FTC Receivership (TBD))

Jared J. Perez, P.A.

Jared Perez
























E-Hounds, Inc.

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

Tel (727) 726-8985

email - support@ehounds.com

<input type="checkbox"/> Original Evidence		7/11/2024	HP Notebook	N/A	No Bitlocker	Doug Goodman Laptop	
<input type="checkbox"/> Original Evidence		7/11/2024	Samsung Galaxy S23+	R5CW40E00WF		Doris Goodman Phone	
<input type="checkbox"/> Original Evidence		7/11/2024	Dell Inspiron Desktop	JFRX4L2	No Bitlocker	Doris Goodman Desktop	
<input type="checkbox"/> Original Evidence		7/11/2024	Samsung Galaxy S23 +	R3CW4032L6M		Doug Goodman Phone	
<input type="checkbox"/> Original Evidence		7/11/2024	AOL Email	N/A	Forensic Email Collector	dorisegman@aol.com	
<input type="checkbox"/> Original Evidence		7/11/2024	AOL Email	N/A	Forensic Email Collector	xunidg@aol.com	
<input type="checkbox"/> Original Evidence		07/11/2024	WhatsApp Messaging	N/A	Cloud Collection (Oxygen)	Doug Goodman	
<input type="checkbox"/> Original Evidence		7/11/2024	Google Workspace Takeout	N/A		admina@start-connecting.com	
<input type="checkbox"/> Original Evidence		7/12/2024	Google Workspace Takeout	N/A		bakie@start-connecting.com	
<input type="checkbox"/> Original Evidence		07/12/2024	Google Workspace Takeout	N/A		doug@start-connecting.com	
<input type="checkbox"/> Original Evidence		07/12/2024	Google Workspace Takeout	N/A		isabel@start-connecting.com	
<input type="checkbox"/> Original Evidence		7/12/2024	Google Workspace Takeout	N/A		jsrojas@start-connecting.com	
<input type="checkbox"/> Original Evidence		7/12/2024	Instagram Public Facing Page	N/A	Page and Media Capture	usastudentdebtreief	
<input type="checkbox"/> Original Evidence		7/12/2024	EH Stock#: 3885				
<input type="checkbox"/> Original Evidence		7/12/2024	Google Account Takout			doug.goodman@zagegroup.com	
<input type="checkbox"/> Original Evidence		07/12/2024	Google Account Takeout			dorisegman1@gmail.com	



E10685 Inventory Report

(FTC Receivership (TBD))

Jared J. Perez, P.A.

Jared Perez

E-Hounds, Inc.

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

Tel (727) 726-8985

email - support@ehounds.com

E10685-17

Original Evidence



7/12/2024

YouTube

Channel

Page and Media Capture

@usastudentdebtrelief8949



E10685-18

Original Evidence



7/12/2024

Facebook

Page

Page Expand and Capture

Usastudentdebtrelief



E10685-19

Original Evidence



7/12/2024

Website

Site

Site Complete (Public Facing)

usastudentdebtrelief.com



E10685-20

Original Evidence



7/12/2024

Website

Site

Site Complete (Public Facing)

startconnectig.co



E10685-21

Original Evidence



07/12/2024

TikTok

Page

Page and Media Capture

startconnecting



E10685-22

Original Evidence



07/12/2024

Instagram

Page

Page and Media Capture

startconnecting



E10685-23

Original Evidence



7/12/2024

Facebook

Page

Page Expand and Capture

startconnecting



E10685-24

Original Evidence



7/30/2024

Quickbooks

Backup File

Conversion from Online to QBB

Start Connecting



E10685-25

Original Evidence



8/1/2024

Google

Ads

Public Facing - Expand and Capture

Start Connecting Google Ads



E10685-26

Original Evidence

8/20/2024

EH Stock# 3893

FTC Production Drive (Evidence)



EXHIBIT 8

2520-B North McMullen Booth Rd., Suite 145
 Clearwater, Florida 33761
 (727) 437- 7422

Law Office of Jared J. Perez
 Attn; Jared J. Perez

Invoice Number:

Date: September 24, 2024

Terms:

Service Through: August 31, 2024

In re: Jared J. Perez, as Receiver for Start
 Connecting, LLC, d/b/a USA Student Debt
 Relief, and Start Connecting SAS, d/b/a
 Start Connecting

Date	By	Services	Hour	Rate	Amount	Sales Tax
07/08/24	ALT	Zoom meeting with J. Perez. Received emails & review information spreadsheet, implementation plan, financial accounts templates & other documents from J. Perez.	1.70	\$ 250.00	\$ 425.00	N/A
07/10/24	ALT	Emails. Review Receiver Report & Employee Questionnaire. Review Order received from J. Perez	1.50	\$ 250.00	\$ 375.00	N/A
07/11/24	ALT	Telephone call J. Perez. Emails. Telephone calls J. Rojas. Emails & texts. Sarasota for enforcement action. Interview J. Rojas.	7.00	\$ 250.00	\$ 1,750.00	N/A
07/12/24	ALT	Telephone call J. Perez. Telephone calls J. Rojas	0.20	\$ 250.00	\$ 50.00	N/A
07/16/24	ALT	Telephone call FTC, N. Nash	0.30	\$ 250.00	\$ 75.00	N/A
08/14/24	ALT	Email to/from J. Perez regarding J. Rojas	0.10	\$ 250.00	\$ 25.00	N/A

Date	By	Expenses	Rate	Mileage	Amount
07/11/24	ALT	Mileage	0.60	154	\$ 92.40
	ALT	Tolls			\$ 2.00

Total Hours:	\$ 10.80
Total Services:	\$ 2,700.00
Discount (20%):	\$ (540.00)
Total Expenses:	\$ 94.40
Total Invoice Amount: (Due)	\$ 2,254.40