

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,  
c/o United States Attorney's Office  
555 Fourth St., N.W.,  
Washington, D.C. 20530,

Plaintiff,

v.

8 GILCREASE LANE, QUINCY  
FLORIDA 32351,

and,

ONE CONDO LOCATED ON  
NORTH OCEAN BOULEVARD IN  
MYRTLE BEACH, SOUTH  
CAROLINA,

and,

ALL FUNDS, INCLUDING  
APPROXIMATELY \$53 MILLION,  
HELD ON DEPOSIT AT BANK OF  
AMERICA ACCOUNTS IN THE NAMES  
(1) THOMAS A. BOWDOIN, JR.,  
SOLE PROPRIETOR, DBA  
ADSURFDAILY, (2) CLARENCE  
BUSBY JR. AND DAWN STOWERS,  
DBA GOLDEN PANDA AD BUILDER,  
AND (3) GOLDEN PANDA  
AD BUILDER,

Defendants, and

GOLDEN PANDA AD BUILDER, AND  
CLARENCE BUSBY, JR.

Claimants.

VERIFIED CLAIMS OF CLAIMANTS

Civil Action No: 1:08-cv-01345  
Hon. Rosemary M. Collyer

**VERIFIED CLAIMS OF CLAIMANTS**

Pursuant to Supplemental Rule G(5) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions (the “Supplemental Rules”), Golden Panda Ad Builder and Clarence Busby Jr. asserts its interest and right in various Bank of America accounts currently seized under the Government’s complaint. Golden Panda Ad Builder (“Golden Panda”) claims the right to defend in this action. In support of Claimant’s verified statement, Claimant asserts that:

1. Golden Panda and Clarence Busby Jr. are legal owners of the funds in the following Bank of America accounts seized by the Government:

- a. All funds held in account #334011130192 at Bank of America, in the name of Clarence Busby Jr. and Dawn Stowers, DBA Golden Panda Ad Builder Deposit Account;
- b. All funds held in account #334011130200 at Bank of America, in the name of Clarence Busby Jr. and Dawn Stowers, DBA Golden Panda Ad Builder Operating Account;
- c. All funds held in account #91000113401039 at Bank of America, in the name of Golden Panda Ad Builder; and
- d. All funds held in account #91000113404188 at Bank of America, in the name of Golden Panda Ad Builder.

2. The Government named Golden Panda Ad Builder’s property as defendants in its complaint and that property remains subject to immediate seizure pending the resolution of forfeiture proceedings. Mr. Busby opened each of those accounts. Mr. Busby and his daughter, Dawn Stowers, are the named account holders and exercise dominion and control over the above-listed accounts. Mr. Busby is CEO

and President of Golden Panda. Golden Panda and Clarence Busby, as sole proprietor of Golden Panda, claim ownership of the currency contained within the above-listed accounts and, therefore, asserts their right to defend this forfeiture action.

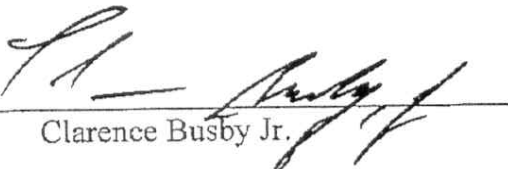
3. The claimants timely file this claim under 18 U.S.C. § 983(a)(4)(A). The Government filed its complaint on August 5, 2008. Golden Panda submits this claim within 30 days from the date the Government served its complaint.

**VERIFICATION**

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed on Aug 22, 2008.

GOLDEN PANDA AD BUILDER  
AND CLARENCE BUSBY JR.

By:   
Clarence Busby Jr.  
Individually and as CEO  
and President of Golden Panda  
Ad Builder

Respectfully submitted,

GOLDEN PANDA AD BUILDER,

By:   
D. Jack Smith\*\*  
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4620 Shady Grove Rd.  
Memphis, TN 39117  
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By:   
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\*\*Motion for admission pro hac vice pending

\*Counsel of Record