



This is an open letter/e-mail to Bill McCollum, the Attorney General of Florida:

It is in response to his remarks on television about ASD. I plan to share this response with the entire membership of ASD and Golden Panda. I sure hope that I am not violating any contractual agreement with ASD and Golden Panda, because I am simply trying to explain how their businesses work, and I can't access their membership contract pages with their websites down. I'm going to take the risk for the benefit of all my fellow members, in hopes of getting ASD and Golden Panda back up and running ASAP. I also do not want to write anonymously, as I am not afraid to be corrected publicly if I am incorrect, and I will happily write an acknowledgement and apology if I am found to be so.

Also, you, Bill McCollum, spoke publicly on television, and I am writing to you in response to your public statements. We can think of this as a sort of op-ed letter, and I am making a public reply to your television statements.

Hello Bill McCollum,

My name is Will York, and I live in Los Angeles, California. I am an online marketer, and I just watched a news clip in which you spoke about ASD. I was sad to see you speak incorrectly about ASD, and I would like to correct you and explain your mistakes.

Please do not think I am a nut-case. I have two masters degrees and I taught high school biology and chemistry in the nineties. My background does not mean that I'm correct in my following explanations, but is merely introduced as evidence that my explanation will probably be clear enough for you to justify spending the time to read this e-mail. I am a good teacher and want to politely teach you how you are mistaken about ASD and Golden Panda (GP). Please take the time to read this correction and explanation.

Before I begin, I will say that I am thankful the government does not allow pyramid schemes, because they are horrible schemes that prey upon people's hopes and dreams and then shatter them. When I first saw ASD, I too thought it must be a Ponzi scheme, but I read everything on their website and drew diagrams and cash flow charts according to their business plan and I finally figured out what these advertising companies are doing.

I will now address your mistakes and explain the ASD and Golden Panda business structure.

First, the news caster said that you say, "[you] wouldn't feel comfortable with the company operating again, even with court oversight. [You say] the company used advertising as a front for its money making scheme."

If you did say such a thing, you have implied by your statement that ASD is guilty before the allegation has been proven. With all due respect, the fact that you and Federal agents do not understand a business does not make it an illegal "scheme." The allegation has not been proven, and if you are willing to read this e-mail, you will see that it cannot be proven, because it is false. Also, the company is asking for oversight so that whoever does the oversight can actually comprehend the business plan and observe its legality. I realize that you are trying to protect the public by saying that you do not want ASD to continue its "pyramid scheme." But in reality, you are harming the public, because ASD and Golden Panda (GP) are not pyramid schemes; they are very affective advertising companies that can guarantee fifteen-second website-views to those who purchase their advertising. Seriously, I read every single sentence on the ASD and Golden Panda websites before I bought any advertising from them. It took me three weeks to understand their business plan, and when I did, I realized they had designed a breakthrough business plan that will literally revolutionize the advertising industry as we know it. I will explain it after addressing your second mistake.

Second, you said, "at the end of the day, that's the only way that they can sustain themselves, uh, is by getting new members, and that's an illegal pyramid scheme, and, and it's not right for them to go back and do it again. It just doesn't work that way."

Okay, if ASD and GP were indeed running a pyramid scheme, I would wholeheartedly agree with you that they should not be allowed to continue fleecing the innocent of their hard earned money. But, none of your statement is true. First and foremost, membership in ASD and Golden Panda is 100% FREE! There is no cost whatsoever to becoming a member. The only cost is if a member wants to buy advertising. Please realize that Google, Yahoo, myspace, Facebook, MSN, and other high-traffic websites are all multi-billion dollar companies because of one thing -- SELLING ADVERTISING. And, "the only way they can sustain themselves" is by continuing to sell advertising.

You may not know this, but buying advertising from the above-listed companies is extremely expensive. I will provide a Google example.

I have a business acquaintance who buys \$300 to \$500 of advertising per day from Google. The amount my friend buys varies because each day he uses exactly half of his income to buy more advertising from Google. This means that Google is actually earning half of my friend's income from his selling nutritional supplements and using Google as his main advertiser. (There are some individual marketers who buy \$100,000 worth of advertising from Google daily!) When we sales-people buy from Google, our money is permanently gone into the Google bank accounts. It is a scary feeling to know that the only hope we have of earning that money back is by selling our product to the viewers of the Google search engine results. And Google offers no guarantee that anyone will look at our website long enough to know what we are selling. But we marketers have to buy advertising, and Google, blogs, search engines, and high traffic websites keep our money permanently. Now, if Google or any other advertising medium, including TV, magazines, newspapers, radio, and billboards, stopped selling new advertising, they could not "sustain themselves."

ASD and Golden Panda are no different. If they stop selling new advertising, they will not be able to "sustain themselves." When I purchased advertising from both companies, I was aware of the fact that I was buying 15 second advertisements with my money (each ad is called an "ad package"). I knew from reading the terms and agreements and other parts of the website that I was buying advertising from these companies in the exact same way that I buy from Google, MSN, Yahoo, and blog pages, and that the money was gone; it was spent permanently on advertising.

I was also aware of the fact that similar to being involved in any other multi level marketing company (MLM) I could sell the ASD and GP product – ADVERTISING – to other business people, and receive a 10% commission on all my sales. My sponsor would also receive a commission on all advertising I sell, 5%. Most MLM companies in the USA pay commissions to sponsors from many more levels below the sponsor than just two levels. And in all direct sales of any product, the sales-person is motivated by the anticipation of earning the promised commission. This is a well known fact in the sales world.

The rebate process is simply a shared sale's commission given to the entire sales-force if they meet one requirement: view a certain number of advertisements for 15 seconds each on any day they want to receive a rebate. But, there are two situations in which a rebate would not be paid to advertisers: 1) If the company and all of its independent sales associates do not sell any advertising products, website products, consulting products, or website development products on the day people have viewed websites in hopes of receiving a rebate. In other words, if no products are sold, no rebate will be given, plain and simple. I was fully and completely aware of this fact before I bought advertising from these companies. 2) If an individual advertiser does not view the required number of website advertisements on the day he/she hopes to receive a rebate, he/she will not qualify to receive the rebate. In other words, no work, no rebate.

How do the rebates get paid? This is simple math.. Imagine that ASD has 60 million advertising packages that people like me have bought. If ASD sells only \$2 million worth of advertising products in one day, here is how that \$2 million is divided up:

50%, or \$1 million dollars, is divided among the qualifying advertising packages. (Ad packs are "qualified" when their purchaser surfs the required number of his fellow advertiser's websites.) In this case, we will assume that all 60 million ad packs were qualified. Therefore, when dividing \$1 million dollars equally among 60 million ad packs, each ad pack would earn a rebate of 1.666666 cents. If you multiply 1.666666 by 60 million and then divide by 100 to convert the result to cents, you get 1 million. If we value each ad pack at \$1, then in this example of a rebate, 1.666% of the advertiser's advertising cost has been rebated back to the company or advertising individual for that day. (This is not a return on investment! No one "invests" in anything in these two companies. Advertising was sold and commissions are being given back to the sales/advertising team as a "thank you" for helping the company satisfy its guarantee that every ad pack is a guaranteed 15-second-view of the purchaser's website. It is a win/win situation for everyone, even for people who don't sell advertising that day. Non-sellers still helped view websites for 15 seconds each and are therefore qualified to be rewarded by the rebate.)

For the sales people who did sell advertising that day, they get a sweeter reward. Their 10% commission, and their sponsor's 5% commission is taken out of the other 50% of sales that day. So, 15% from the left over \$1 million in sales equals \$150,000 in commissions that will be paid out that day.

Now, ASD would be left with an income that day of \$350,000. They have to pay their employees, their lawyers, their computer hosting companies, their electric bills, their taxes, etc. out of that income. And of course, their lawyer fees are now much higher because someone didn't understand where all the money is coming from or how online marketing works. Well, the money is coming strictly from the SALE of ADVERTISING and other web service products such as hosting and domain registrations, and if the sale of advertising stops at any time in the future, the business stops too, and no one is guaranteed their rebates or money back.

So, each day of the year, the total sales income is split 50/50. 50% is rebated to the qualifying ad pack purchasers. 15% is paid in commissions to each salesperson and his/her sponsor. 35% is ASD's to keep and pay bills and salaries with.

In the example above, the ASD sales-force sold \$2 million worth of sales, and ASD only kept \$350,000 of it. ASD gave 65% of their sales income to their sales force. They're generous!

If on any given day there are no products sold at all, then NO ONE GETS REBATED AT ALL. This was clear to me after reading ASD's and GP's websites. If people do not read the websites or somehow get the idea that the company is guaranteeing them their money back, those people have misread the company's terms and conditions and are believing a lie. They may be able to earn their advertising money back through rebates, but advertising has to be sold daily for anyone to get any rebates. Now, if people agree to a contract they do not understand, the company with whom they formed the contract is not to be blamed. The phrase, "always read the fine print" is evidence that people often do not understand what they are signing, and often do not "read the fine print." But the company who wrote and agreed to the contract cannot be blamed for the non-reading and misunderstanding people who enter into contract with them.

Now, financially, when would these companies be unable to "sustain themselves"? Only when there are no companies or individuals who want to advertise their goods and services to a captive audience. If such an event were to happen, we would not have free television, radio, newspapers, magazines, blogs, search engines, e-mail accounts, vlogs, dating websites, etc, etc. It is highly unlikely that there will ever be such a time. So, when Nike, Coke, Nestle, Micky D's, Ford, GE, Victoria's Secret (sad day), and politicians stop advertising, we can expect ASD and Golden Panda to run out of customers soon thereafter.

Next, let me explain the "matching bonuses" that are given out at the "rallies." Please realize that in marketing we want to evoke a purchase from as many potential customers as possible. Any business that sells a product has a time-tested and proven way of increasing the number of products sold: they can have a "sale." We are all familiar with the fact that people are much more likely to buy when there is a "sale" than when the products are being sold at their regular "retail" price. Therefore, sales are used to increase a company's cash flow.

(Another way to get people very excited about buying a product is to tell them they can earn a rebate on it, which I've already explained above.)

The rallies are nothing more than "sales," but the wording they use is extremely effective. Instead of telling potential customers that they can buy ad packages "at a discount," ASD and GP are saying that they will "give" matching-bonus-ad-packages of 25%, 50% or 100% of the original purchase. Let's look at the most outrageous offer, 100%.

If ASD is offering a 100% matching bonus, someone buying \$50,000 in advertising will actually receive 100,000 ad packages for their money. That purchaser just paid fifty cents for each 15

second ad rather than one dollar.. They bought during a "half-off-sale." And, as expected at such huge "savings" people are buying a lot of ad packs at the rallies. The customer is being told that the company is "giving" them something, but in reality the customer is simply being "sold" something at a discount. The wording works and people "buy" at the discount price. Even knowing this wordplay, I am happy to buy at the sale price.

Also, the sponsor of someone buying \$50,000 in advertising during a 100%-matching-bonus-rally would also get 50,000 fifteen second ads. Thus, ASD or GP was actually running a "66% off sale" or a "three-for-the-price-of-one sale." Sponsors are understandably very motivated to make sales. And the customer is seriously motivated to buy advertising. And ASD or GP has increased its cash flow dramatically.

The confusing part of these sales is that the amount of money ASD or GP is going to divide 50/15/35 in order to pay rebates and commissions is only the original \$50,000 received by the company. ASD and GP are not matching people's money with more money, they are simply selling their advertising at huge discounts. If an advertiser wanted a refund on their purchase and the company agreed to refund purchases in the contract, which they don't, the only money the company would refund would be the \$50,000, no more.

Quite simply, 150,000 ad packages were sold for \$50,000; therefore, \$25,000 would be "rebated" to qualifying ad packs. \$7,500 would be paid in commissions to the salesperson and his/her sponsor. And \$17,500 would be the amount ASD or GP keeps.

If no sales are made, no salespeople get paid. To increase sales of advertisements, ASD and GP discount the retail price of their product, which costs them less than a penny to provide for the customer.

So, what these companies are doing is sharing the huge profits from online advertising with their customers, who are also their sales force, which is legal under the MLM laws of this great nation.

Who wouldn't want to be a part of such a business? What advertiser in their right mind would not want to look at other advertisements and sell advertising for the company they buy advertising from in order to earn their advertising money back over time? With ASD and GP an advertiser can earn 125% of the value of their advertising packages back in the form of rebates -- if sales continue and are enough, just as in any other advertising business. No sales, no rebates. But, most existing advertisers are going to continue buying advertising from ASD and GP on a regular basis, so it is unlikely that there will ever be a day that there are zero sales.

Lastly, let's look at the profits. Google sells click ads from a penny to \$500 and higher per click. Google's cost for each click is probably less than a penny. Is a \$500 retail price on an item that cost \$0.01 a great profit? You bet!! That's why Google's owners are billionaires.

Thomas A Bowdoin, Jr., Clarence Busby, Jr., and Dawn Stowers, DBA Ad Surf Daily and Golden Panda, are sharing the massive profits to be made in online advertising with their customers who 1) advertise with them, 2) sell advertising for them, and 3) view advertising for them. They are charging \$1 for a product that costs less than a penny to provide, but sometimes they only charge \$0.33. Either way, they are then dividing up the total income into the following categories: 50% in rebates, 15% in commissions, and %35 for themselves. And, they are not only being generous by sharing the daily income, they are also charging us online-marketers much less money than Google, or any other advertising site on the net, which means they will

probably out-sell some of those sites at some time in the future. These ad companies should be allowed to grow to any size that their computer systems can handle. I believe they will grow to twenty or thirty million members if they are given the chance. And if their members read the contracts they are agreeing to when they become members for free, they will know that none of their advertising money is guaranteed to be returned to them, not in rebates or in commissions. Sales must always be made for a sales force to be paid and for a business to sustain itself.

In conclusion, Mr. McCollum, ASD and Golden Panda were providing valuable products and services to their rapidly growing membership. I believe that federal agents did not do their due diligence before freezing these company's assets, and if I'm right, every day that ASD and GP are closed, there are thousands of innocent citizens who are being financially and emotionally harmed by not allowing ASD and GP to continue operating their advertising-sales-business with oversight. I'm certain that I can speak for all of the members when writing that we would welcome the oversight of each company. We do not want the managers of these companies to mangle funds, mismanage, or commit any kind of fraud, because we want to purchase and benefit from their advertising for many years into the future.

Many of our websites were receiving higher click rates from ASD and GP advertising than from any other form of advertising. One of my friend's websites received 200 website-views a month before joining ASD, and within two months after purchasing advertising with ASD her website was receiving 8,000 views a month. That friend's sales of financial advising services grew so quickly she had to hire help. That's the consequence of great advertising! Her website also moved to the number-one-position in the free Google search results. This kind of advertising effectiveness is every business person's dream.

Over 100,000 Americans were using these companies to advertise their products until the Federal agents shut them down. Sadly, it seems that the crime in this situation has not been committed by ASD or GP but by the agents, and thousands of small business owners such as myself are suffering every day that ASD and GP are not operating.

Please feel free to call me at ###-###-####, which I will remove from the public letter. I would be very happy to speak with you and answer any questions you have.

If you would like to learn how you can become an online affiliate marketer for numerous businesses such as Blockbuster, Netflix, The Dish Network, and more, for free, and start earning the great commissions that such companies pay us marketers, I'll be happy to teach you how the affiliate business works as well.

And, of course, if you'd like to become a free member of ASD and/or Golden Panda, then please visit my website at <http://www.nojokesjustbrilliance.com/> and provide your name and e-mail for more information. It is free to join and you can even earn advertising credits for free. I know that your AG job pays a decent salary, but if you're willing to spend just fifteen to twenty minutes a day, you could probably double your salary in less than a year, and I can teach you how to do that. (I'm a sales guy!) But, of course, there are no guarantees, and you would sign a contract in agreement to those terms. You would also need to provide ASD and Golden Panda with a W-2 form so they can properly send you a 1099 for tax purposes at the end of the year.

Thank you for taking the time to read this. I wish you the best.

Sincerely, Will York

If you now understand that ASD and Golden Panda are not pyramid schemes, I hope that you will share this letter with the honorable Rosemary M. Collyer, who has the authority and power to demand that these two businesses be allowed to operate with any necessary oversight she may want to place over them, so that those of us who earn our livelihood by selling goods and services on the Internet can get back to business and stop stressing out.

If you still disagree with me, it is possible that I have believed a lie, and I would ask that you please call and explain where you think I am mistaken about these businesses. If you convince me that these businesses are pyramid schemes, I will humbly write another open letter to tell everyone and notify them that we've all been suckered. Then I'll start an advertising company with the above business plan and be a hero for doing so. But in this case, I don't think I'll have to do that.

Again, I wish you the best.



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