

**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.

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.

**AFFIDAVIT OF
WALTER CLARENCE BUSBY JR.
IN SUPPORT OF GOLDEN
PANDA'S MOTION FOR
SEVERANCE AND TRANSFER**

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

**AFFIDAVIT OF WALTER CLARENCE BUSBY JR. IN SUPPORT OF GOLDEN
PANDA'S MOTION FOR SEVERANCE AND TRANSFER**

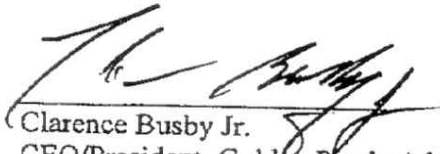
I, Walter Clarence Busby Jr. ("Clarence Busby"), declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am President and Chief Executive Officer of Golden Panda Ad Builder Inc. ("Golden Panda") (www.goldpandaadbuilder.com). As President and CEO, I oversee the daily

operation of Golden Panda. My daughter, Dawn Stowers, is the Chief Operating Officer. Golden Panda has 2 directors: Clarence Busby Jr. and Dawn Stowers.

2. I lived in Georgia all but two years of my life. I have resided in Acworth, Georgia for 7 of the past 12 years. I have lived within a 20 mile radius of Acworth for the past 20 years.
3. In my lifetime I have owned and resided in about 15 homes all located in Georgia. I have held an ownership interest in at least 150 homes located within Georgia.
4. I have run several successful businesses, all of which were located within Georgia. Those businesses include: Rockdale Bolt and Screw (operated in Georgia for 2 years); LADS Fasteners (operated in Georgia for 5 years); Classic Express Custom Vans (operated within Georgia for 4 years); Oceanview Enterprises (operated in Georgia for 4 years); Beach Management (operated in Georgia for 4 years); and Legacy Premier Properties, Inc. (operated in Georgia for 12 years).
5. Aside from Golden Panda, I have never transacted business outside of the State of Georgia.
6. Georgia is home to four Busby Generations. I am the second generation to reside in Georgia, and my grandchildren are now raised in Georgia. I currently have no intention of leaving the state for business or to establish a new residence.
7. When the Government seized Golden Panda's accounts, the company employed 14 individuals who all resided within Georgia. All of Golden Panda's employees resided within Cobb County or the surrounding counties.
8. Golden Panda received its startup funding from 34 founders. None of those founders were from the District of Columbia. Those founders resided in: Maryland, Iowa, Alabama, Arizona, Michigan, New York, Florida, and Georgia.

9. All money received from these founders arrived from those states, and no seed capital transferred from the District of Columbia.
10. The Government seized five Golden Panda bank accounts from Bank of America. Those accounts are: Bank of America Account #'s 334011130192; 33401130200; 334015765704; 91000113401039; and 91000113404188. Golden Panda opened all of those accounts in Georgia, through Bank of America institutions located within Georgia.
11. The listed address on each of those seized accounts is 4900 Ivey Rd., N.W., Suite 820, Acworth, GA, 30101-4001.
12. When the Government seized Golden Panda's business, the company had 19,804 customers. To the best of my knowledge, none of those customers resided in the District of Columbia. Golden Panda has made no rebate payments to individuals in the District of Columbia. It has never made cashout payments to individuals in the District of Columbia.
13. Aside from the present litigation, neither Golden Panda nor any of its representatives has discussed Golden Panda's business operations with an individual from the District of Columbia. Golden Panda has never specifically solicited business within the District of Columbia.
14. No Golden Panda representative, officer, or owner has ever traveled into the District of Columbia for business.
15. Other than the present litigation, Golden Panda's business and its assets have had no connection with the District of Columbia.



Clarence Busby Jr.
CEO/President, Golden Panda Ad Builder Inc.

Executed on: 8/25/08