

**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
DAWN STOWERS
IN SUPPORT OF GOLDEN
PANDA'S MOTION FOR
SEVERANCE AND TRANSFER**

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

**AFFIDAVIT OF DAWN STOWERS IN SUPPORT OF GOLDEN PANDA'S MOTION
FOR SEVERANCE AND TRANSFER**

I, Dawn Stowers, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Chief Operating Officer of Golden Panda Ad Builder Inc. (“Golden Panda”) (www.goldpandaadbuilder.com). As Chief Operating Officer, I assist in the daily operation of Golden Panda. Golden Panda has 2 directors: Clarence Busby Jr. and Dawn Stowers.
2. I have resided in Georgia my entire life. I have lived in various locations within Georgia, including: Norcross, Dahlonega, Macon, Hartwell, Powder Springs, Marietta, Kennesaw, and Acworth. I have owned four properties in the State of Georgia. Those properties are located in: Kennesaw (owned for 1 year); Kennesaw (owned for 2 years); Acworth (owned for 8 years); and Acworth (owned for 2 years).
3. I have never held a job outside the State of Georgia, nor have I transacted business outside Georgia.
4. I am among the third Busby generation to reside in Georgia. My extended family also lives in Georgia, including my children, brother, and parents.
5. I am aware that Golden Panda does not employ any individual residing outside the State of Georgia.
6. Golden Panda has never received funding from the District of Columbia. It received its initial startup money from 34 founders, none of whom reside or resided in the District of Columbia.
7. I am named on Golden Panda’s Bank of America accounts. Golden Panda opened each of those accounts at local institutions in Georgia. The address attributed to those accounts is 4900 Ivey Rd., N.W., Suite 820, Acworth, GA 30101-4001. That was the only address ever listed on those accounts.

8. I have never traveled to the District of Columbia for business. I have never discussed Golden Panda's business or conducted business with a Golden Panda customer from the District of Columbia. No Golden Panda employee has transacted business with an individual from the District of Columbia.
9. The Government seized Golden Panda's business accounts on August 1, 2008. At that time, Golden Panda had 19,804 customers. To best of my knowledge, information, and belief, none of those customers resided in the District of Columbia.
10. Golden Panda has never advertised in the District of Columbia, or otherwise specifically marketed its program in the District of Columbia.
11. Golden Panda has never issued a cashout payment to an individual or business located within the District of Columbia.
12. Other than the present litigation, Golden Panda's business and its assets have had no connection with the District of Columbia.



Dawn Stowers
Chief Operating Officer, Golden Panda Ad Builder Inc.

Executed on: 8-29-08