

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,		)
		)
Plaintiff,		)
		)
v.		)
	Case: 1:08-cv-01345	)
		)
8 GILCREASE LANE, QUINCY		)
FLORIDA 32351,		)
	Hon. Rosemary M. Collyer	)
		)
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		)
OF (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		)
		)
ADSURFDAILY, INC., THOMAS A.		)
BOWDOIN, JR., AND BOWDOIN HARRIS		)
ENTERPRISES, INC. ,		)
		)
Claimants.		)
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**NOTICE OF FILING OF CLAIMANTS'  
PROPOSED COMPLIANCE AND OVERSIGHT PLAN**

Claimant, AdSurfDaily, Inc. ("ASD"), by counsel, hereby submits this Proposed Compliance and Oversight Plan ("Plan") in connection with its still-

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pending Emergency Motion for Return of Seized Funds To Save Business and Jobs With Oversight and Monitoring And/Or For Evidentiary Hearing, and Motion to Dismiss ("Claimant ASD's Emergency Motion").

1. On August 18, 2008, Claimant ASD's Emergency Motion was filed with this Court. Memoranda in Opposition of the United States ("Government Oppositions") were filed on August 25, 2008, and ASD's Reply to the Government's Oppositions ("Reply") was filed on August 29, 2008.

2. Claimant ASD's Emergency Motion and Reply request emergency relief as part of a Compliance and Oversight Plan.

3. ASD is still in need of the requested emergency relief and proposes the attached Plan for ASD's future operations for consideration by the Court at an evidentiary or other hearing as soon as possible.

Dated: September 16, 2008

Respectfully submitted,

**AKERMAN SENTERFITT**

By: /s/ Michael L. Fayad  
Michael L. Fayad, Esq.  
D.C. Bar No. 91694  
8100 Boone Boulevard, Suite 700  
Vienna, VA 22182  
Telephone: 703-790-8750  
Fax: 703-448-1801

Jonathan Goodman, Esq.<sup>1</sup>  
Florida Bar Number: 371912  
One Southeast Third Avenue  
25th Floor  
Miami, FL 33131-1714  
Phone: (305) 374-5600  
Fax: (305) 374-5095  
Email:  
jonathan.goodman@akerman.com

ATTORNEYS FOR CLAIMANTS

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<sup>1</sup> Mr. Goodman has been permitted to Appear *Pro Hac Vice*.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice and Proposed Compliance and Oversight Plan was served this 16th day of September, 2008 via the Court's electronic filing system upon the following counsel:

William Rakestraw Cowden, Esq.  
U.S. Attorney's Office  
555 Fourth Street, NW  
Washington, DC 20530

/s/ Michael L. Fayad  
Michael L. Fayad, Esq.