

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, DC 20530

Plaintiff,

v.

2 NORTH ADAMS STREET,  
QUINCY, FLORIDA 32351;

AND

205 CACTUS STREET  
TALLAHASSEE, FLORIDA 32304;

AND

APPROXIMATELY \$634,266.13 IN  
U.S. FUNDS PREVIOUSLY DEPOSITED  
AT THE BARTOW COUNTY BANK,  
ACCOUNT 059-602, IN THE NAME OF  
GOLDEN PANDA AD BUILDER;

AND

ONE 2009 LINCOLN MKS,  
VIN 1LNHM93R99G602546, IN THE  
NAME OF BOWDOIN HARRIS  
ENTERPRISES, INC.

AND

ONE 2008 TRITON 20 FOOT  
CABANA BOAT, VIN TJZP1458B808,  
VESSEL #FL5752NU,  
ONE 2008 MERCURY 90ELPT 4/S  
MOTOR, VIN 1B533883, AND  
ONE 2008 COMF TRAILER,  
VIN 5DKPB13168N019903, FL LICENSE  
881LLS;

CIVIL COMPLAINT FOR  
FORFEITURE *IN REM*

Civil Action No.: 1:08-cv-02205

Assigned to: Collyer, Rosemary M.

08-1345 (RMC)

RECEIVED

FEB 27 2009



On January 13, 2009, a Motion for Leave to Withdraw Claims Release of Claims to Seized Property and Consent to Forfeiture by the Claimants was filed with this Honorable Court which was granted on January 22, 2009.

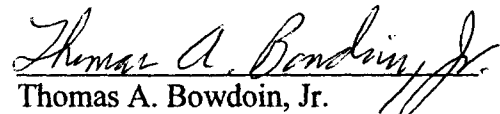
The Claimants after re-evaluation and reconsideration of the withdrawal and release of claims have decided that the decision to withdraw and release claims was a grave mistake and error for the following reasons.

- 1.) The procedures used to search and seize said property in the forfeiture were non-existent, improper, illegal and tainted with violations of due process of law in violation of the 4<sup>th</sup> and 5<sup>th</sup> Amendments concerning the claimants.
- 2.) The claimants were greatly influenced by legal counsel that was ineffective at best and only looking out for the best interest of the government at worse in violation of their Professional Code of Responsibility and Ethics on several issues requiring disbarment.
- 3.) The claimants were illegally intimidated, threatened and coerced by government agents and attorneys concerning potential prosecutions and sanctions against them.
- 4.) The claimants withdrew and released claims to seized property due to forfeiture under severe duress and true feeling of protest against what was illegally occurring.
- 5.) The government agents used fraud, trickery and deceit to implement illegal actions and procedures and then use those illegal actions and procedures to convince the claimants that the withdrawal and release of claims was their only option.
- 6.) The government agents and prosecutors acted in bad faith in deciding to use a civil investigation and forfeiture to gain information and evidence for a criminal indictment and conviction.

7.) The government agents and prosecutors have willfully and intentionally used an illegal forfeiture to destroy the business enterprise that has affected thousands of innocent purchasers with de minimis or non-existent harm to the public to punish the claimants.

THEREFORE, this rescission is now legally accomplished as a matter of law.

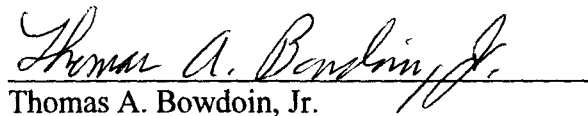
Respectfully submitted,

  
Thomas A. Bowdoin, Jr.  
Defendant – Pro se  
8 Gilcrease Lane  
Quincy, Florida 32351  
(850) 363-9602

**Verification**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

2/25/09  
Date

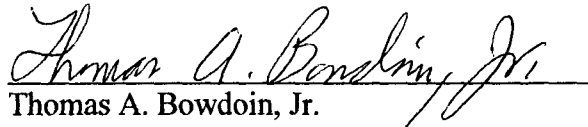
  
Thomas A. Bowdoin, Jr.

**Certificate of Service**

The undersigned certifies that a true copy of the enclosed Notice of Rescission and Withdrawal of Release of Claims to Seized Property and Consent to Forfeiture was mailed on the 25 day of February, 2009 upon the following:

William Cowden, Assistant U.S. Attorney  
Chief Asset Forfeiture Unit  
555 4<sup>th</sup> St. N.W.  
Washington, D.C. 20001

Jeffrey Taylor, U.S. Attorney  
United States Attorney's Office  
555 4<sup>th</sup> St., N.W.  
Washington, D.C. 20001

  
Thomas A. Bowdoin, Jr.