

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	PROOF OF SERVICE ON ALL
)	DEFENDANTS <i>IN REM</i>
v.)	
)	Civil Action No.: 08-cv-01345 (RMC)
8 GILCREASE LANE, QUINCY)	
FLORIDA 32351,)	
)	
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.)	
_____)	

PROOF OF SERVICE ON ALL DEFENDANTS *IN REM*

Plaintiff, United States of America, by and through its undersigned attorneys respectfully submits an attached "Process Return and Receipt Form" for each defendant in this *in rem* forfeiture case. The forms establish that each defendant in this *in rem* action, one parcel of improved real property and funds seized from fifteen (15) bank accounts at the Bank of America,

was served in accordance with applicable procedural rules. The forms applicable to the funds sued for forfeiture also establish the value of funds seized from each of the bank accounts, after credits, and net of offsets that occurred.

1. Plaintiff intends forfeiture of 8 Gilcrease Lane, Quincy, Florida. Proof of service on the Gilcrease Lane property is attached. Plaintiff did not serve the real property that it identified as a Myrtle Beach Condo in the Complaint. Its forfeiture is not now intended in this case.

2. The defendant personal properties in this case consist, in their aggregate, of \$65,838,999.70 (U.S. dollars) seized from ten (10) Bank of America (“BOA”) accounts that had been under the control of Thomas A. Bowdoin, Jr. (the “Ad Surf Daily” accounts) and \$14,045,598.07 seized from five (5) BOA accounts that had been under the control of Clarence or Dawn Busby (the “Golden Panda Ad Builder” accounts). The funds in the BOA accounts were seized by the government pursuant to warrants issued by the United States District Court for the District of Columbia and, after credits and debits were reconciled, are more fully described as:¹

- (a) \$1,088,246.48 from account #005483933650 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (b) \$31,674,039.13 from account #005483933016 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (c) \$937,470.18 from account #005483933553 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;

¹ On three of the Process Receipt and Return forms (those applicable to the accounts listed here under (a), (d) and (l)), one or two numbers were transposed or omitted. The omissions did not interfere with service of process on these defendants. The account numbers are listed accurately in the Complaint and in the text of this document.

- (d) \$13,286.89 from account #005483933605 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (e) \$403,791.04 from account #005483933634 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (f) \$4,999,893.00 from account #005562565949 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (g) \$23,721,256.25 from account #005562566896 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (h) \$1,000,338.91 from account #91000116796961 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (i) \$1,000,338.91 from account #91000116797038 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (j) \$1,000,338.91 from account #91000116797070 at Bank of America, in the name of Thomas A. Bowdoin, Jr., Sole Proprietor, DBA ADSURFDAILY;
- (k) \$2,282,999.72 from account #334011130192 at Bank of America, in the name of Clarence Busby Jr. and Dawn Stowers, DBA Golden Panda Ad Builder Deposit Account;
- (l) \$1,112,978.42 from account #334011130200 at Bank of America, in the name of Clarence Busby Jr. and Dawn Stowers, DBA Golden Panda Ad Builder Operating Account;
- (m) \$1,642,039.08 from account #334015765704 at Bank of America, in the name of Clarence Busby Jr. and Dawn Stowers, DBA Golden Panda Ad Builder Cashout Account;
- (n) \$6,000,000.00 from account #91000113401039 at Bank of America, in the name of Golden Panda Ad Builder; and
- (o) \$3,007,580.85 from account #91000113404188 at Bank of America, in the name of Golden Panda Ad Builder.

Respectfully submitted,

/s/

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Opposition to be served by means of the Court's ECF system on this 11th day of May 2009 upon all counsel of record.

/s/

William R. Cowden