Case: 1:08-cv-01345

Assign. Date: 8/5/2008 Description: General Civil

Assigned To: Collyer, Rosemary M.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, c/o United States Attorney's Office 555 Fourth Street, N.W. Washington, DC 20530,

Plaintiff,

VS.

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,

_	•				
- 13	efe	nr	я	n	te

VERIFIED CLAIM OF BOWDOIN/HARRIS ENTERPRISES, INC.

Claimant, Bowdoin/Harris Enterprises, Inc., herby submits this Verified Claim to real property of 8 Gilcrease Lane, Quincy, Florida 32351, and says:

Bowdoin/Harris Enterprises, Inc. is the owner of the real property at 8 Gilcrease Lane, Quincy, Florida 32351.

Bowdoin/Harris Enterprises, Inc. is the record title owner of the real estate at 8 Gilcrease Lane, Quincy, Florida 32351.

The Deed transferring title to the real estate at 8 Gilcrease Lane, Quincy, Florida 32351 transfers and conveys the property to Bowdoin/Harris Enterprises, Inc.

VERIFICATION

I HEREBY DECLARE, under penalty of perjury, that the foregoing is true and correct.

Executed on August 13, 2008.

Bowdoin/Harris Enterprises, Inc.

Thomas A. Bowdoin, Ji

{M2716173;1} 2

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Case: 1:08-cv-01345

Assign. Date: 8/5/2008

Description: General Civil

Assigned To: Collyer, Rosemary M.

UNITED STATES OF AMERICA, c/o United States Attorney's Office 555 Fourth Street, N.W. Washington, DC 20530,

Plaintiff,

VS.

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		

VERIFIED CLAIM OF ADSURFDAILY, INC.

Claimant, Adsurfdaily, Inc., herby submits this Verified Claim to an approximate \$53 million previously held on deposit at the Bank of America in accounts in the names of Thomas A. Bowdoin, Jr., sole proprietor, d/b/a Adsurfdaily, and says:

Adsurfdaily, Inc. is the owner of the funds held on deposit at Bank of America in the

names of Thomas A. Bowdoin, Jr., sole proprietor, d/b/a Adsurfdaily.

All of the accounts were initially opened in the name of Thomas A. Bowdoin, Jr.

The accounts and the funds in them were owned by Adsurfdaily, Inc. and were treated as

corporate assets.

The funds deposited into the bank accounts at issue were derived from the business

operations of Adsurfdaily, Inc.

Before the government served seizure warrants for the bank accounts at Bank of

America, I had signed and submitted to Bank of America the necessary paperwork to formally

change the technical name on the accounts to more correctly reflect the true and actual

ownership status of these accounts. In other words, I had submitted documents which would

have changed the official names on the accounts to Adsurfdaily, Inc.

In an abundance of caution, Adsurfdaily, Inc. has requested that Thomas A. Bowdoin, Jr.

also file a verified claim to these bank accounts in order to prevent a default should the United

States take the position that only Mr. Bowdoin is a claimant because the account names were

technically listed in his name (with an Adsurfdaily d/b/a) and the paperwork to officially change

the specific name on the accounts to Adsurfdaily, Inc. had not yet been processed and finalized

by Bank of America.

VERIFICATION

I HEREBY DECLARE, under penalty of perjury, that the foregoing is true and correct.

Executed on August 13, 2008.

ADSURFDAILY, INC.

Thomas A. Bowdoin Jr

(as President)

{M2716155;1} 2

Case: 1:08-cv-01345

Assign. Date: 8/5/2008 Description: General Civil

Assigned To: Collyer, Rosemary M.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, c/o United States Attorney's Office 555 Fourth Street, N.W. Washington, DC 20530,

Plaintiff,

VS.

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.

VERIFIED CLAIM OF THOMAS A, BOWDOIN, JR.

Claimant, Thomas Bowdoin, Jr., herby submits this Verified Claim to an approximate \$53 million previously held on deposit at the Bank of America in account in the names of Thomas A. Bowdoin, Jr., sole proprietor, d/b/a Adsurfdaily, and says:

Adsurfdaily, Inc. is the owner of the funds held on deposit at Bank of America in the names of Thomas A. Bowdoin, Jr., sole proprietor, d/b/a Adsurfdaily.

All of the accounts were initially opened in my name, Thomas A. Bowdoin, Jr.

However, the accounts were owned by Adsurfdaily, Inc. and were treated as corporate assets. Adsurfdaily is the d/b/a listed on the accounts at issue.

The funds deposited into the bank accounts at issue were derived from the business operations of Adsurfdaily, Inc.

Before the government served seizure warrants for the bank accounts at Bank of America, I had signed and submitted to Bank of America the necessary paperwork to formally change the technical name on the accounts more correctly to reflect the true and actual ownership status of these accounts. In other words, I had submitted documents which would have changed the official names on the accounts to Adsurfdaily, Inc.

In an abundance of caution, Adsurfdaily, Inc. has requested that I also file a verified claim to these bank accounts in order to prevent a default should the United States take the position that only I am a claimant because the account names were technically listed in my name (with an Adsurfdaily d/b/a) and the paperwork to officially change the specific name on the accounts to Adsurfdaily, Inc. had not yet been processed and finalized by Bank of America.

<u>VERIFICATION</u>

I HEREBY DECLARE, under penalty of perjury, that the foregoing is true and correct.

Executed on August 13, 2008.

By: Home C. Bridge, Ja.
Thomas A. Bowdoin Sr.

{M2716166;1}