

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.

Case: 1:08-cv-01345
Assigned To: Collyer, Rosemary M.
Assign. Date: 8/5/2008
Description: General Civil

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. _____ /

DECLARATION OF GARY TALBERT

1. My name is Gary Talbert.
2. I am the Human Resource Manager, Assistant CFO and Website Editor of
Adsurfdaily, Inc.

EXHIBIT H

3. I was present at the Adsurfdaily office in Quincy, Florida on the day that Secret Service agents executed a search warrant.

4. The Secret Service agents did not ask me to help them locate what they wanted to find, and I did not hear them ask any other Adsurfdaily employee for help, either. Instead, they instructed us to leave and to go home early.

5. In the days after the Secret Service completed its search (removing all of the company computers and most of its business records), I found more than 550 additional checks, totaling more than \$1.2 million, which the Secret Service left behind. I delivered those checks to the Secret Service, along with the Adsurfdaily stamp which the Secret Service and/or the bank could use to assist in the negotiation of the seized checks, including the additional checks I delivered to the Secret Service.

6. Although the Secret Service agents initially accepted the additional checks I found and voluntarily delivered, they ultimately told me to keep the checks and they returned them to me.

7. Specifically, on Monday, August 11, 2008, I went to the Secret Service once again and attempted to drop off approximately 16 checks, totaling approximately \$40,000. These checks were also made payable to Adsurfdaily. The Secret Service agent specifically told me to not bring any more checks to the Secret Service. I was instructed to not drop off any further checks, to keep the checks I was attempting to deliver and to send the checks to the members who sent them to the Adsurfdaily office.

8. The Secret Service agents (or Task Force agents) also returned approximately \$15,000 in checks which I had dropped off the previous Friday (August 8, 2008).

9. Since the seizure of the Adsurfdaily bank accounts and the execution of the search warrants, Adsurfdaily and its executives have been swamped with telephone calls and emails from Adsurfdaily members who say they are upset over these developments and who want the business up and running as quickly as possible. They have praised the Adsurfdaily program for generating additional traffic to their websites.

10. The seizure of the accounts and the removal of computers and files have caused the company to effectively be placed out of business. The seizure of the bank account balances have crippled the company, as it cannot pay employees, vendors and creditors.

11. Unless all or most of the seized funds and the computer equipment are returned quickly, and unless Adsurfdaily, Inc. is provided access to its business files, it is exceedingly unlikely that the business will be able to resume.

12. Adsurfdaily's employees and their families depend on Adsurfdaily for their salaries, which provides critical support to their families. Many of the employees have already contacted me to say that they are extremely worried about their ability to financially support their families without working for Adsurfdaily and without receiving salaries.

VERIFICATION

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

Executed on this 14th day of August, 2008.

By: 
GARY TALBERT