

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
Ocala Division

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NO. 5:06-cr-22(S1)-Oc-10GRJ
	)	
WESLEY TRENT SNIPES	)	
et al.,	)	
_____	)	

**AFFIDAVIT OF WILLIAM R. MARTIN**

I, William R. Martin, do hereby state the following:

1. Each allegation made by Robert R. Bernhoft regarding my alleged lack of trial preparation in this matter is false.
2. As co-lead counsel in this matter, Sutherland Asbill & Brennan LLP ("Sutherland") was responsible for receiving all discovery from the government. Over 400,000 pages of discovery has been reviewed, organized and analyzed by a team of lawyers at Sutherland including three partners, one of whom is a former chief counsel for the Internal Revenue Service ("IRS") and one of whom is a former District Counsel for the IRS, one senior-level counsel, three associates, a paralegal and an outside investigator. In addition, the documents have been loaded into an electronic document system, or database, to facilitate the review of the documents by all undersigned counsel and to ease use of and retrieval of the documents during trial.
3. The discovery documents are continually updated and analyzed with the entire team retained by Mr. Snipes to represent him as part of our collective trial preparation.
4. The record indicates that all appropriate discovery motions have been filed.
5. All discovery demands have been made of the government, and, as the government indicated at the pre-trial conference, *Giglio* and *Jenks* evidence is forthcoming, along with a witness and exhibit list.
6. The unsupported and false allegations made by Mr. Bernhoft on behalf of Mr. Snipes in an attempt to find a basis for a continuance of this trial have created an irreconcilable conflict with all trial counsel named on the Supplement to the Emergency Motion to Withdraw.

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

October 4, 2007

/s/ WILLIAM R. MARTIN  
William R. Martin