

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
OCALA DIVISION

UNITED STATES,)
)
 Plaintiff,)
) Case No. 5:06-cr-00022-WTH-GRJ
 v.)
)
 WESLEY SNIPES,)
)
 Defendant.)

**SNIPES' MOTION FOR LIMITED TRAVEL
FOR WORK OBLIGATIONS**

Comes now the Defendant, Wesley Trent Snipes (hereinafter "Snipes"), by and through his counsel of record, Daniel R. Meachum & Associates, LLC., by Daniel R. Meachum, who respectfully moves the Court for permission to travel outside the continental United States to fulfill contractual obligations on two films, as more fully set forth below.

1.

The Order Setting Conditions of Release entered in this case on December 8, 2006, restricts Mr. Snipes' travel to the continental United States. (Doc 60.)

2.

The Order Setting Conditions of Release allowed Mr. Snipes to return to Namibia, to complete the shooting of a film he was working on at that time. When discussing this request, the Government agreed that Mr. Snipes posed no risk of flight, is not a risk to himself or the community, and has strong family ties in the United States.

3.

On August 6, 2007, the Court granted Snipes' Unopposed Motion to Amend Conditions of Release (Doc. 181), which authorized Mr. Snipes to film Art of War in Vancouver, Canada.

4.

On December 19, 2007, the Court granted Snipes' Motion for Limited Holiday Travel to be with his family (Doc 329), authorizing him to travel to South Korea for Christmas and New Year's Eve.

5.

On March 12, 2008, the Court granted Mr. Snipes' Unopposed Amended Motion to Travel and Conditions of Release, (Doc. 430) authorizing him to travel outside the country for the limited purpose of post-production of The Art of War II, for which he was under contract.

6.

By Order entered May 22, 2008 (Doc. 475) this Court continued Mr. Snipes' bail pending appeal. On June 19, 2008, the government filed a notice of appeal from that bail order.

7.

At this time, Mr. Snipes is herein respectfully requesting leave to travel to London, England and Bangkok, Thailand for the limited purpose of fulfilling other contractual obligations relating to two additional films- Gallowalker and Chasing the Dragon.

8.

Mr. Snipes' employment obligations require him to be onsite for approximately three days for post-production editing on the film Gallowalker. Post-production editing of the film is scheduled to begin on July 14, 2008 .

9.

The post-production editing is central to the completion of the film. Mr. Snipes is under contract for this post-production work, and his failure to take part in this post-production work may be deemed a breach of his contract with adverse effects for the completion of the film and for his future livelihood as an actor.

10.

In addition to the Gallowalker contractual obligations, Mr. Snipes seeks leave to travel to Bangkok, Thailand to film Chasing the Dragon, on which Mr. Snipes is under contract to perform as an actor.

11.

The filming of Chasing the Dragon is scheduled to begin on September 8, 2008 in Bangkok and is expected to last approximately eight weeks.

12.

The appeal and cross-appeal in this case will not be completed in the ordinary course before the end of the shooting schedule for Chasing the Dragon and the completion of the post-production work in Gallowalker.

13.

These requests are similar to those previously granted by this Honorable Court. Mr. Snipes has conscientiously complied with the Order Setting Conditions of Release

living up to the trust the Court has shown in him. He has never presented and does not currently present a risk of flight.

14.

Further, the circumstances of the work, surrounded by a cast of other actors and film and production professionals as well as Mr. Snipes' contractual obligations to complete these films provide additional assurances that he does not present a risk of flight; were he to abscond under these circumstances, it would destroy his ability to earn a living for the rest of his life. Mr. Snipes will of course voluntarily return after his work on this film, as he has done each time he has been granted permission by this Court.

15.

It is essential that Mr. Snipes complete these two projects to satisfy his civil tax liabilities and provide for his family.

16.

If the Court requires additional specificity or confirmation of the travel arrangements or contractual details relating to these films, counsel will provide it at the Court's request.

WHEREFORE, for the reasons set forth above and any others this Court may find appropriate, Snipes respectfully requests that the Court return his passport and allow him to travel to London for the period beginning July 13, 2008 through July 17, 2008 and further travel subsequently to Bangkok on September 8, 2008, to return upon completion of filming.

Respectfully submitted on June 25, 2008.

/s/ Daniel R. Meachum

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