

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

United States)	
)	
)	
v.)	NO. 21cr201
)	
Zachary Martin)	
)	
)	
<u>Defendant.</u>)	

MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

Comes now, undersigned counsel, and moves for the *pro hac vice* admission of Dee Wampler, Joseph Passanise and Taylon McCafferty Summers. In support of this request, undersigned counsel offers the following:

1. I am acquainted with counsel for defendant Zachary Martin through representation of codefendants in a lengthy and complex criminal case in this Court. *United States v. Goncalves*, et al., 1:09cr335-RJL. I was impressed with level representation they provided to their client.
2. Declarations from counsel for Mr. Martin are attached to this filing. All attorneys meet the criteria for practice under Local Rule 44.1.
3. I hereby sponsor Dee Wampler, Joseph Passanise and Taylon McCafferty Summers for admission to this court *pro hac vice* on behalf of defendant Zachary Martin.

For the foregoing reasons, undersigned counsel respectfully requests that this Court admit counsel for defendant Zachary Martin to practice before this Court *pro hac vice*.

Respectfully Submitted,

By:

/s/ Charles Burnham
Charles Burnham VSB # 72781
Attorney for the Accused
Burnham & Gorokhov, PLLC
1424 K St. NW, Suite 500
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(202) 386-6920 (phone)
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CERTIFICATE OF SERVICE

I have served this filing on the government through the ecf system.

Respectfully Submitted,

By: /s/ Charles Burnham
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**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT COURT OF COLUMBIA**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Case No. 21-cr-201
)	
ZACHARY MARTIN,)	
)	
Defendant.)	

DECLARATION OF JOSEPH S. PASSANISE

I, Joseph Samuel Passanise with the WAMPLER & PASSANISE LAW OFFICE (417-882-9300), under penalty of perjury, declare as follows:

1. I am and have been an active member in good standing of the Bar of the State of Missouri since 1997 with No Disciplinary Actions. I am further admitted to practice before the United States District Court, for the Western and Eastern District of Missouri, Eighth Circuit Court of Appeals of Missouri, and the Supreme Court of the United States.
2. Previously, I was admitted Pro Hac Vice several years ago in this District and Jury tried Lee Allen Tolleson before Judge Richard Leon
3. Pursuant to Rule 44.1 of the Local Rules of Criminal Procedure, I am eligible to practice before this Court. I agree to abide by the Standards of Professional Conduct set forth in the Local Rules and to comply and to become familiar with the Rules of Criminal Procedure;
4. As an attorney who is a member of the bar of this Court in good standing has been designated as co-counsel in the above entitled action. The name, address and telephone number of the attorney is:

Charles Burnham (D.C. Bar #1003464)
Burnham & Gorokhov, PLLC
1424 K. Street NW, Suite 500
Washington, D.C. 20005
Tel: (202) 765-2173
charles@burnhamgorokhov.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 3, 2021.

/s/Joseph Passanise
Joseph S. Passanise (MO Bar #46119)
Wampler & Passanise Law Office
2974 E. Battlefield
Springfield, MO 65804
Tel: (417) 882-9300
Fax: (417- 882-9310
joe@entrapped.com
Counsel for Defendant

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT COURT OF COLUMBIA**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Case No. 21-cr-201
)	
ZACHARY MARTIN,)	
)	
Defendant.)	

DECLARATION OF TAYLON SUMNERS

I, Taylon McCafferty Sumners with the WAMPLER & PASSANISE LAW OFFICE (417-882-9300), under penalty of perjury, declare as follows:

1. I am and have been an active member in good standing of the Bar of the State of Missouri since September 2020, with no disciplinary actions. I am further admitted to practice before the United States District Court, for the Western District of Missouri.
2. I have never been admitted *pro hac vice* by this Court within the last two years.
3. Pursuant to Rule 44.1 of the Local Rules of Criminal Procedure, I am eligible to practice before this Court. I agree to abide by the Standards of Professional Conduct set forth in the Local Rules and to comply and to become familiar with the Rules of Criminal Procedure;
4. As an attorney who is a member of the bar of this Court in good standing has been designated as co-counsel in the above entitled action. The name, address and telephone number of the attorney is:

Charles Burnham (D.C. Bar #1003464)
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Washington, D.C. 20005
Tel: (202) 765-2173
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I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 3, 2021

/s/ Taylon Sumners
Taylon Sumners (MO Bar #73114)
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taylon@deewampler.com
Counsel for Defendant

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT COURT OF COLUMBIA**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	Case No. 21-cr-201
)	
ZACHARY MARTIN,)	
)	
Defendant.)	

DECLARATION OF DEE WAMPLER

I, Dee Wampler, under penalty of perjury, declare as follows:

1. I am and have been an active member in good standing of the Bar of the State of Missouri since 1966. I am further admitted to practice before the United States District Court, for the Western and Eastern District of Missouri, Eighth Circuit Court of Appeals of Missouri, and the Supreme Court of the United States.(July 15, 1971)
2. Previously, I was admitted Pro Hac Vice several years ago in this District and Jury tried Lee Allen Tolleson before U.S. District Court Judge Richard Leon
3. Pursuant to Rule 44.1 of the Local Rules of Criminal Procedure, I am eligible to practice before this Court. I agree to abide by the Standards of Professional Conduct set forth in the Local Rules and to comply and to become familiar with the Rules of Criminal Procedure;
4. I am currently on probation from the Missouri Supreme Court, *In re Dee Wampler*, SC98004 arising out of violations of Rules 4-1.4 (inadequate communication) and 4-1.15(safekeeping property). In that case, the Missouri Supreme Court issued a suspension of my license, but that suspension was stayed, and I was placed on

probation for a period of three years beginning July 30, 2019. I am currently in “good standing.”

5. As an attorney who is a member of the bar of this Court in good standing has been designated as co-counsel in the above entitled action. The name, address and telephone number of the attorney is:

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 3, 2021.

/s/Dee Wampler
Joseph S. Passanise (MO Bar #46119)
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