

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

CRIMINAL CASE NO.: 9:22-MJ-08332-BER-1

UNITED STATES OF AMERICA,

vs.

SEALED SEARCH WARRANT,  
\_\_\_\_\_ /

**THE PALM BEACH POST'S MOTION TO INTERVENE FOR THE LIMITED PURPOSE OF OBTAINING ACCESS TO SEARCH WARRANT COURT RECORDS**

*The Palm Beach Post* (“*The Post*” or “Intervenor”), a newspaper owned and operated by Gannett Co., Inc., moves to intervene in this proceeding for the limited purpose of obtaining access to all documents filed with this Court related to the search warrant executed on Monday, August 8, 2022, at former President Donald J. Trump’s Mar-a-Lago Palm Beach, Florida club and residence (the “Search Warrant Records”), and also to oppose any attempts to limit public access to the court records and court hearings associated with this proceeding. The requested Search Warrant Records include, without limitation: (1) the search warrant; (2) the search warrant application; 3) any probable cause affidavit filed in support of the search warrant application; (4) any search warrant return, including any inventory or receipt identifying property seized pursuant to the execution of the warrant; (5) any motion to seal any part of the Search Warrant Records; and (6) any order granting or denying a motion to seal any part of the Search Warrant Records. The grounds for this relief are as follows:

1. *The Post* is a newspaper of general circulation in Palm Beach County and surrounding Counties and distributes news over the Internet via the commercial website [www.palmbeachpost.com](http://www.palmbeachpost.com).

2. *The Post* has covered the news about Donald J. Trump for decades, including his immersion in a vast number of public controversies and disputes, arising not only from his term as President of the United States, but also from virtually every other facet of his business, social, and political life. To carry out its newsgathering activities, *The Post* relies upon court records and other public records as principal sources of information. *The Post* desires to continue reporting to its readers on the many newsworthy events surrounding Mr. Trump who, according to news reports, is contemplating making another run for the Presidency.<sup>1</sup>

3. *The Post* has standing to intervene in this proceeding for the limited purpose of protecting public access to the records and events associated with this proceeding. *Newman v. Graddick*, 696 F.2d 796, 800 (11<sup>th</sup> Cir. 1983).

4. *The Post* adopts and incorporates by reference herein the arguments set forth by the New York Times Company in its Motion to Intervene for the Limited Purpose of Obtaining Access to Search Warrant Records and Supporting Memorandum of Law, filed herein on August 10, 2022. [DE 8].

WHEREFORE, The Post respectfully requests that it be permitted to intervene in this proceeding for the limited purpose of obtaining access to the Search Warrant Records, and to oppose any attempts to limit public access to the public records related to this judicial proceeding.

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<sup>1</sup> See, e.g., Fin Gómez, Robert Costa, CBS News, *Trump told allies he's considering announcing 2024 presidential bid early, sources say*, July 6, 2022, available at <https://www.cbsnews.com/sanfrancisco/news/trump-2024-presidential-campaign-announcement-summer/>; Dennis Aftergut, NBC News, *Why an FBI search won't stop Trump from running in 2024 – and might encourage him*, August 8, 2022, 9:42 PM, available at <https://www.nbcnews.com/think/opinion/trump-fbi-raid-fuel-2024-presidential-campaign-rcna42098>; Haris Alic, FOX News, *FBI raid on Mar-a-Lago could boost Trump's 2024 White House run, say strategists*, available at <https://www.foxnews.com/politics/fbi-raid-rallies-gop-around-trump-overshadows-bidens-policy-wins>.

Dated: August 12, 2022.

Respectfully submitted,

**ATHERTON GALARDI MULLEN  
& REEDER PLLC**

By: /s/ Martin Reeder

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*Counsel for Proposed Intervenor, The Palm Beach  
Post*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 12, 2022, a true and correct copy of the foregoing document was electronically filed and will be furnished via CM/ECF. A copy of the foregoing is also being served by email and first-class mail, postage paid, to:

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