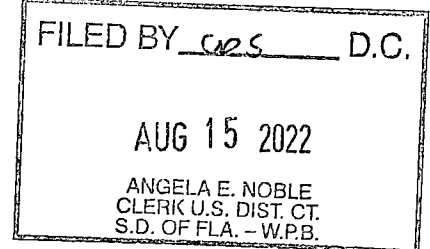


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-MJ-8332-BER



IN RE SEALED SEARCH WARRANT
_____ /

MOTION TO OPEN SEARCH WARRANT AFFIDAVIT(S) AND
OTHER DOCUMENTS AND TO DESIGNATE MOVANT AS A LIMITED
PARTY OF INTEREST FOR NOTICE AND SERVICE OF DOCUMENTS

Movant undersigned moves the Court to open the Affidavit(s) and other supporting materials in this proceeding; in support of his request for relief he states:

1. Movant is a ballot-qualified candidate for United States Senator in New Hampshire in the 2022 primary election (see andymartinforussenator.com) and a Republican Party activist.

2. Because New Hampshire conducts the First-In-The-Nation ("FITN") primary, the activity of potential presidential candidates is of special interest to New Hampshire voters in both primary and general election discussions.

3. In particular, FITN activity will begin the day after the November election this year, or in less than three (3) months.

4. Because questions about the search warrant are already appearing, Movant is making an extra effort to be informed about the nature and status of the controversy.

5. Movant is an author/writer. He first encountered former President Donald Trump in 1979 when Movant was serving on the Board of Managers of Olympic Tower Condominium in New York City. Movant reviewed Trump's "board package" (application to lease an apartment) and approved his proposed lease of a condominium unit.

6. Movant later consulted informally with the architects for Trump Tower.

7. In each of the subsequent decades, Movant and Trump's lives have crisscrossed in minor and major ways. Most recently, Movant was a guest at a function at Mar-Lago in 2015, when Trump appeared to welcome the guests.

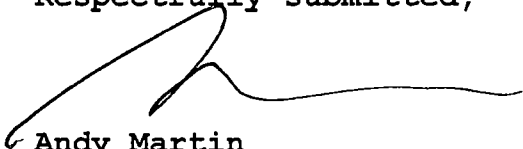
8. Because of his decades-long connection to Trump, Movant is working on a book, tentatively "A Psychological Study of President Donald Trump," and is assembling material and doing his own analysis. (Movant is not a psychologist or psychiatrist but is a skilled interviewer and evaluator of human behavior and was familiar with the Trump milieu in New York and Palm Beach).

9. Access to the Affidavit(s) and any supporting materials in this matter would obviously be of special interest to Movant in preparing his book.

10. Movant is in South Florida for a very limited period of time to do in person, on-the-scene research on the search warrant controversy.

11. Movant asks that pursuant to whatever option is available, he be designated as a limited party to this proceeding for the purpose of being entitled to receive service of notices, documents and appeals, if any.

Respectfully submitted,



Andy Martin
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Email: andymart20@aol.com

Agreement to receive mail notices and service of documents

The undersigned agrees to receive notices and service of documents by email.



Andy Martin

Certificate of Service

I certify that on August 13, 2022 I served the following parties/interested persons and, upon being notified by the court, will serve any additional parties/interested persons:

Juan Antonio Gonzalez
United States Attorney
4th Floor
500 Australian Avenue
West Palm Beach, FL 33401
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Andy Martin