

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

TAYLOR BUDOWICH, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 1:21-cv-03366
)	
NANCY PELOSI, <i>et al.</i> ,)	
)	
Defendants.)	
)	

AFFIDAVIT OF CHRISTOPHER W. DEMPSEY

Before me, the undersigned notary, on this day, personally appeared Christopher W. Dempsey, a person whose identity is known to me, who being duly sworn, hereby deposes and states:

1. My name is Christopher W. Dempsey. I am over 18 years of age and a resident of the State of Florida. I have personal knowledge of the facts set forth in this Affidavit. If called upon, I would testify competently to the facts stated herein.

2. I am providing this Affidavit pursuant to Rule 65.1(b), Rules of the United States District Court for the District of Columbia, which states that if an application for a temporary restraining order is to be made outside regular business hours, the party seeking relief shall, if possible, notify the Clerk of such a forthcoming application during business hours so that proper arrangements can be made to handle the matter and that, if such notice is not given to the Clerk, the party shall file with its application an Affidavit stating why such notice was not given.

3. While Mr. Budowich was attending his deposition proceedings in Washington, D.C., before the Defendant Select Committee, his financial institution, Defendant JPMorgan Chase & Co. (“JPMorgan”), transmitted to Mr. Budowich a letter dated December 21, 2021, stating that JPMorgan will produce documents pursuant to a subpoena received from the Select Committee

unless Mr. Budowich, by December 24, 2021, at 5:00 p.m. EST, provides JPMorgan with “documentation legally obligating it to stop taking such steps.”

4. Despite the fact that Congress, this Court, and banking institutions across the nation are currently closed for the holiday weekend and the Select Committee’s investigation into past events does not present any exigency or immediacy, the Select Committee has refused to extend the deadline for when JPMorgan must produce documents thus permitting Mr. Budowich to file this lawsuit and his application for emergency relief with reasonable notice to the Court during business hours.

5. Likewise, JPMorgan itself has refused to delay its production of Mr. Budowich’s private and personal financial records pursuant to the Select Committee subpoena at issue.

6. Mr. Budowich therefore has no other option but to file the instant Complaint and Motion for Temporary Restraining Order outside regular business hours without prior notice to the Court.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 24th day of December, 2021.


CHRISTOPHER W. DEMPSEY

STATE OF FLORIDA
COUNTY OF DUVAL

The foregoing instrument was SWORN TO and SUBSCRIBED before me before me this 24th day of December 2021 by Christopher W. Dempsey, who took an oath via [] physical presence OR [] online notarizations, who is: (check one) [] personally known to me OR [] has produced _____ as identification.




Notary Public, State of Florida