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STIPULATED
PROTECTIVE ORDER**

Videotaped Deposition of
Anne Holt
January 08, 2025

In Re Bank of America CA Unemployment Benefits Litigation



Anne Holt

In Re Bank of America CA Unemployment Benefits Litigation

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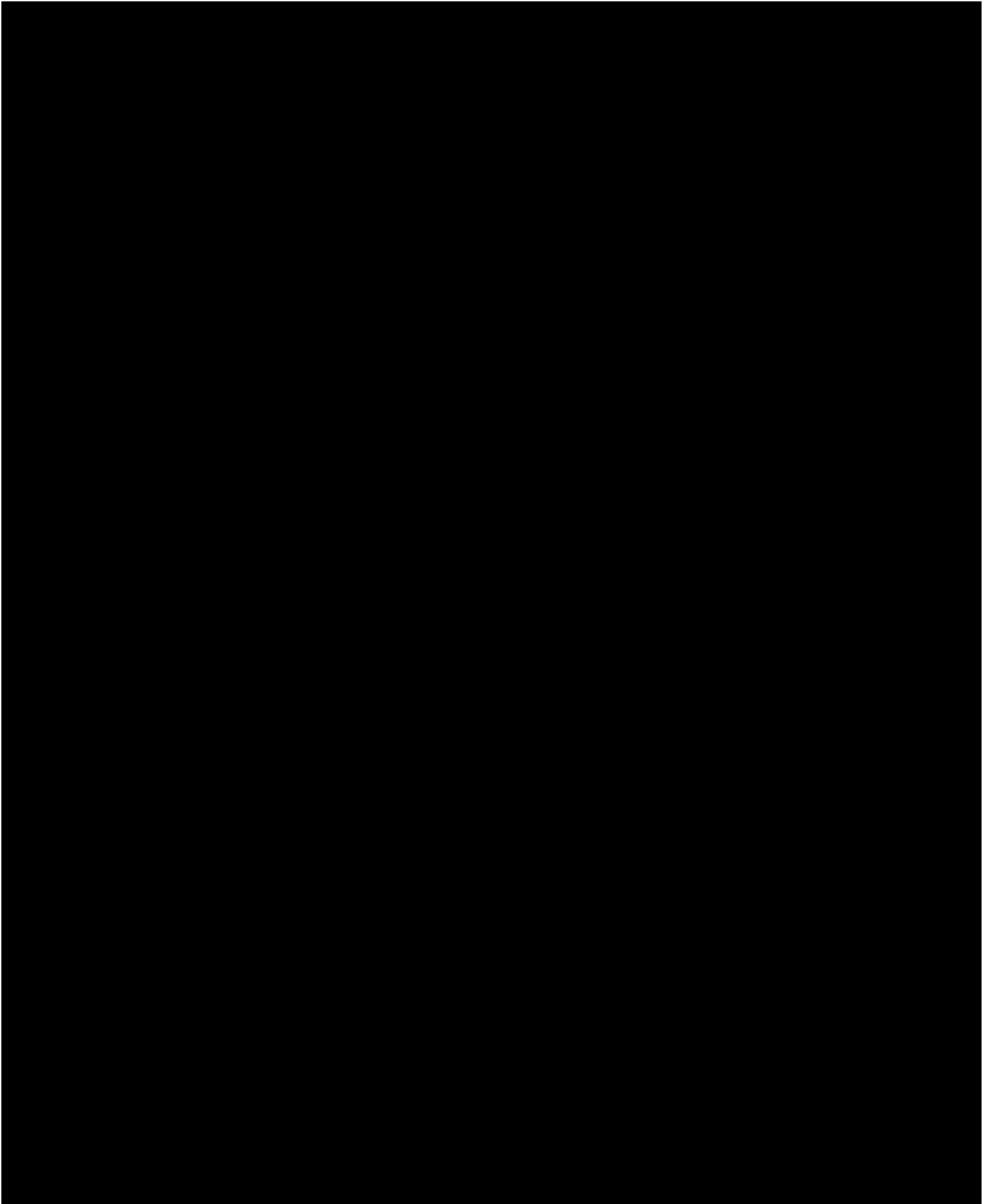
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

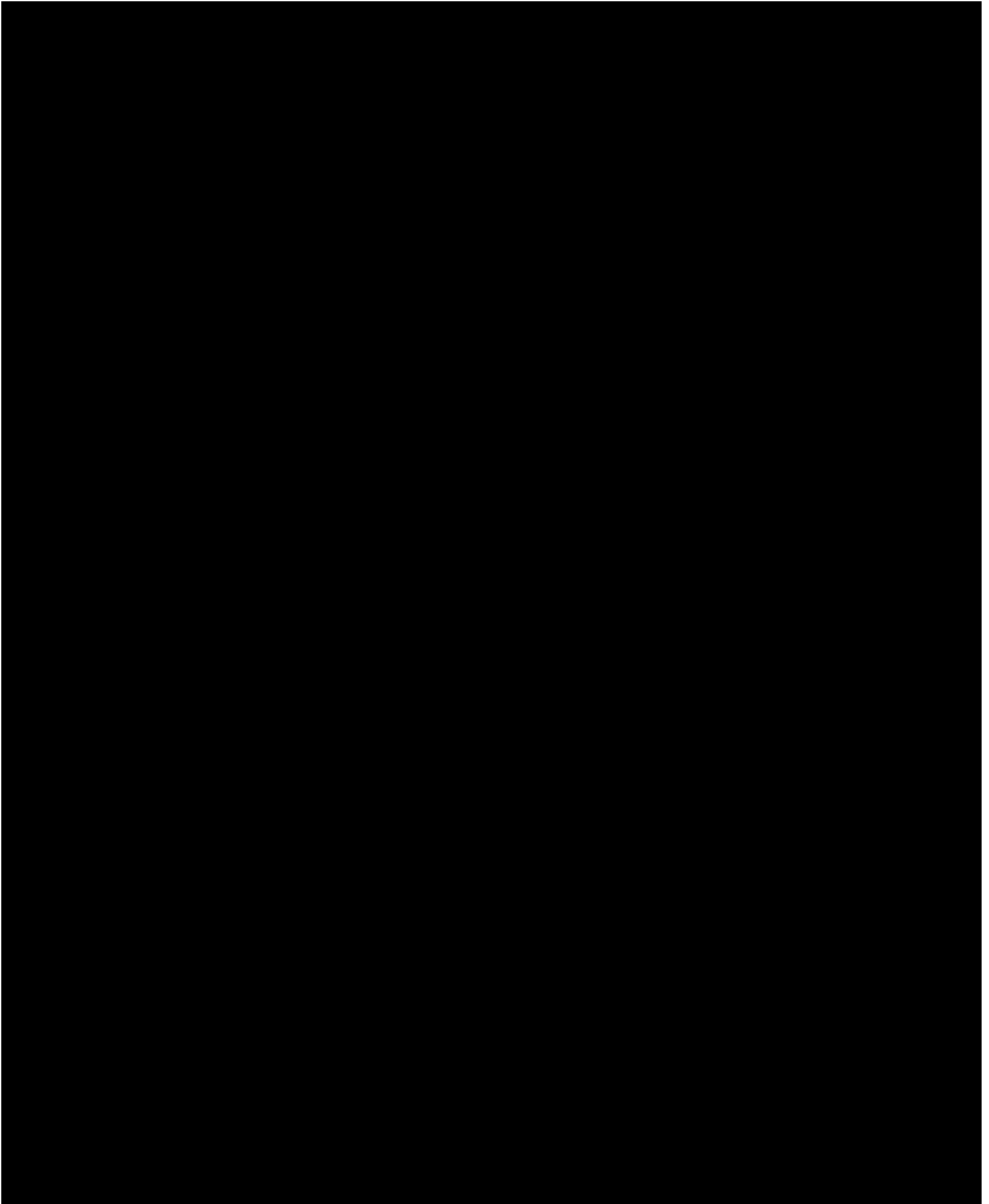
IN RE BANK OF AMERICA	Case No.
CALIFORNIA UNEMPLOYMENT	3:21-md-02292
BENEFITS LITIGATION	-GPC-MSB

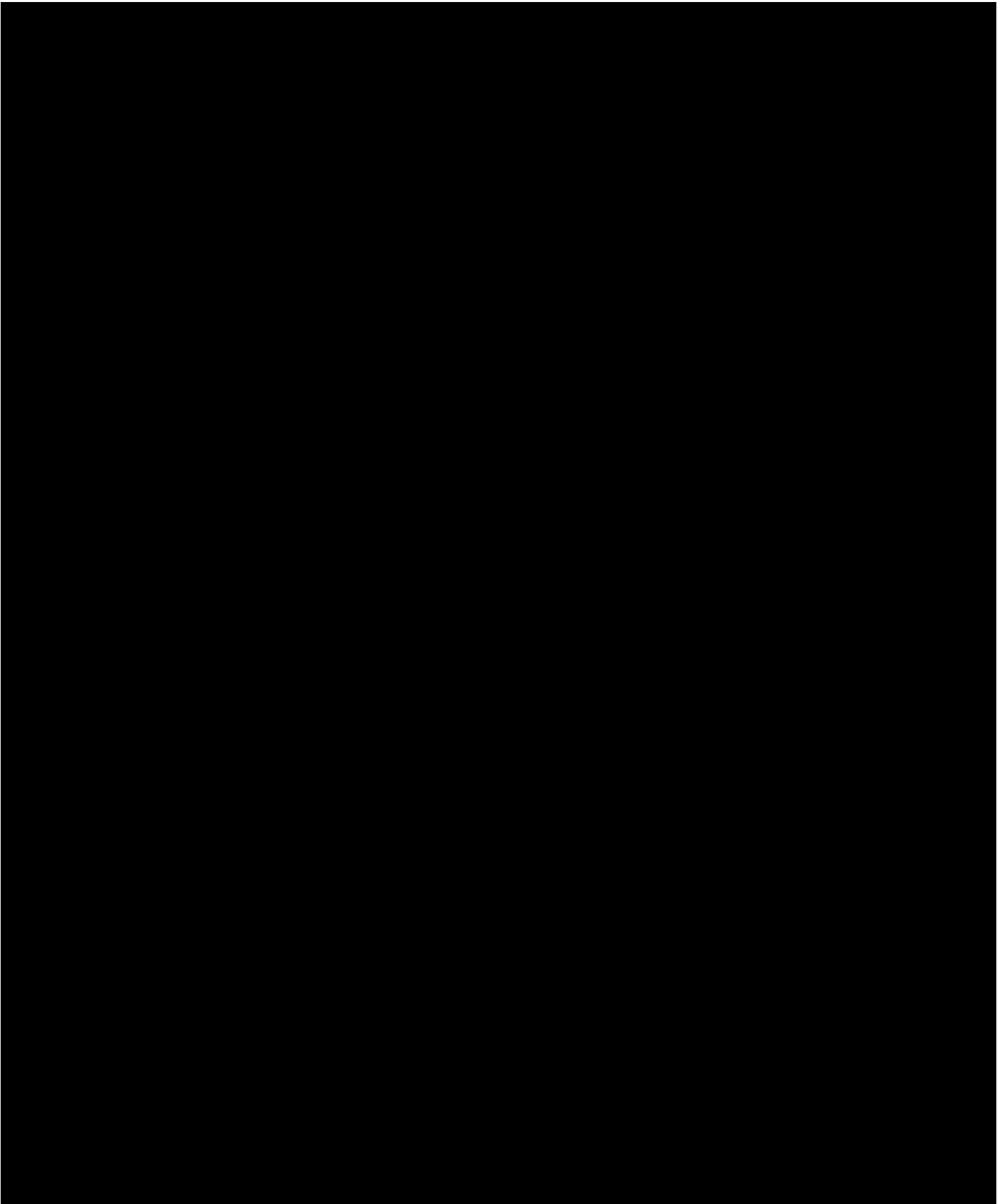
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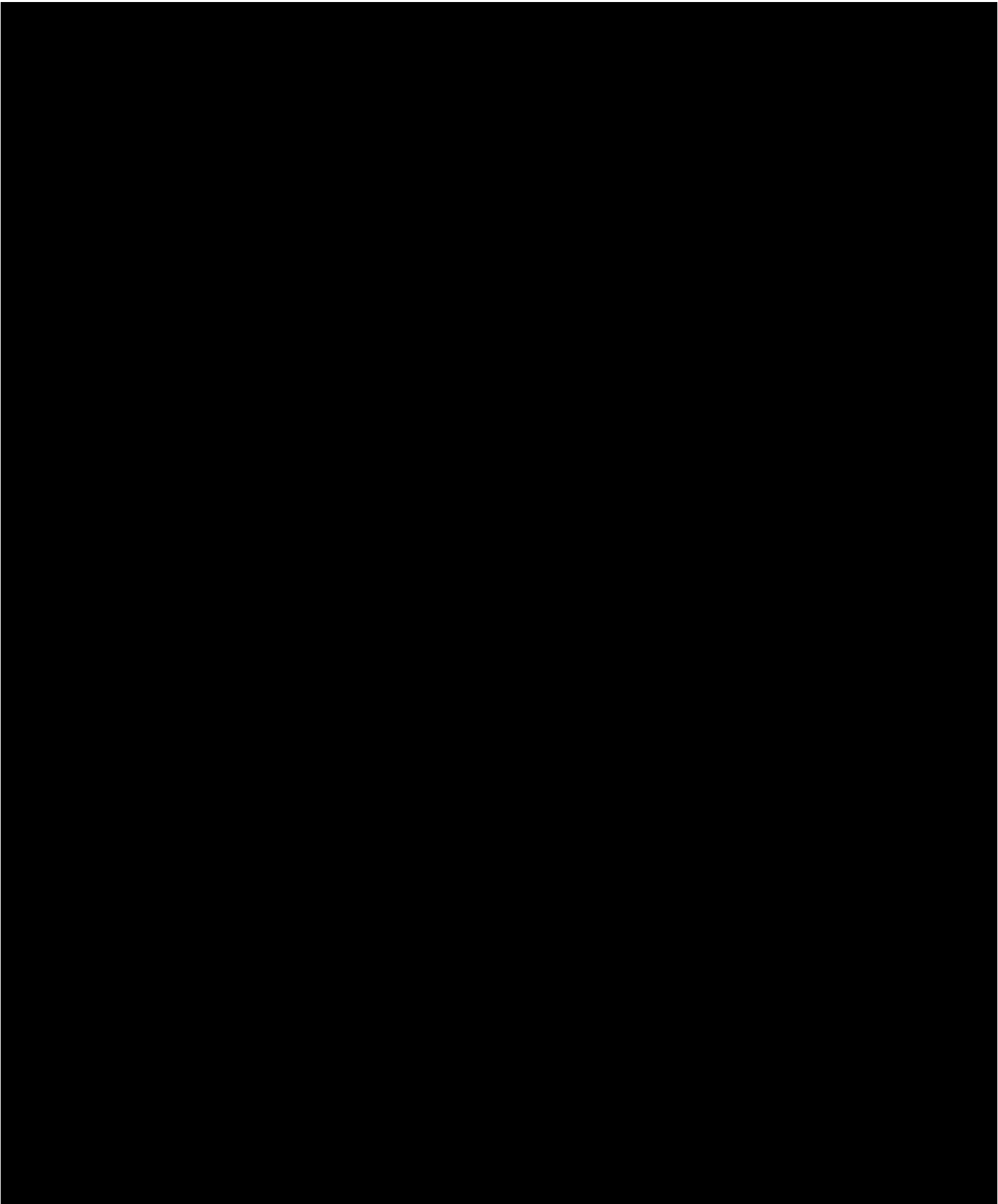
VIDEOTAPED DEPOSITION OF ANNE HOLT
Charlotte, North Carolina
January 8, 2025
10:07 a.m.

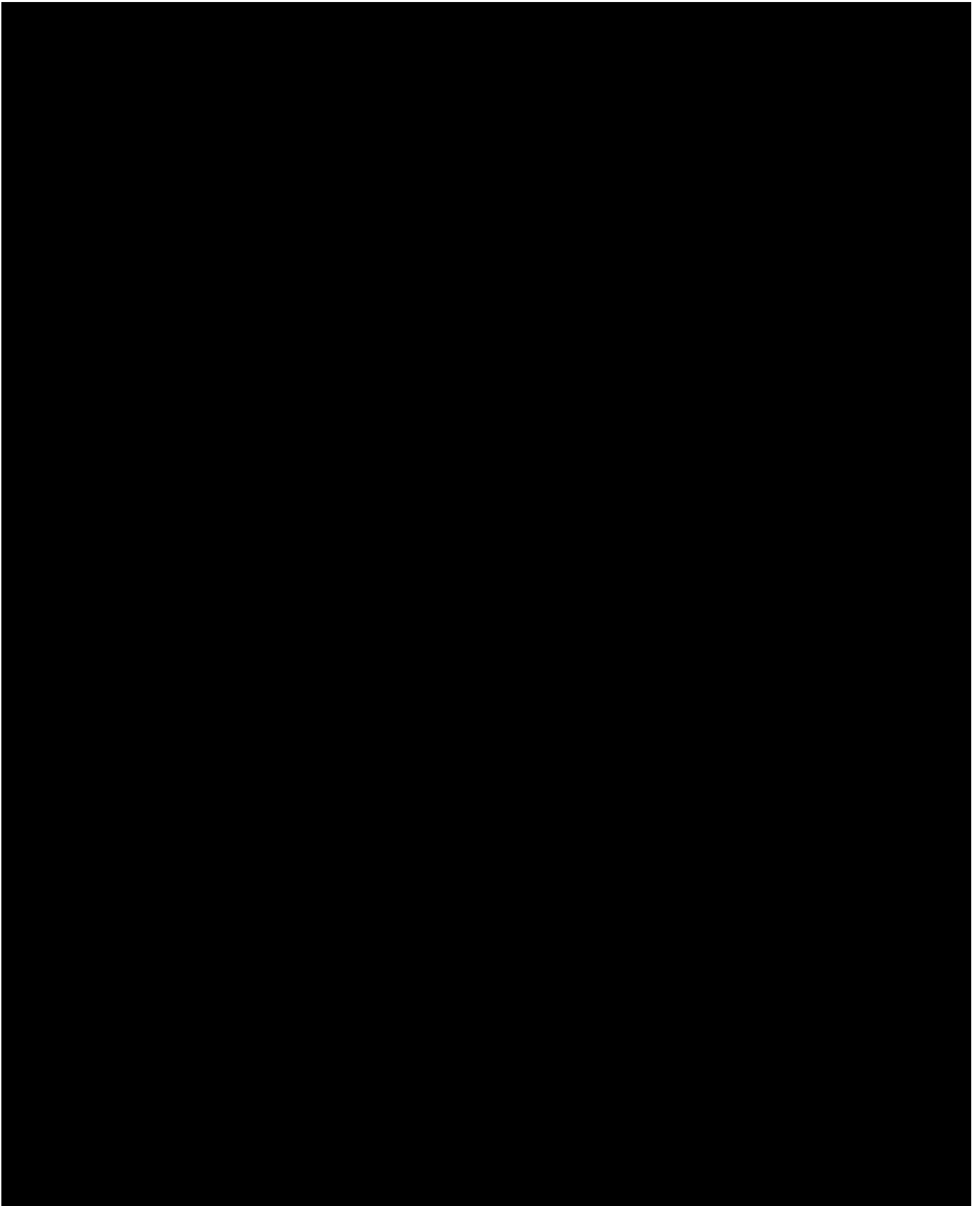
Reported by: Karen K. Kidwell, RMR, CRR
Job Number: 10155338

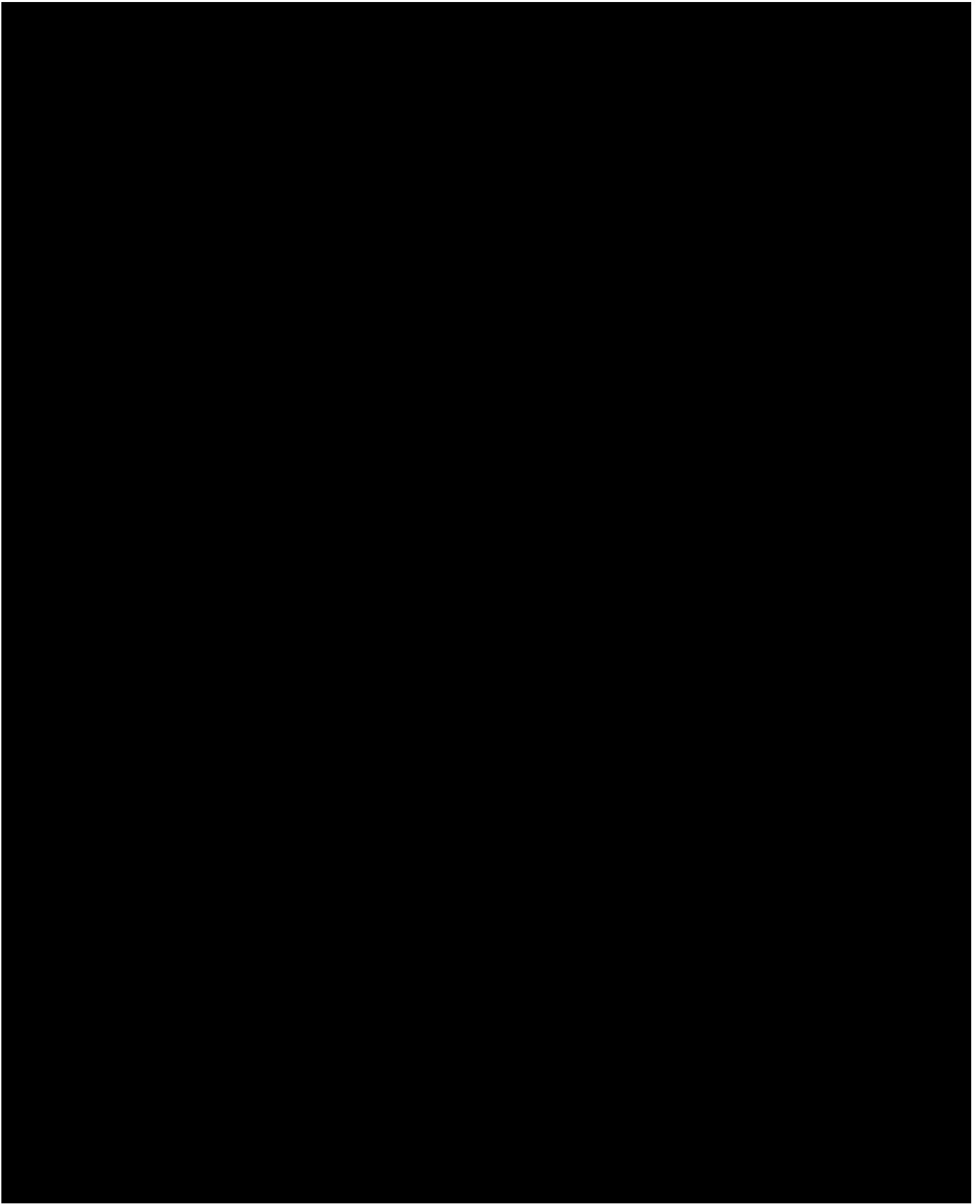


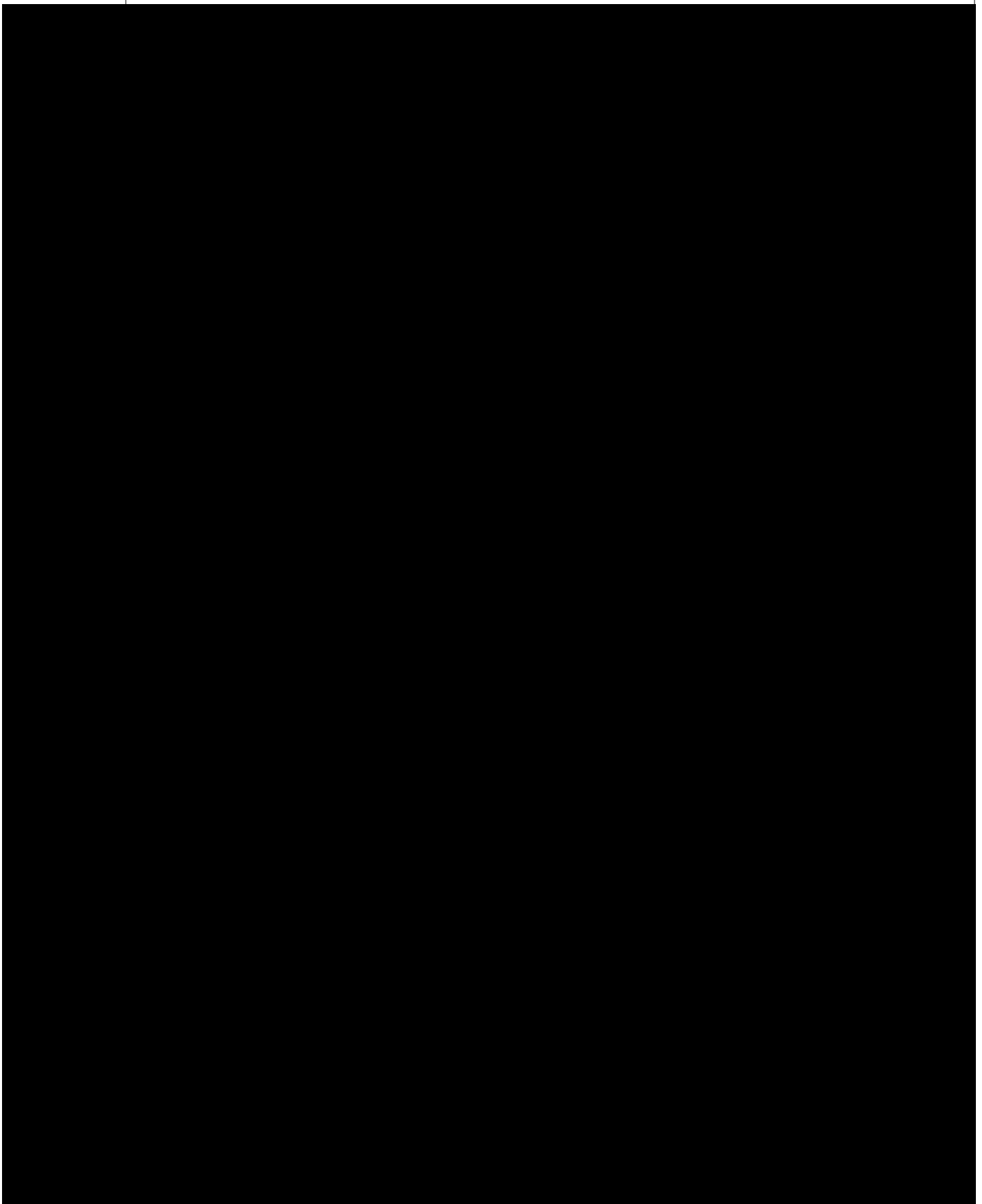


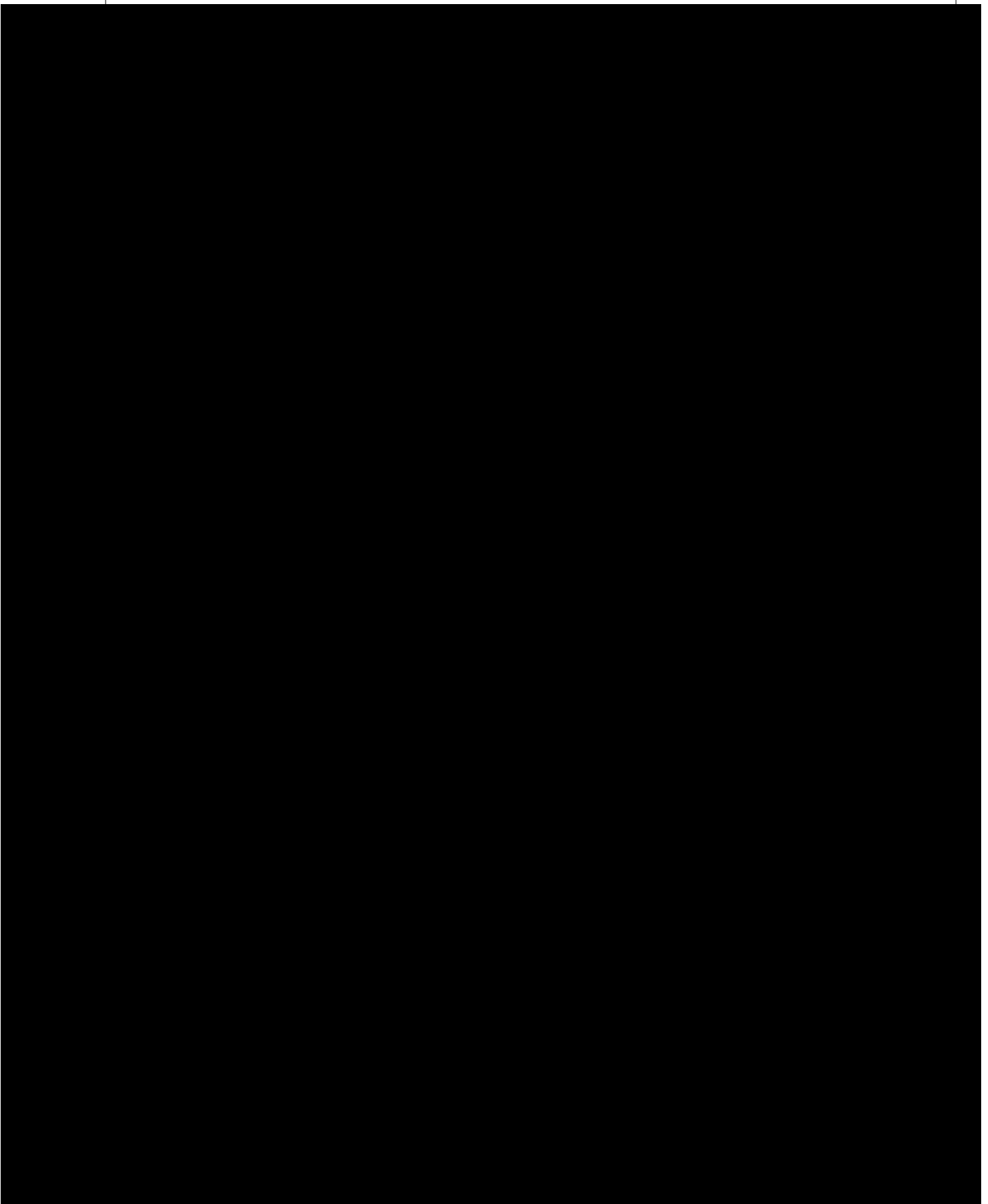


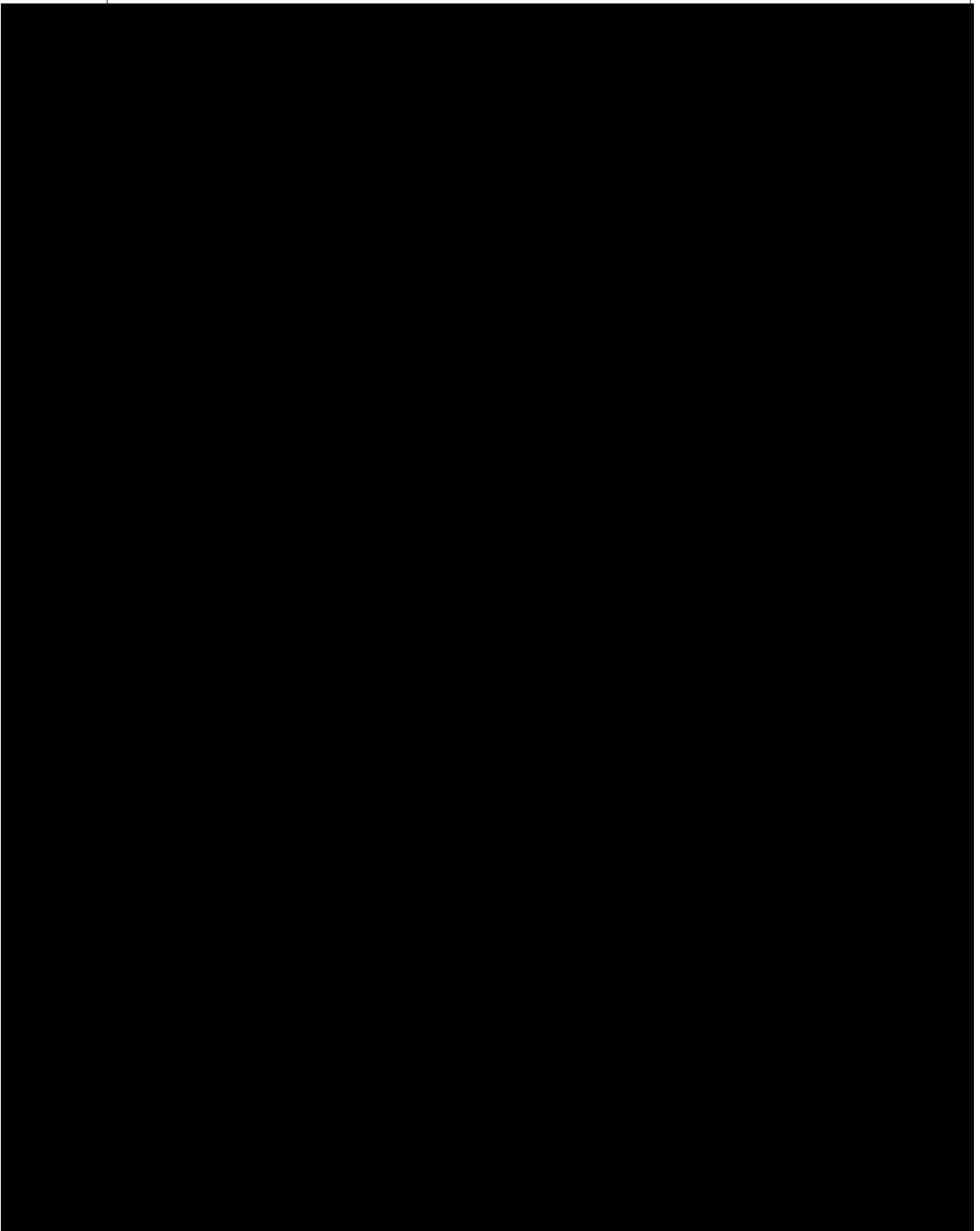












Anne Holt

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1 back and forth commenting on what's happening on the
2 call, right?

3 A. It looks like we're on a call, yeah.

4 Q. And the third line down, you say, "this
5 claims 'filter' isn't 100 percent, i don't see why we
6 can't just say we suspect fraud, State said no."

7 Do you see that?

8 A. Yes.

9 Q. So the claims falter -- the claims filter
10 was not 100 percent, correct?

11 A. No fraud strategy is 100 percent.

12 Q. So the claims filter was not 100 percent,
13 correct?

14 A. Correct.

15 Q. And you knew that before September 28th,
16 correct?

17 A. Definitely.

18 Q. GFC knew that before September 28th?

19 A. Definitely, which is why there were
20 controls put in place, to recourse.

21 Q. Was there anyone who worked on the project
22 that you were aware of who did not know that?

23 A. No.

24 Q. The claims filter flagged accounts that
25 GFC felt were suspicious, correct?

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1 Q. Can you turn to page -- or to Exhibit 286,
2 please?

3 A. Got it.

4 Q. Earlier counsel asked whether you had just
5 started working on this particular logic at the time
6 that this slide was being sort of shared back and
7 forth over a weekend. Do you remember that?

8 A. Yes.

9 Q. Was that weekend the first time that you
10 started to work on logic for claims filtering?

11 A. No.

12 Q. How long had you been working on it?

13 A. We -- from the e-mail, which I believe was
14 early September, when we had evidence that
15 individuals were card-cracking or double-dipping.

16 Q. You said that this -- this particular
17 slide or some version of it -- I don't want to
18 mischaracterize what you said -- was presented in a
19 meeting. Do you know that for sure?

20 A. I believe it was. When you say this
21 version or another version, that kind of trips me up
22 a little bit.

23 Q. So you don't know whether there was a
24 version of this -- which version might have been
25 presented at a meeting?

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STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

I, Karen K. Kidwell, RMR, CRR, in and for the State of North Carolina, do hereby certify that there came before me on Wednesday, January 8, 2025, the person hereinbefore named, who was by me duly sworn to testify to the truth and nothing but the truth of her knowledge concerning the matters in controversy in this cause; that the witness was thereupon examined under oath, the examination reduced to typewriting under my direction, and the deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any attorney or counsel employed by the parties hereto or financially interested in the action.

This the 19th day of January, 2025.



Karen K. Kidwell, RMR, CRR
Notary Public #19971050142