

DX 14.Q

**REDACTED VERSION OF
DOCUMENT SOUGHT TO
BE SEALED PURSUANT TO
STIPULATED
PROTECTIVE ORDER**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE: BANK OF AMERICA) Case No.:
CALIFORNIA UNEMPLOYMENT) 3:21-md-02992-LAB-MSB
BENEFITS LITIGATION)

This Document Relates to)
All Actions)

_____)

VIDEOTAPED 30(b)(6) DEPOSITION OF

BANK OF AMERICA, N.A.

by its designee: MICHAEL LETSON

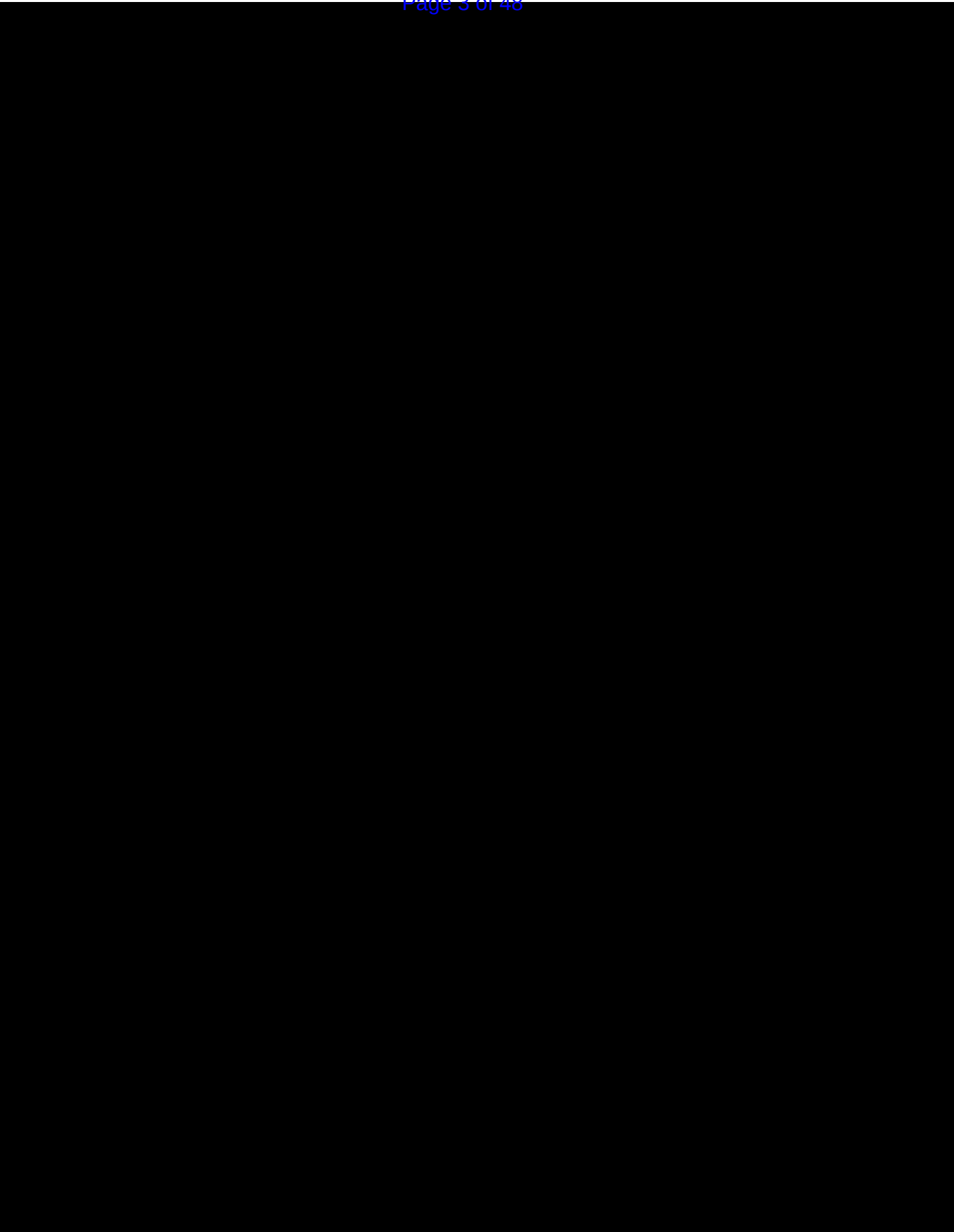
9:20 a.m.

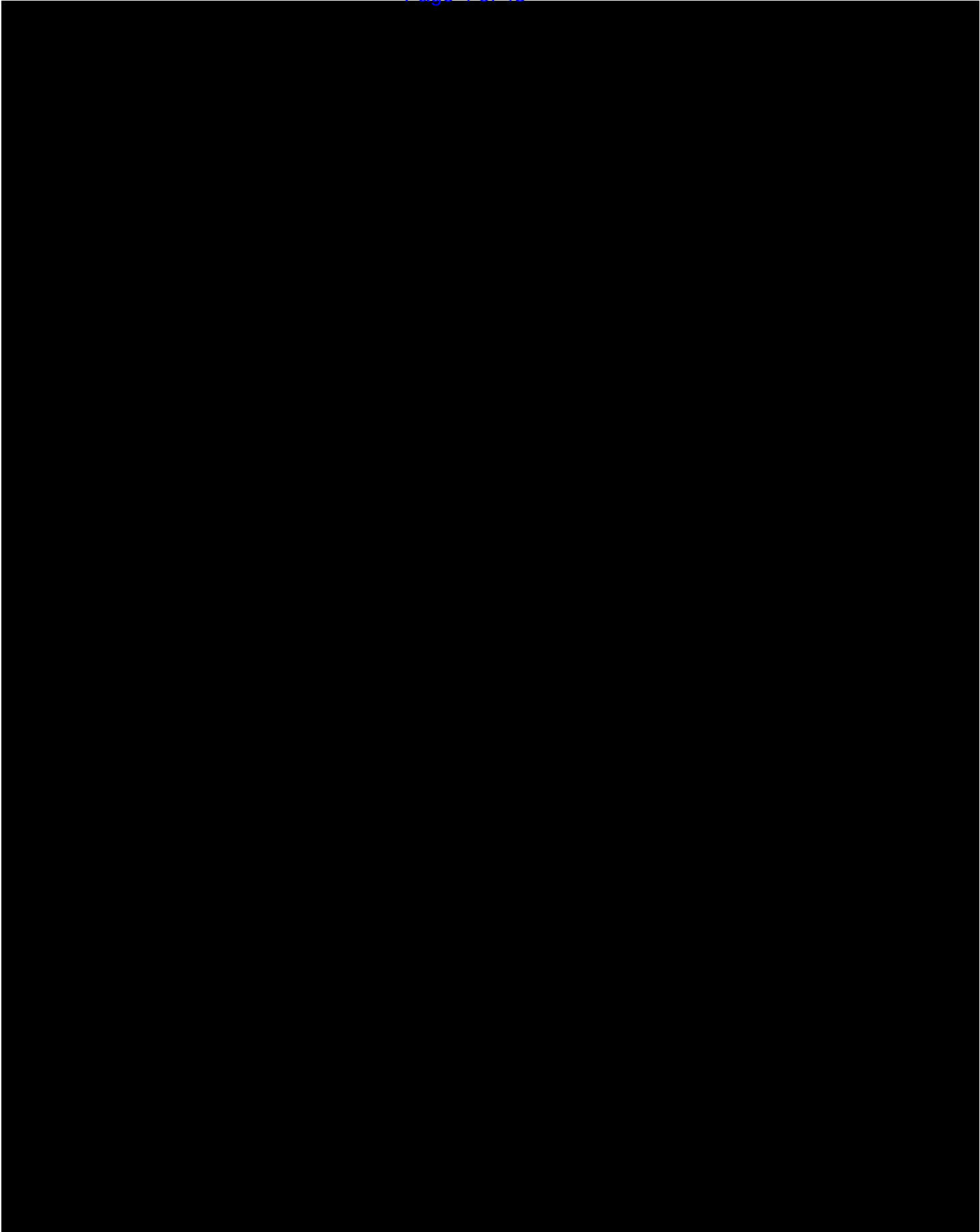
Friday, February 16, 2024

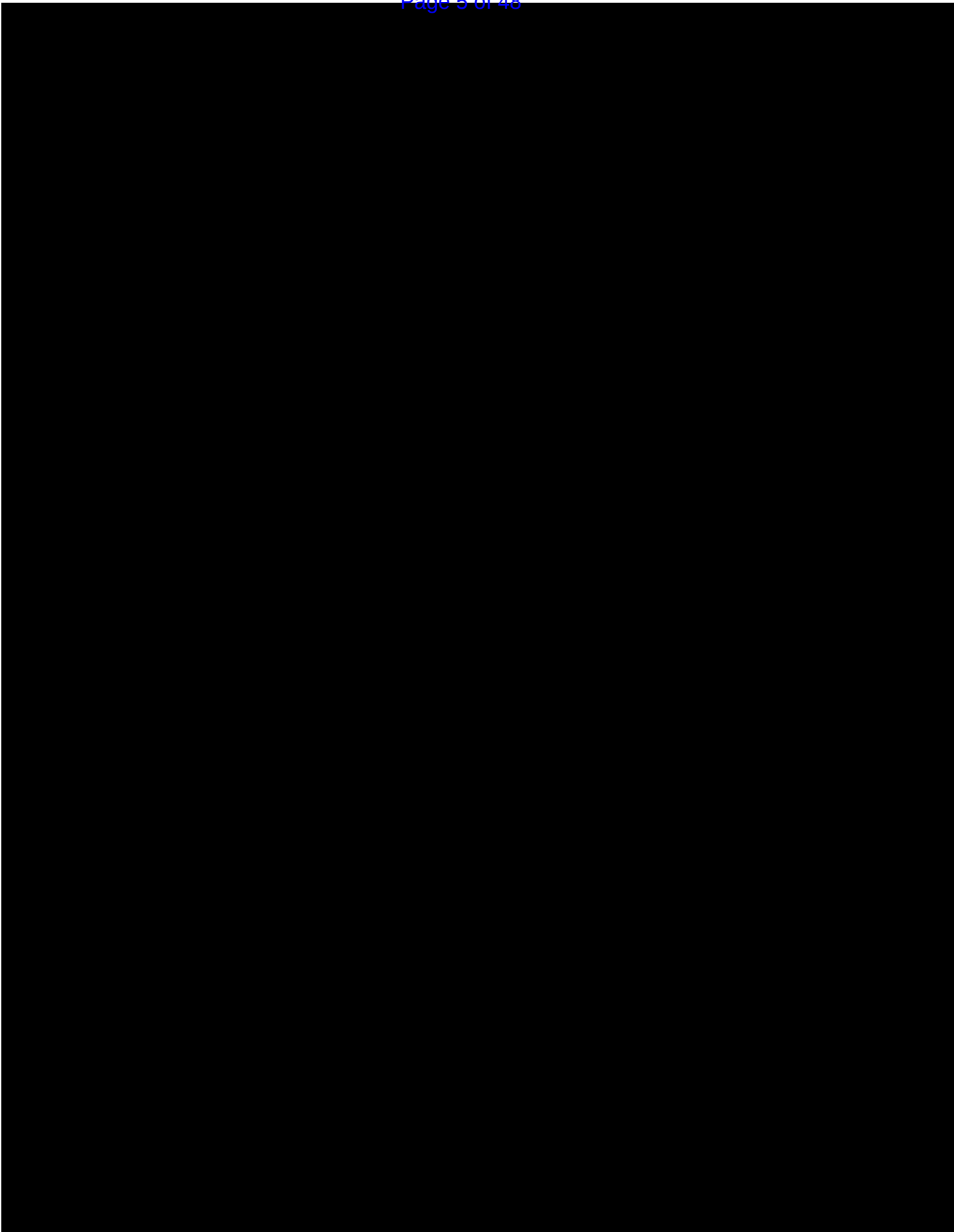
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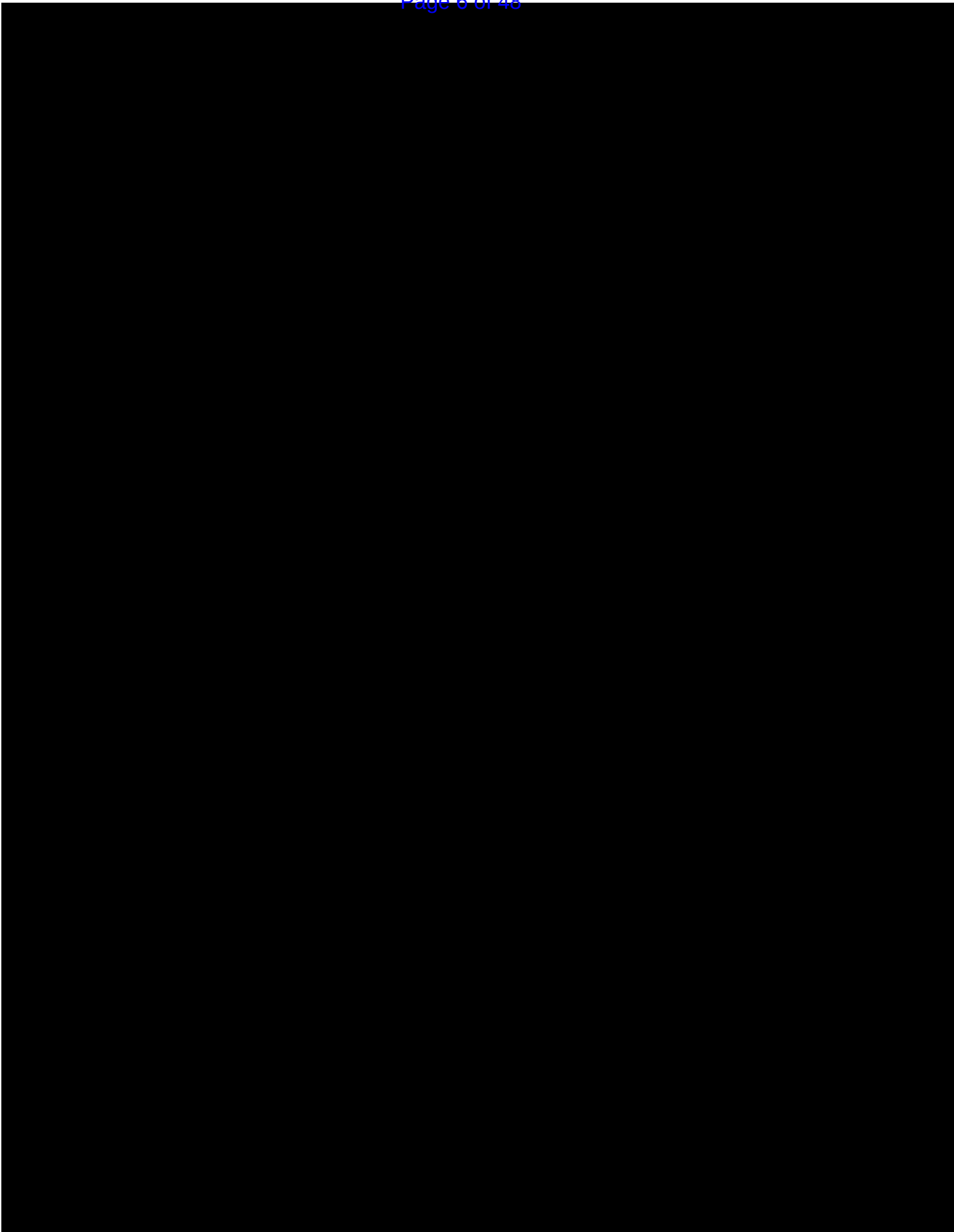
REPORTED BY: Christine A. Taylor, RPR

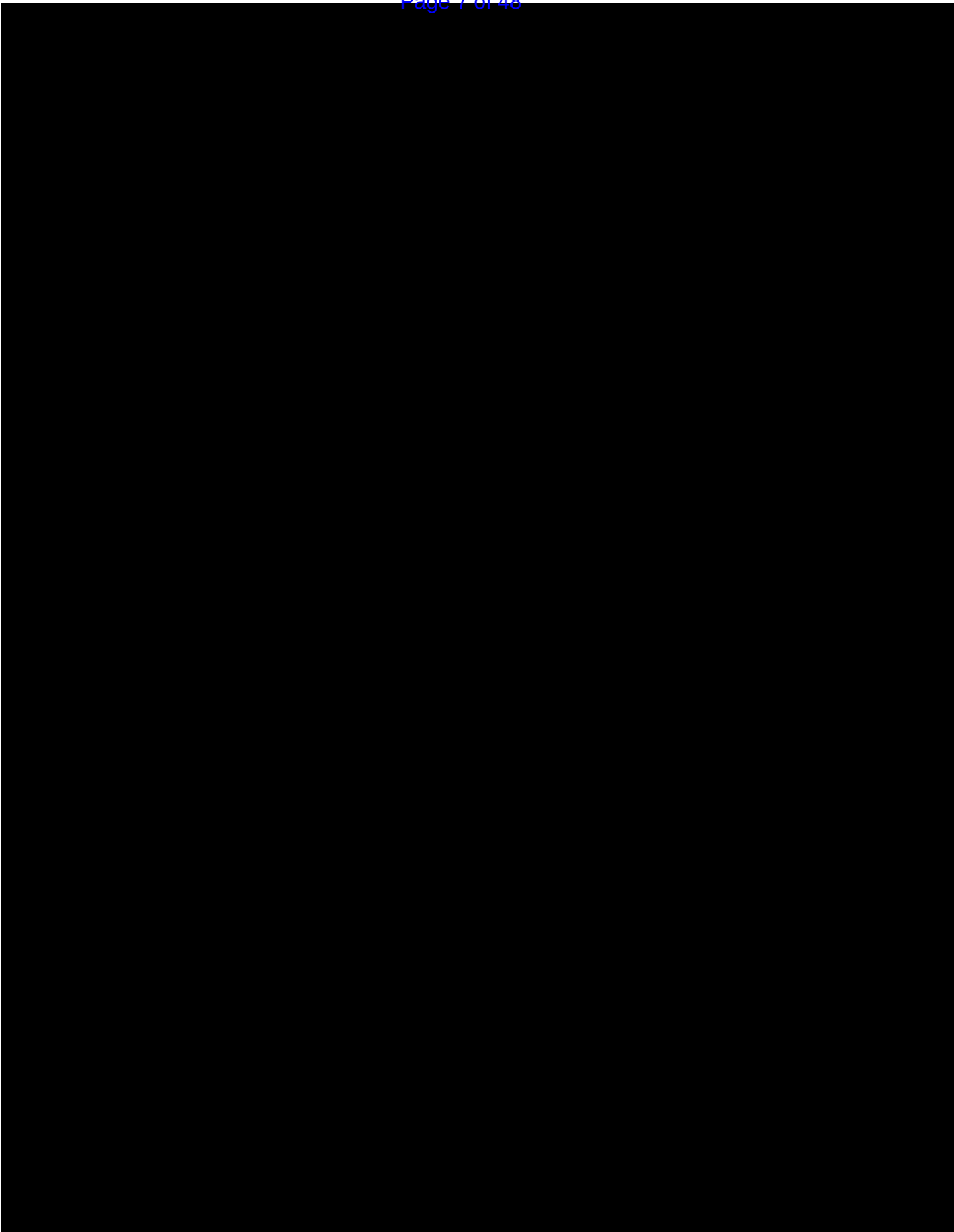
Page 1

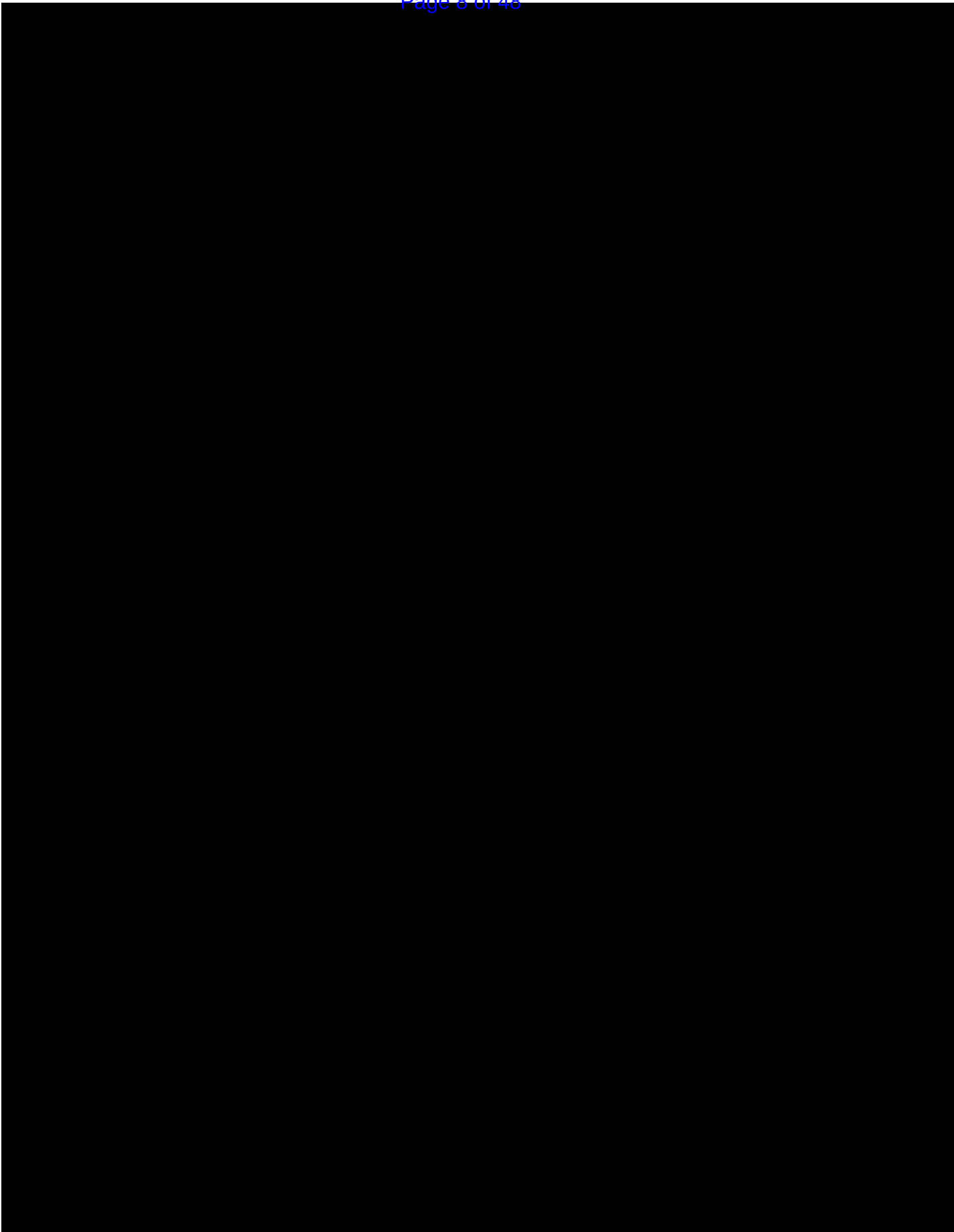


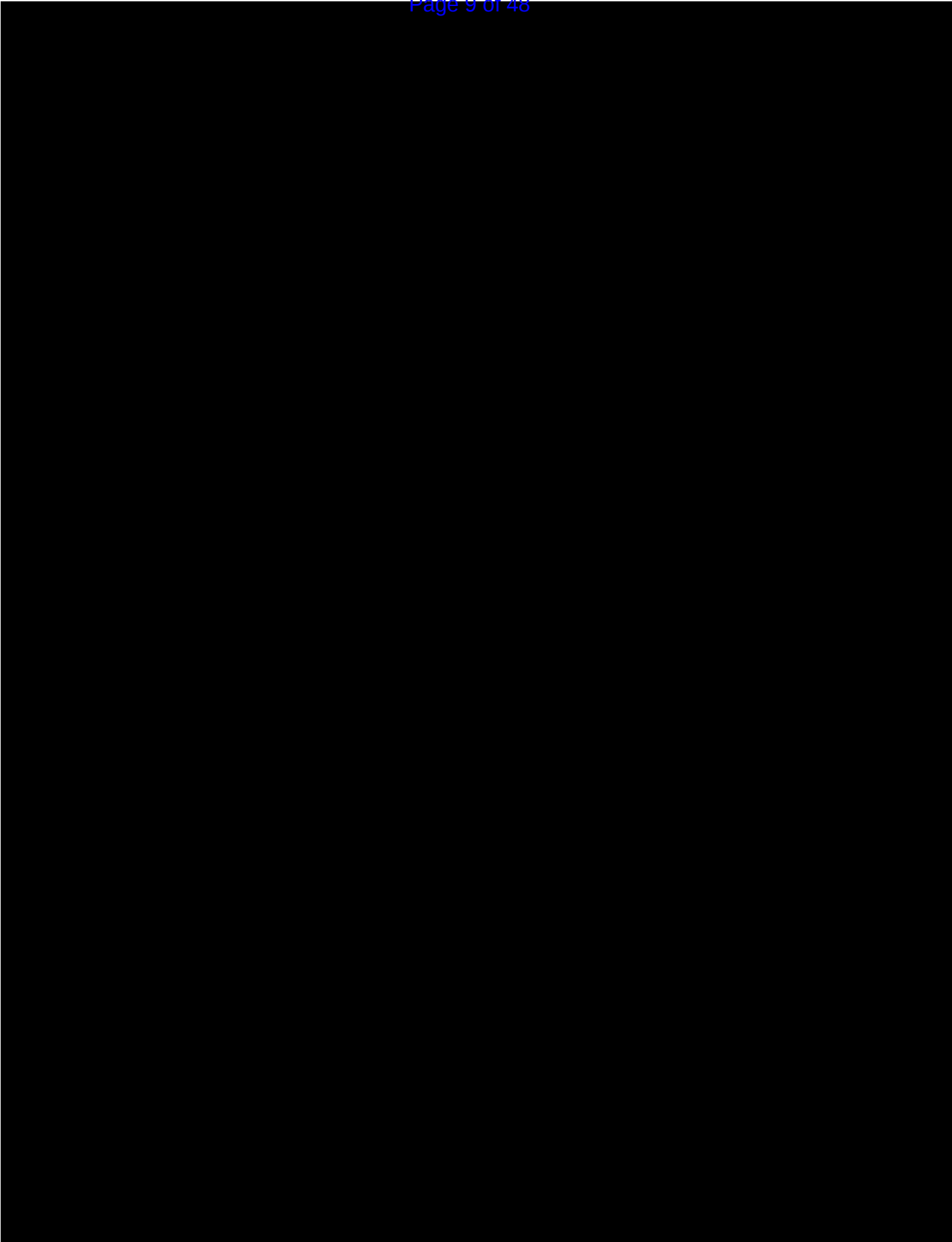


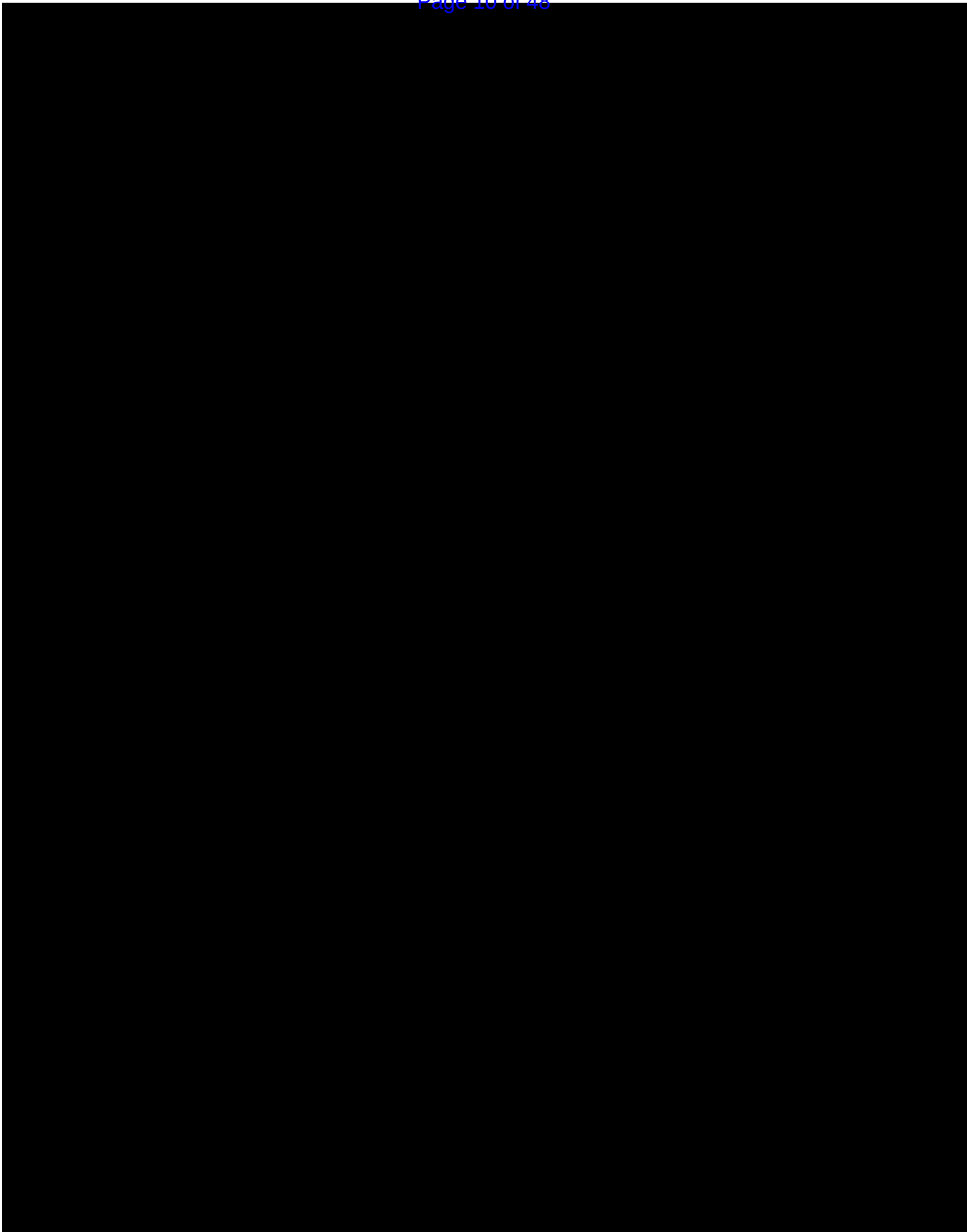


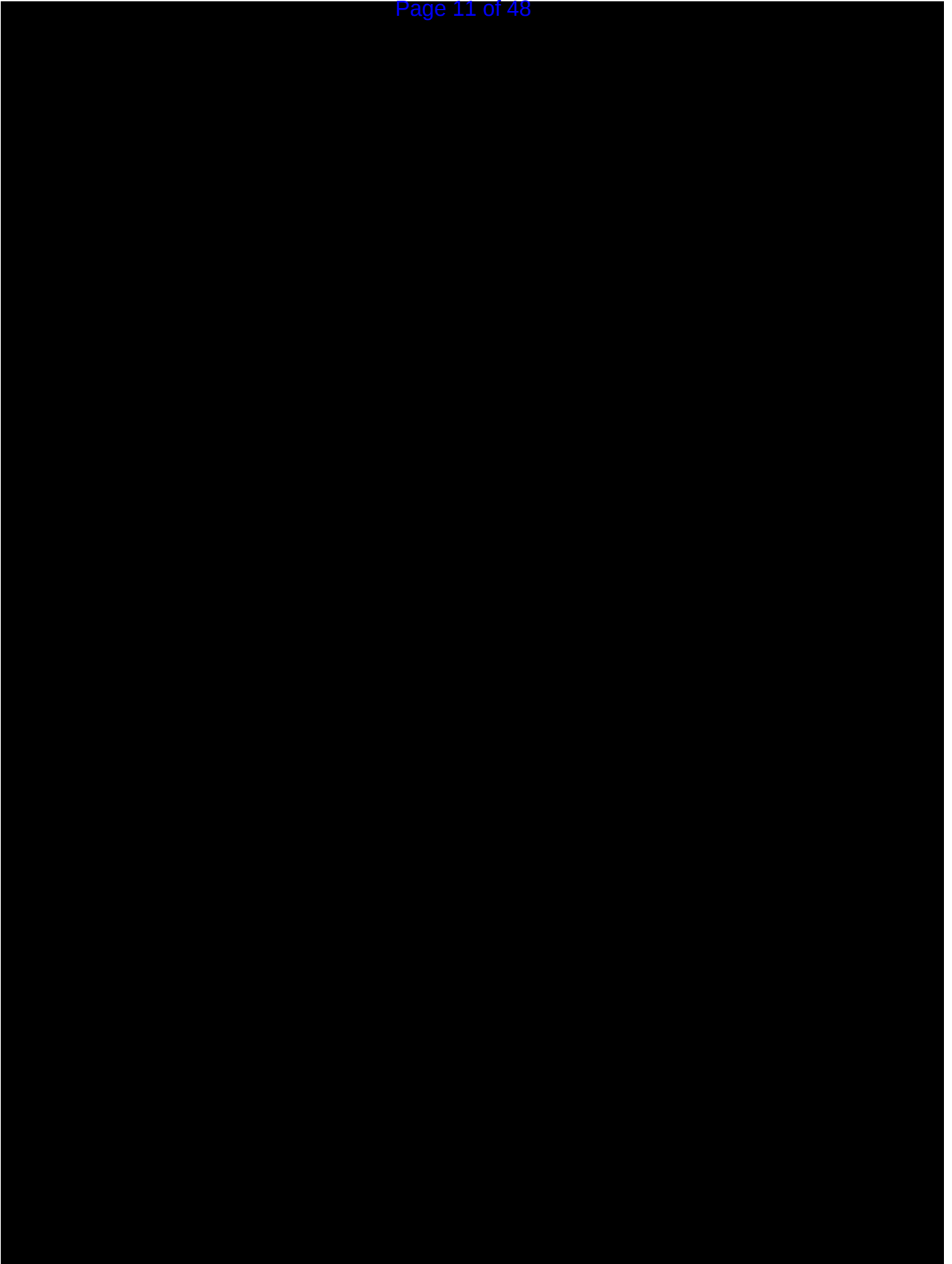


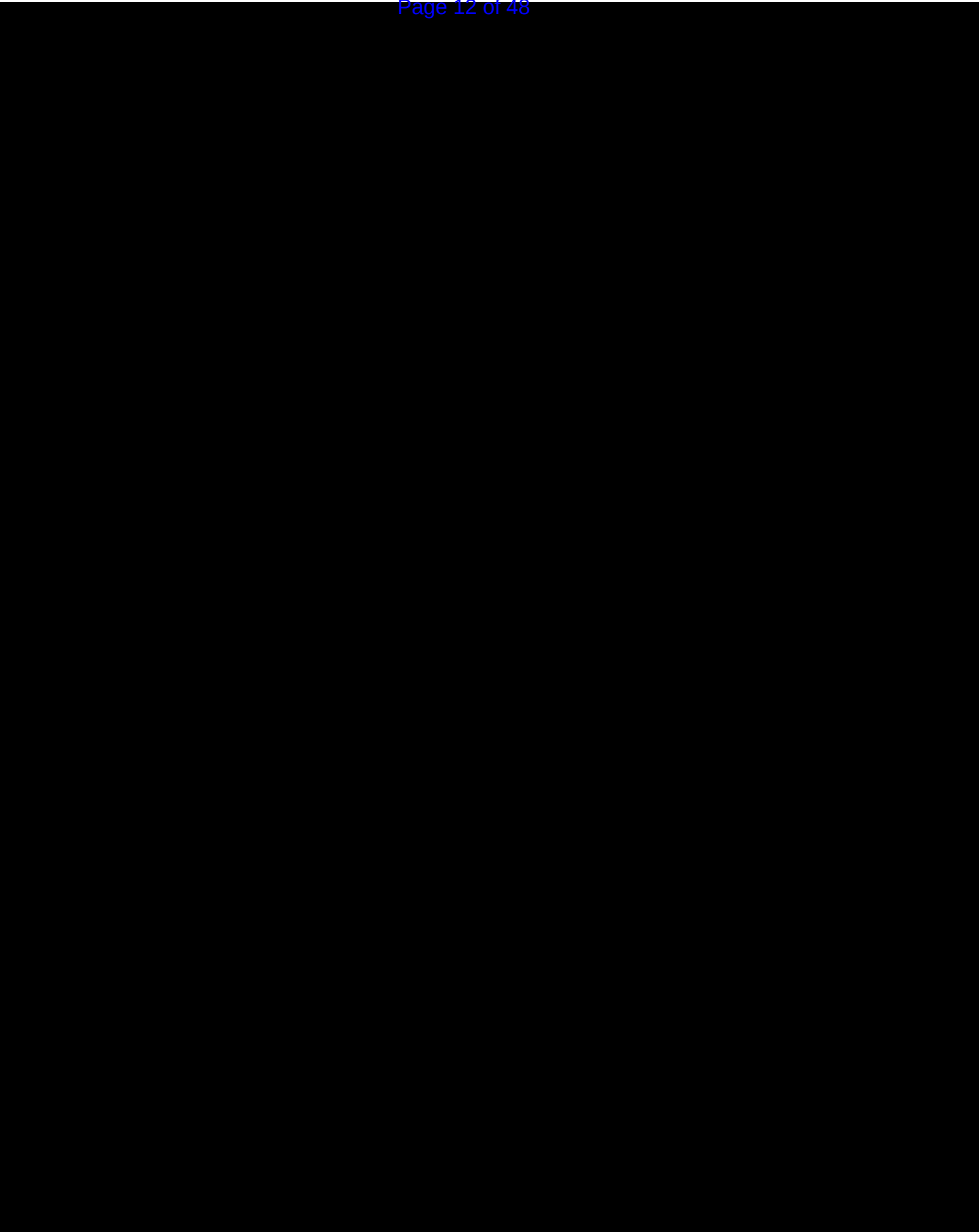


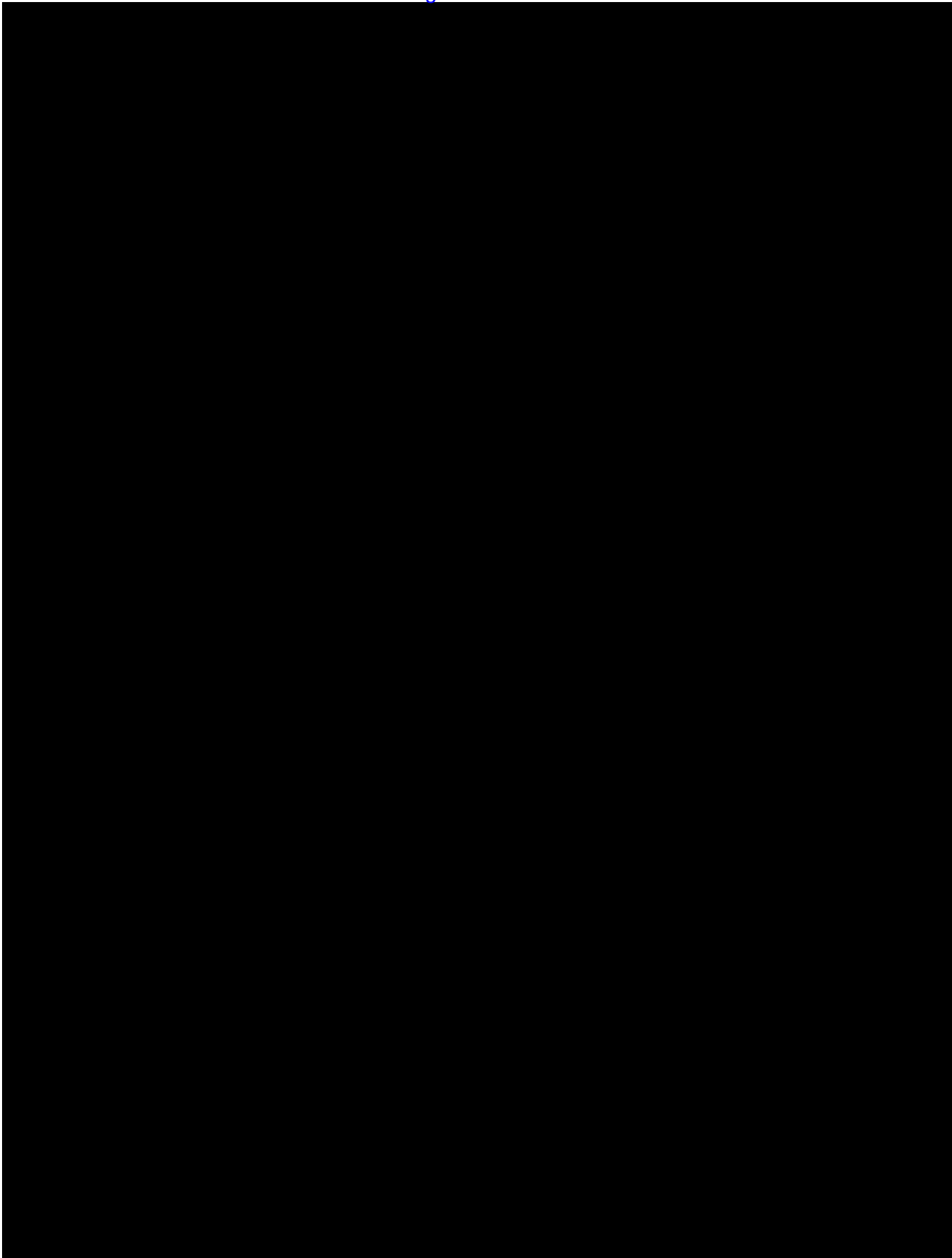












2 started to look into it. She escalated her
3 concerns.

4 I reached out to folks in the cyber
5 and fraud team, and then we started talking with
6 the product management team in GTS. And through
7 engagement with them, they asked us to do more in
8 the way of identifying what the risk was and
9 things that we could do to stop it.

10 Q. And initially, the scenario you just
11 described, the concern was that there were
12 individuals who were using stolen identities to
13 engage in unemployment insurance benefits
14 enrollment fraud; correct?

15 A. Correct.

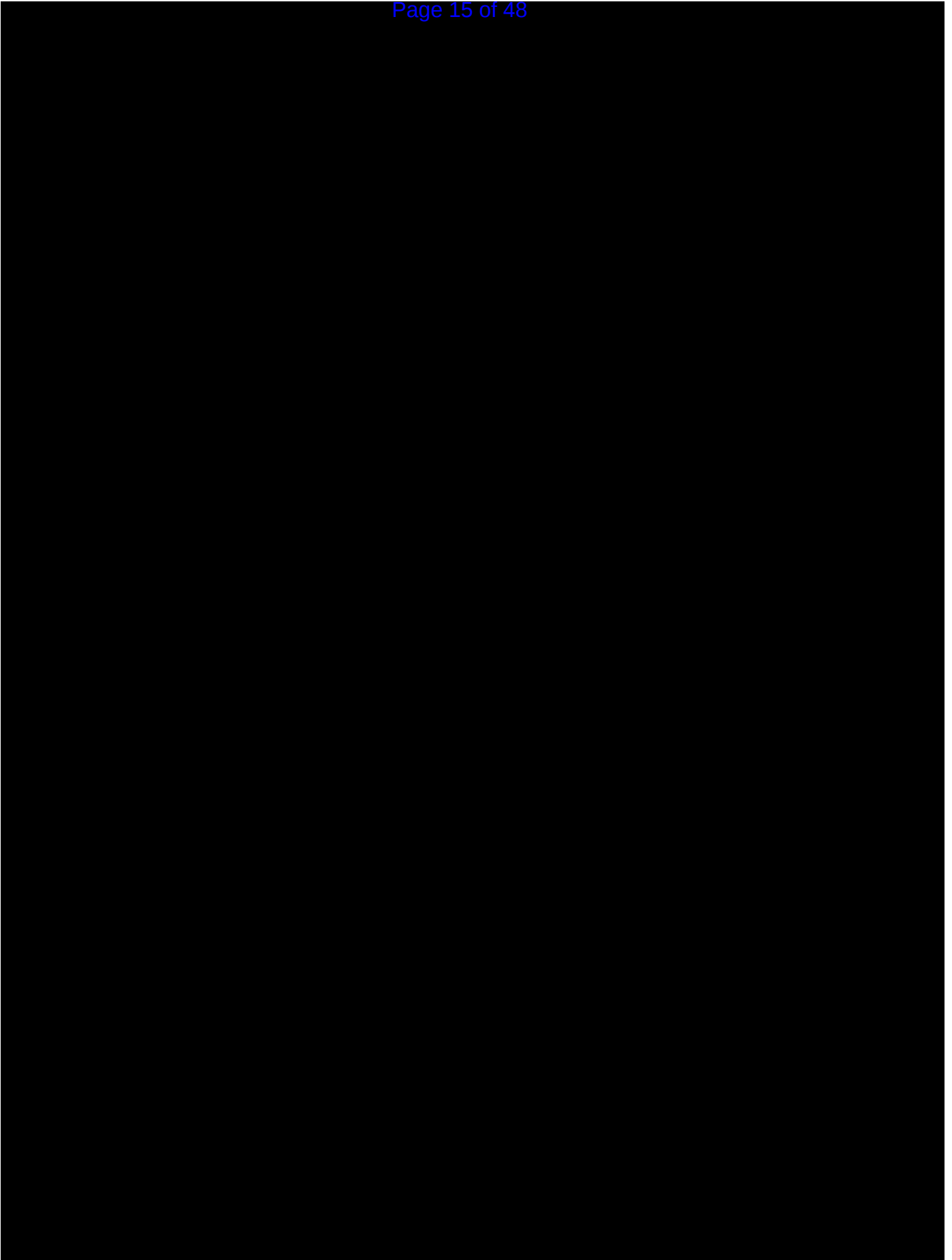
16 Q. And so that was the problem that GFC
17 was brought in to try to analyze?

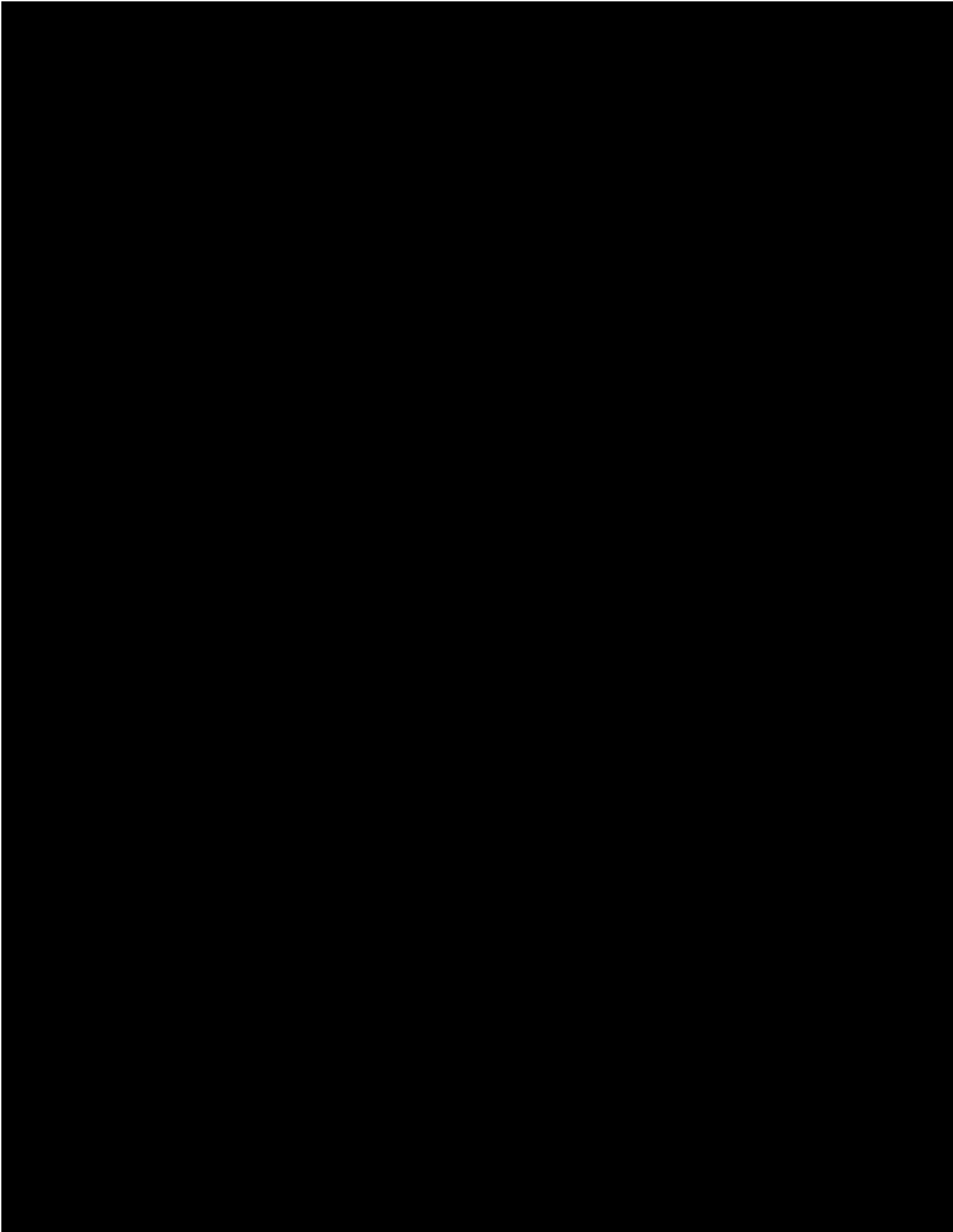
18 A. Correct.

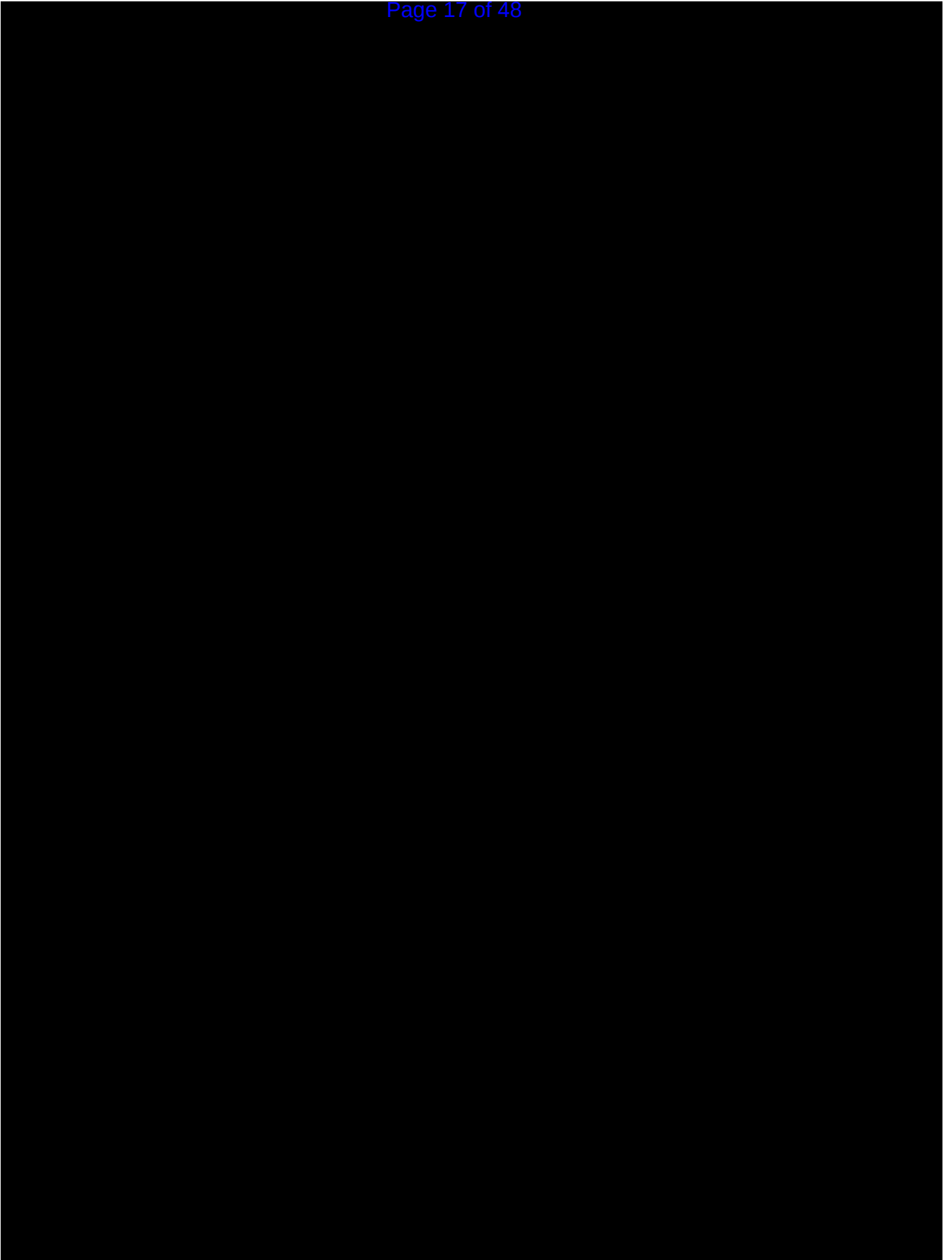
19 MS. CHAN: How do you feel about a
20 break? Can we go off the record?

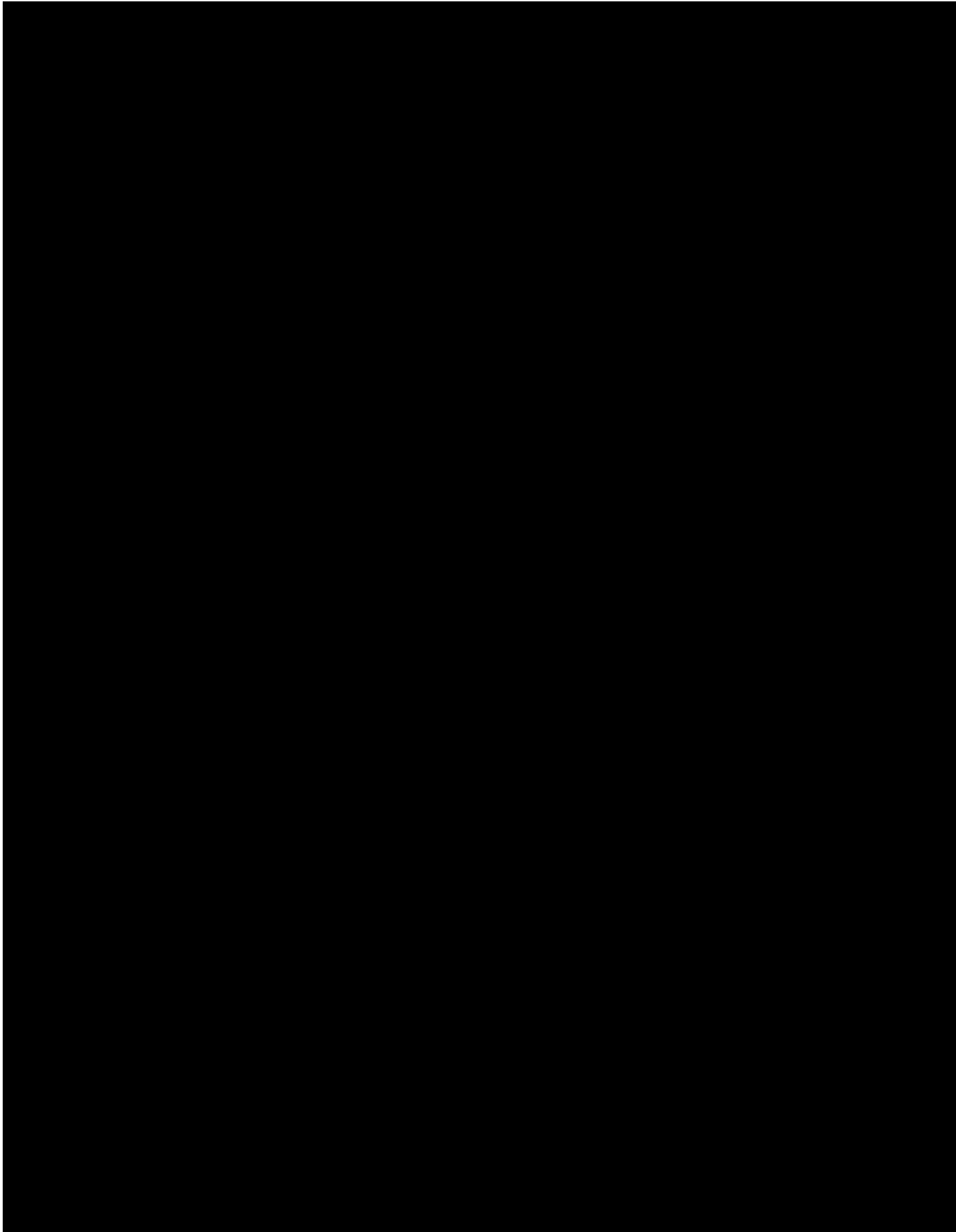
21 MS. ROSE-SMITH: I would love a break.
22 I just have too much coffee in the morning.

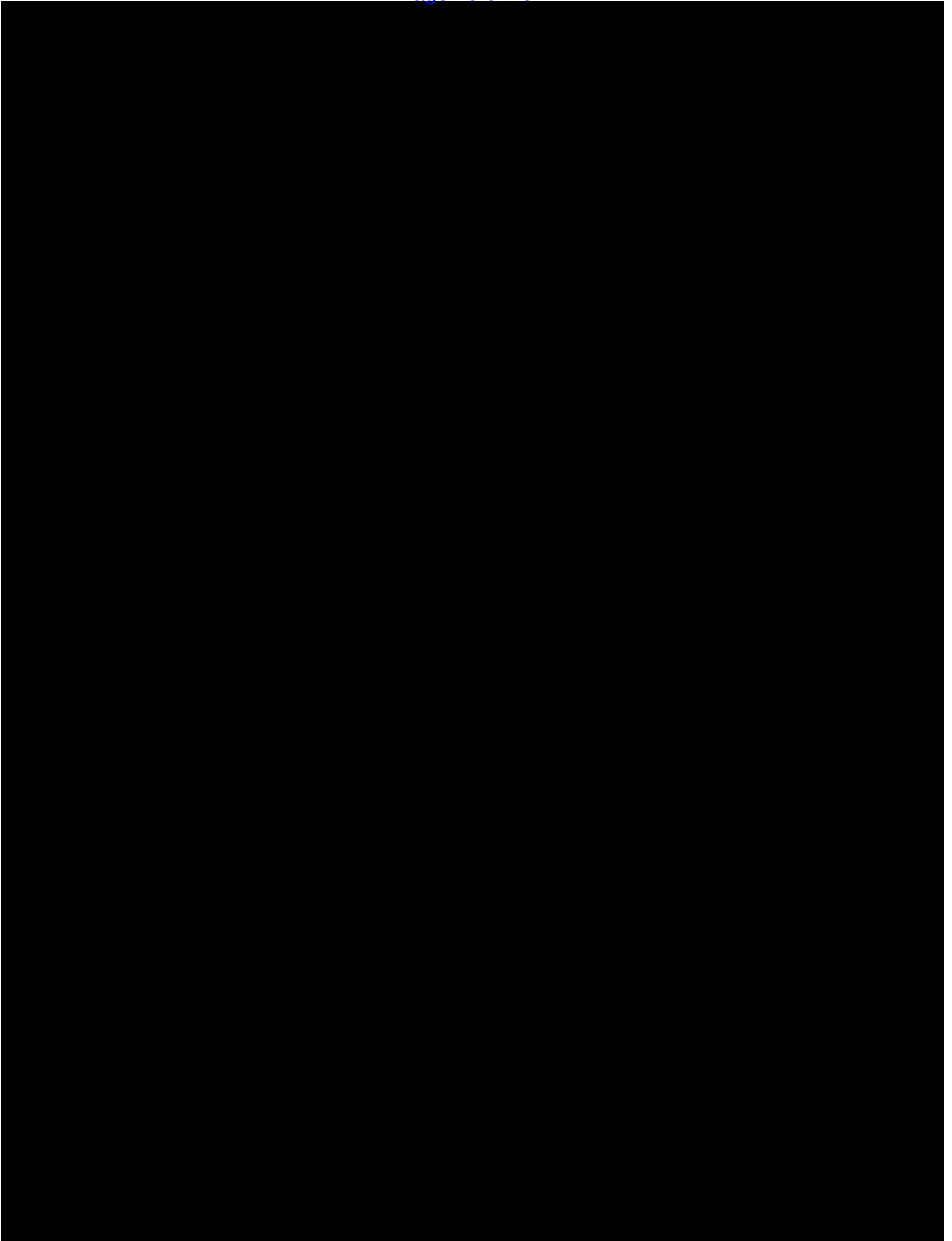
23 THE VIDEOGRAPHER: The time is
24 approximately 10:47:46 -- 57 a.m. We are
25 now off the record.

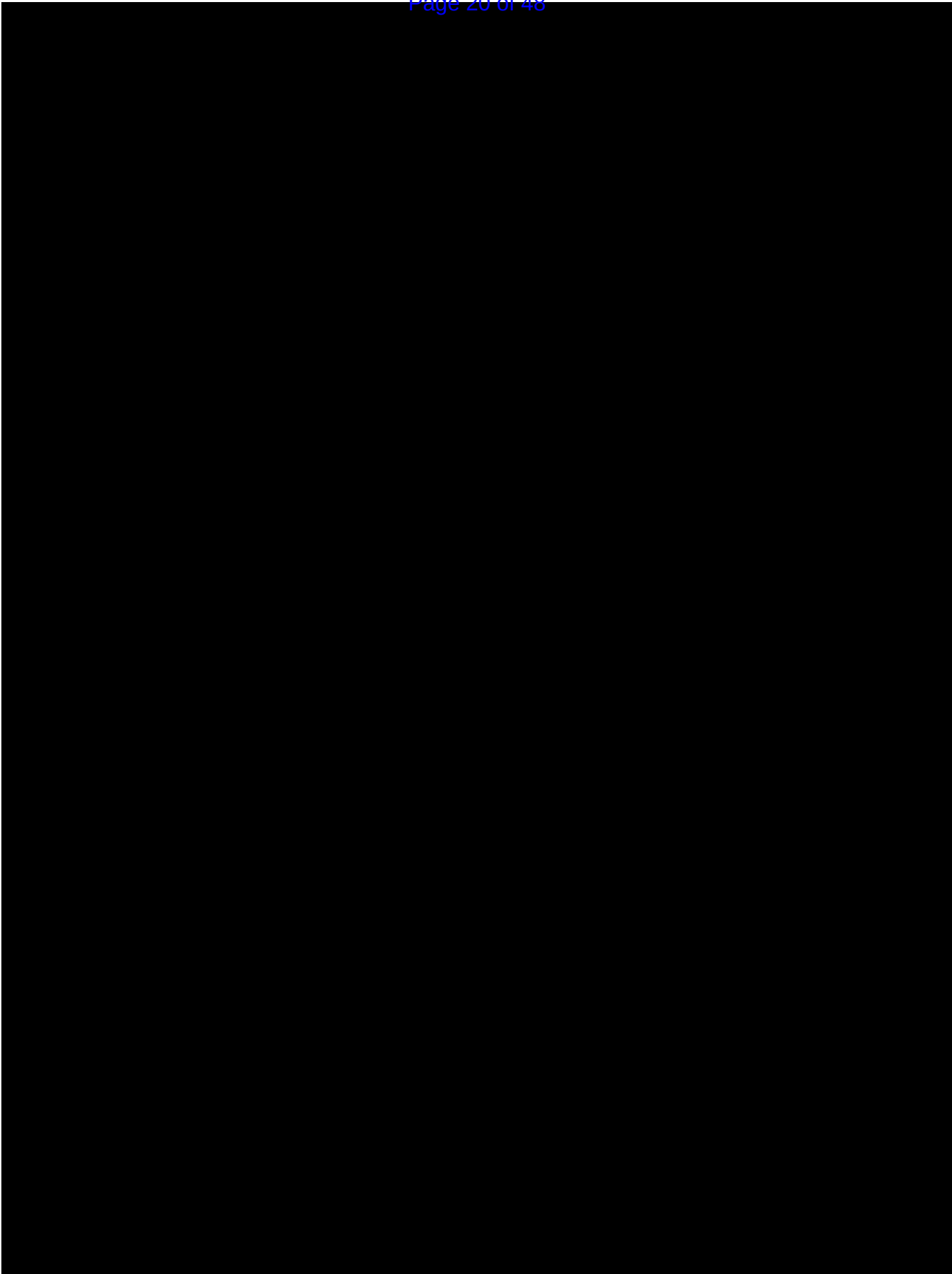


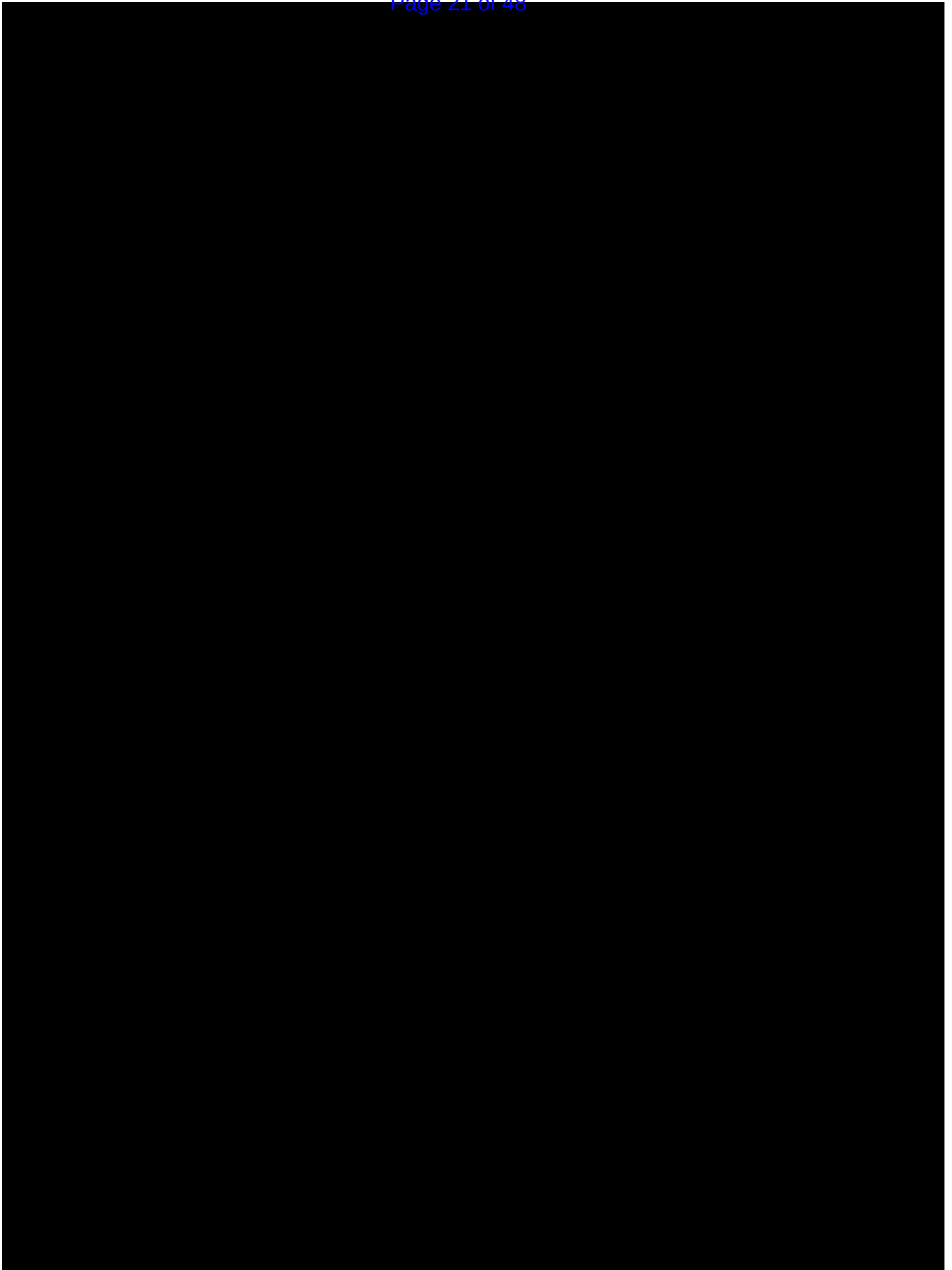


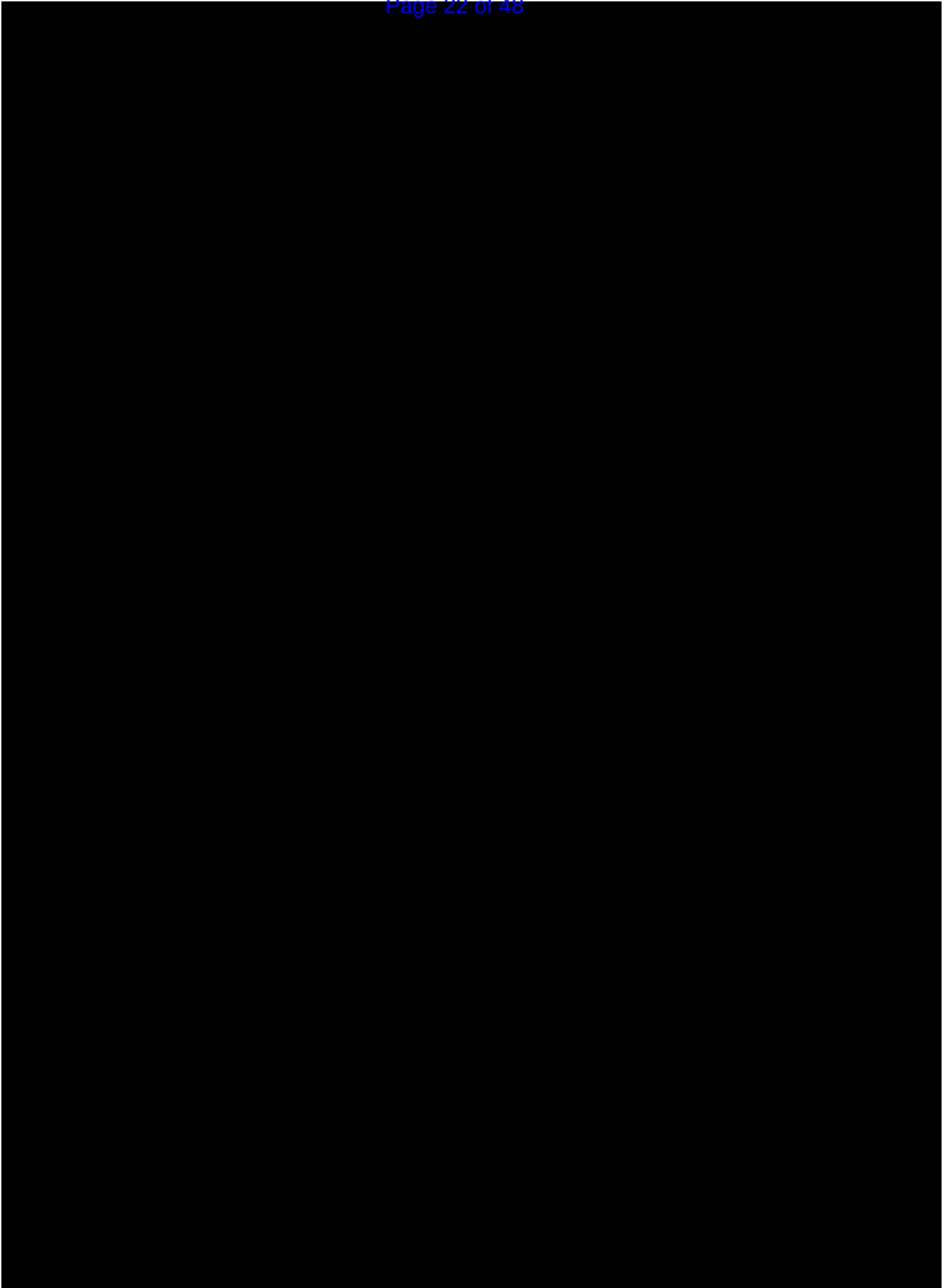


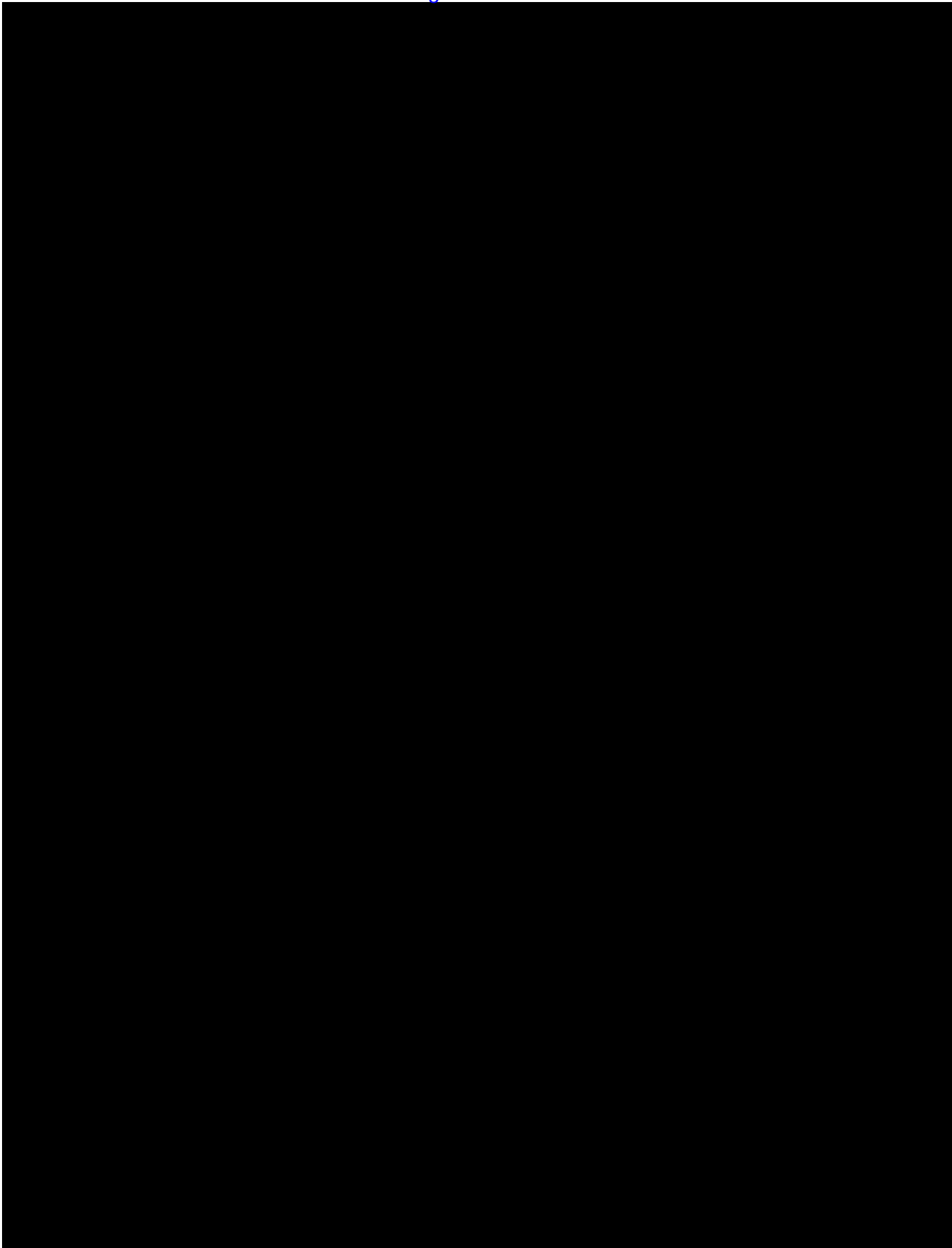


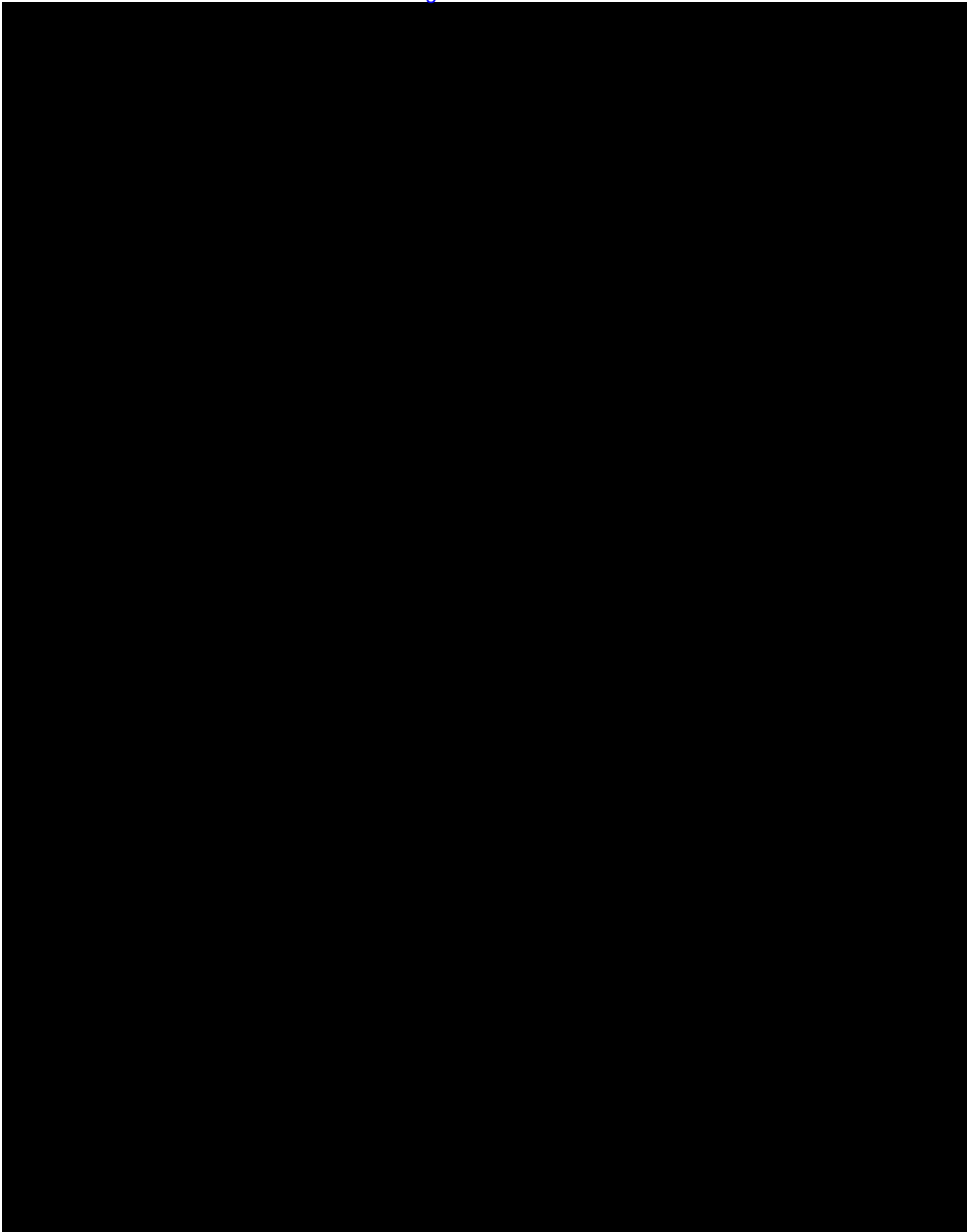


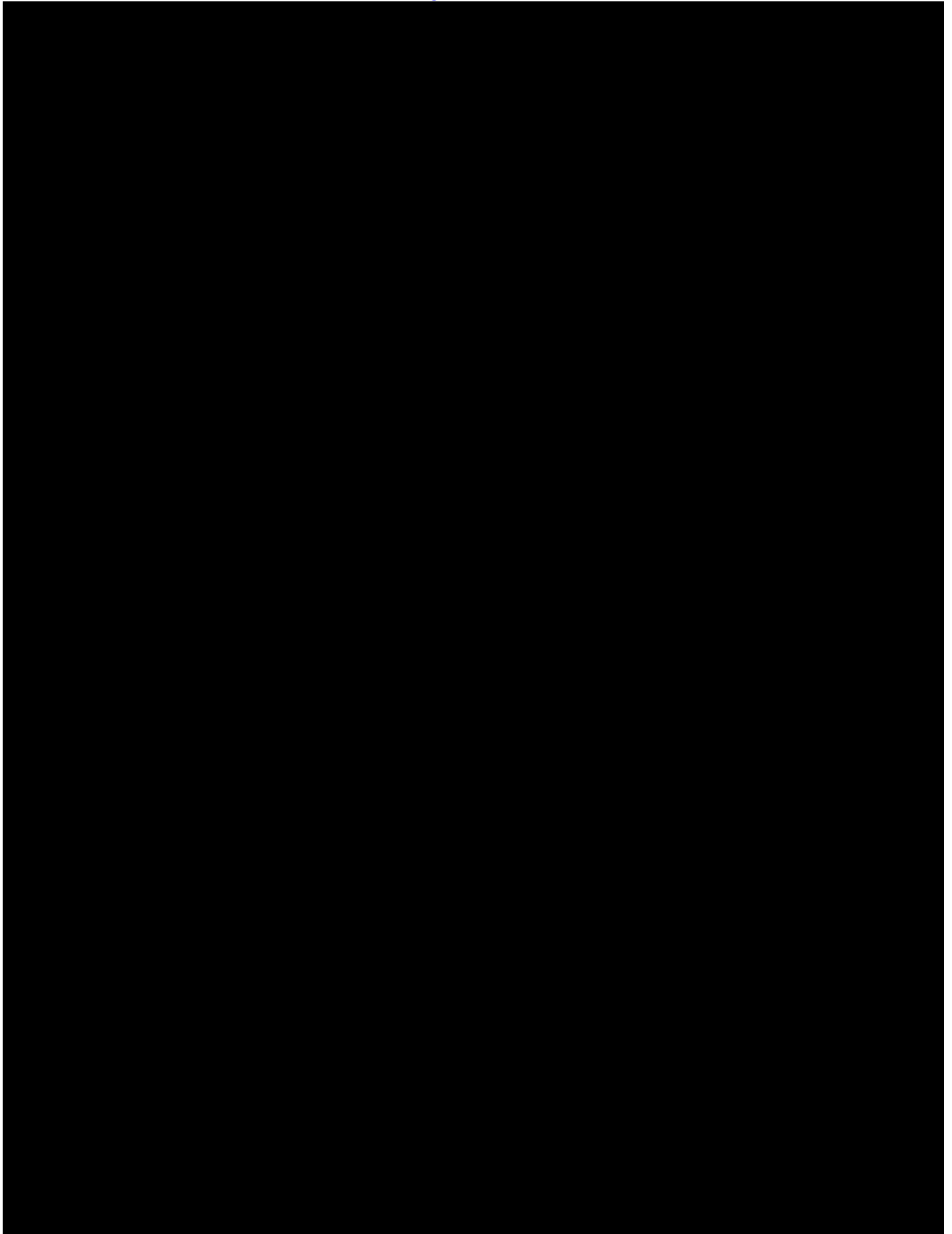


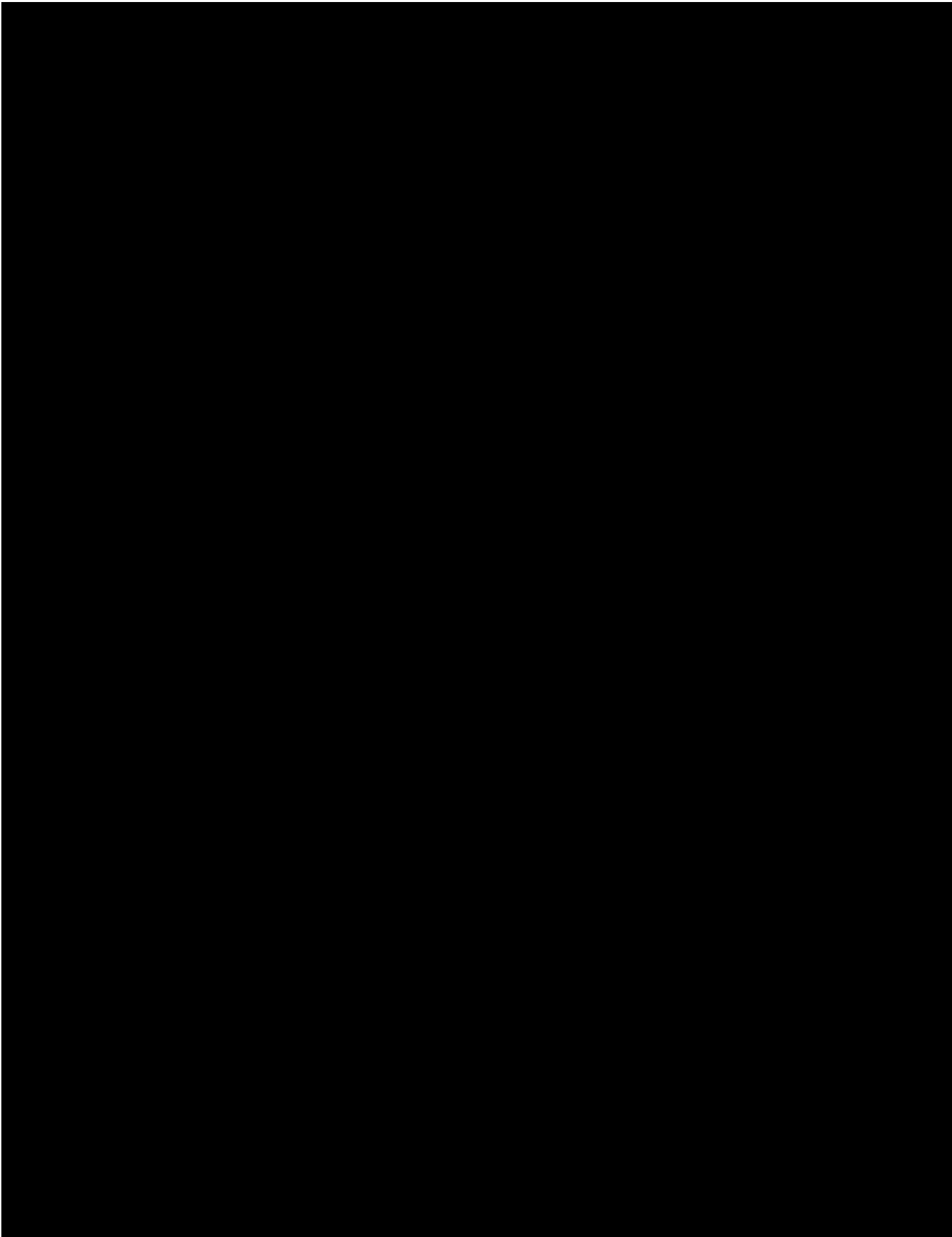


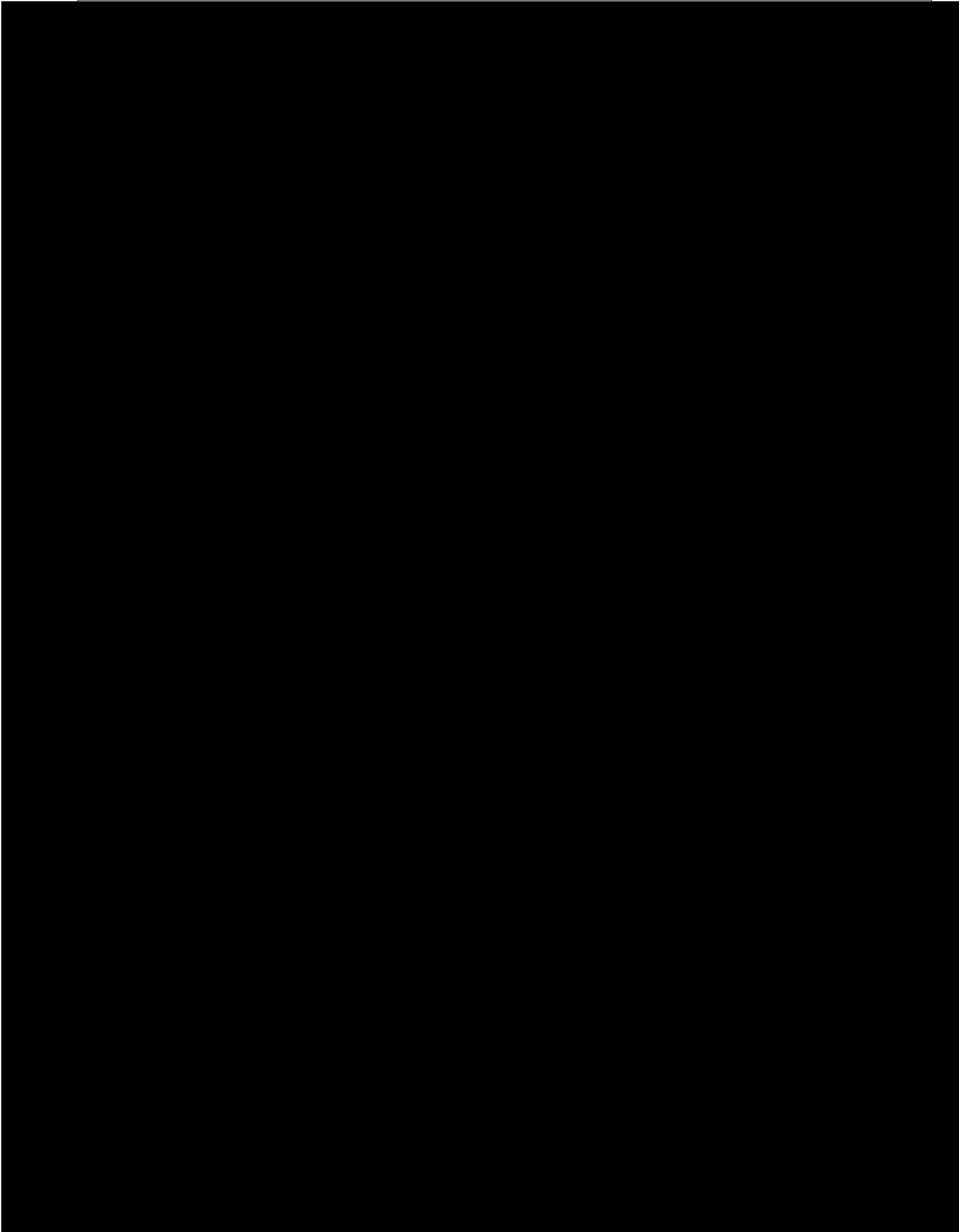


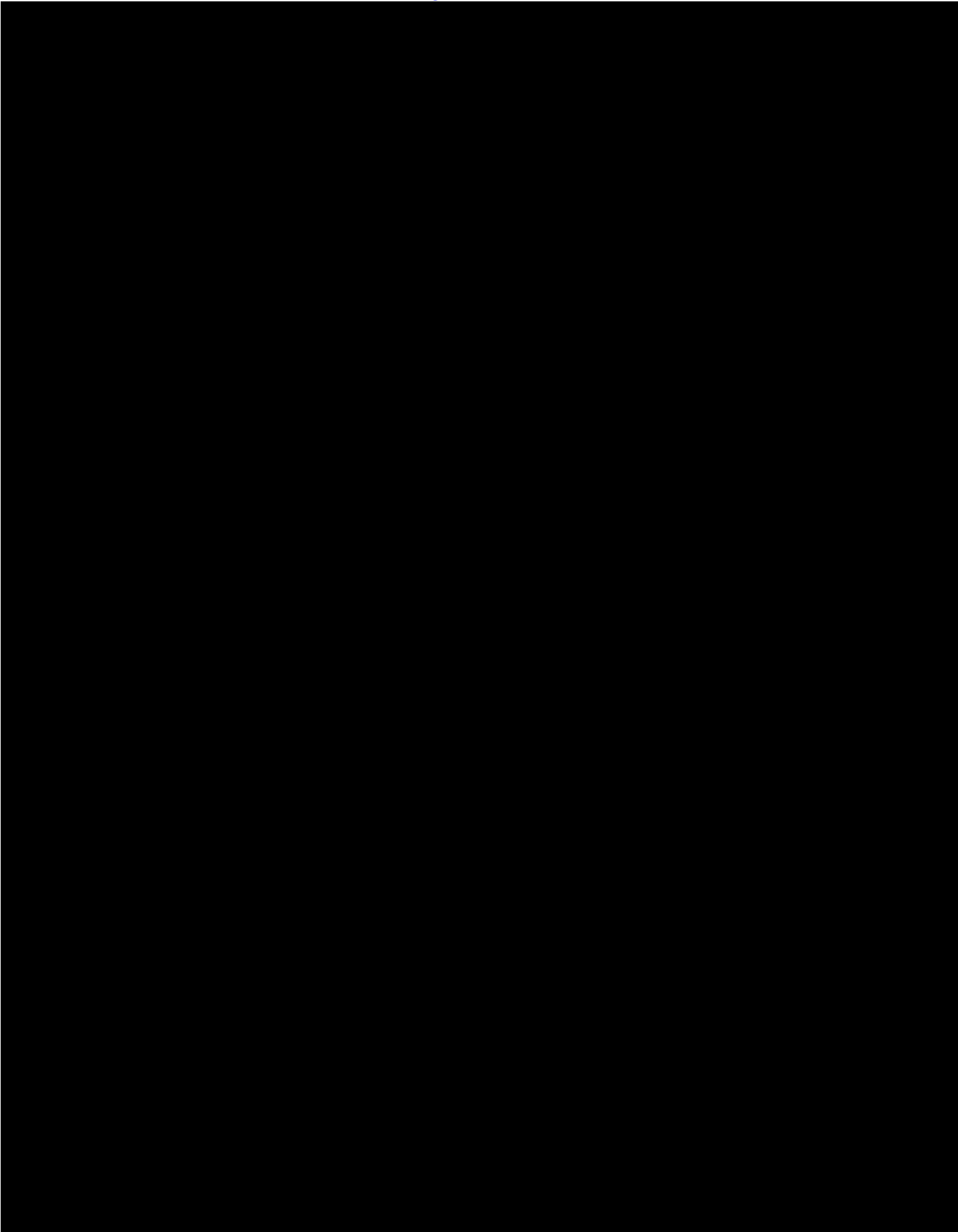


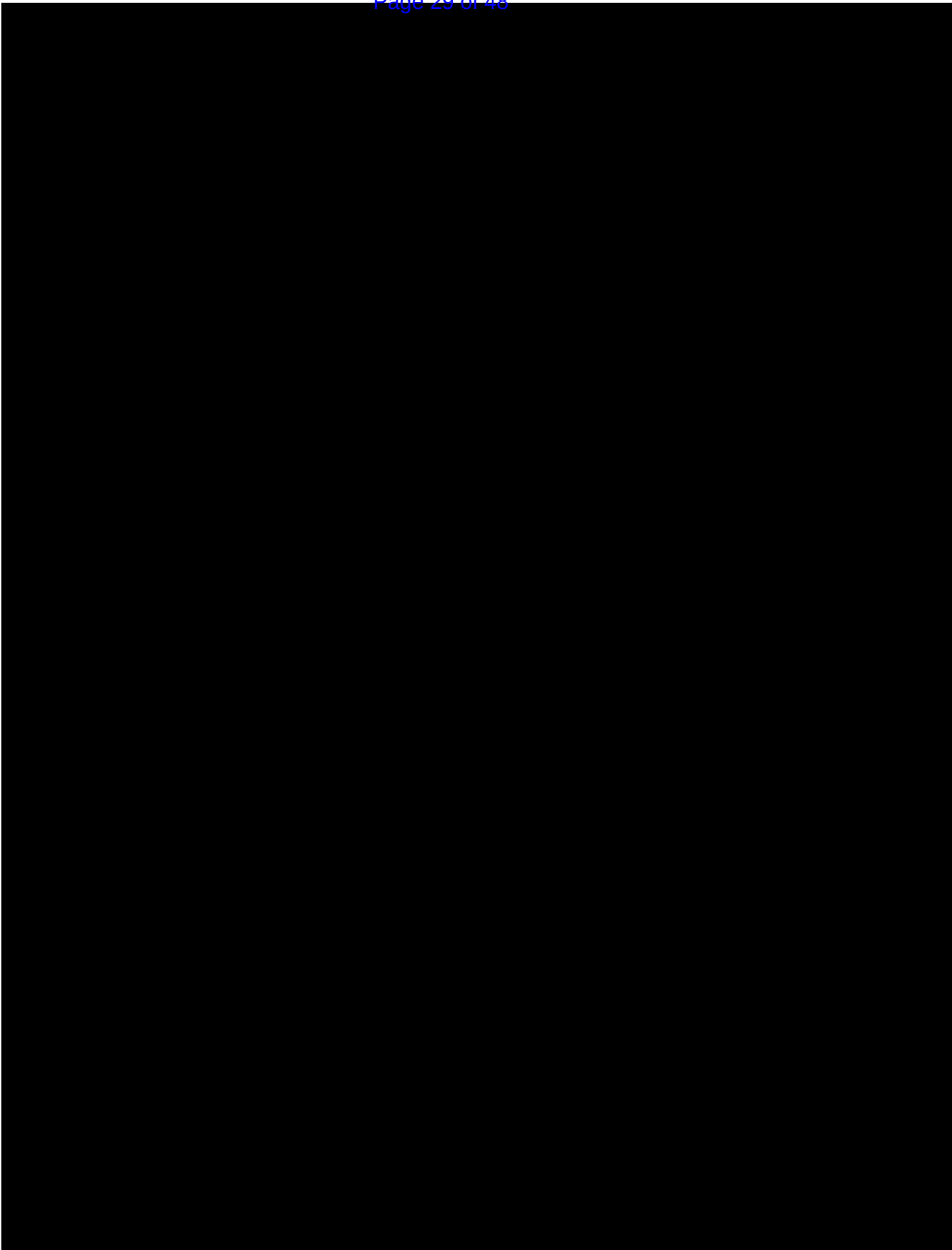


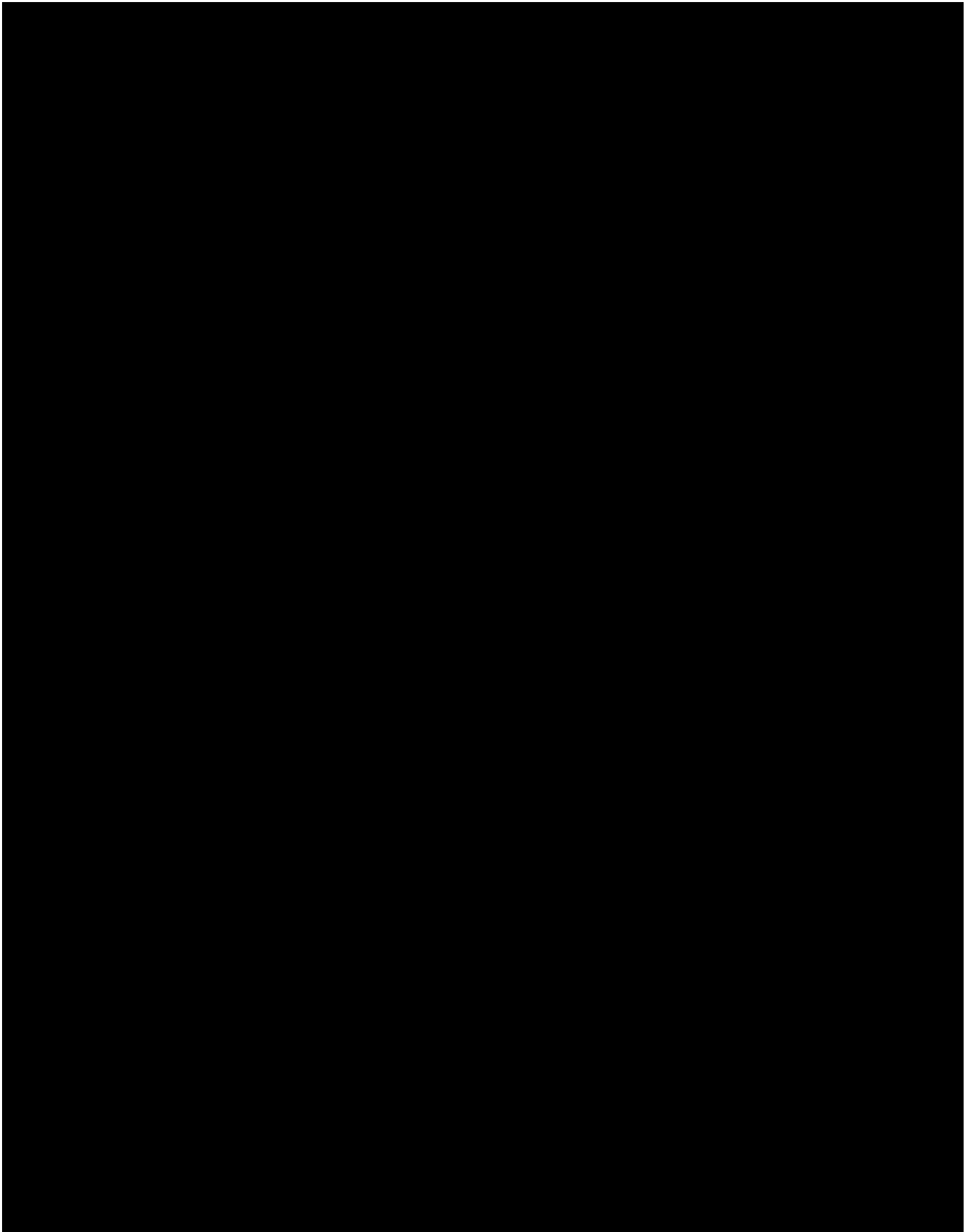


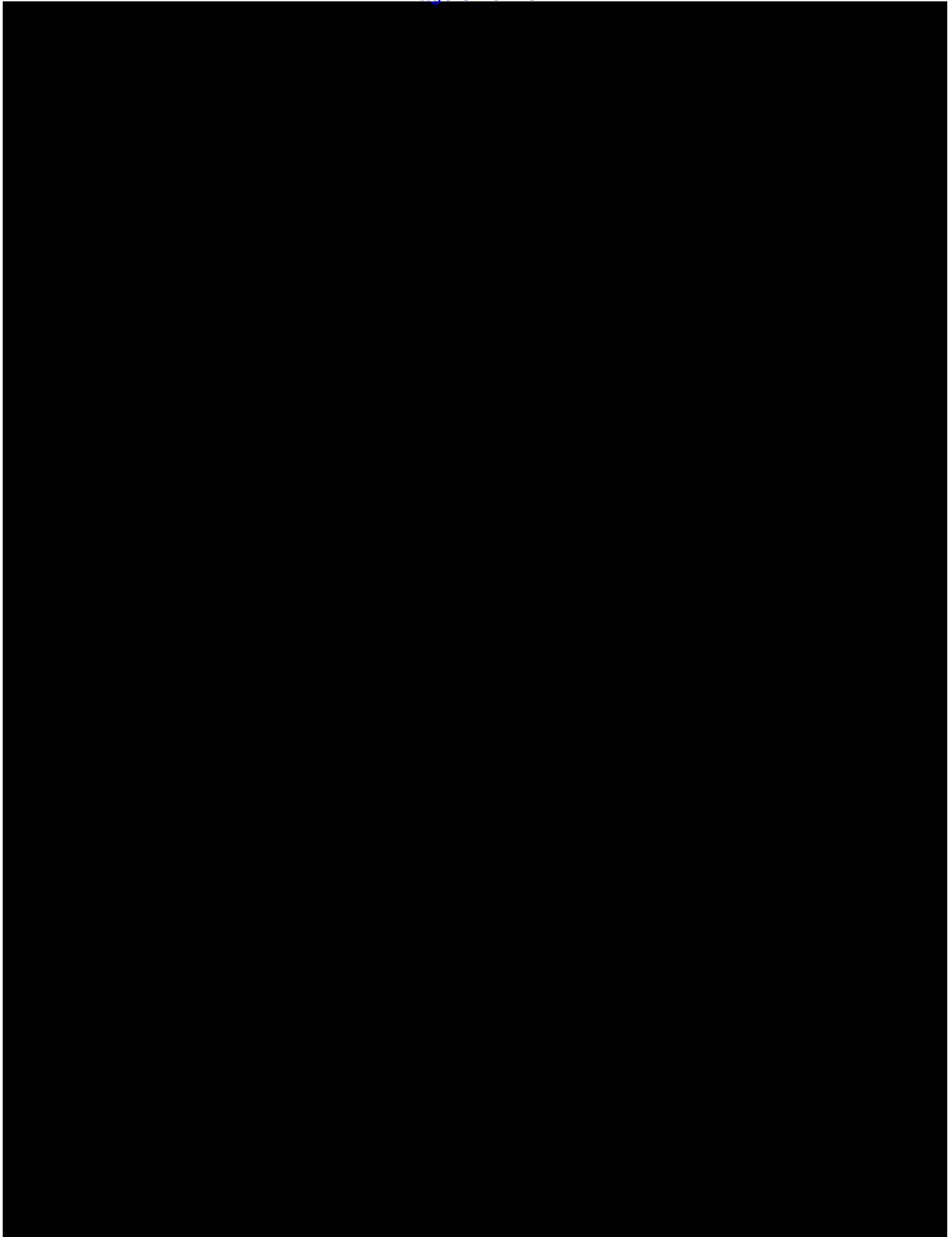


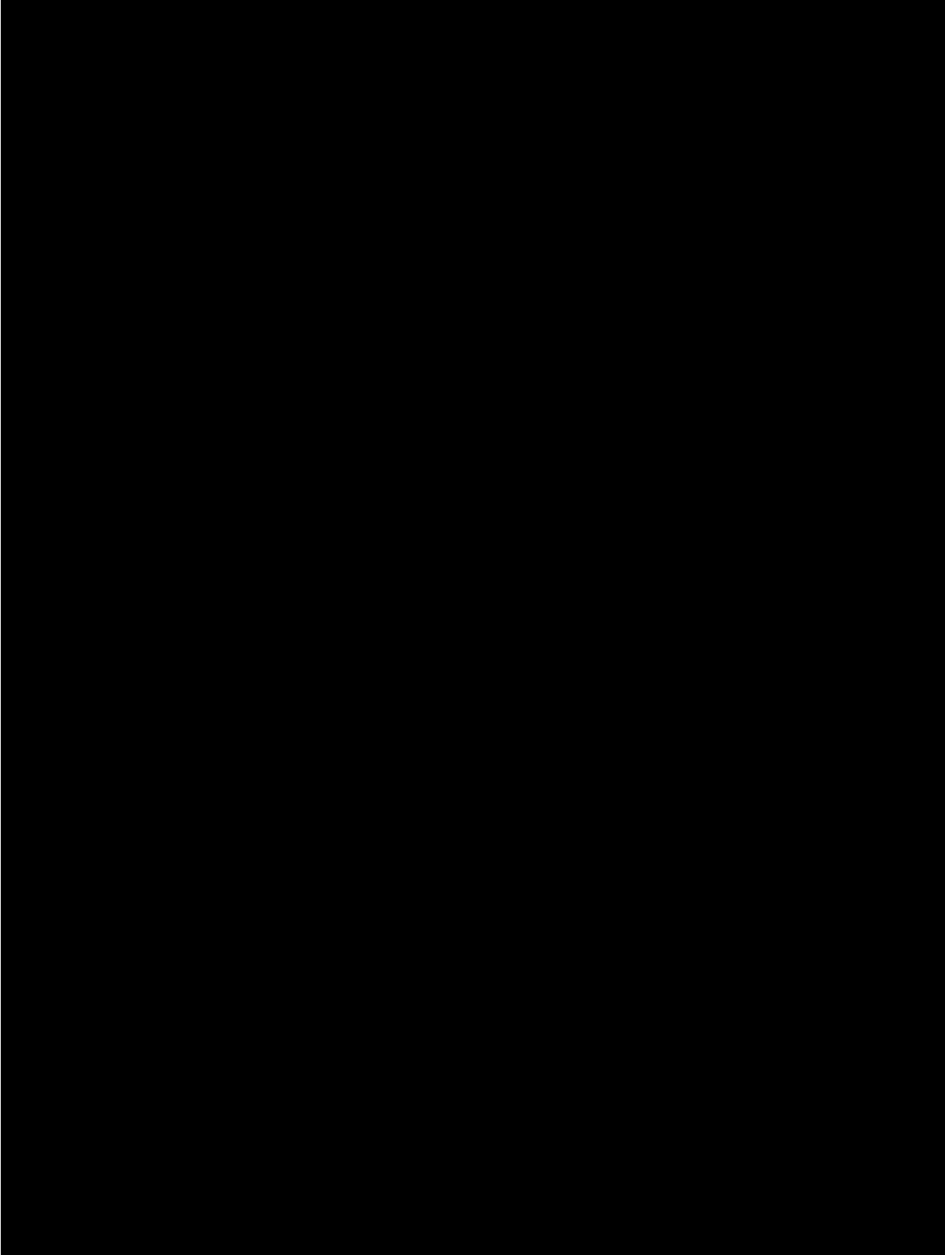


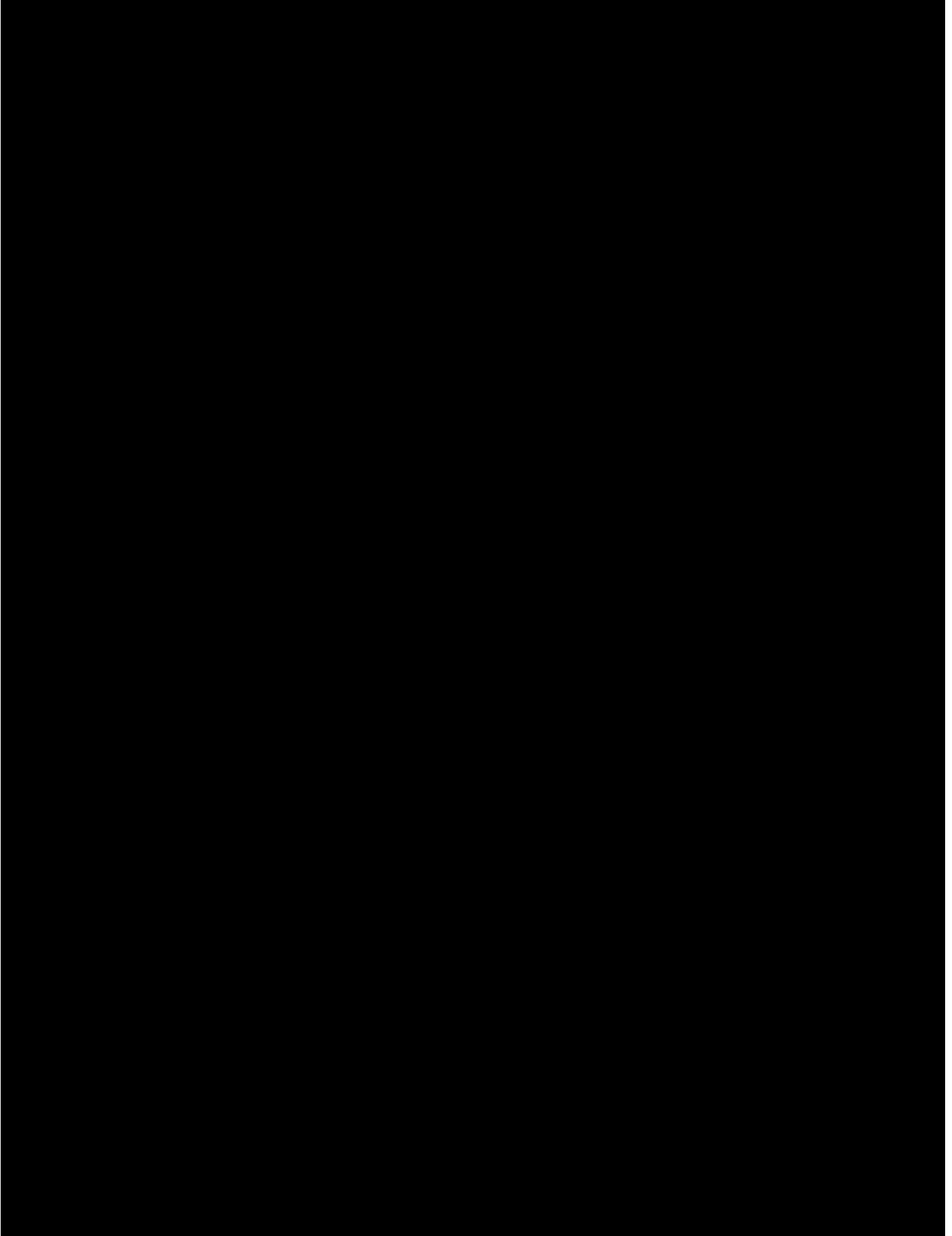


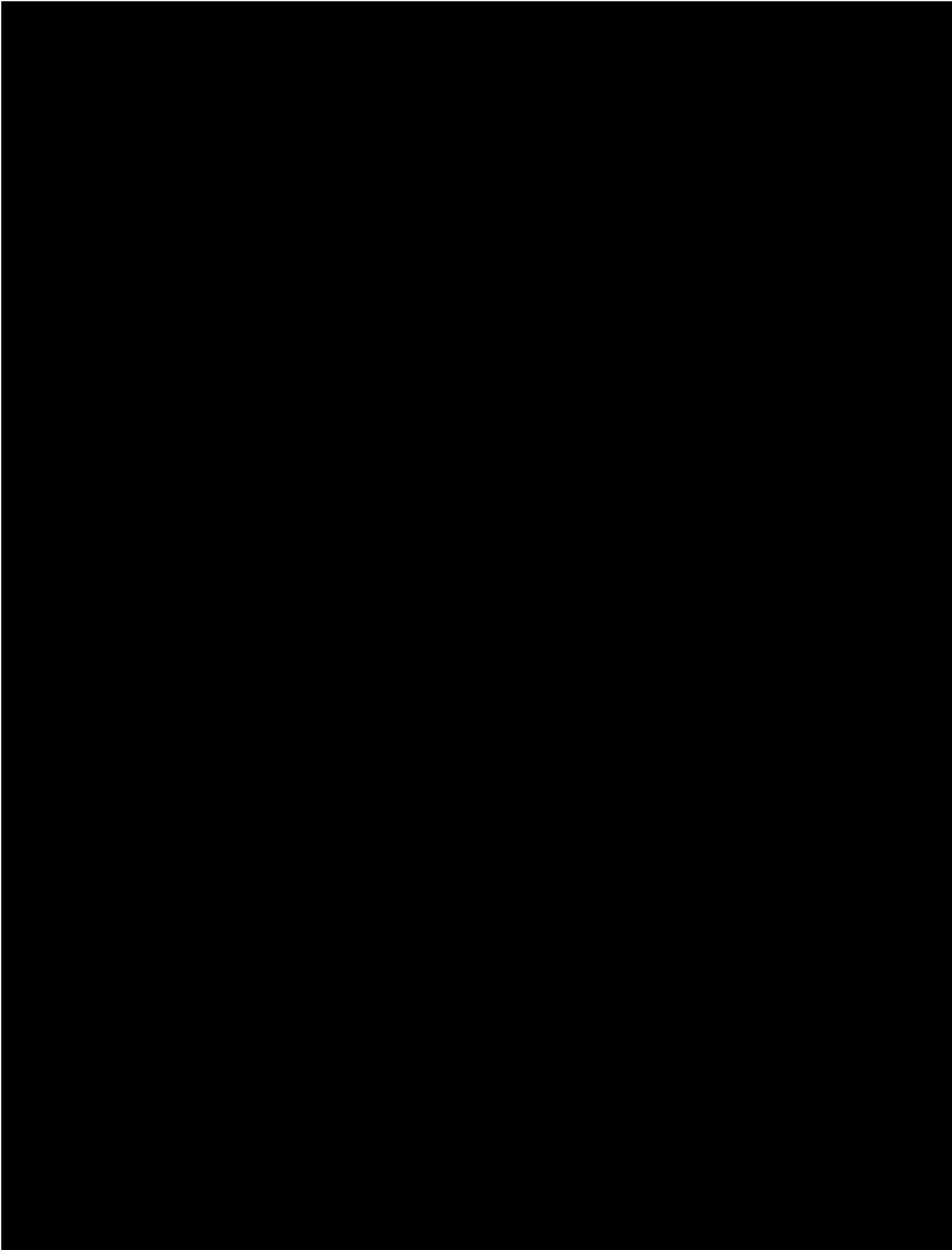


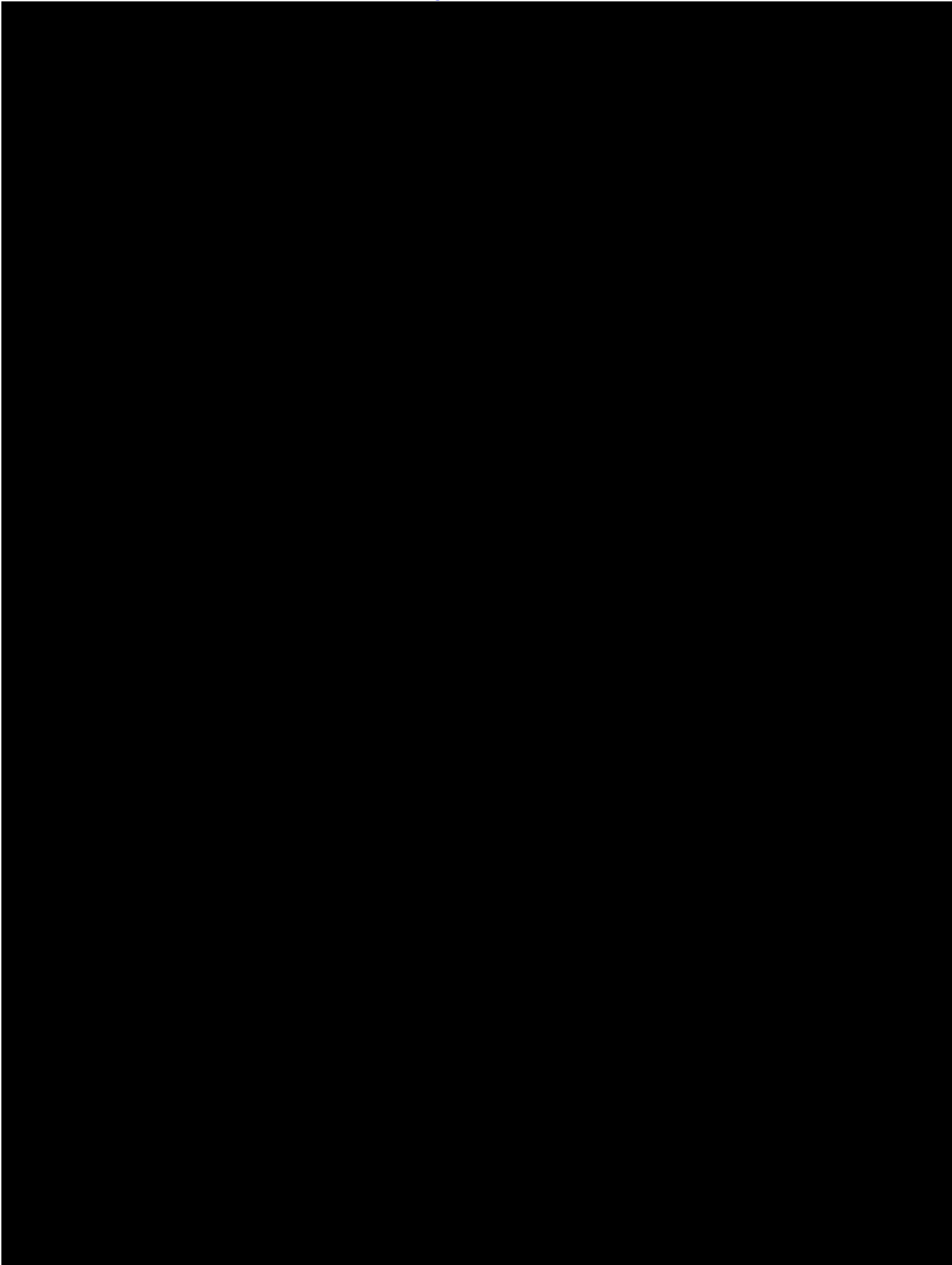


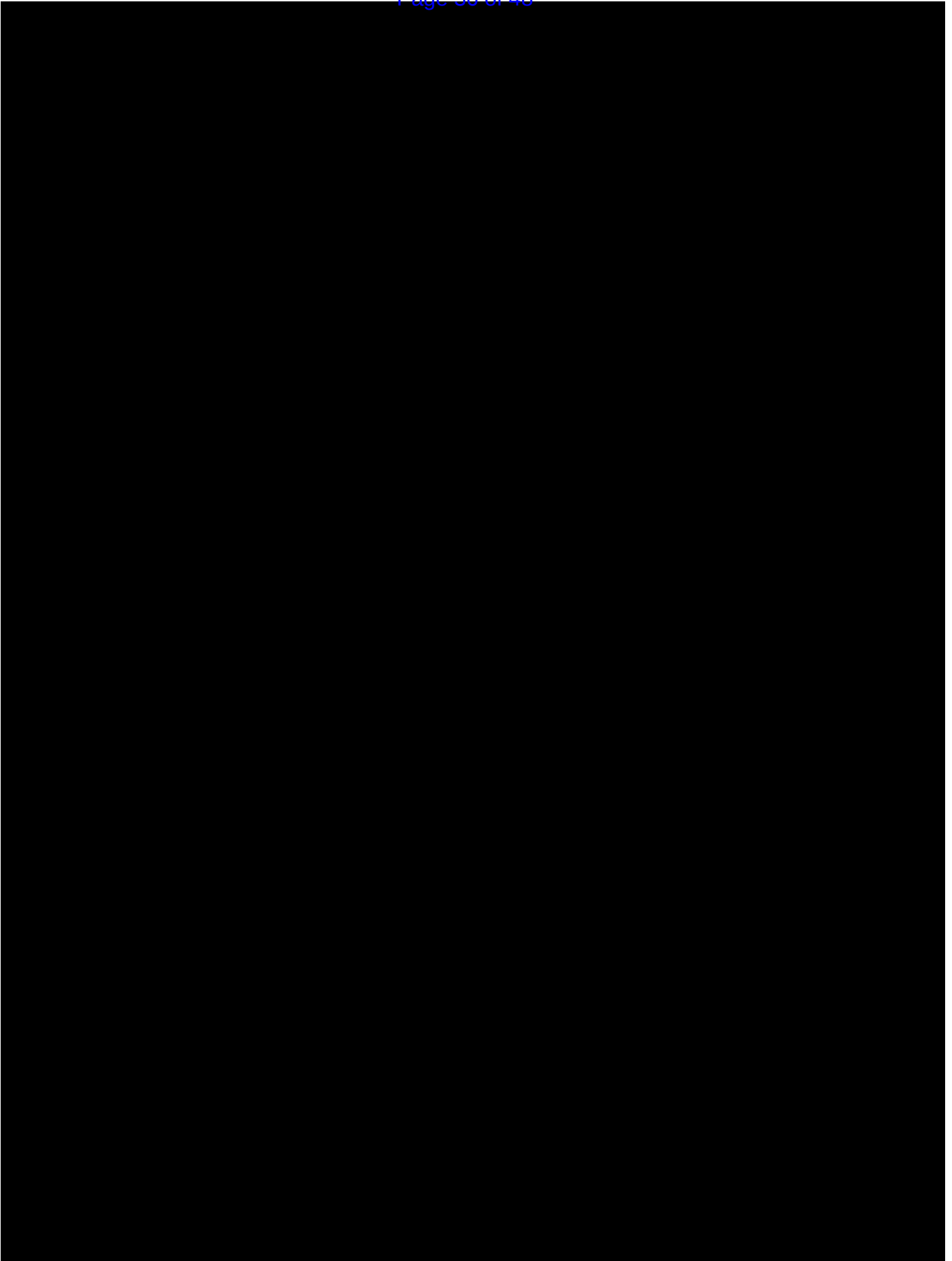


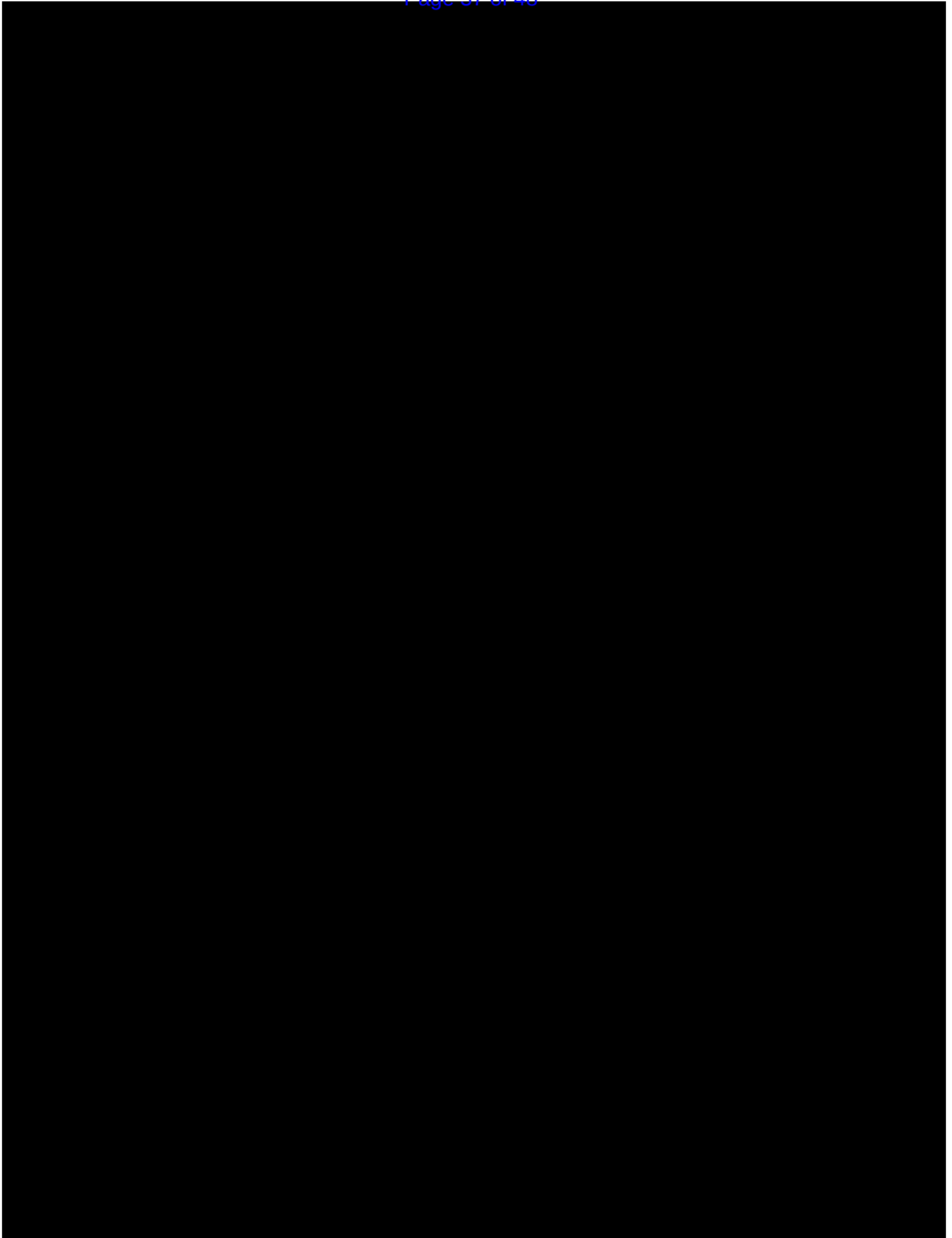


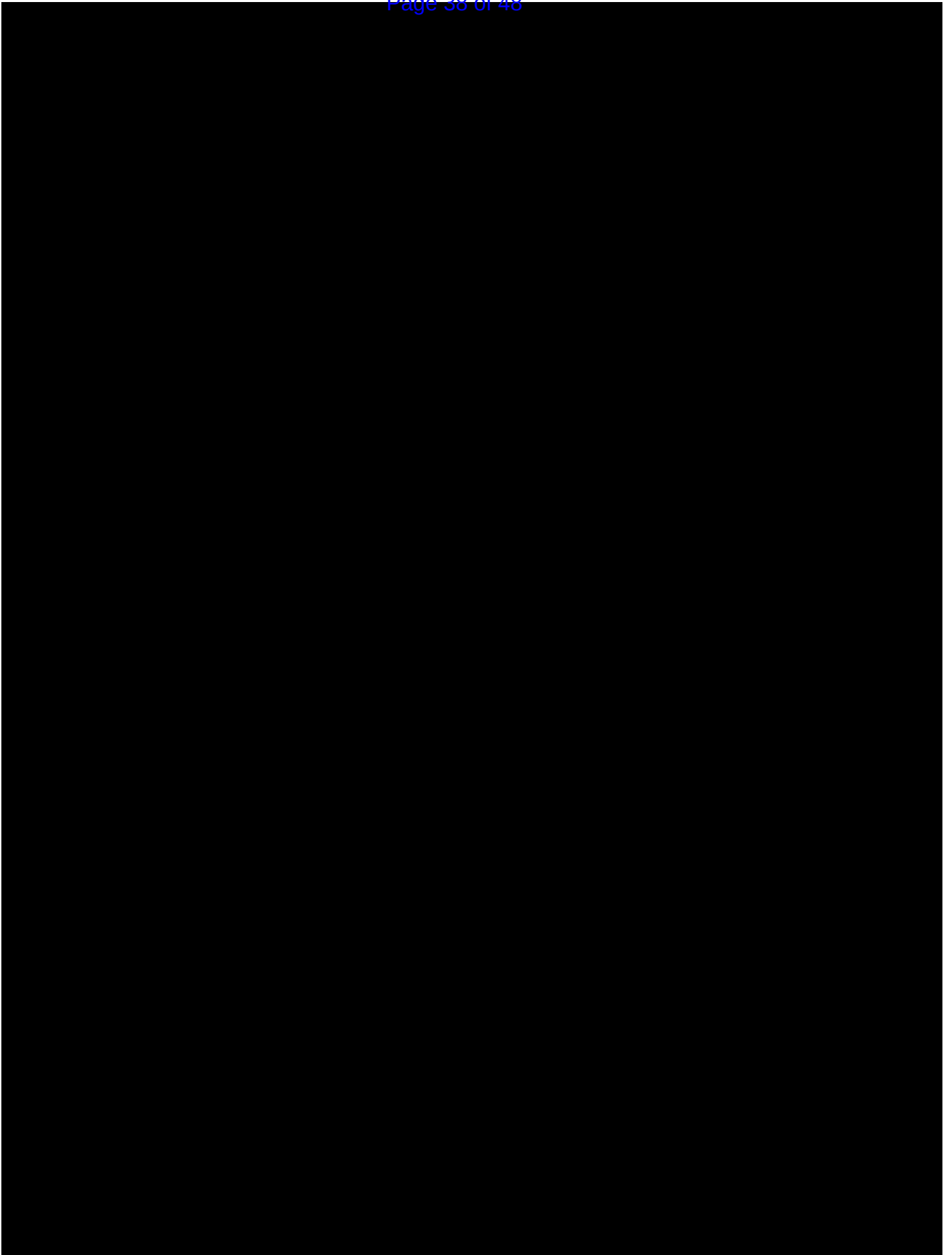


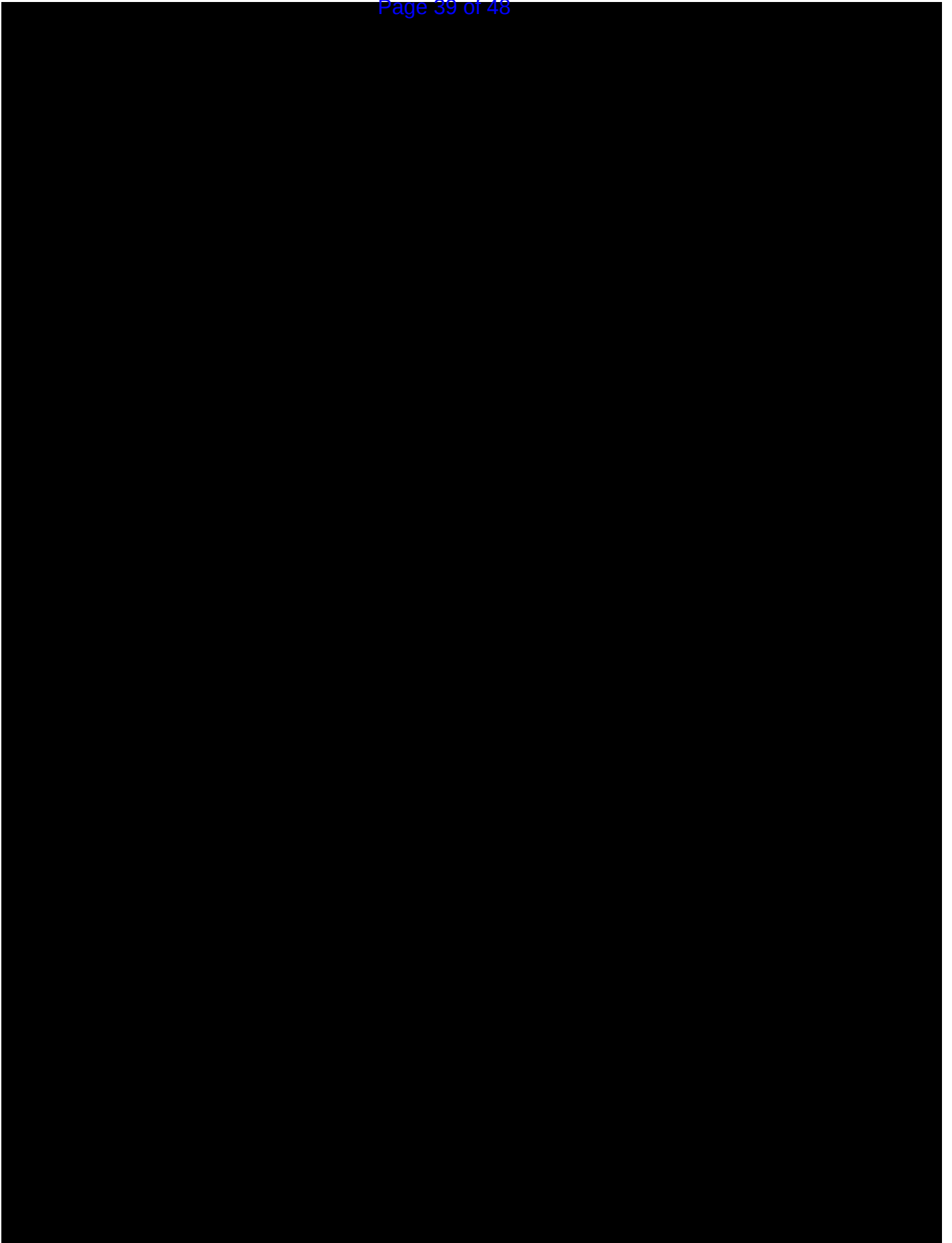


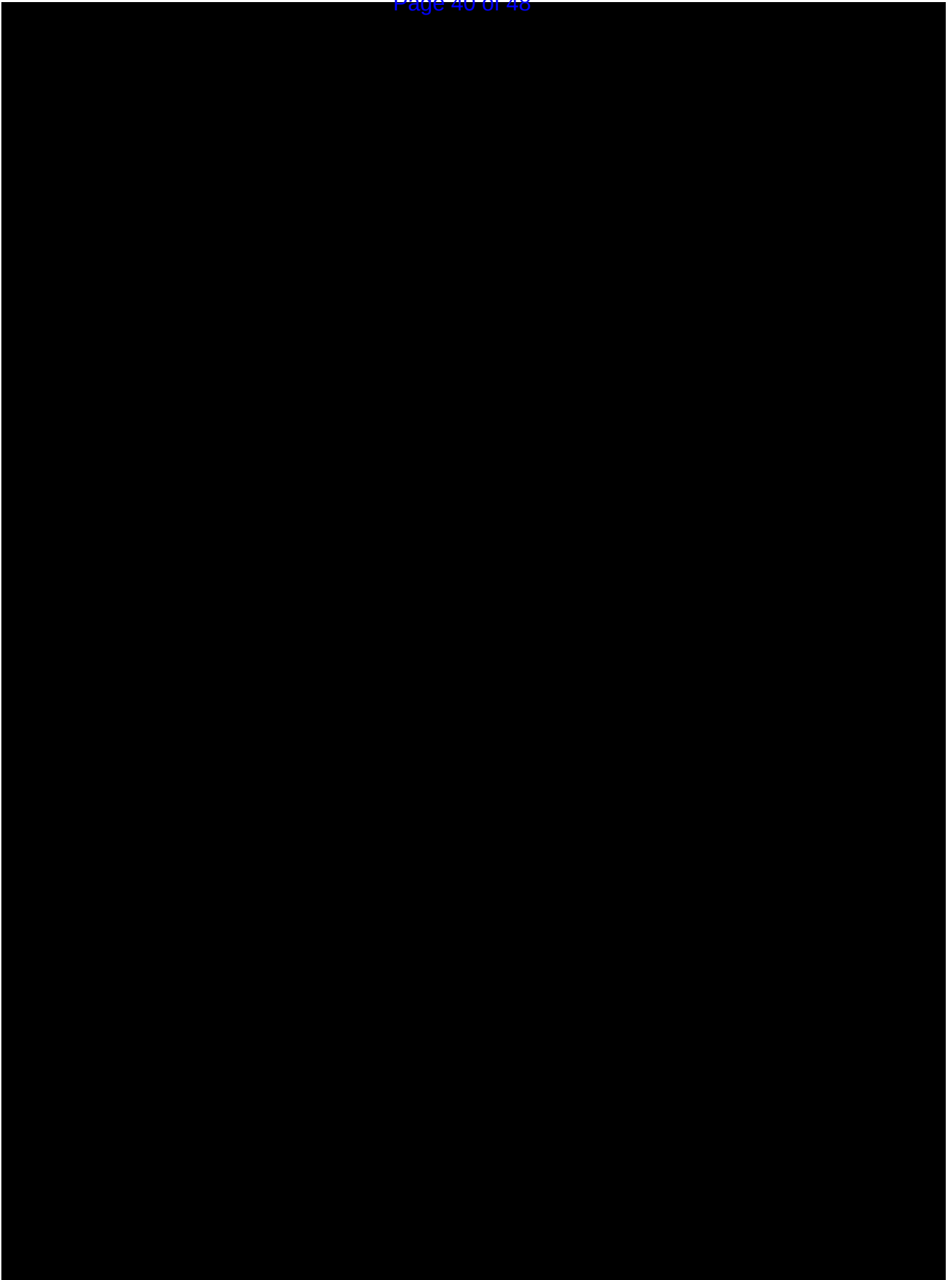


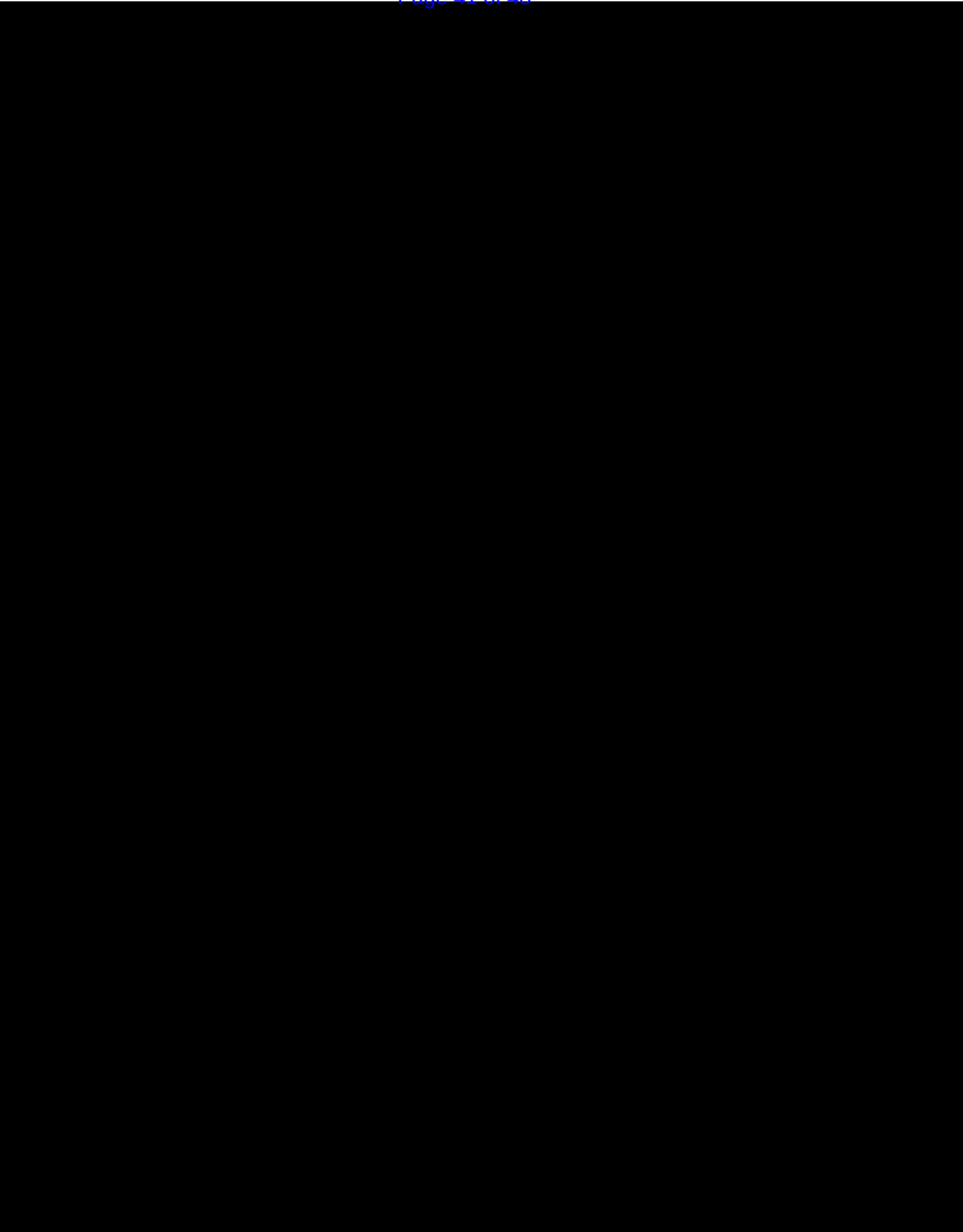


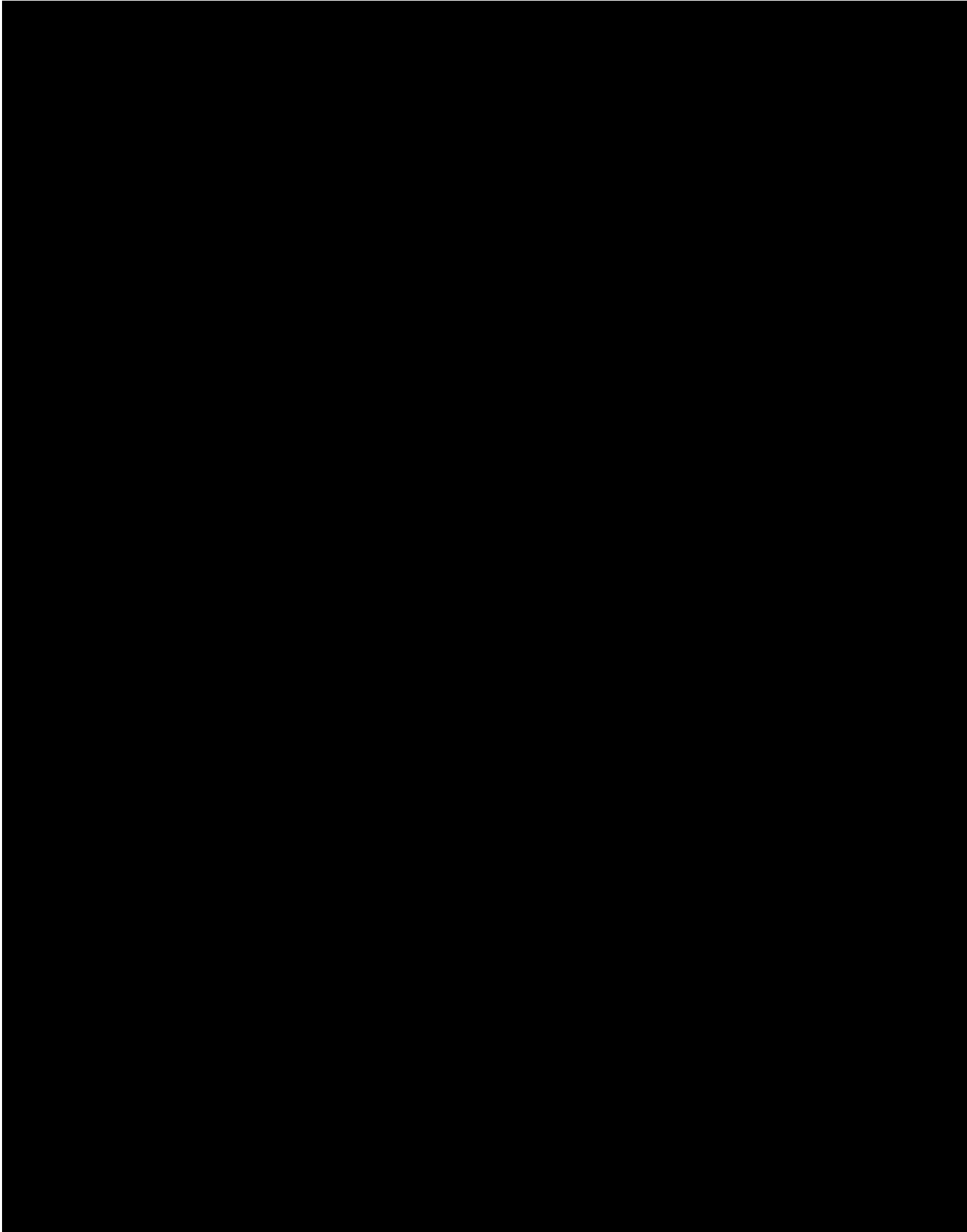


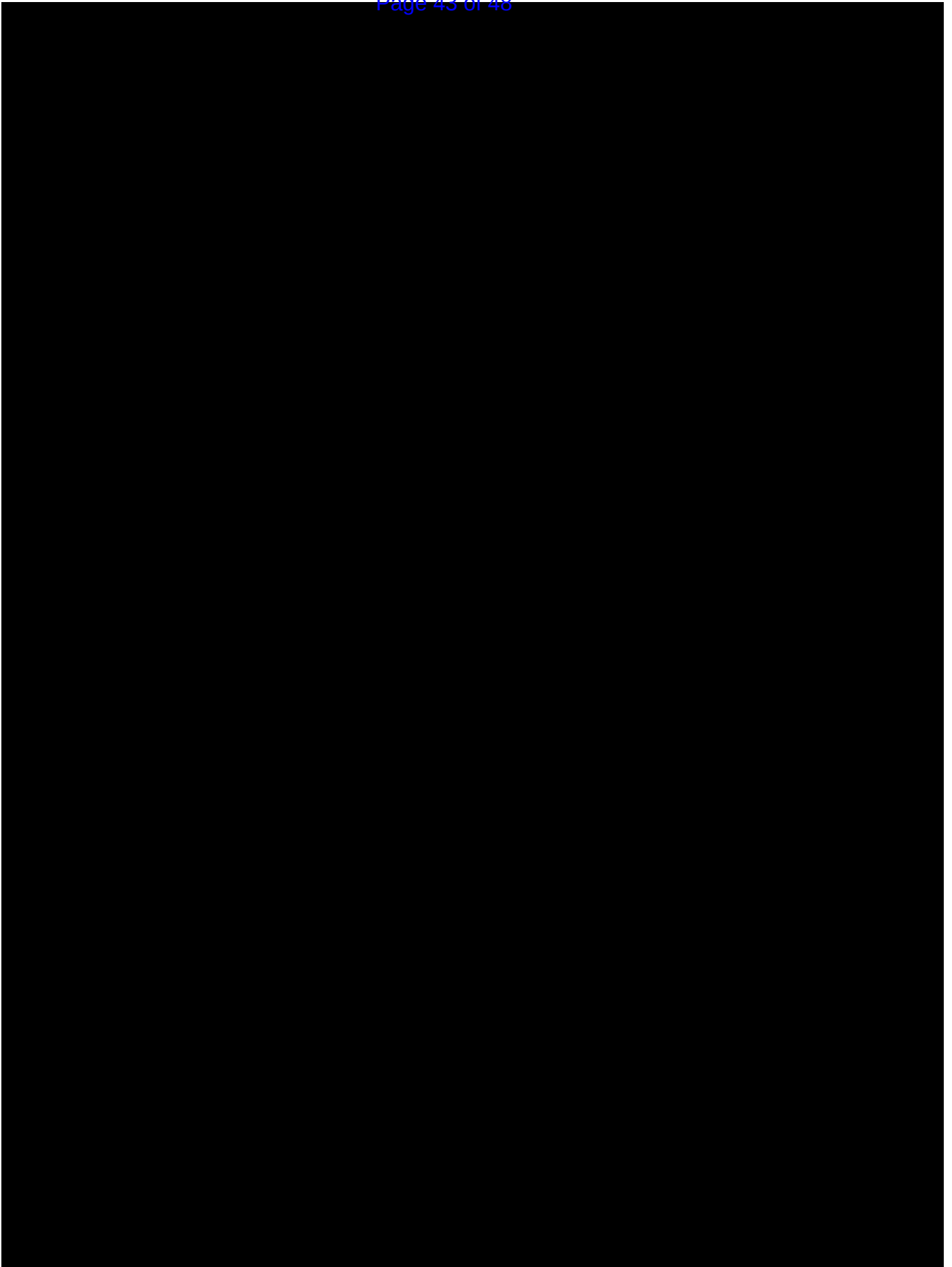


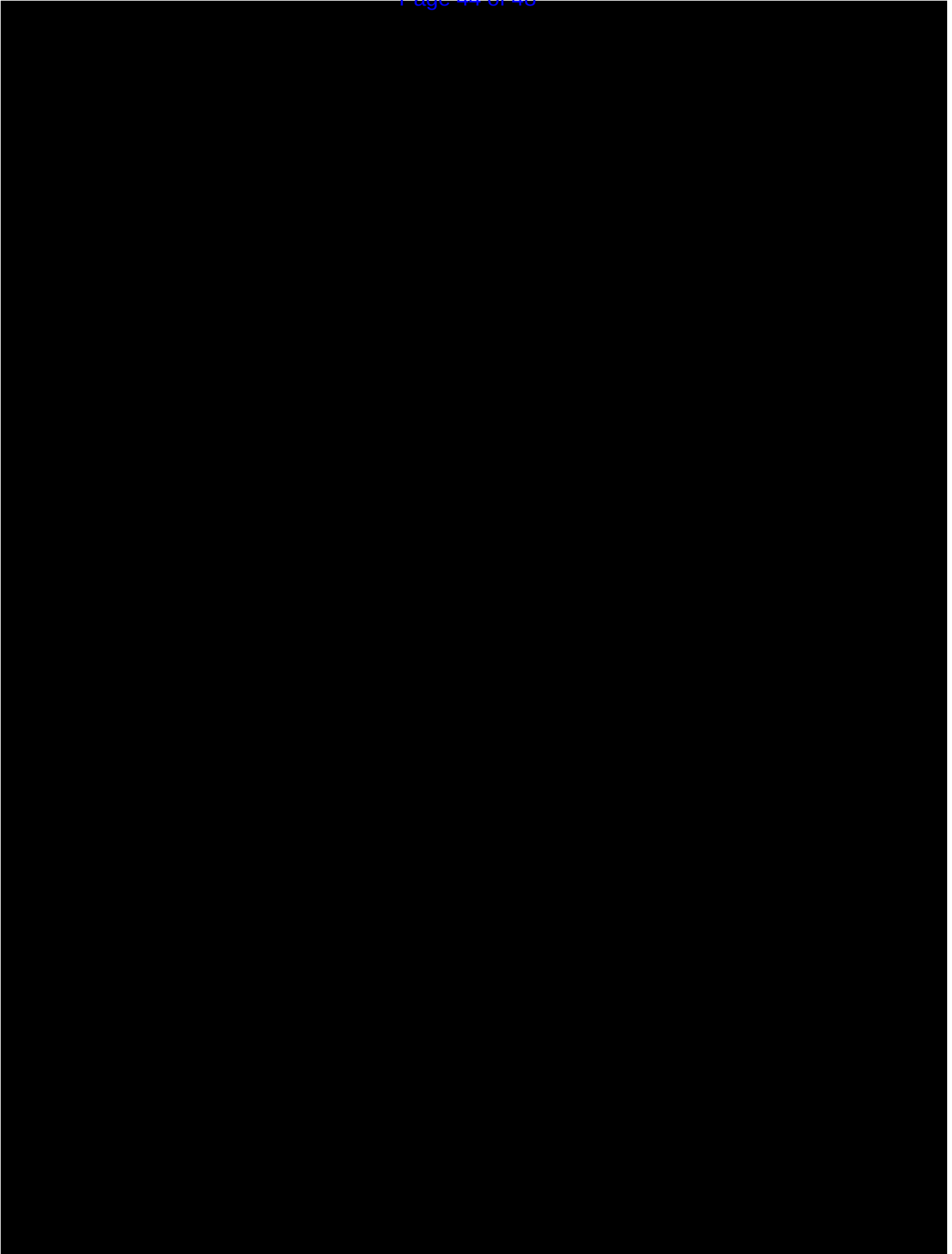


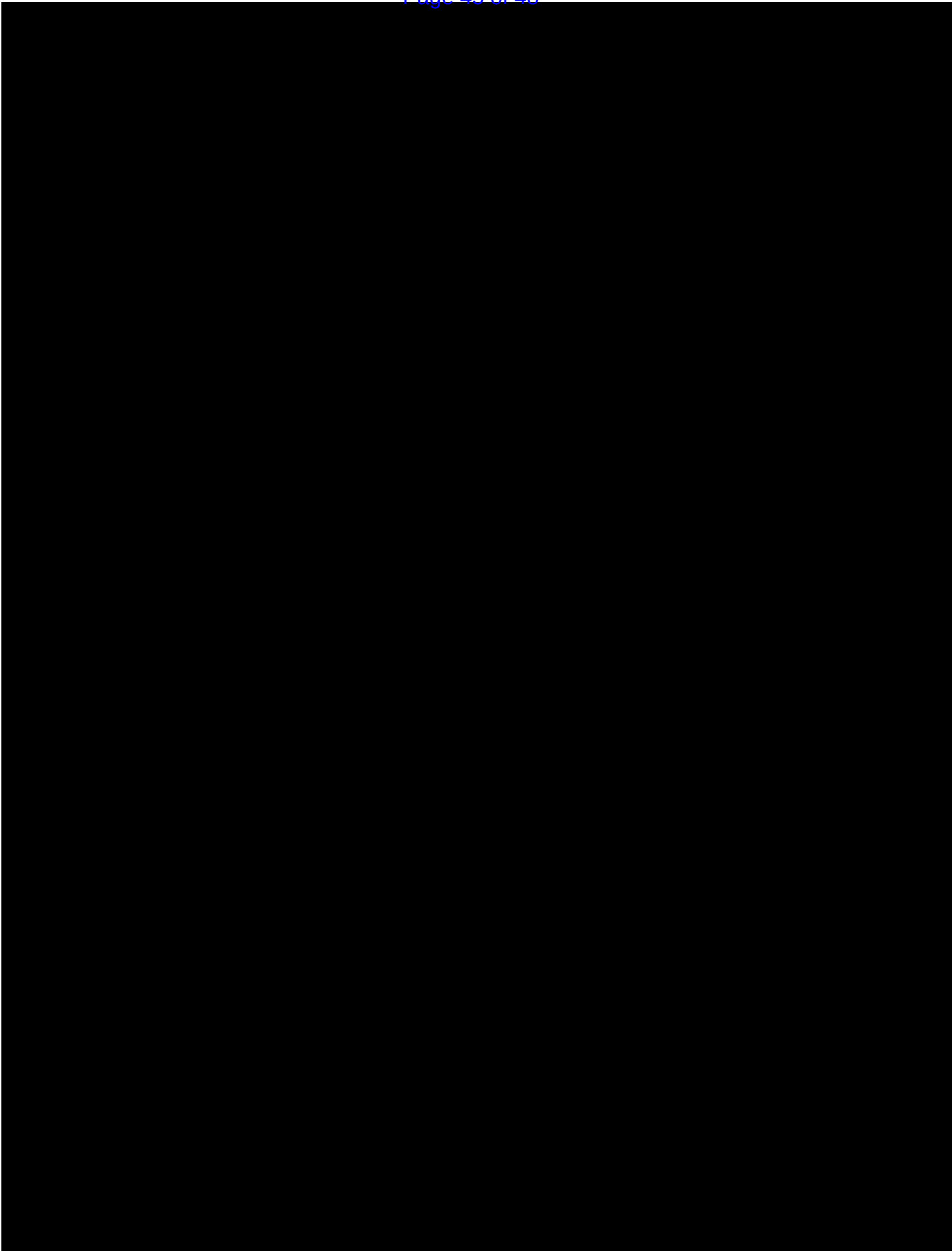


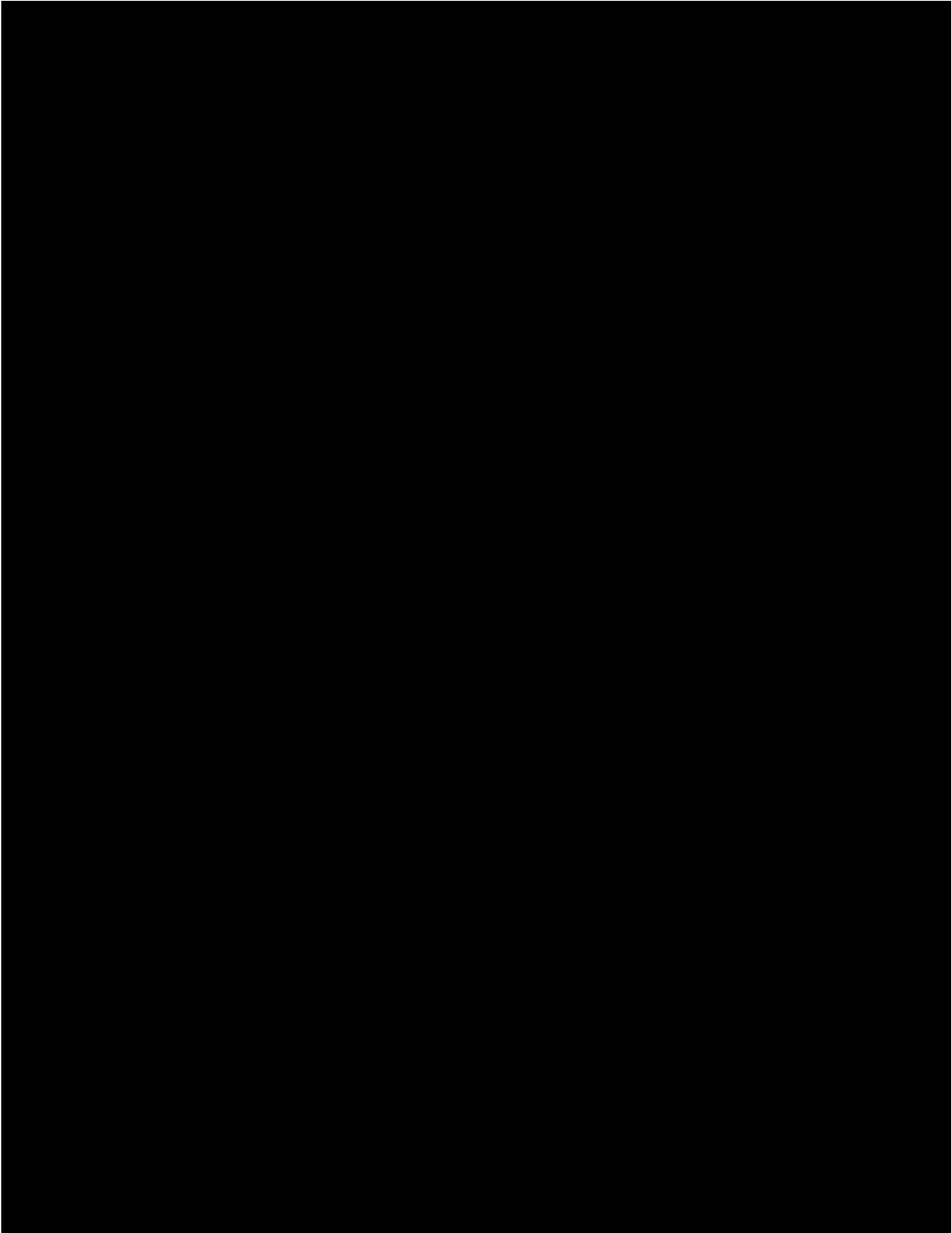


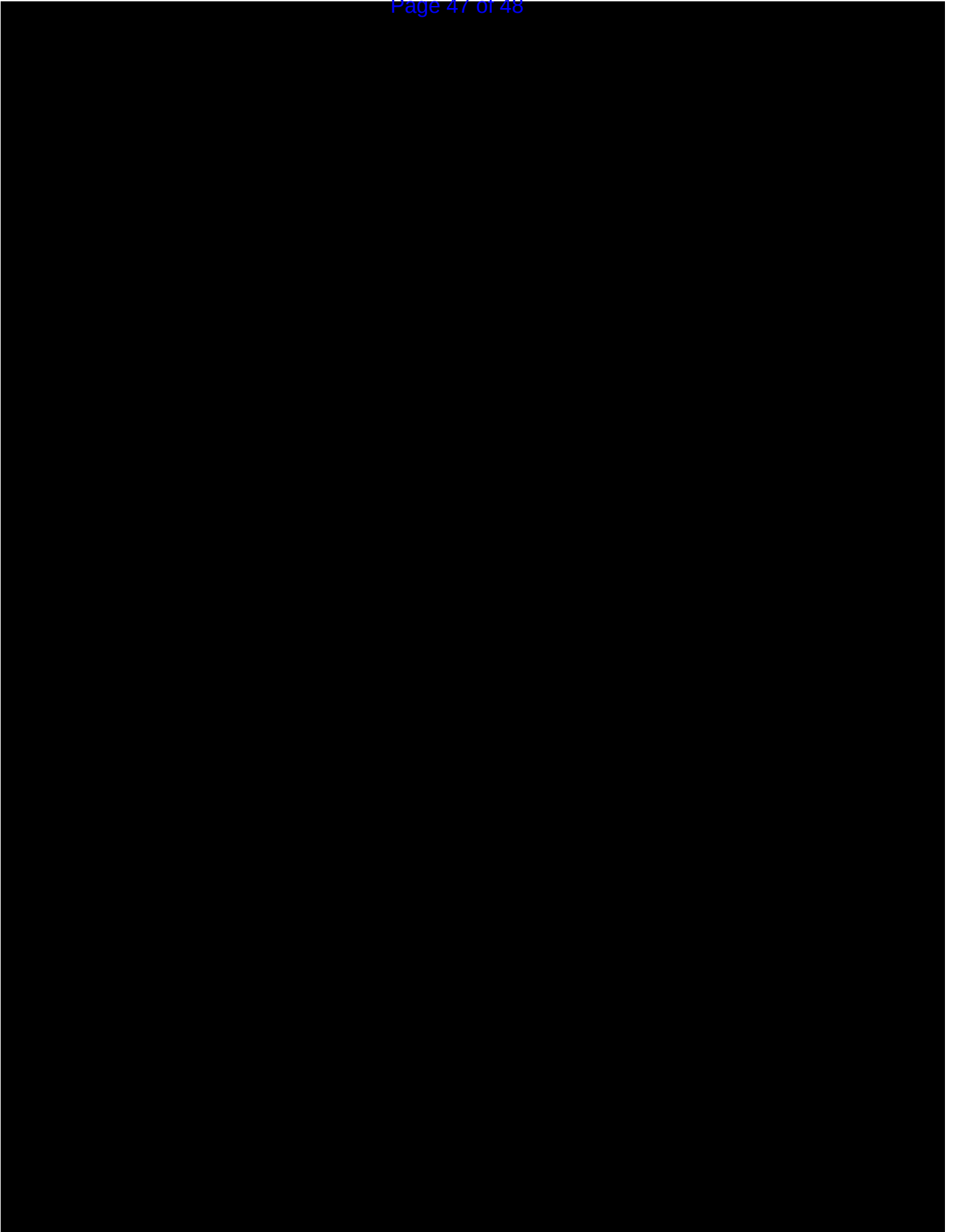












CERTIFICATE OF REPORTER

I, Christine A. Taylor, Registered
Professional Reporter and Notary Public for the
State of North Carolina at Large, do hereby
certify:

That the foregoing deposition was taken
before me on the date and at the time and location
stated in this transcript; that the deponent was
duly sworn to testify to the truth, the whole
truth and nothing but the truth; that the
testimony of the deponent and all objections made
at the time of the examination were recorded
stenographically by me and were thereafter
transcribed; that the foregoing deposition as
typed is a true, accurate and complete record of
the testimony of the deponent and of all
objections made at the time of the examination to
the best of my ability.

I further certify that I am neither related
to nor counsel for any party to the cause pending
or interested in the events thereof. Witness my
hand, this 28th of February, 2024.



Christine A. Taylor
Registered Professional Reporter
Notary Public 19960530077
State of North Carolina