EXHIBIT 29

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)

BLUE FLAME MEDICAL LLC Plaintiff vs. CHAIN BRIDGE BANK, N.A., JOHN J. BROUGH and DAVID M. EVINGER Defendants	)Civil Action No.)1:20-cv-00658(LMB/IDD)
CHAIN BRIDGE BANK, N.A. Third-Party Plaintiffs vs. JPMORGAN CHASE BANK, N.A. Third-Party Defendant	

Remote Videotaped Deposition of Heather Schoeppe
January 22, 2021
9:33 a.m.

Reported by: Bonnie L. Russo
Job No. 4398416

Remote Videotaped Deposition of Heather Schoeppe held through:

Veritext Legal Solutions
1250 I Street, N.W.
Washington, D.C.

Pursuant to Notice, when were present on behalf of the respective parties:

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Geoff Bassett, Videographer

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BY MR. MITCHELL

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he was in the office?
A. Mariano Castagnello.
Q. And was the bank open -- I guess it was open for business that day?
A. No. We -- well, we were open for business. But it was right at the start of COVID. And so we actually -- the banking office was not physically open. We were not letting people in the door. We were doing things remotely and then just taking transactions as people came in.
But to protect the staff, we did not have the door open at that time.
Q. Okay. And did -- just so I am clear on the -- the physical geography, did -- was the door open for Mr. Gula for him to come in, or did Mr. Castagnello meet with him somewhere else?
A. Okay. Sorry. So he -- we have a vestibule. And so Mr. Gula came into the vestibule and said that he needed to open an account. And Mariano -- the way that we were

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opening accounts then is we were not doing accounts in person.
And so we told him that we can collect his documents and open the account and then e-mail him the paper to sign through DocuSign.
And -- but he refused to leave until we opened the account. And so -- which was kind of frustrating, honestly. And it was -- and un -- and it was also a little bit strange. Because normally he works with a different team of people, and he -- we'd have never met -- you know, done anything with him before.
Most of the time people who are assisting customers would just e-mail and say, "I need to open an account." And we could take care of it for them that way.
But he wouldn't leave until we opened the account. So Mariano took care of him.
Q. And as part of that process, was he filling out paperwork?

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Is that basically what he had to do to open the account?
A. We basically collected his entity documents. And basically Mariano was going back and forth and just cracking the door and opening the door and asking him questions and going back over to his station, you know.
So it's just back and forth a bunch of times for Mariano trying to get the information. It was not and ideal situation.
Q. And you said that he normally worked with a different team of people?
A. Yes.
Q. Who did he normally work with?
A. Our commercial deposit team, which is Mike Richardson and Maria Cole.
Q. Did he normally work with those people because he was normally working with business accounts as opposed --
A. Yes.
Q. -- to personal accounts?
A. Yes. Exactly.

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Q. And are -- is your team typically more responsible for the personal accounts?
A. We -- we do personal and business accounts. But we do --we don't handle the larger-size clients. Mike's team handles the political clients and the larger-size client -- clients. So we handle more of the local businesses and consumer accounts.
Q. You mentioned that Mike's team handles the political clients.
Does the bank have a lot of political clients?
A. We do have some, yeah, political clients.
Q. Is that a significant business for the bank, working with political clients?
A. I would say so, yes.
Q. Okay. So you had mentioned that -- that Mr. Gula is working with Mariano to fill out the paperwork.
And did you have any involvement in the process at that point in time?

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A. The only involvement I had was with Mariano. I saw Mariano going back and forth to the door and -- you know, a bunch of times and for a long time. And I couldn't -- and he seemed kind of, you know, animated. And, you know, he kept going back and forth.

And honestly, I was getting concerned. Because we weren't supposed to be interacting with clients face-to-face, and clearly he was.

And so I did ask him what was going on. And then that's when he said that Mr. Gula was there and needed to open an account and said that, you know, he -- and I -- and I asked Mariano, "Why are you doing it this way? You know -- you know, you should -- you know, we could just e-mail him the documents and do the normal procedure."

And he said that, you know, "No. He wouldn't leave until he -- we open the account for him."

So then I actually called Mike

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Richardson just to -- I asked who he was, who was there, and called Mike Richardson to say, you know, "This client's here. Do you know him? Do you know what's going on? You know, he's not -- he's not willing to leave without us opening this account."

And really I was looking -- hoping that then, you know, Mike's team would take over at that point. But Mariano had already done so much work on it and already was in the process of opening it, that it would have wasted more effort to have someone else start over.

So Mike said that he did know him and, you know, to go ahead and proceed with the account. And so we did that.

Q. And when you talked to Mr. Richardson, were you seeking his -- well, you said that he said to -- to go ahead -- to proceed with the account.

Were you asking him for authorization to proceed with the account, or

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can you just explain that a little bit more?

A. Yes. So for -- normally we would require everyone's signatures before we opened -- actually physically uploaded and made the account active.

And Mr. Gula was saying, you know, that his other partner was in California, and so we would have to e-mail him the documents.

And he said that he was expecting a wire and so that he needed the account number right away. And so that's why he needed it immediately.

So -- but that's -- you know, normally we would wait and get all the signatures before we actually uploaded the account.

So really what I was looking for from Mike was to say, you know, "Is this somebody who -- that will sign and that we -- that you feel comfortable with, that you know?"

Because if it was somebody who walked off the street and wanted him to do

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that, honestly we -- I would not -- we would not do it.

So because Mike knew him, we felt okay to proceed doing the account immediately like that.

Q. Okay. Thanks.

So after Mariano finished speaking with Mr. Gula and -- I guess Mr. Gula signed some forms?

Am I correct in that assumption?

A. We actually e-mailed him the forms through DocuSign. Because, again, I didn't want him to have to show him where to sign in person and be that close to him. So we e-mailed Mr. Gula the forms, and he signed them.

And then we also DocuSigned them to -- oh, John Thomas -- sorry. I couldn't remember his name -- at that time also.

Q. Okay. And once those forms were all filled out, where do they go next?

What's the process for that?

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A. They get filed to the client's profile or the account profile. And our Bank Secrecy Act team will, you know, take a look at them and review the account information after that.

Q. And do you interface at all with the Bank Secrecy Act team when they're doing that process?

A. Not -- basically -- not -- our responsibility is to give them the required paperwork. And then, if they have questions or want more information or something, then they will reach out to us and let us know.

Or if we feel like, you know, we have questions or something, then we would ask them. But generally we just complete the paperwork and -- and file it.

Q. And in connection with the account that Mr. Gula opened on March 25th, did you interact with the Bank Secrecy Act team?

A. No. Not -- not -- not then. Uh-uh.

Q. Did you at a later point in time?

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A. I think -- and honestly, I can't remember exactly. I think that, when we found out what the dollar sign -- what the transactions were going to be, then I think that we -- the BSA team was brought in at that time.

Q. Do you recall speaking to anybody on the BSA team about that?

A. No. I think it was through e-mail. We usually e-mail them if there's large transactions or something going on.

Q. Do you recall who you e-mailed with about that?

A. I think it was probably Nancy and Tsega for sure. And I'm not sure who -- if I put anybody else on there.

Q. I apologize if you mentioned this before.

But who's Nancy?

A. Oh, Nancy is a consultant with the bank. She was our director of operations for many years and started the bank. And she still works with the bank and is part of the BSA compliance team.

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Q. We talked a few minutes ago about know-your-customer requirements.

Are -- are know-your-customer requirements the same for all business accounts?

A. Yes.

Q. Does it matter if the customer has had other business accounts with the bank in the past?

Does that impact the process at all?

A. Not really when it comes to businesses. And I -- when I say they're the same, I should also say that different entity documents are required for different types of entities. So it's not all the-- but -- but -- but no.

Basically we always have to collect the -- the same things, you know, before we can open a business account.

Q. And for an LLC account, am I correct

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in assuming you would need to have the certificate of formation?

Any other entity-level documents like that that you can think of that you need?

A. The SS-4 form from the IRS with the EIN and the -- generally the articles of organization.

Q. And do you also need to collect information about the members of the LLC?

A. Yes.

Q. And what -- and what information do you collect from them?

A. Name, address, social, birth date, ID -- ID information, the -- what their position is with the company.

And then for business accounts we also correct beneficial ownership information. So if -- if they're an owner, how much.

I think that's pretty much it.

Q. Okay. And if a -- if a new LLC account -- or a new business account for an LLC is being opened, and the bank has already