EXHIBIT 26

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

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

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

25th, 2020?

A. Yes.

Q. And do you recall if that was the first phone call you had with Mr. Gula on March 25th, 2020?

A. I don't -- I don't know for sure if it was the first one or not.

Q. Do you recall if that was the first call you had with Mr. Gula concerning the receipt of a wire transfer from the State of California?

A. Yes. I think that was the --

MS. FORSTEIN: Object to form.

THE WITNESS: -- first time I -- I was aware of it, the amount of the wire, yeah.

BY MR. MITCHELL:

Q. And Mr. Gula told you during that call that he was expecting a wire on behalf of Blue Flame Medical from the State of California, correct?

A. Correct.

Q. In the amount of $450 million?

A. Correct.
Q. And he asked you to let him know if there were any problems with the wire, correct?
A. I think he just asked to know when it was -- when it hit his account.
Q. Okay. And he wanted to know as soon as it had hit the account.
He expressed that to you, correct?
A. Correct.
Q. And, Ms. Schoeppe, if you recall, before we took a break we were talking about the recording of phone calls at Chain Bridge Bank.
Do you recall that?
A. Yes.
Q. And I believe you testified that your understanding was that calls would be manually recorded concerning outgoing wires; is that right?
A. Uh-huh.
Q. Did you manually record that phone call?

that that recording was produced by defendants bearing Bates No. CBB00002795.

BY MR. MITCHELL:

Q. So, Ms. Schoeppe, on that call you asked Mr. Gula about the purpose of the wire. And he said that the State of California was buying 100 million N95 masks, correct?

A. Correct.

Q. And Mr. Gula said that Blue Flame Medical would be selling those masks to the state, correct -- of California. Excuse me.

A. Yes.

Q. And that those were going to be manufactured in China, correct?

A. Correct.

Q. And that Blue Flame Medical would be sending the money out in phases to purchase those masks, correct?

A. Yes.

Q. And Mr. Gula also said that not all of the money would be going out and that Blue Flame Medical would have its profit as well,

correct?
A. Yes.
Q. And you congratulated him, right?
A. Uh-huh.
Q. When you had that call with Mr. Gula, did you have any concerns about the information that he was providing to you?
A. Not the information in particular but just that, you know -- it was just a very shocking transaction to hear about. I've never dealt with any kind of transaction like that before of that size.
Q. And Mr. Gula said that he would have more information about the exact details of how the money would be sent out the next day, correct?
A. Correct.
Q. And that he would provide that to the bank, correct?
A. Uh-huh.
Q. Did you ever discuss that with Mr. Gula after this call?

A. No. I didn't inter -- really -- it took over -- other people took over at that point. Because it really was more than what I normally deal with.
Q. And do you know who took over at that point?
A. I think John and David did.
Q. Do you know if they discussed that with Mr. Gula after this call?
A. I don't know what they discussed.
Q. Okay. If we could look back at the document that has been shared as Plaintiff's Exhibit 12. And I want to direct your attention, if you still have that up, to the bottom of the second page, which bears Bates stamp CBB00000854.
Do you see the e-mail on the lower half of that page that you sent on March 25th at 4:22 p.m.?
A. Yes.
Q. And this was to Mr. Richardson, Mr. Brough and Ms. Williamson, correct?

Q. Who is Ms. Lincoln?
A. She's part of the operations team.
Q. Did you discuss this wire transfer or Blue Flame Medical with Ms. Lincoln at any point?
A. No. But she might have been on the wires e-mail, in that -- part of that e-mail group.
Q. I got you.
And then, in response to Ms. Lincoln's e-mail, do you see that Mr. Brough responds, at 12:11 p.m.: Do not contact the client about this wire?
A. Yes.
Q. Do you have an understanding as to why Mr. Brough wrote that in the e-mail?
A. I'm not exactly sure why he did. But I'm -- I think it's because they were still looking into the transaction.
Q. And did that make it necessary to avoid any contact with the client about the wire while looking into the transaction?

MS. FORSTEIN: Object to form.
Calls for speculation.
BY MR. MITCHELL:
Q. You may answer, if you can.
A. Okay. What was the question again?
I'm sorry.
Q. Let me rephrase it.
Did the fact that Mr. Brough and
others were still looking into the transaction
make it necessary to avoid any contact with the
client about this wire?
MS. FORSTEIN: Object to form.
THE WITNESS: I think that basically
there was nothing to reach out on yet. I think
they just wanted us to wait until we had more
information.
BY MR. MITCHELL:
Q. As we've discussed earlier today,
Mr. Gula told you that he wished to be
contacted as soon as the wire was received,
correct?
A. Correct.

Q. And you indicated that you would do that, correct?

A. I -- I said that. But obviously we have to do our jobs at the bank and do our due diligence before we can, you know, reach out to a client on something.

So just because they asked us to do that, we still have to do our jobs before we can do that.

Q. Is there a reason that Mr. Gula couldn't have been told, "The wire is received, but we have to look into it"?

A. I'm not sure that he wasn't or -- you know, I don't -- really don't -- I wasn't asked to do that.

Q. You were directed not to contact him, correct?

A. More so -- I mean yes, that's what this e-mail says. But basically we're still doing the due diligence. And so wait to talk to the customer until we have more information to give him.

22.

And for the record, this document, Plaintiff's Exhibit 25, bears Bates No. CBB00000741 through 743.

(Deposition Exhibit 25 was marked for identification.)

BY MR. MITCHELL:

Q. Ms. Schoeppe, please let me know when you have that document in front of you.

A. I have it.

Q. Okay. And I'd like to direct your attention to the second page of the document, which is an e-mail from you. The header information's on the first page. You sent it at 12:18 p.m. to Mr. Brough and others.

And you wrote: John, I think the confirmation e-mail notifying him we received it had already gone out because Mike gula called and let us know he couldn't open the confirmation e-mail.

Do you see that?

A. Yes.

Q. Do you recall sending this e-mail to Mr. Brough?

A. Yeah. I think so.

Q. And why were you sending it to Mr. Brough?

A. To let -- letting him know that the client's been notified that the wire's been received.

Q. And why were you notifying Mr. Brough of that fact?

A. Because the -- the client had asked to be notified. And I'm just letting him know that -- that it went -- that he has been notified.

Q. In the e-mail directly below, Mr. Brough also said not to contacted the client about the wire, correct?

A. Oh, sorry. Yes. Uh-huh.

Q. So do you think you were sending this e-mail because the client had asked to be notified or because Mr. Brough had directed not to let the client know about the wire -- or

excuse me -- to not contact the client about the wire?
A. It looks like it was because we were told not to contact him. So I was just letting him know that the customer had already been contacted or is aware that the wire's been received.
Q. And you understood the -- from your e-mail that Mr. Gula had said that he couldn't open the confirmation e-mail that he had received, correct?
A. Correct.
Q. Do you know if anybody explained to Mr. Gula that the wire had been received?
A. I don't know.
Q. Do you know if anybody talked to Mr. Gula about the fact that he couldn't open the confirmation e-mail?
Well, strike that. Never mind.
Do you know who spoke with Mr. Gula about the fact that he couldn't open the confirmation e-mail?

that.

Q. Okay. And you sent this e-mail about nine minutes after Mr. Claburn had deactivated those features of the accounts that we just looked at, right?

A. I --

Q. And --

A. Yeah. I don't -- if -- I don't -- I didn't pay attention to the time of that one.

Q. Okay. That's fine.

Turning to the first page of Plaintiff's Exhibit 28, at the bottom of the -- at the bottom of that page, Mr. Brough responds: TY. Continue to hold him off, correct?

A. Yes.

Q. At this point in time at 1:27 p.m., do you know why Mr. Brough wanted you to continue to hold off any efforts by Mr. Gula to contact the bank?

A. Because I guess they were still looking into the transaction. And based on the e-mail from -- that Maria said about wiring money out, it looks like he wanted to wire money out. And so we couldn't do that until we had more information.

Q. And Ms. Cole responds to that e-mail at 1:34 p.m.: He just tried my cell phone. I didn't answered.

And then Mr. Brough responds: That was the right thing to do. We will let you know when we have resolution, correct?

A. Correct.

Q. Do you know what resolution Mr. Brough was referring to in his e-mail?

A. I'm assuming that he meant until -- so we would know how to proceed -- until he knows -- until he would be able to tell us how to proceed.

Q. Do you have any greater understand -- well, strike that.

Did you have any discussions with anyone around this time in terms of what resolution the bank was waiting for?