

EXHIBIT 59

Case 1:20-cv-00658-LMB-IDD Document 132-59 Filed 05/07/21 Page 2 of 12
PageID# 3004
To: Maria Cole[mcole@chainbridgebank.com]; Heather Schoeppe[HSchoeppe@chainbridgebank.com]; David M. Evinger[DEvinger@chainbridgebank.com]; Mike Richardson[mrichardson@chainbridgebank.com]; Joanna Williamson[jwilliamson@chainbridgebank.com]
From: John J. Brough
Sent: Thur 3/26/2020 1:34:41 PM
Subject: RE: Blue Flame Medical incoming wire 450 million

That was the right thing to do. We will let you know when we have resolution.

John J. Brough

Chief Executive Officer

Chain Bridge Bank, N.A.
(703) 748-7384 Direct
(703) 748-2005 Main
(703) 216-5477 Cell
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: Maria Cole <mcole@chainbridgebank.com>
Sent: Thursday, March 26, 2020 1:34 PM
To: John J. Brough <JBrough@chainbridgebank.com>; Heather Schoeppe <HSchoeppe@chainbridgebank.com>; David M. Evinger <DEvinger@chainbridgebank.com>; Mike Richardson <mrichardson@chainbridgebank.com>; Joanna Williamson <jwilliamson@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

He just tried my cell phone. I didn't answered.

Maria Cole

Assistant Vice President & Commercial Relationship Manager

Chain Bridge Bank, N.A.
(703) 748-3432 Direct
(571) 405-0600 Cell
(703) 748-2005 Main
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

From: John J. Brough <JBrough@chainbridgebank.com>
Sent: Thursday, March 26, 2020 1:27 PM
To: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; David M. Evinger <DEvinger@chainbridgebank.com>; Mike Richardson <mrichardson@chainbridgebank.com>; Joanna Williamson <jwilliamson@chainbridgebank.com>
Cc: Maria Cole <mcole@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

TY. Continue to hold him off.

John J. Brough

Chief Executive Officer

Chain Bridge Bank, N.A.
(703) 748-7384 Direct

Plaintiff's
Trial Exhibit
569

Exhibit
0028

1445-A Laughlin Avenue
McLean, VA 22101

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From: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Sent: Thursday, March 26, 2020 1:27 PM
To: David M. Evinger <DEvinger@chainbridgebank.com>; Mike Richardson <mrichardson@chainbridgebank.com>; John J. Brough <JBrough@chainbridgebank.com>; Joanna Williamson <jwilliamson@chainbridgebank.com>
Cc: Maria Cole <mcole@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

Mike Gula just called the main number and we did not answer it. Just wanted you to know.

Heather Schoeppe

Senior Vice President and Branch Manager

Chain Bridge Bank, N.A.
(703) 748-2005 Office
(703) 748-7383 Direct
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: David M. Evinger <DEvinger@chainbridgebank.com>
Sent: Thursday, March 26, 2020 12:30 PM
To: Mike Richardson <mrichardson@chainbridgebank.com>; John J. Brough <JBrough@chainbridgebank.com>; Joanna Williamson <jwilliamson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Maria Cole <mcole@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

John and I are in communication with the State of CA. Stand down for now.

David M. Evinger

President & Chief Credit Officer

Chain Bridge Bank, N.A.
(703) 748-7389 Direct
(703) 593-1672 Cell

From: Mike Richardson <mrichardson@chainbridgebank.com>
Sent: Thursday, March 26, 2020 12:29 PM
To: John J. Brough <JBrough@chainbridgebank.com>; David M. Evinger <DEvinger@chainbridgebank.com>; Joanna Williamson <jwilliamson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Maria Cole <mcole@chainbridgebank.com>
Subject: FW: Blue Flame Medical incoming wire 450 million

Everyone – the wire from the State of California was received @ 15 minutes ago. See the details Claudia passed along below.

We have the ICS documentation ready and, once we have the instructions from you and David, will be sending to Mike Gula to sign so that these funds can be moved off balance sheet.

However, the ICS program has a maximum limit of \$125 mil.

Need to have some clarity around how long these funds would be on deposit.

MR

Mike Richardson

Senior Vice President &
Commercial Banking Manager
Chain Bridge Bank, N.A.
Direct 703-748-2074
Cell 571-329-7456
Main 703-748-2005

From: Claudia A. Mojica

Sent: Thursday, March 26, 2020 12:06 PM

To: Mike Richardson <mrichardson@chainbridgebank.com>; Rick Claburn <rclaburn@chainbridgebank.com>; Maria Cole <mcole@chainbridgebank.com>

Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Wires <Wires@chainbridgebank.com>

Subject: RE: Blue Flame Medical incoming wire 450 million

Here you go Mike:

WIRE TRANSFER NOTICE

3/26/20
Chain Bridge Bank NA
McLean, VA 22101

INCOMING WIRE TRANSFER

IMAD: 20200326B1QGC06C006570
OMAD: 20200326MMQFMPCZ00001103261155FT01

Amount of Wire: \$456,888,600.00
Credit Account: Acct Ending 7459

Originator: CALIFORNIA STATE TREASURER
Originator Address: CONCENTRATION ACCOUNT
915 CAPITOL MALL RM 319
Originator Bank: JPMORGAN CHASE
Originator Bank ABA: 021000021
Originator to Beneficiary: BY ORDER OF DEPARTMENT OF GENERAL SERVICES

Wire Fee: \$.00

Beneficiary:
Blue Flame Medical LLC
499 S Capitol St, SW, Ste 420
Washington DC 20003

Chain Bridge Bank N A Wire Department

This is an automated email. Please do not respond to this email.

Claudia A. Mojica

Operations Technician II

Chain Bridge Bank, N.A.
(703) 748-2078 Direct
(703) 748-3430 Operations
(703) 942-8891 Fax

6718 Whittier Ave Ste 120
McLean, VA 22101

www.chainbridgebank.com

From: Mike Richardson <mrichardson@chainbridgebank.com>
Sent: Thursday, March 26, 2020 12:01 PM
To: Rick Claburn <rclaburn@chainbridgebank.com>; Maria Cole <mcole@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Wires <Wires@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

Rick – can you forward the details on the incoming wire?
Thanks
MR

Mike Richardson

Senior Vice President &
Commercial Banking Manager
Chain Bridge Bank, N.A.
Direct 703-748-2074
Cell 571-329-7456
Main 703-748-2005

From: Rick Claburn
Sent: Thursday, March 26, 2020 11:58 AM
To: Maria Cole <mcole@chainbridgebank.com>; Mike Richardson <mrichardson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Wires <Wires@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

Hi Maria,

The wire has been received and credited to the client's account.

Best Regards,

Rick Claburn

Operations Associate
Chain Bridge Bank, N.A.
703-748-3439 Direct
703-748-3430 Main
703-942-8891 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: Maria Cole
Sent: Thursday, March 26, 2020 11:12 AM

To: Mike Richardson <mrichardson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>, Wires <wires@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

John Thomas just called me asking if the wire already hit their account. They are expecting it today, they were told it was going to be sent at 8:00 am Western Time.
I told them they are set up for wire notifications, both him and Mike Gula.

This is just an update.

Best,

Maria Cole

**Assistant Vice President &
Commercial Relationship Manager**

Chain Bridge Bank, N.A.
(703) 748-3432 Direct
(571) 405-0600 Cell
(703) 748-2005 Main
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

From: Mike Richardson <mrichardson@chainbridgebank.com>
Sent: Thursday, March 26, 2020 9:30 AM
To: Maria Cole <mcole@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

No rush on it.
Thanks
MR

Mike Richardson

**Senior Vice President &
Commercial Banking Manager**
Chain Bridge Bank, N.A.
Direct 703-748-2074
Cell 571-329-7456
Main 703-748-2005

From: Maria Cole
Sent: Thursday, March 26, 2020 9:30 AM
To: Mike Richardson <mrichardson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

I just have to request a transfer for Stephanie Fenjiro and will get this account ready... will let you know when ready.

Maria Cole

**Assistant Vice President &
Commercial Relationship Manager**

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(703) 748-3432 Direct
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McLean, VA 22101

From: Mike Richardson <mrichardson@chainbridgebank.com>
Sent: Thursday, March 26, 2020 9:27 AM
To: Maria Cole <mcole@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

Don't upload yet. We'll wait on this to go live.
I'll have the ICS Agreement ready in the next 10 minutes.
MR

Mike Richardson

Senior Vice President &
Commercial Banking Manager
Chain Bridge Bank, N.A.
Direct 703-748-2074
Cell 571-329-7456
Main 703-748-2005

From: Maria Cole
Sent: Thursday, March 26, 2020 9:25 AM
To: Mike Richardson <mrichardson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

Awesome. Thanks Mike. I couldn't remember the numbers upfront....I think I got it from there. Do you want me to upload it of just wait?

Best,
Maria

From: Mike Richardson <mrichardson@chainbridgebank.com>
Sent: Thursday, March 26, 2020 9:22 AM
To: Maria Cole <mcole@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Subject: RE: Blue Flame Medical incoming wire 450 million

Hey Maria – ICS shadow accounts will be 2199+the last 6 digits of the account it will be linked to, so in this case the last 6 digits of the Blue Flame Medical account that was opened yesterday.

You will have to select "ICS Shadow Acct" in the account type field on the first screen of the account opening.

Let me know if you have ?'s
Thanks
MR

Mike Richardson

Senior Vice President &
Commercial Banking Manager
Chain Bridge Bank, N.A.
Direct 703-748-2074
Cell 571-329-7456
Main 703-748-2005

From: Maria Cole
Sent: Wednesday, March 25, 2020 6:50 PM
To: Mike Richardson <mrichardson@chainbridgebank.com>
Cc: Heather Schoeppe <HSchoeppe@chainbridgebank.com>
Subject: Re: Blue Flame Medical incoming wire 450 million

Sure thing Mike! I will do this first thing in the morning.
Just finished up his wire agreement and sent it via DocuSign.

The shadow account starts with 2300*****?

Thanks and have a great evening!

Best,
Maria

Sent from my iPhone

On Mar 25, 2020, at 6:34 PM, Mike Richardson <mrichardson@chainbridgebank.com> wrote:

Hey Heather - yeah I'm skeptical of this whole thing too.

In any event, will monitor and adjust as needed. I don't believe any funds were transferred in today. He may be opening himself up if he provides wire instructions to this group that supposedly is sending him funds. So we should be on the lookout for potential fraudulent transactions.

I'll work up the ICS agreement just in case and Maria, can you work up the ICS shadow account and not upload yet?

Thanks and let me know if there are questions.
MR

Mike Richardson
Sr. Vice President &
Commercial Banking Manager
Chain Bridge Bank
703-748-2074

Sent from my Verizon Wireless mobile device

On Mar 25, 2020, at 5:46 PM, Heather Schoeppe <HSchoeppe@chainbridgebank.com> wrote:

Hi Mike,
John and David were going to reach out to him to confirm the information b/c they are very skeptical about this. If it ends up being real, then we discussed putting them on ICS. Would it be possible for Maria to prepare ICS paperwork tomorrow in case it goes that way? They said we would need it off of the books asap. They just think it seems very strange a company established 2

Have a great evening,
Heather

Heather Schoeppe

Senior Vice President and Branch Manager

Chain Bridge Bank, N.A.
(703) 748-2005 Office
(703) 748-7383 Direct
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: Mike Richardson <mrichardson@chainbridgebank.com>

Sent: Wednesday, March 25, 2020 5:12 PM

To: Heather Schoeppe <HSchoeppe@chainbridgebank.com>

Subject: RE: Blue Flame Medical incoming wire 450 million

Hey Heather – tried to call you but missed you . . . checking to see what the verdict was on this anticipated wire.

Thanks

MR

Mike Richardson

**Senior Vice President &
Commercial Banking Manager**
Chain Bridge Bank, N.A.
Direct 703-748-2074
Cell 571-329-7456
Main 703-748-2005

From: Heather Schoeppe

Sent: Wednesday, March 25, 2020 4:31 PM

To: John J. Brough <JBrough@chainbridgebank.com>; Mike Richardson <mrichardson@chainbridgebank.com>;
Joanna Williamson <jwilliamson@chainbridgebank.com>

Subject: RE: Blue Flame Medical incoming wire 450 million

Call me back

Heather Schoeppe

Senior Vice President and Branch Manager

Chain Bridge Bank, N.A.
(703) 748-2005 Office
(703) 748-7383 Direct
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: John J. Brough <JBrough@chainbridgebank.com>

Sent: Wednesday, March 25, 2020 4:31 PM

To: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Mike Richardson
<mrichardson@chainbridgebank.com>; Joanna Williamson <jwilliamson@chainbridgebank.com>

Subject: RE: Blue Flame Medical incoming wire 450 million

I'm on the phone with David. Trying to conference you in Heather.

John

John J. Brough

Chief Executive Officer

Chain Bridge Bank, N.A.
(703) 748-7384 Direct
(703) 748-2005 Main
(703) 216-5477 Cell
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: Heather Schoeppe <HSchoeppe@chainbridgebank.com>

Sent: Wednesday, March 25, 2020 4:22 PM

To: Mike Richardson <mrichardson@chainbridgebank.com>; John J. Brough <JBrough@chainbridgebank.com>;
Joanna Williamson <jwilliamson@chainbridgebank.com>

Subject: FW: Blue Flame Medical incoming wire 450 million

Importance: High

John and Joanna,

We opened an account today for Blue Flame Medical/Mike Gula and he is expecting a wire in today for 450 Million from the State of California. Mike Gula said the Governor of California just announced that California is buying 100 Million N95 masks from China and will be deploying them. Mike's company Blue Flame Medical received the contract. He said the money should be in today and will be spent out fairly rapidly as China produces the masks and they pay them. He said he understands that the timing is important to us and can give us more information tomorrow on the timing of payments out of the account.

I will call you right away, but wanted you to see this in case I can't reach you immediately.

Thanks,
Heather

Heather Schoeppe

Senior Vice President and Branch Manager

Chain Bridge Bank, N.A.
(703) 748-2005 Office
(703) 748-7383 Direct
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: Mike Richardson <mrichardson@chainbridgebank.com>

Sent: Wednesday, March 25, 2020 4:00 PM

To: Heather Schoeppe <HSchoeppe@chainbridgebank.com>

Cc: Wires <Wires@chainbridgebank.com>; Commercial Banking <commercialbanking@chainbridgebank.com>

Subject: Re: Blue Flame Medical incoming wire

Anything of that size would need to be known on the front end because that's half our asset size and could be problems on our capital ratios.

Please reach out to confirm and let's talk with John and Joanna if it turns out to be something that massive.

MR

Mike Richardson
Sr. Vice President &
Commercial Banking Manager
Chain Bridge Bank
703-748-2074

Sent from my Verizon Wireless mobile device

On Mar 25, 2020, at 3:54 PM, Heather Schoeppe
<HSchoeppe@chainbridgebank.com> wrote:

He actually said 450 million. I was hoping Maria knew about it already b/c it is pretty crazy and would explain why he is going crazy today. If not, then maybe someone should reach out to discuss further to see what it's all about and the timeline of how long it will be here. I'm happy to do it if you want.

Heather Schoeppe

Senior Vice President and Branch Manager

Chain Bridge Bank, N.A.
(703) 748-2005 Office
(703) 748-7383 Direct
(703) 748-2007 Fax

1445-A Laughlin Avenue
McLean, VA 22101

www.chainbridgebank.com

From: Mike Richardson <mrichardson@chainbridgebank.com>

Sent: Wednesday, March 25, 2020 3:53 PM

To: Heather Schoeppe <HSchoeppe@chainbridgebank.com>; Wires <Wires@chainbridgebank.com>

Cc: Commercial Banking <commercialbanking@chainbridgebank.com>

Subject: RE: Blue Flame Medical incoming wire

Heather – I hope you're using "M" as roman numeral for thousands and not "M" for millions. ☺

MR

Mike Richardson

Senior Vice President &

From: Heather Schoeppe

Sent: Wednesday, March 25, 2020 3:31 PM

To: Wires <Wires@chainbridgebank.com>

Cc: Commercial Banking <commercialbanking@chainbridgebank.com>

Subject: Blue Flame Medical incoming wire

Mike Gula with Blue Flame Medical is expecting a wire from the state of California for 450M. and he would like to be contacted at 202-255-9745 as soon as we receive the funds.

Thank You,
Heather

Heather Schoeppe

Senior Vice President and Branch Manager

Chain Bridge Bank, N.A.

(703) 748-2005 Office

(703) 748-7383 Direct

(703) 748-2007 Fax

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