EXHIBIT 44

HIGHLY CONFIDENTIAL
PURSUANT TO PROTECTIVE ORDER
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)
---------------------------------x
BLUE FLAME MEDICAL LLC,
Plaintiff,

-against- Civil Action No. 1:20-cv-00658

CHAIN BRIDGE BANK, N.A., JOHN J. BROUGH, and DAVID M. EVINGER,
Defendants.
---------------------------------x
CHAIN BRIDGE BANK, N.A.,
Third-Party Plaintiff,
-against-
JPMORGAN CHASE BANK, N.A.,
Third-Party Defendant.
---------------------------------x
February 9, 2021
9:35 a.m.

Remote Videotaped Deposition of RAKESH KORPAL, a 30(b)(6) Witness, held in the above-entitled action, located in Tampa, Florida, taken before Dawn Matera, a Shorthand Reporter and Notary Public.

brokers 99 percent of the time, how were those funds recovered?

A. We would speak with the financial institution that received the funds. There would be a mutual discussion to understand where those funds are and determining if there is any viability in us being able to recover those funds.

And then assuming that was the case, we would submit a recall request to the financial institution and then receive those funds back.

Q. And how was it determined whether there was any viability in JPMorgan being able to recover funds?

A. The financial institution that received the moneys was the only one who had visibility into the account, the balances or the status of the funds.

Q. What do you mean by status of the funds?

A. Had the funds been credited to the ultimate beneficiary's account or not.

Q. And if they had been credited to the ultimate beneficiary's account, that would mean they would not be able to be returned to JPMorgan, correct?

MR. SCHOENFELD: Objection.

MR. BURKE: Objection to the form.

Q. Can you answer that question, Mr. Korpal?

A. The funds could be recovered. However, it would require debit authorization potentially from the beneficiary or the beneficiary account owner.

Q. And here, with respect to the wire transfers we've been discussing regarding Chain Bridge Bank and Blue Flame Medical, are you aware of any authorization of Blue Flame Medical to

return the funds to JPMorgan?
A. No.
Q. Did JPMorgan understand that Blue Flame Medical was not involved -- let me rephrase that.
Did JPMorgan understand that Blue Flame Medical had not authorized the return of the funds to JPMorgan?
A. Yes.
Q. Was it JPMorgan's understanding that Chain Bridge Bank had concerns that there could be fraud with respect to this transaction?
A. I don't believe they said fraud. I think they just were suspicious.
Q. Do you recall that they said that the transaction didn't smell right to them?
A. They just said that the transaction was suspicious.
Q. Do you recall whether they had

A. I am trying to calculate the hours.
Q. Approximately.
A. About 12 hours, I would say.
Q. And did you spend additional time preparing individually or that's part of the 12 hours?
A. That's part of the 12 hours.
Q. Got you. Thanks.
So I just want to try to walk through, Mr. Korpal, the history of the wire transaction that we've been talking about in sort of an organized fashion. We have skipped around a little bit. I just want to preview for you what I am trying to develop is JPMorgan's understanding as to the chronology of events with respect to that March 26th wire and the events on March 26th relating to that wire or around March 26th.
When did JPMorgan first receive

an instruction from the State of California to wire approximately $457 million to Chain Bridge Bank for the benefit of Blue Flame Medical?
A. That would be March 26th, 2020.
Q. How did it receive that instruction?
A. The instructions are entered, verified and released by the client using an electronic portal channel that we provide to our clients called Access, A-C-C-E-S-S.
Q. Do you know when the instructions were entered into Access?
A. Based on the documentation that I saw, it was slightly after 8 p.m. Pacific coast time on March 26th, 2020.
Q. Okay. And what happened after that instruction was entered into the Access system by the State of California?
A. A second operator in the State of California reviewed and released the

transaction. The transaction was then delivered into our wire payments platform. And then it alerted within our roll payment guardian application which is screening for suspicious transaction activity.

The agent then contacted the State of California to validate the transaction in addition to some research the agent would have conducted. Received approvals from her manager. And then a third manager or team lead released the transaction for delivery to Chain Bridge Bank in McLean, Virginia.

Q. Okay. Let's go over some of that.

Who was the agent that you mentioned?

A. Michelle Long is her name. She is on our team.

Q. And did she then get approval from her manager following her review?

A. She communicated with the State of California first. And the State of California approved the transaction for release and confirmed it to be valid, at which point Michelle would have requested approval from a manager, given the large value of the transaction, that she had followed the appropriate steps to authenticate and validate the transaction for release.

Q. Okay. And do you know, who did Michelle Long speak with at the State of California?

A. I believe it was Natalie Gonzalez.

Q. Okay. And then after Michelle Long validated the transaction by confirming with the State of California that it was approved, what did she do next?

A. She then would submit a request into the managers, would be myself, Jennifer Robinson and Tim Coffey.

Because it was a transaction that was larger than $50 million, it requires a vice president or above to review and validate the steps that were taken to authenticate the transaction and validate the transaction for release.

Q. And did such a review and validation occur by a manager?

A. Yes, Tim Coffey.

Q. And did Mr. Coffey approve the transaction?

A. He did.

Q. And what happened after that?

A. The approval from Tim Coffey is attached to the transaction case file. And then a second manager reviews all of the work that Michelle had completed, the conversation or the validation of the conversation with the State of California and the authorized party, as well as Tim Coffey's approval.

And then the transaction was released for settlement with Chain Bridge Bank.

Q. Who was the second manager that Michelle sought approval from and received approval from?

A. His name is Su, S-U, Nguyen, N-G-U-Y-E-N.

Q. And do you know what Su Nguyen did in connection with reviewing the transaction?

A. As part of the procedure, he would validate the search that -- the independent search that Michelle would have done; the confirmation of the conversation that she had with the State of California; what she utilized in terms of information to contact them. And then authenticate them.

And then, in addition, that there was an approval for a 50 million or larger transaction from a vice president or above.

Q. And Su Nguyen undertook those steps and completed them to JPMorgan's satisfaction, correct?

A. Yes, and then released the transaction.

Q. What time was the wire transfer released?

A. Approximately noon Eastern.

Q. Prior to the time the wire was released, had JPMorgan spoken to Chain Bridge Bank?

A. Prior to the transaction being released? No.

Q. Prior to the time when the transaction was released, how many times had JPMorgan spoken with a representative of the State of California with respect to the transfer?

A. I believe it was just Michelle Long that one time to authenticate and validate the transaction.

Q. Okay. And specifically, what was the process she followed to authenticate and validate the transaction?

MR. SCHOENFELD: Objection.

Q. You can answer, Mr. Korpal.

A. I thought I heard an objection.

MR. SCHOENFELD: When I object, you can go ahead and answer unless I tell you not to.

THE WITNESS: Okay. I'm sorry.

A. So Michelle would have followed a script. We have a script for all of our agents, which outlines the verbiage that they should be using to confirm the transaction and confirm the caller that they are speaking with as well.

Q. And she actually did that in accordance with the script, correct?

A. Yes.

Q. Did anybody else at JPMorgan have a conversation with the State of million.

Q. And did you receive the details?

A. I had received the details subsequent to that conversation based on my follow-up when she confirmed the transaction had been completed.

Q. So what happened next, Mr. Korpal? Did you review those details?

A. I asked Tim Coffey to pull the transaction details for me. I reviewed the transaction details. And I asked Tim Coffey to call Chain Bridge Bank to determine if they knew the beneficiary of the funds and what the disposition of the transactions or the funds were at that point.

He came back to me and confirmed that they had received the transaction. They were suspicious of it. And they had held the funds and not credited the account of Blue Flame Medical.

Tim and I then spoke with Blue Flame Medical to understand, again, the disposition of the funds and what their concerns were with the transaction.

They confirmed that the transaction had not been credited to Blue Flame Medical's account. This was a newly established account with no balances. And the account -- so then I asked if they knew the owner of the account and they said yes, he is a lobbyist in the area.

Q. What did Chain Bridge Bank tell Mr. Coffey with respect to the suspicions they had relating to the transaction?

A. The first conversation that Tim had with the Chain Bridge Bank was that they were concerned with the size of the transaction. They had never received a transaction that large and that they were holding the funds. They had not credited the account of Blue Flame Medical.

Q. Did JPMorgan ever reach out to Blue Flame Medical?

A. Not that I am aware of.

Q. In the time that you first reached out to Mr. Coffey to ask him to call Chain Bridge Bank to the time when you learned from Chain Bridge Bank that the owner of the account was a lobbyist in the area, did JPMorgan do anything else with respect to the transaction?

A. Not with the transaction, no.

Q. Did JPMorgan do anything else to follow up with respect to the transaction prior to the time that it issued a recall request to Chain Bridge Bank?

A. Yes, that was when Art Neville, the relationship person, and Ana Prieto, the client service person, contacted the State of California to determine if they after the recall notice was sent or prior to the notice, the recall notice being sent?

A. I don't recall that one.

Q. Okay.

A. I would have to go and research that.

Q. Do you know when you informed the global security investigations team that you were researching a potentially suspicious transaction?

A. It was just prior to our conversation with Blue Flame Medical -- I'm sorry, with Chain Bridge Bank.

Q. Prior to the -- the first one that Mr. Coffey had or prior to a conversation that you were personally a participant on?

A. Prior to the conversation that I and Tim Coffey had with Chain Bridge Bank representatives.

Q. Was there a call prior to that

conversation that Mr. Coffey had on his own with Chain Bridge Bank?

A. Yes, that was the initial conversation that he had with Chain Bridge Bank, who confirmed that they were concerned with the transaction and were holding the funds. They had not credited the account of Blue Flame Medical.

Q. And so just to make sure I have the chronology in my head accurately, is it your testimony that it was following that call that Mr. Coffey had that you contacted the global security investigations team?

A. They were contacted, yes, right before the conversation we had with -- Tim and I had with Chain Bridge Bank.

Q. The global security investigations team was contacted in between those two conversations, after Mr. Coffey spoke with Chain Bridge Bank, but before you and Mr. Coffey spoke

A. I don't know.
Q. Going back to our timeline sequence of events, Mr. Korpal. I was trying to get an exhaustive list of what you know occurred at JPMorgan with respect to this transaction prior to the time JPMorgan issued the recall notice to Chain Bridge Bank.
Do you recall anything else occurring prior the recall notice being sent at JPMorgan that we have not discussed?
A. Not that I am aware of.
Q. Whose decision was it to issue the recall notice?
A. It was my decision to recall -- to issue the recall notice based on the request from Chain Bridge Bank to recall the funds.
Q. And what is your understanding as to why Chain Bridge Bank wanted JPMorgan to issue a recall notice with

Q. And then you write, "Call the president of the bank and ask him if they can tell you when the account for Blue Flame was opened and do they have balances like $500 million."

Do you see that?

A. Yes.

Q. And Mr. Coffey said, "He already said this amount was out of character for this client."

Do you know what Mr. Coffey meant by "This amount is out of character for this client"?

A. He was referring to the 456 million dollars for Blue Flame Medical.

Q. And you write, "When did they open this account?"

Did Mr. Coffey respond to that?

A. He did not here in this conversation on Skype.

Q. Okay. And he writes, "They have not released the funds."

And what did you understand Mr. Coffey to mean when he wrote "They have not released the funds"?

A. That the funds have not been credited to the account of Blue Flame Medical at Chain Bridge Bank.

Q. And is that something that Mr. Coffey understood to be the case based on representations made by Chain Bridge Bank?

A. Yes.

Q. Did he have any other basis to make that statement?

A. No.

Q. And the last line of the Skype conversation is from Mr. Coffey. He says, "Banker/Ana Pietro says 'received an e-mail client and call confirming it was valid.'"

Is that an indication that Mr. Coffey received notice that the JPMorgan banker and service been told by representatives of Chain Bridge Bank at this point in time?

A. That's correct.

Q. In the last sentence on this conversation you write, "The Blue Flame Medical account was recently opened by a lobbyist."

Do you see that?

A. Yes.

Q. What is your basis for making that statement?

A. It was, again, information that was provided by Chain Bridge Bank.

Q. Why did you understand it could be relevant that Chain Bridge Bank -- let me rephrase that.

Why did you understand Chain Bridge Bank to be telling JPMorgan that the Blue Flame Medical account was opened by a lobbyist?

MR. BURKE: Object to the form.

Q. You can answer.

A. This was a large-value transaction that was being delivered to a lobbyist.

And we had also become aware that the purpose of this transaction was for personal protection equipment.

Q. And was the suggestion that that didn't add up?

A. Yes.

MR. GUSSMAN: Keni, how can we play the audio that is -- that is tab 10 in our binder?

MR. UKABIALA: I'll -- if it's a new exhibit, I will add it to Exhibit Share. If it's an existing exhibit, I will re-upload it and share my screen and play the audio file.

MR. GUSSMAN: Okay. Can we populate it and play the first 23 seconds of that and stop?

MR. UKABIALA: And you referring to the previously marked Exhibit 78?