

EXHIBIT 67

Privileged and confidential client attorney matter.

Timeline March 25, 2020 – March 26, 2020

March 25, 2020:

Heather let John know that Mike Gula opened an account for Blue Flame Medical on the 25th. Mike came into the banking office to open the account and would not leave until the account was opened. Mariano offered to send documents via DocuSign, but he insisted on staying and waiting until the paperwork was completed. Heather said the entity was formed on March 23rd. Heather noted that she did not recall Mike coming into the banking office in the past. He normally would open accounts over the phone with commercial banking. Mike told the banking office staff he was expecting a large wire in for approximately \$50 million. (Note: Mike emailed Maria Cole (commercial banking department) at 4:12 that the wire would be approximately \$450 million.)

Timeline notes:

- Mike emailed Maria on March 24th at 12:17pm asking for wire instructions to receive funds into the Blue Flame account.
- Mike emailed on March 25th at 11:19am that he needed to be emailed “ASAP when the wire hits from Cali.”
- Maria emailed back at 4:11pm: “This wire you are waiting for, how much are you expecting and who is the originator? Our wire department would like to know to track it and let you know. I’m assuming it is coming to your new account Blue Flame Medical?”
- Mike responded at 4:12pm “\$450,000,0000 from the state of California (not a typo)” (Note: the final zero does appear to be a typo.)

John and David decide to call Mike to discuss the transaction with him.

- John and David called Mike at approximately 4:45pm.
- Mike conferenced in his attorney, Brent Case. Mike engaged Brent to look over his shoulder because of the magnitude of the transaction. He has known Brent for 30 years. Brent was the best man at his wedding. Brent is an attorney practicing employment law in Denver.
- Mike explained that Blue Flame Medical was formed by John Thomas and him.
- Blue Flame entered into a contract to sell 100 million masks to California for approximately \$600 million and the \$450 million payment represented 75% of the amount of the contract.
- Getting masks from Great Health Companion.
- Leveraging his political contacts to procure the masks and sell them to governments.
- They also have entered into other contracts with foreign countries.
- For example, \$337 million (note: this dollar amount is not clear) in masks were purchased by Bahrain? Also had a contract with another foreign country.
- Shutting down business. Sick of DC and the politics. Want to get out. This is my payday. I will not be reachable after this.
- New contact information is mike@blueflame.agency.

- Cell phone is 202-713-8608.
- John and David ask Mike questions about the transaction such as who is manufacturing the masks? How are you paying for them? Is an international letter of credit being used? He confidently answered the questions, but his answers were quite vague and he didn't appear to understand the mechanics of how international transactions worked. For example he didn't appear to be knowledgeable about the function of an international letter of credit.
- He said he had connections with a producer in China who was going to manufacture and deliver the masks. John and David asked if the masks had been manufactured and he said not all of them.
- David asked him for a copy of any contracts he had in place with purchasers or sellers. Mike said he would send the contracts.
- John and David wanted to make sure Mike was not being scammed. Asked if Mike had sent any cash to other entities or brokers to procure the masks. Mike said he had not.
- John mentioned the size of the wire and operational challenges and the requirement to maintain certain capital levels based on the asset size of the Bank. John asked how long the money would be at the bank. John said we have some off balance sheet solutions that we would like to put in place should the money stay here for a longer period of time.
- Mike was convinced that the wire had already been sent, but David told him the wire had not been received and that wires are pretty much instantaneous.
- The call ended.

David and John called Peter to let him know what was going on. They discussed the issue and concluded that the transaction probably would not go through.

David emailed Mike at 5:17 thanking him for taking our call and saying we were looking forward to receiving information related to the contracts.

At 5:42 Mike emailed back asking if they wire had been received claiming that his partner was with the CA procurement officer when he hit send.

At 6:04 David responded that nothing had been received.

At 6:10 Mike responded "thank you."

At 6:17 John emailed back asking "Did you send any money to China or others as a "fee" for these transactions?"

At 6:18 Mike emailed back saying "no, we have not sent the money to China, but when we do this is where we are sending it." Attached were instructions about how to wire funds to Great Heath Companion Group Ltd Co. The beneficiary of the funds would be Wingar Industrial Inc. in Bell, CA.

At 6:27 Mike emailed David and John a screen print of a message from Michael Wong at the California Department of General Services to John Thomas that said "CA State Controllers

Office will be paying you via wire transfer first thing in the morning.” Michael Wong’s address was Wong,Michael@DGS. (Department of General Services)

David and John did some work looking up some of the companies involved and planned on what to do should the money arrive the next day. They decided to try to call the state to verify the transaction with them. They researched who to contact at the California Department of General Services and found that Daniel Kim was the director.

David and John had many unanswered questions about the transaction. They were concerned about the size of the transaction, the qualifications of Mike Gula to deal in medical equipment, the naive nature of Mike when discussing international transactions. They also found it strange that Mike had not engaged an attorney well versed in international trade, procurement and government contracting.

March 26, 2020:

Wire comes in at 11:55. It was memo posted to Blue Flame Medical’s account at 11:57. An automated message was sent to the client.

John receives automated notice of the incoming wire. John called David and they decided to try to get in touch with someone at the state of California. David and John start with Daniel Kim at the California Department of General Services based on researched conducted the night before. John and David left a message but did not talk to anyone.

John asked Heather and Thais to place a hold on the funds.

John was working from home, but decided to come into the Bank to work the wire.

Call from Tim Coffey, JP Morgan:

- David receives a call from Tim Coffey from JP Morgan. They said they were conducting an investigation and asked us to hold the funds. David agrees to hold the funds.

Call from Jay Perera, from the California Department of General Services.

- Jay Perera from the Department of General Services called back. We explained that we needed to talk to someone about a very large wire transfer we received. He said Kim was in the “war room” and could not be reached. He said he would have someone call us back.

Call from Rakesh Korpai, JP Morgan, Executive Director Global Head of Payments Controls & Sanctions

- Rakesh Korpai at JP Morgan calls David. (Executive Director Global Head of Payments Controls & Sanctions) John joins the conversation. Rakesh says that the wire is suspicious. The amount is high, the cost of the purchase is high for the supplies ordered. Asked if it was a new account or an established business. John explained that the funds went into an account that is brand new. Opened by an existing client who has been with us for approximately 10 years. He is a lobbyist. We called him last night about the

transaction. He told us that he was going to receive a wire for \$450 million. We said that was very unusual.

- Rakesh said he was going to get in touch with the banker for the state of California. Ask him to provide a copy of the instructions they received. How they authenticated it, etc.
- Asked if the lobbyist maintained that type of money. We responded no.
- He said that his global security investigations team is telling him that this does not look right.
- John asked “you have not received word from the state that it was fraud then?” He said no, they had not. He asked them for information about the transaction last night and followed up this morning. He saw the wire today and started to do more investigation and it was not leading to good places.
- State of California called while we were on the line with Rakesh. Missed the call.
- Rakesh’s contact info: 813-432-7553, cell: 917-445-1705.
- Will continue investigation. We will keep in touch.

Call from Phee Chang, California Department of General Services (12:40)

- State of Californian called back. David and John explained that they wanted to make sure the wire was legitimate and the funds were transferred properly. Phee said the wire was authorized by the California state treasurers office. Natalie Saunders is in charge of the transfer. She asked if we wanted to talk to the treasurers office. We said yes. She said she would pass our information on to the treasurers office.

Call from Mark Hariri and Natalie Saunders from California.

- Treasurers office called. Spoke to Mark Hariri and Natalie Saunders. David and John explained to them that the recipient’s account was just opened yesterday by a client of the bank who is a political lobbyist. This seemed to surprise them. We said we would be happy to return the wire. Don’t do that. There was an executive order to the Department of General Services from the governor to purchase 100 million masks. A warrant was issued by the Comptrollers office to purchase the masks. Now you are saying that the wire was sent to a lobbyist. We did look up the company and we couldn’t find anything. Give us 10 minutes or so. We said we would hold the money. We asked them to do some due diligence on their end. They thanked us. We said we would stand down until they called us back.

Call from Rakesh at JP Morgan:

- Rakesh from JP Morgan called us back. He said “They are a bit unsure.” David asked if they wanted us to return the money. Rakesh said he was comfortable with us holding the money for now. I can issue a recall, but let’s find out more about the transaction. I will get back to you.

Call from Tim Coffey at JP Morgan:

- Tim Coffey at JP Morgan called back. He said they would be recalling the funds. He asked if we needed official notice from them? We said yes, please send us a message through the FedLine system. He said that was not a problem. He thanked us. He said they will get a service message out now, the sooner you send the money back the better.

Mike Gula emailed and called multiple times trying to contact someone at the Bank. John sent an email to Mike at 1:56 that the Bank received official notice from the sending bank to return the wire.

Service message received from JP Morgan/Chase over the FedLine wire system asking us to return the wire. Message received via FedLine at 2:05pm.

Mike Gula visits Bank:

- Mike came to the Bank at approximately 2:30. The Bank's lobby was not opened to the public because of Covid 19. John and David spoke to Mike outside the front door of the Bank. John explained that the Bank had received notice from JP Morgan to return the funds. John told Mike that the Bank was going to close the Blue Flame Medical account and all of the other accounts Mike had opened in the last couple of weeks. John said the Bank would leave his personal accounts opened as well as the Gula Graham accounts. John told Mike to contact the State of California directly to resolve the issue. John told Mike that if the issue was resolved to open an account at another bank and have the money sent there. John told Mike to not send the money back to Chain Bridge Bank because the funds would be returned due to the fact that the account was closed.
- John was expecting Mike to be very upset and was prepared for a confrontation. In fact, Mike was very calm. He was not upset at all. He was apologetic. He appeared to be nervous. As he left he apologized.

The wire was returned at 3:21.