

EXHIBIT 110

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 (Alexandria Division)
4 - - - - - X
5 BLUE FLAME MEDICAL LLC, :
6 Plaintiff, :
7 v. : Civil Action No.
8 CHAIN BRIDGE BANK, N.A., : 1:20-cv-00658
9 JOHN J. BROUGH and DAVID M. :
10 EVINGER, : CONFIDENTIAL
11 Defendants. :
12 _____ :
13 CHAIN BRIDGE BANK, N.A., :
14 Third-Party Plaintiff, :
15 v. :
16 JPMORGAN CHASE BANK, N.A., :
17 Third-Party Defendant. :
18 - - - - - X

19 Remote Deposition
20 Tuesday, January 12, 2021
21 Videotape Deposition via Zoom of MIKE
22 GULA, a witness herein, called for examination by

Page 2 1 counsel for Defendant/Third Party Plaintiff in the 2 above entitled matter, pursuant to notice, the 3 witness being duly sworn by MARY GRACE CASTLEBERRY, a 4 Notary Public in and for the District of Columbia, 5 taken at 10:05 a.m. EST, Tuesday, January 12, 2021, 6 and the proceedings being taken down by Stenotype by 7 MARY GRACE CASTLEBERRY, RPR, and transcribed under 8 her direction. 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Page 4 1 APPEARANCES (Continued): 2 3 On behalf of the Defendant/Third-Party Plaintiff 4 Chain Bridge Bank, N.A.: 5 GARY A. ORSECK, ESQ. 6 CAROLYN FORSTEIN, ESQ. 7 MATTHEW M. MADDEN, ESQ. 8 Robbins Russell Englert, Orseck, 9 Untereiner & Sauber 10 2000 K Street, N.W., 4th Floor 11 Washington, D.C. 20006 12 (202) 775-4500 13 14 On behalf of the Third-Party Defendant JPMorgan 15 Chase Bank: 16 ALAN SCHOENFELD, ESQ. 17 ALBINAS PRIZGINTAS, ESQ. 18 Wilmer Cutler Pickering Hale & Dorr LLP 19 1875 Pennsylvania Avenue, N.W. 20 Washington, D.C. 20006 21 (212) 663-6981 22
Page 3 1 APPEARANCES: 2 3 On behalf of the Plaintiff Blue Flame Medical 4 LLC: 5 PETER H. WHITE, ESQ. 6 GREGORY KETCHAM-COLWILL, ESQ. 7 BILL GUSSMAN, ESQ. 8 JASON MITCHELL, ESQ. 9 KENI UKABIALA, ESQ. 10 Schulte Roth & Zabel 11 901 15th Street, N.W., Suite 800 12 Washington, D.C. 20005 13 (202) 729-7476 14 and 15 ETHAN BEARMAN, ESQ. 16 The Bearman Firm 17 10250 Constellation Boulevard, Suite 100 18 Los Angeles, California 90067 19 (747) 344-1004 20 21 22	Page 5 1 APPEARANCES (Continued): 2 3 On behalf of the Third-Party Defendant JPMorgan 4 Chase Bank: 5 GABRIEL TORRES, ESQ. 6 JPMorgan Chase 7 Assistant General Counsel 8 383 Madison Avenue 9 New York, New York 10179 10 (212) 270-6000 11 12 ALSO PRESENT: 13 JASON AQUI, Videographer 14 15 16 17 18 19 20 21 22

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1 said, "Coming in. Are you there? Need to verify in
2 person," right?
3 A. Yeah. I don't know what "need to verify
4 in person" means. This was under caution. I don't
5 know if that was autopopulated from him since --
6 Q. Okay. You wrote the subject line and
7 you're not sure about the rest?
8 A. That's correct.
9 Q. And did you go into Chain Bridge Bank that
10 afternoon?
11 A. I went to Chain Bridge Bank that
12 afternoon.
13 Q. Do you know what time you arrived?
14 A. Sometime after 2:16.
15 Q. What happened when you got there?
16 A. I met with David and John outside the
17 bank. I asked them what happened. I said, you knew
18 this wire was coming. You were comfortable with the
19 wire. You had no problem yesterday. What changed?
20 They wouldn't specifically tell me in any
21 detail other than I believe they wouldn't be
22 receiving the transaction and they wanted to close

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1 Blue Flame Medical. I repeatedly asked why very
2 politely, almost embarrassingly, because we
3 specifically had a conversation the day before of the
4 size, why and what we were doing and they had no
5 problem with it. And they just said, I believe, just
6 'cause. They wouldn't give me an explanation.
7 I then asked, well, I have other accounts.
8 Are those okay? They said, yes, those are --
9 accounts are okay and kept those accounts open, which
10 confused me even more.
11 Q. Do you remember anything else that you
12 said or they said during that meeting?
13 A. No, they would not -- they were not very
14 forthcoming given the extent of the conversation that
15 I had with them the day before.
16 Q. How long did the meeting last?
17 A. Anywhere from five to 15 minutes.
18 Q. Was anyone other than the three of you in
19 attendance at the meeting?
20 A. No.
21 Q. Did you ask -- did they tell you that
22 California's bank had requested return of the wire?

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1 A. No.
2 Q. Did you ask where the money was at that
3 point?
4 A. No, I didn't because they sent -- they
5 told me in the email it was sent back. I didn't ask
6 where it was. I just know it wasn't in my account
7 where it was.
8 Q. The email, which is Defendant's 55, says,
9 "We received official notice from the sending bank to
10 return the wire."
11 Did anybody ever tell you that, by the
12 time of your meeting, they had returned the wire?
13 A. No. I just know it was in my account and
14 by the time I showed up, it was not in my account.
15 And I know it was in my account because it was a
16 rather large number next to other small numbers in
17 retrospect.
18 Q. Did you ask them to -- not to return the
19 money to California or its bank?
20 A. They didn't ask. They just took it.
21 Q. Did you ask them during the meeting not to
22 do that?

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1 A. They didn't ask to take money out of my
2 account. They just took money out of my account
3 without asking.
4 Q. I'm going to try it again. Did you say to
5 them, don't send the money back?
6 A. I didn't have the opportunity because they
7 had already stolen the money out of my account.
8 Q. Do you know when the money was sent back
9 to JPMorgan Chase?
10 A. No, I don't. I just know it was in there
11 along with my other account money, and then it
12 wasn't.
13 Q. Did you make any notes of this meeting?
14 A. No, I don't -- I did not make any physical
15 notes.
16 Q. After the meeting, did you have any
17 conversations with Mr. Thomas or Mr. Bearman or
18 anybody else associated with Blue Flame?
19 A. Yes.
20 Q. What conversations did you have?
21 A. I apologized to them for trusting that
22 Chain Bridge Bank was going to honor what they said,

Page 210 1 that they could accept the wire and using Chain 2 Bridge Bank. Had I known Chain Bridge Bank would 3 steal our money, I wouldn't have used Chain Bridge 4 Bank. I said I have no idea why they did what they 5 did given I told them the day before. 6 Q. Was it a conference call that you had with 7 Mr. Thomas and Mr. Bearman? 8 A. It more than likely was a conference call 9 at the same time. 10 Q. Do you remember saying anything else to 11 them besides apologizing to them for trusting Chain 12 Bridge Bank? 13 A. I believe I remember telling them I truly 14 don't understand their problem given they kept my 15 other accounts open. So I couldn't have been that 16 bad of a guy and I personally couldn't have been 17 anything bad if they kept my other accounts open or 18 they would have just kicked me out of the bank, which 19 they did not do. So if they had a problem with me, 20 they would have canceled everything else. 21 Q. Did -- and you said that on the call with 22 them?	Page 212 1 MR. WHITE: Sometimes it takes a couple of 2 tries. That's what he was telling me. 3 THE WITNESS: This is Number 59; is that 4 correct? 5 MR. ORSECK: Fifty-nine, yes. 6 MR. WHITE: Right, right. 7 THE WITNESS: Do I have the right 8 document, Lindsay Angerholzer, Friday, March 27th? 9 MR. ORSECK: Right. 10 THE WITNESS: I'm opening it. One second. 11 MR. WHITE: I believe he has another copy 12 of the same document on the computer you can probably 13 see him holding. 14 THE WITNESS: I can download it now. 15 MR. WHITE: Okay. It is the exhibit. 16 BY MR. ORSECK: 17 Q. Do you have it? 18 A. I do. I'm reading it on another computer 19 because mine was not downloading. 20 Okay. I've read the document. 21 Q. On the first page of Exhibit 59, there are 22 a couple of emails. The bottom one is from Lindsay
Page 211 1 A. Probably, yes, because I was truly 2 confused. I would -- 3 Q. Do you have any specific -- I'm sorry. Go 4 ahead. 5 A. I would have been less confused had Chain 6 Bridge just said everything's canceled, we don't like 7 you, you're gone. But no, they kept all my other 8 businesses, my personal account open for business. I 9 was very confused, especially since I had a long 10 conversation with them the day before. 11 Q. Do you have any specific recollection of 12 anything either of them said to you on that call? 13 A. No. 14 MR. ORSECK: Can we pull up tab 129, 15 please? And this will be Exhibit 59. It begins with 16 Bates 67 -- 627. 17 (Defendant's Exhibit No. 59 was 18 marked for identification.) 19 MR. WHITE: It looks like a long file 20 again. 21 MR. ORSECK: This document is two pages 22 long, so --	Page 213 1 Angerholzer on Friday, March 27th at 10:25 a.m. to 2 you. Who is Lindsay Angerholzer? 3 A. She's a political colleague that I know in 4 Washington. 5 Q. Had you attempted to establish some 6 relationship with her relating to Blue Flame Medical? 7 A. She reached out to me to be a part of it. 8 Q. This email at the, bottom, I think, 9 consists of questions to her -- numbered questions -- 10 questions from her that are numbered and then your 11 responses under each individual question; is that 12 correct? 13 A. Correct. 14 Q. The first question asks, "Can you walk me 15 through your relationship with Henry again and how 16 you know him?" That's Henry Huang? 17 A. Correct. 18 Q. "This will come up and I'll have to 19 explain." And then I believe your answer is, "My 20 business partner grew up with Henry and his best 21 friend. Henry is a Chinese American." 22 Have I approximately read that correctly?