EXHIBIT 96

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)
----------x
BLUE FLAME MEDICAL LLC,
Plaintiff,

-against- Civil Action No.

CHAIN BRIDGE BANK, N.A., JOHN J. BROUGH, and DAVID M. EVINGER, 1:20-cv-00658
Defendants.
----------x
CHAIN BRIDGE BANK, N.A.,
Third-Party Plaintiff,
-against-
JPMORGAN CHASE BANK, N.A.,
Third-Party Defendant.
----------x

February 10, 2021
10:07 a.m.

Remote Videotaped Deposition of ANDREW STURMFELS, held in the above-entitled action, located in West Sacramento, California, taken via Zoom before Dawn Matera, a Shorthand Reporter and Notary Public.

additional information that would have been helpful to know at the time you signed the wire transfer memorandum?

MS. PORTER: Objection. Calls for speculation.

A. Again, repeating my previous response, any additional information on the organization that we were doing business with, based on the size of the transaction, the complexity and risk, would have been helpful in our decision-making process.

Q. Okay. Just a few more of these style of questions.

At the time you signed the wire transfer memorandum, did you know that Blue Flame Medical owned no inventory of N95 masks?

MR. WHITE: Objection to form.

A. My understanding is they were a broker that had direct lines to inventory. So I think we did have some

understanding that the inventory was not in their control at the point in time.

That was the purpose of needing the funds up front.

Q. Okay. At the time you signed the wire transfer, did you know that Blue Flame Medical had never delivered N95 masks to any customer?

MR. WHITE: Objection. Misstates evidence.

MS. PORTER: Objection. Assumes facts not in evidence.

A. I did not have that information at the time.

Q. You testified earlier about a discussion that you had with Andre Rivera about a call between Chain Bridge Bank on the one hand and officials at the State Treasurer's Office on the other; do you recall that?

A. I do.

Q. Do you know whether Mr. Rivera