EXHIBIT 102

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)

BLUE FLAME MEDICAL LLC Plaintiff vs. CHAIN BRIDGE BANK, N.A., JOHN J. BROUGH and DAVID M. EVINGER Defendants	Civil Action No. 1:20-cv-00658(LMB/IDD)
CHAIN BRIDGE BANK, N.A. Third-Party Plaintiffs vs. JPMORGAN CHASE BANK, N.A. Third-Party Defendant	

Remote Videotaped Deposition of Heather Schoeppe
January 22, 2021
9:33 a.m.

Reported by: Bonnie L. Russo
Job No. 4398416

Remote Videotaped Deposition of Heather Schoeppe held through:

Veritext Legal Solutions
1250 I Street, N.W.
Washington, D.C.

Pursuant to Notice, when were present on behalf of the respective parties:

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Ethan Bearman, Blue Flame Medical, LLC
Geoff Bassett, Videographer

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BY MR. MITCHELL

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for this deposit other than the ICS agreement?
A. No. The only thing I had -- had been in discussions with was about the ICS.
Q. And you understood that Mr. Brough and Mr. Evinger thought that the funds needed to be moved off the balance sheet ASAP, correct?
A. Yes.
MS. FORSTEIN: Object to form.
THE WITNESS: Looks from the e-mail, yes, they wanted to move the -- move it off balance sheet.
BY MR. MITCHELL:
Q. At the end of his e-mail, Mr. Richardson says: Need to have some clarity around how long these funds would be on deposit.
Do you see that?
A. Yes.
Q. In do you have any understanding, sitting here today, why Mr. Richardson was asking that question?

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A. Honestly, not really. I'm -- typically just we would want to know for purposes of, you know, having -- knowing what's going to be going on in the account. And so -- and possibly for money management purposes.
Q. Other than this e-mail from Mr. Richardson, do you recall any discussions, after the wire transfer was received, about the fact that the ICS program had a maximum limit of $125 million?
A. No.
Q. Or, just so that I'm clear, that it had a limit lower than the amount of Blue Flame Medical's deposit?
A. No.
Q. Did you discuss this e-mail from Mr. Richardson with anybody?
A. No. Not that I remember.
Q. In response, a minute later, Mr. Evinger writes: John and I are in communication with the State of CA, California.
Do you see that?

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A. Yes.
Q. And he says: Stand down for now, correct?
A. Correct.
Q. Did you have an understanding as to what Mr. Evinger meant?
A. Just to hold on sending any paperwork or anything out until we have more information.
Q. Did you have an understanding as to what Mr. Evinger meant by "John and I are in communication with the State of California"?
A. Just that they are talking to the State of California about the wire, I'm guessing.
Q. And did you ever learn what they were talking to the State of California about in connection with the wire?
A. No.
Q. In your career at Chain Bridge Bank, do you recall any other situations where the bank reached out to your client's counterparty

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to inquire about a transaction?
A. Yes. Yes, we have.
Q. When?
A. Any time we have a question about, you know, a -- a transaction, we will reach out to other banks to verify account numbers or -- you know, that's pretty standard practice.
Q. What about reaching out to the other bank's client; is that standard practice?
A. I don't -- honestly, I can't speak to that. Because I don't deal in the wire department. So I don't know what their standard practice is for the wires, honestly.
Q. Can you recall any other circumstance when you're aware that Chain Bridge Bank had reached out to another bank's client to confirm details about a transaction with Chain Bridge Bank's client?
A. Where we reached out to a bank's client about the transaction?
That's what you said?
Q. Yes.

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A. Okay. I know that we reach out on transactions frequently. But honestly, I'm not sure -- I'm not really privy to that level of, you know, investigation into the accounts.

I know that I'm asked to call and verify bill pay. I call and verify settlement company information.

So -- but -- so -- I mean I don't know specifics -- I couldn't, you know, tell you specifically. But I do know that, yes, we do verify transactions.

Q. And so that I'm clear, when you say that "we verify transactions," you mean with the client of the bank on the other side of the transaction or with the bank on the other side of the transaction?

A. Could be any -- you know, anything.

Q. You personally have reached out to clients on the other side of transactions to verify the details of those transactions?

Am I understanding you correctly?

A. Yes. I mean I'm sure that I -- that

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I have. Because we -- I mean we do verify transactions.

Q. Can you think of any examples of that?

Specific examples of that, I should say.

A. I've called other banks to verify account numbers for ACHs. I have reached out to bill pay recipients to get information -- more information about them. Because maybe they've hit the OFAC report. Do -- call credit -- like -- like a credit card company to verify if they initiated a transaction.

So, you know, it's -- I feel like personally it's pretty standard practice. If there's a question about a transaction that the bank is involved in, then -- or -- or our client is involved in, that we could try to do what we can to verify it before proceeding. And our clients appreciate that, generally.

Q. And in your experience, there's no difference between reaching out to the

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counterparty bank on a transaction to verify it versus reaching out to the counterparty bank's client to verify the transaction?

Am I understanding you correctly?

A. Yes. I would say that's true.

MR. MITCHELL: Keni, would you please mark as Plaintiff's Exhibit 27 our Tab 25.

And for the record, Plaintiff's Exhibit 27 is a document produced by defendants bearing Bates stamp CBB00000818 through 829.

(Deposition Exhibit 27 was marked for identification.)

BY MR. MITCHELL:

Q. And, Ms. Schoeppe, please let me know when you have that document in front of you.

A. Okay.

Q. And, Ms. Schoeppe, I want to direct your attention to the e-mail on the first page from Rick Claburn at 1:18 p.m. on which you're copied.

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And in that e-mail Mr. Claburn says: I've deactivated transfers and Bill Pay for Blue Flame Strategies in TM.

Do you see that?

A. Yes.

Q. What do you understand that to mean?

A. That they have -- he turned off his -- the ability to send out money out -- out of the account and -- through online banking, our online banking portal.

Q. Through the Blue Flame Strategies account, correct?

A. Yes.

Q. Do you know why Mr. Claburn was doing that for the Blue Flame Strategies account at this time?

A. No. I can't really speak to his exact motivations in that. I -- I would just assume it's because it's related to -- it was just opened the week before, and so it's associated with the Blue Flame Medical account.

Q. And then he also says: I've also