EXHIBIT 125

CONFIDENTIAL - CHARLES H. GRICE VOL. I

US DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

BLUE FLAME MEDICAL LLC,	:	
Plaintiff,	:	
v.	:	Civil Action No.
CHAIN BRIDGE BANK N.A.,	:	1:20-cv-00658
JOHN J. BROUGH, and DAVID	:	
M. EVINGER,	:	
Defendants.	:	
------------------------	x	
CHAIN BRIDGE BANK, N.A.,	:	
Third-Party Plaintiff,	:	
v.	:	
JP MORGAN CHASE BANK,	:	
N.A.,	:	
Third-Party Defendant.	:	

VIDEOTAPE DEPOSITION VIA ZOOM OF:

CHARLES H. GRICE VOLUME I

FRIDAY, APRIL 9, 2021

REPORTED BY:
SILVIA P. WAGE, CCR, CRR, RPR
JOB NO. 4528853

pop surprise on a brand new account and it's got characteristics that make it potentially suspicious or unusual. And so I just don't know a fact pattern that's like this.

I apologize. I don't have -- I can't answer this from experience because this transaction has too many jagged edges.

Q. I take it it's your opinion, though, that the funds at issue here were never in Chain Bridge Bank's -- or never in Blue Flame Medical's account; am I right about that?

MR. MADDEN: Objection to the form.

A. That's my understanding. There were very emphatic statements by Brough and Evinger that these money were never in the account.

Q. And that's based on testimony, correct?

A. Yes, sir.

Q. And is it based on documentation as well?

A. I -- I don't know what you mean by that.

Q. Have you seen --

A. This is the most relevant -- this

will be the most relevant information.

Q. Have you seen bank documents that corroborate their testimony that the funds always stayed in the bank's account and never went to Blue Flame Medical's account?

A. Have I seen documents other than the sworn testimony?

Q. Yes.

A. I don't recall, as I sit here. I just don't recall.

Q. Banks have records of all fund transfers, correct, it's big part of banking requirements?

A. Yes, sir.

Q. And if you wanted to know whether those funds actually went into the account, you wouldn't just talk to the bankers, you would look at the records, correct?

A. Certainly. That would -- I mean, if -- yes, I just don't recall as I sit here if I saw that or if you asked questions about this. If you asked questions, I read them. I just don't recall what the -- I mean, to me the most compelling part of this was the instantaneous

26th I'm trying to make sense of the information that he provided.

The afternoon of the 26th the bank came to the determination it appears that the risk of this relationship was not consistent with the bank's appetite, which is a decision that really only the bank can make and I support that decision. So the termination of the account relationships related to Red Line and Blue Flame on the afternoon of the 26th, I think, was perfectly reasonable given what they had just experienced in the 24 hours prior.

Q. Is it also normal for a bank to contact the counterparty to the wire transfer directly as opposed to their banking counterparty; is that normal?

MR. MADDEN: Objection, objection to form.

A. Yes, sir. I talk to originators of wires routinely to try to understand what the transaction represented. So, if I'm in the receiving bank, I need to understand. My one early source of information is my client, right, the beneficiary. That for a large transaction with this many kind of suspicious characteristics, that's not sufficient. I want to look at more information. So I'm going to, basically, square that information against other information.

So the other information banks routinely gather is, you know, web search, Internet information, Google hits, news about the originator, you know, trying to build a profile for what does this originator do. So is what I can learn about it match what my customer has told me they do.

And then if doubts persist, again, in particular, against the backdrop of an extremely large transaction, I am free to call the originator.

Q. So the ordinary course would be to gather information from your own client, that's a normal thing to do, correct?

A. Right, as was done here.

Q. And to gather information from public sources, Google searches and so on about both parties to the transaction, correct?

A. Correct. And, you know, J.P.