

EXHIBIT 129

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

16)
17

18 ***CONFIDENTIAL***
19 REMOTE VIDEOTAPED DEPOSITION OF
20 JOANNA WILLIAMSON
21 located in McLean, Virginia
22 Sunday, April 11, 2021
23
24 Reported By:
25 CATHI IRISH, RPR, CRR, CLVS

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2 going for about another hour. Would
3 you like a break?

4 THE VIDEOGRAPHER: This will end
5 media unit 4. Going off the record at
6 2:47, April 11, 2021.

7 (Recess taken from 2:47 p.m. to
8 3:05 p.m.)

9 THE VIDEOGRAPHER: We are back on
10 the record. The time is 3:05, April
11 11, 2021. This will begin media unit
12 5.

13 BY MR. KETCHAM-COLWILL:

14 Q. Ms. Williamson, can I ask you to
15 open up once again Plaintiff's Exhibit 48
16 which was the general account history
17 document, the green and white ledger
18 document?

19 A. I have it open. Which page?

20 Q. 2534.

21 A. I'm there.

22 Q. I believe -- okay, so I'm looking
23 at rows 2 and 4 again, the incoming wire
24 transfer entries, and we discussed how
25 there are equal debit and credit entries

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2 reflected here for that incoming wire
3 transfer.

4 Do you recall that?

5 A. Yes.

6 Q. And I believe you testified that
7 the fact that there are those equal debit
8 and credit entries with respect to the
9 incoming wire transfer is because the
10 funds were, you said, quote, the funds
11 were never actually credited to the
12 client.

13 Do you recall that?

14 A. Yes.

15 Q. Did that statement refer to a
16 hard post?

17 A. Yes, it did.

18 Q. As opposed to a memo post?

19 A. Right.

20 Q. And that's because the funds were
21 memo posted to Blue Flame's account?

22 MR. MADDEN: Object to the form,
23 foundation.

24 THE WITNESS: The funds were not
25 hard posted is what I was trying to

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2 convey.

3 BY MR. KETCHAM-COLWILL:

4 Q. I understand that your testimony
5 is they were not hard posted. Do you
6 agree that they were memo posted?

7 MR. MADDEN: Objection to the
8 form, foundation.

9 THE WITNESS: I have seen the
10 screenshot that we looked at earlier
11 that said -- I believe memo credit was
12 the term used in that screenshot so it
13 does appear that there was a memo.

14 BY MR. KETCHAM-COLWILL:

15 Q. A memo credit?

16 A. Yes.

17 Q. And it's your understanding that
18 if you -- it's your understanding that the
19 entries on this document are automatically
20 generated?

21 A. Yes, it is.

22 Q. And so if you went into this
23 system on March 26th before batch
24 processing occurred, you would see the
25 debit but it would also indicate that it

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2 was a memo credit?

3 MR. MADDEN: Objection to the
4 form, misstates the testimony.

5 THE WITNESS: I think that we
6 covered this a little bit before and
7 I'm not sure in the -- with these
8 automatic journal entries whether or
9 not I would see the memo post in the
10 general ledger accounts. I'm not sure
11 because I don't often track them.

12 BY MR. KETCHAM-COLWILL:

13 Q. So is it a matter of access,
14 you're not sure you would be able to
15 access that information same day?

16 MR. MADDEN: Objection to the
17 form, misstates the testimony.

18 BY MR. KETCHAM-COLWILL:

19 Q. I'm asking.

20 A. I don't recall looking for it
21 before so that's why I don't know.

22 Q. But your understanding is they
23 are automatically generated during the
24 day?

25 MR. MADDEN: Objection to the

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2 form, vague.

3 BY MR. KETCHAM-COLWILL:

4 Q. I'll restate.

5 Your understanding is that
6 entries such as these debit entries for
7 wire transfers in Chain Bridge Bank's
8 Federal Reserve Bank accounts are
9 automatically generated as the funds hit
10 Chain Bridge Bank's Federal Reserve Bank
11 account?

12 A. Only in a pending status. I
13 don't believe that these records are
14 actually produced until we have that
15 overnight batch process that we talked
16 about.

17 Q. The entries are in a pending
18 status but they exist in some form or
19 fashion?

20 MR. MADDEN: Object to the form,
21 vague. Answer if you can.

22 THE WITNESS: I don't know how to
23 answer that. I'm sorry, I don't know.

24 BY MR. KETCHAM-COLWILL:

25 Q. Isn't it reasonable to assume