EXHIBIT 117

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	

- CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER -

Remote Videotaped Deposition of John Brough

February 2, 2021

9:35 a.m.

Reported by: Bonnie L. Russo

Job No. 4398587

Remote Videotaped Deposition of John Brough 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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Also Present:
Beth Sharon, Chain Bridge Bank
David Evinger
Ethan Bearman, Blue Flame Medical, LLC
Bill Gussman
Geoff Bassett, Videographer

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time of the account opening?
A. We -- we knew that Heather didn't find out about the dollar amount of the transaction until after the account was open.
Q. Why is that a red flag?
A. Because it's inconsistent with the activity that's -- that's -- that's being -- being expected by the client.
We always ask that question when we open an account. We put it into our platform. And if the volumes are greater than that, then that's always a red flag.
Q. Let me ask a more direct question.
If you are aware that a new customer is not forthcoming with what you consider to be important information that the bank is requesting, does that, all else equal, give you cause to question the customer's integrity?
MR. WHITE: Object to leading.
THE WITNESS: I would -- I would agree with that, yes. It has to go with whether or not we can -- we can rely on what

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they tell us in the future.
BY MR. ORSECK:
Q. You testified earlier today -- and I think we've seen documents -- that you and Mr. Evinger asked Mr. Gula for certain document -- documents to back up the transaction when you spoke to him on the afternoon of the 25th, correct?
A. That is correct.
Q. And Mr. Evinger sent him a follow-up e-mail making that request?
A. Yes. We asked in the telephone call. And then David sent a follow-up e-mail.
Q. Did Mr. Gula provide the requested information?
A. Mr. Gula never supplied the requested information.
Q. Was that, to you, a red flag?
A. Yes. That certainly was a red flag. Absolutely.
Q. Is the -- do you know whether the failure to provide requested information to a

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bank is referenced as an indicator of potentially suspicious activity in the Bank Secrecy Act?
A. I do not know if that is specifically in the Bank Secrecy Act. I do not know the answer to that. I do know that it would qualify as a red flag.
Q. You also testified to your impression, during your conversation with Natalie Gonzales and Mark Hariri on the 26th, that they seemed surprised to learn that Mr. Thomas and Mr. Gula had just open the account or just opened the business and did not have prior experience in this field.
Am I -- am I correctly characterizing your testimony?
A. Yes. They were surprised. They were very surprised.
Q. Did you didn't infer one way or the other from their surprise whether anyone at Blue Flame had advised California officials of those facts?

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A. I assumed that, if the people who were responsible for sending the wire didn't know about the -- the recipient of the wire, then yes, that's a red flag.
MR. WHITE: Objection to the assumption.
BY MR. ORSECK:
Q. Why -- why would it be a red flag that they didn't know those facts?
A. I think, with the transaction of $456 million, everybody who's involved in that transaction is going to know the legitimacy of the transaction.
Q. What do you mean by that?
A. I mean they're going to know whether or not the -- the purchaser -- I'm sorry -- the seller of the product is legitimate, they've been vetted and -- and been approved and gone through that due diligence process.
And -- yeah. It was a surprise to hear that they didn't know that the company had been formed three -- three days ago.

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Q. You testified or repeated a few minutes ago that Mr. Korpal from JPMorgan told you that JPMorgan's investigation was not leading to good places or words to that effect; is that right?
A. That's correct.
Q. That's what he told you on the phone?
A. That is what he told us on the phone, yes.
Q. Was that information a red flag to you?
A. Yes. Certainly the information that JPMorgan supplied to us was a surprise -- well, was a -- was a red flag to us. Was a red flag to us.
Q. Did employees -- one or more employees of yours report to you on March 25th that they'd had phone interactions with Mr. Gula?
A. Yes.
Q. Did any of them describe to you

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their perceptions of his demeanor or tone on those calls?
A. Yes. Specifically Heather said that Mike Gula came into the bank to open the account, which was unusual. He usually -- it was I think the only time he came to the bank. It might have been the second time. Maybe he came to the bank to sign loan documents five, six, seven years ago. I don't know.
But he never came to the bank to open accounts. He did that through our commercial banking division. So just for him to come to open the account was unusual.
The fact that he seemed very anxious to get the account opened immediately is also a red flag. I mean any time a -- a -- a client has a sense of extreme urgency to do something and appears kind of agitated, that's a red flag.
Q. Did you receive any reports about calls that Mr. Gula placed to the bank after the account was opened?

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A. Yes. Yes.
Q. And did you -- what did you understand?
A. Well, I mean the next day he was calling about, you know, whether or not the wire had come in. He never called David or me to tell us about the wire.
There were some e-mail conversations with Maria Cole where he kept on asking if a wire had come in. And this was on the 25th. And -- and Maria said, "No. But how much are you expecting?"
So he really never volunteered the amount until asked.
Q. Was the fact of his calling on the 25th to inquire about whether the wire had arrived, was that a red flag to you?
A. Yes. That was a red flag.
Q. You've testified that you were told that the money was going -- that -- that- - that Blue Flame wanted the money, once it came in, to go back out quickly; is that right?

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A. That is correct.
Q. Was that a red flag to you?
A. Yes. Whenever a client has money wired in and then immediately wired out, it's always a -- that's always a red flag. It's something that our -- that we always watch out for. It can be a -- a number of -- of different type of -- of issues can come up with that.
Q. You testified earlier to your understanding that Blue Flame intended, via a multipart transfer, the outgoing money would end up in China; is that accurate?
A. Yes. That is accurate.
Q. Was that a red flag to you?
A. Yes. Large international wire transfers are always red flags, yes.
Q. We looked at some of your notes from your conversation with Mr. Gula on the 25th.
Were his remarks that this was his payday and that he would be unreachable and that he was shutting down his D.C. office, was

any of that a red flag to you?
A. Yes. Those were all red flags, yes.
Q. Did you have these facts in your mind at the time that JPMorgan recalled the wire?
A. Yes. We had those -- those facts in our mind. And those questions -- and many other questions in our mind, yes.
MR. ORSECK: Thank you. That's all I have.
Pete?
MR. WHITE: Nothing further from me.
MR. ORSECK: All right. Thank you, John. You're done.
THE WITNESS: We're done? All right. Thank you.
THE VIDEOGRAPHER: Please stand by
We're going off the record at 6:24 p.m.
And This concludes today's testimony given by Mr. John Brough.
(Whereupon, the proceeding was

concluded at 6:25 p.m.)

CERTIFICATE OF NOTARY PUBLIC

I, Bonnie L. Russo, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to computerized transcription under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

Bonnie L Russo

Notary Public in and for the District of Columbia
My Commission expires: August 14, 2025

ACKNOWLEDGMENT OF DEPONENT

I, JOHN BROUGH, do hereby certify that I have read the foregoing transcript of my testimony taken on 2/2/21, and further certify that it is a true and accurate record of my testimony (with the exception of the corrections listed below):

Page	Line	Correction
____	____	_____
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_____
JOHN BROUGH

SUBSCRIBED AND SWORN TO BEFORE ME THIS ____DAY OF _____, 2021.

_____ _____
(NOTARY PUBLIC) MY COMMISSION EXPIRES: