EXHIBIT 41

Blue Flame Medical, LLC
Notes of David Evinger
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Events of Wednesday, March 25, 2020

- On Wednesday, March 25, 2020. Michael Gula opened the Blue Flame Medical, LLC ("Blue Flame") deposit account in person at the Bank's main office – 1445 Laughlin Avenue, McLean, VA 22101. Evinger was working in the Bank's main office that day. Brough was working remotely from his home in McLean, VA.
- Staff present in the main office were Heather Schoeppe, SVP & Branch Manager, Mariano Castagnello, Personal Banker, and Angeli Nanali, Personal Banker.
- At some point in the morning, Heather Schoeppe, SVP & Branch Manager, made me aware that Gula insisted on opening the account in person and wanted to be in the branch area. Schoeppe was frustrated with Gula because she did not want to let clients come into the branch due to the COVID-19 virus. I was told Gula waited in the vestibule while the account was being opened. I was not aware of any other details about the account.
- Note: Beginning on March 16th, the Bank restricted access to its main office / branch to bank personnel only due to COVID19. New accounts were being opened online and only a limited number of transactions were being processed in the main office through its vestibule.
- On March 16, 2020, Gula opened a deposit account for Blue Flame Strategies, LLC and on March 18, 2020 he opened a deposit account for Redline Strategies, LLC. Both of these accounts were opened remotely by Maria Cole who sent him all account opening papers to electronically sign.
- On March 25, 2020, Gula refused to open the Blue Flame account online and insisted this account be opened at the bank. As I understand, Cole referred the account to Heather Schoeppe, SVP & Branch Manager, who then assigned it to Mariano Castagnello, Personal Banker, to process. Gula waited impatiently in the vestibule while Mariano Castagnello opened the account.
- During the account opening process, Gula told Mariano Castagnello that Blue Flame was expecting a large incoming wire transfer of $50 million.
- As part of the Bank Secrecy Act / Know You Customer questions at account opening, Gula provided the following wire transfer information: incoming wire transfer would be 5 per month for $25 million, outgoing foreign wires were 25 per month for $75 million, and outgoing domestic wires were 50 per month for $25 million.
- After the account was open, Gula called numerous times throughout the day to check on the status of the wire. Based on emails to Marie Cole, it appears Blue Flame initiated the wire with California on Wednesday, March 25, the same day the account was opened and before he spoke to Evinger and Brough.
- Heather Schoeppe, after taking one of his calls, notified Evinger that the expected amount of the wire was $450 million and this was for the purchase of 100 million N95 face masks from China. Heather expressed her concern with Gula and this transaction.
- Based on this information, Evinger and Brough and they determined it was important to speak with Gula. Brough and Evinger requested to have a call with Gula to better understand what was happening.



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Call with Gula on Wednesday, March 25, 2020

- On Wednesday, March 25th at approximately 4:45 pm, Brough and Evinger called Gula who conferenced in Brent Case, his attorney. Case was introduced to us as a long-time personal friend who was the best man is Gula's wedding. Case said he was a labor attorney in Colorado and was helping Gula look over the contracts, but admitted that he was not experienced in such areas as international trade.
- Gula told Evinger and Brough that Blue Flame was awarded a large contract with the State of California for the delivery of 100 million N95 face masks. The initial payment of approximately $450 million could arrive by the end of the day. The $450 million about 75% of the contract and was the first of several payments that would be sent.
- Gula believed the wire should have actually arrived on Wednesday, March 25. During the call he attempted to confirm with his partner John Thomas if the wire had actually been sent. Later the Bank received an email.
- Gula told Evinger and Brough he was getting out of political fundraising/advocacy business and getting into the healthcare business to help with COVID-19.
- Gula said the CA contract was just the first of many. He said they were lining up deals with others. He mentioned the Swiss Army and Bahrain.
- Gula told Evinger and Brough they (Gula and Thomas) have a good friend whose family owns a factory in China - Great Health Companion Group - who will be making N95 face masks.
- Gula expressed his complete displeasure for the political fundraising and advocacy business. He was very firm, decisive, and explicit with his negativity toward politics and political fundraising.
- Gula said was tired of dealing in the political circles and wanted to get out forever. This was his payday and he would no longer be reachable after this.
- Gula said he will be informing all of his clients of his decision to leave the business. Note: Gula sent an email to all his clients informing them of his departure. This was published by Politico and other news outlets.
- Gula said this deal will help him leave this all behind and he would make enough money to never have to worry about anything.
- Gula was glad to go far away and never have to deal with politics ever again.
- Gula expressed sadness for not being able to take his children because of his recent divorce.
- Gula said his current email and cell phone would no longer work the next day. He would no longer be reachable by any of his clients. He added that only 10 people have his new contact information.
- Evinger asked Gula if we could have his new email address and cell phone. Gula provide us with both mike@blueflame.agency and 202-713-8608.
- Brough and Evinger asked Gula how Blue Flame, a newly formed company, could obtain this contract and how these masks would be sourced so quickly since Blue Flame did not have any inventory.
- Gula said they (Gula and Thomas) used their political contacts in California to obtain this deal.
- Gula said the face masks need to be produced. He could not offer any specific on the production other than his contact has an industrial factory in China that would be retooled to make face masks.

- Brough and Evinger then asked questions about the production of the face masks, terms of the contract, and what steps Blue Flame had taken to facilitate the shipment of goods from China.
- Evinger asked if Blue Flame had established any international letters of credit that are typical for international trade.
- Gula said time was of the essence and he did not need this. Gula said they would pick these up by aircraft.
- Brough and Evinger asked if the masks were ready. Gula said they will be manufactured.
- Brough and Evinger expressed their concern to Gula about the legitimacy of this deal. We wanted to make sure Gula was not being used.
- Evinger asked for the contract with CA and the manufacturer. Gula said he would send them.
- Brough then spoke to Gula about the amount of the wire in relation to the asset size of the Bank and its capital levels.
- Brough reviewed the operational challenges the Bank would have holding a deposit of this size.
- Brough informed Gula that the Bank would have to explore an off-balance sheet solution for holding this size of a deposit.
- Brough asked how long the funds would remain with the Bank. No details were provided.
- The call with Gula ended shortly after 5:00 pm.

Call with Peter G. Fitzgerald on Wednesday, March 25

- Following the call with Gula, Brough and Evinger called Peter Fitzgerald at approximately 5:10 pm, to discuss the events with Gula and the potential incoming wire for Blue Flame. The events surrounding Blue Flame concerned everyone. The account been opened with the understanding of a $50 million deposit and it escalated to $450 million with more funds due to arrive possibly later in the week. Blue Flame has no prior operating history, it was formed 3 days earlier (Monday, March 23, 2020), and its owners had no experience in the medial supply space. Given the time of day there was nothing that could be done with the account. The account was opened by the staff without having all this relevant information. The likelihood of the wire actually being received seemed low. Everyone agreed to reconnect on Thursday.

Events following the call with Gula on Wednesday, March 25

- Following the call, Evinger sent an email to Gula on Wednesday, March 25, 2020 5:17 PM to his new email address (mike@blueflame.agency) with the subject "Contact Info" and the message "Mike: Thank you for taking our call. We look forward to receiving your information related to these contracts. My colleague John is copied on this email. Best regards, David Evinger"
- Gula replied at 5:42 pm "can you check on your end about the wire. my partner was with the CA percurrent officer when he hit send thanks so much".
- Evinger replied at 6:04 pm "Nothing received. Fed closes at 6:00 EST for all processing." Gula then replied at 6:10 pm "ok, thank you"
- At 6:17pm, Brough replied "Mike, Just one question. Did you send any money to China or others as a "fee" for these transactions? John"
- Gula replied at 6:19pm "no, we have not sent the money to china but when we do this is where we are sending it. please let me know if you have any questions". Gula attached wire instructions for Wingar Industrial Inc., in California (see wire instructions in file).

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- On Wednesday, March 25th at 6:27 pm, Gula sent Evinger an email with the subject "Screenshot 2020-03-25 at 6.26.08" with a message "See attached. Coming in the AM". The attachment was a screen shot from John Thomas that showed a message from Wong, Michael@DGS saying: Hi John, CA State Controllers Office will be paying you via wire transfer first thing in the morning. Please let me know if you have any questions. Respectfully, Michael Wong"
- Brough and Evinger discussed plans for handling this if the wire arrived. They conducted research on Wingar Industrial, Inc. and Great Health Company Ltd. Co. Wingar's website shows it was a cutlery and kitchen supplier to the restaurant industry. The website for Great Health Company Ltd. Co was blocked by the Chinese government.

Events of Thursday, March 26, 2020

- On Thursday, March 26, 2020. Evinger was working in the Bank's main office that day. Brough was working remotely from his home in McLean, VA.
- Staff present in the main office were Heather Schoeppe, SVP & Branch Manager, Mariano Castagnello, Personal Banker, and Angeli Nanali, Personal Banker.
- Evinger was notified at approximately 12:00 pm that the wire for Blue Flame had arrived.

Call with Tim Coffey, JP Morgan Chase

- Within minutes of the wire arriving, JP Morgan Chase called the Bank's main number (703-748-2005) to ask for someone to speak with about this wire. Mariano Castagnello notified me of the call and I asked him to connect me without delay.
- At approximately 12:10 pm, Evinger spoke with Tim Coffey (813-432-5495) from JP Morgan's Fraud Department. Coffey identified himself as being with JP Morgan Chase and that he worked as an investigator in the fraud department. I provided him with my name and title. He asked me if I was aware that Chain Bridge Bank had just received a $456 million wire for Blue Flame Medical. I told Coffey that I was listening. Coffey then conveyed all of the wire information, including the sender's information and fed reference number. He told me that JP Morgan had flagged this transaction and was conducting an investigation and that his boss would likely be reaching out. Coffey asked if we could place a hold on the funds while this investigation occurred. Evinger agreed. We then exchanged contact information.
- Brough received notification of the wire and headed to the main office.
- Brough arrived to the Bank before 12:30 pm.

Call with DSG

- Brough and Evinger called the California Department of General Services general number to ask for Daniel Kim, Executive Director. Call was taken by Jay Perera (916-44 3-9934).
- We asked to speak with Kim, but Perera said Kim was not available because he was working in the "war room" in Sacramento and could not be reached. Perra recommend that we speak to John Lee (916-376-5192) or Nick Chang (916-376-5143) in the Accounting Office. He said many people are working remotely.
- Perera said he would also have someone call us back.

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Call with Rakesh Korpal, JP Morgan Chase

- Rakesh Korpal called Evinger to discuss the wire transfer. He identified himself at the head of JP Morgan's Global Payments Controls and Sanctions. I asked Korpal to let me get my colleague, Brough, on the call. Brough then joined the call.
- Korpal asked the Bank to continue to hold the funds while his team investigates.
- Korpal said this amount was very large amount. He asked about Blue Flame Medical and if this was a new or established account. Korpal said his team could not find anything on Blue Flame Medical. Brough confirmed the account was new and opened the previous day. Korpal said his team found a Blue Flame entity located in Henrico, VA, but could not find a Blue Flame Medical. Evinger responded that Henrico, VA is a few hours south of the DC area and nearby Richmond, VA. Brough said the account was opened by a long-standing client who was a lobbyist. Brough told Korpal we were made aware of this potential wire late yesterday. Brough and Evinger agreed this was very unusual activity and told Korpal we asked for information about this transaction.
- Korpal said they are reaching out to the CA to confirm this wire transfer and also trying to speak with JP Morgan's banker that handles the CA relationship. He wanted to obtain information on how the wire transfer was authorized.
- Korpal asked if our clients normally keep this amount of money with us. Brough said no.
- Korpal said his team began investigating this transfer last night and are continuing to research. He told us his investigations were not leading to good places.
- Korpal provided his contact information 813-432-7553 and 917-445-1705.
- Korpal said his team will continue to investigate and will be stay in touch.

Call with Ms. Chang – CA DGS

- "Phee" Chang from the CA DGS called the Bank. The call came in while Evinger and Brough were on the phone with Korpal. She left a message saying the wire was legitimate, but expressed concerns that we received the correct amount.
- Brough and Evinger returned the call and spoke to Chang to confirm if the wire was legitimate. Chang said the wire was authorized by the CA State Treasurer's office. She offered us to speak with Natalie Saunders and offered to pass along our contact information. We asked her connect us with the Treasurer's office.

Call with CA Treasurer's Office

- Natalie Gonzales and Mark Hariri from CA State Treasurer's office then called Evinger. Brough was also on the call. Gonzales and Hariri said they were contacted by JP Morgan's Fraud Department about the contract and Blue Flame. Brough and Evinger asked if they had researched Blue Flame and knew that it was a new entity with an account that was just opened yesterday by political lobbyists. They said that a warrant was issued to disburse funds for the purchase of 100 million N95 face masks. Gonzales made a reference that this had to be signed by the Governor.
- Gonzales and Hariri mentioned they could not find information on Blue Flame. As the conversation continued, they became unsure and asked for time to speak with people in the DGS about the contract.

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- Evinger and Brough agreed to hold the money and would await their call back.

Call with Rakesh Korpal, JP Morgan Chase

- Korpal called back to discuss the matter further. Brough was also on the call. He said the CA is a bit unsure. Evinger asked if CA wants us to return the funds. Korpal said he was comfortable with the Bank continuing to hold the funds while the investigations continues. He said a recall can be issued. Korpal said he would be back in touch.

Call with Tim Coffey, JP Morgan Chase

- Coffey called Evinger back a few minutes later. Brough was on the call. Coffey said JP Morgan had legitimate concerns and would be recalling the funds. He asked if the Bank would want official notice. Brough and Evinger requested this be done through a service message via Fedline. Coffey agreed and then thanked us. He said a service message will be forthcoming and inquired if the Bank was able to process the return soon.

Other Events on Thursday, March 26, 2020

- Throughout the day, Gula persistently called and email the Bank about the wire and coming to the Bank to sign the outgoing wire transfer. He called numerous times and to multiple parties within the Bank.
- Gula informed Brough that he was headed to the Bank. Brough alerted me and asked me to join the meeting with Gula.

Meeting with Gula on Thursday, March 26, 2020

- Gula arrived at approximately 2:30 pm. Brough and Evinger met with Gula outside the Bank's main office entrance. Brough explained to Gula that the Bank received a notice from JP Morgan to return the funds. Brough informed Gula that the Bank would be closing the Blue Flame account and all accounts that have been opened in the last few weeks. Gula was noticeably nervous but overly apologetic. Gula did not ask that the return of the wire be stopped nor did he raise any issue with return. Gula asked about his other accounts with the Bank. Brough agreed that any other accounts can remain open. Brough told Gula that this will need to be resolved directly with CA. He told Gula to not send the wire back into another account at Chain Bridge Bank. Brough told Gula to find a bank that could handle it and suggested that he open an account at JP Morgan. Gula apologized for the inconvenience to us and then left.

Call with Rakesh Korpal, JP Morgan Chase

- Later in the afternoon Kopal called Evinger on his cell phone. Korpal thanked the Bank for their efforts. Korpal let me to know the investigation had turned up some interesting things but he could not share them. Korpal said I could reach out to him in the future with any issues we might have with a transaction involving JP Morgan.

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Timeline of Other Activities – Blue Flame Medical

- On Tuesday, March 17, 2020 5:21 pm, Gula emailed Maria Cole to set up an account for Redline Strategies. "Maria - we need another bank account open please for Redline Strategies please see both documents you need (EIN, registration) deposits between $100K – 5 million it is our lobbying arm – federal & state level" Cole opened the account remotely on March 18, 2020. The EIN for the account was provided by email to Gula on March 17, 2020 at 2:55 pm from Randy Taylor at Cohn Reznick (301-664-8184; Randy.Taylor@CohnReznick.com)
- On Tuesday, March 24, 2020 at 12:17 pm, Gula asks Cole for wire instructions: "need wiring instructions to RECEIVE blue flame medical account". Note: This occurred a day before the Blue Flame Medical account was opened.
- On Tuesday, March 24, 2020 at 12:28 pm, Cole replies "Hi Mike, Please find the verification letter and wiring instructions. Best, Maria". Attached to the email was an account verification letter and wiring instructions for Blue Flame Strategies. Note: Cole attached wire instructions for Blue Flame Strategies, LLC because the Blue Flame Medical account was not opened yet.
- On Wednesday, March 25, 2020 10:48 am, Gula replies: "I want to make sure ALL 3 accounts are on my log in when I log in on-line and ap: • Blueflame Strategies• Blueflame Medical • Redline Strategies thank you !"
- On Wednesday, March 25, 2020 at 11:19 am, Gula sends an email to Cole with a request: "also need email ASAP when the wire hits from Cali". This was well before Brough and Evinger spoke to Gula. It implies the wire was already in process. Note: This was under a separate email thread.
- On Wednesday, March 25, 2020 11:24 am, Cole responds: "Will work on this Mike. Heather also mentioned that you want wires capabilities. We can add the wire module to your Treasury Management access. I will have to send you the paperwork . The Agreement and Wire Authorization Form via DocuSign. The users are you and John Thomas. Do we need to add more users? The module fee is $40.00 monthly and every wire sent online is $20 per domestic wire; $45 per international wire and $15 per incoming international wire. Please let me know about the users so I can get the paperwork ready. Kind Regards, Maria Cole"
- On Wednesday, March 25, 2020 11:24 am, Gula replies "that will add up. this business is strictly wire...how can we work a deal here when we will have such large volume of funds and frequency ?"
- On Wednesday, March 25, 2020 12:21 pm, Cole responds: "Hi Mike, I understand your concern about the wire fees however Wires are expensive to process and carry the highest degree of risk to both clients and the bank. Our pricing is less than most other banks and, unfortunately, we are not able to reduce the costs below our stated rates. However, a more cost efficient alternative to wires is to use ACH payments. The module subscription is $25 / month and then $0.15 per item. If the payments do not have to be received the same day, this would be the best option to manage your banking service and processing costs. Please let me know if you want us to work and send the wire agreement and the users for wires. Kind Regards, Maria"
- On Wednesday, March 25, 2020 12:26 pm, Gula replies "no problem. we definitely need same day. need cut off dates/time every day as well"

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- On Wednesday, March 25, 2020 3:03 PM, Cole replies "Please find the wiring and verification letters. Best, Maria Cole". Attached to the email was an account verification form and wiring instructions for Blue Flame Medical.
- On Wednesday, March 25, 2020 at 4:11 pm, Cole responds: "Hi Mike, This wire you are waiting for, how much are you expecting and who is the originator? Our wire department would like to know to track it and let you know. I'm assuming is coming to your new account Blue Flame Medical?"
- On Wednesday, March 25, 2020 at 4:12 pm, Gula replies "$450,000,0000 from the state of California (not a typo) Blueflame medical"
- On Wednesday, March 25, 2020 4:21 pm, Cole responded: "Thank you for letting us know. We would like to know how long are you planning to keep these funds on your account. With such dollar amount we need to inform our financial department about these funds and how long they will stay in your account. Best, Maria"
- On Wednesday, March 25, 2020 4:38 pm, Gula replied: "when is wire cut off time and what are operational days?"
- On Wednesday, March 25, 2020 4:49 pm, Cole responded: "5:00 pm- Monday- Friday not on Holidays."
- On Wednesday, March 25, 2020 5:19 pm, Gula responded: "for domestic? I thought it was later than 5:00. ??? I know cali wanted to do it today"
- On Thursday, March 26, 2020 12:14 pm, Ethan Bearman emails Maria Cole. "Hello Maria, It is a pleasure to make your acquaintance. I am the attorney working with Blue Flame Medical LLC. President John Thomas and CEO Mike Gula asked me to coordinate getting the paperwork started for an outbound wire transfer. The request is for the amount of $22,680,000. The recipient information is: Suuchi Inc: Chase Checking Account Account Number: [redacted]1218 Wire Routing Number: 021000021 Chase Bank Address: 125 River Street, Hoboken, NJ 07030 Please let me know how else I can help coordinate getting this transfer done in a timely fashion. Sincerely, Ethan Bearman, Esq. The Bearman Firm Phone: (747)BEARMAN -- (747)232-7626 Direct Phone Line: (747)202-1433 Fax: (747)344-1004. Note: Mr. Bearman was not an authorized signer on the account. Gula and Thomas were copied on the email.