EXHIBIT 58

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

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

Remote Deposition
Thursday, February 11, 2021

Deposition via Zoom of TIMOTHY P. COFFEY, a witness herein, called for examination by counsel

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for Defendant/Third-Party Plaintiff in the above-entitled matter, pursuant to notice, the witness being duly sworn by MARY GRACE CASTLEBERRY, a Notary Public in and for the District of Columbia, taken at 9:31 a.m. EST, Thursday, February 11, 2021, and the proceedings being taken down by Stenotype by MARY GRACE CASTLEBERRY, RPR, and transcribed under her direction.

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A. It's -- sorry, 10410 Highland, H-i-g-h-l-a-n-d, Manor, M-a-n-o-r, Drive. And that was in Tampa, Florida 33610.

Q. Thank you. And just sort of by way of ground rules, I want to let you know it's important that we speak one at a time and don't talk over each other. That allows the court reporter to get an accurate transcription of the testimony. It's also important that you provide a verbal answer, not just a head nod, so that we can get an accurate record.

Do you understand that?

A. Yes.

Q. And over the course of the day, I'll try to take a break about every hour or so just so everybody gets a short rest. If you need a break off that schedule, just let me know and we should be able to accommodate you. The only exception is if a question is pending, we'll ask you to finish answering the question before we go off the record.

Do you understand that?

A. Yes. Thank you.

Q. Is there any reason today that you won't

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be able to give truthful and accurate testimony?

A. No.

Q. Mr. Coffey, have you ever been deposed before?

A. Yes, I have.

Q. How many times?

A. Approximately six to eight times.

Q. Do you recall the most recent time?

A. Yes. I believe it was via a Zoom -- a Zoom call also.

THE REPORTER: This is the court reporter. Could you repeat that answer?

THE WITNESS: I said yes, I believe it was via a Zoom call also. Zoom.

BY MR. BURKE:

Q. And are these all -- are all of those other depositions matters that arose in connection with your employment at JPMorgan?

A. Yes, sir.

Q. You may not recall each and every one of those, but to the extent you do recall them, can you describe the nature of the cases that they involved?

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A. Generally, they were cases regarding either fraudulent wire transfers or path of funds or something of that nature, something where I was called about to be a subject matter expert.

Q. I see. And have you testified in court proceedings, in a courtroom rather than by deposition?

A. Yes, I have.

Q. And how many times have you done that?

A. Probably 20 to 25 times.

Q. And are all of those matters that arose in connection with your employment at JPMorgan?

A. That is correct.

Q. Were you testifying as an expert witness in any of those court proceedings?

A. I was testifying as a subject matter expert on behalf of Chase.

Q. I see. And again, you may not remember all of those 20 to 25 court proceedings, but can you describe generally what sort of matters they involved?

A. Largely has to do with the path of funds,

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how a wire moves from system to system. Largely trying to find out if things are considered to be interstate or intrastate.

Q. I'm sorry, I just didn't hear the last portion of your answer. Could you repeat that?

A. Sure. The majority of my testimony was as a subject matter expert. And generally, we're trying to find out what we will call path of funds, how the wire moves through the systems. Does it go through New York City, where does the actual wire move to, those types of things.

Q. I see. I believe you testified a moment ago that you're no longer employed by JPMorgan; is that correct?

A. That's correct.

Q. When did your employment with JPMorgan cease?

A. December 11th, 2020.

Q. Are you currently employed by another employer?

A. I am not.

Q. Can you tell me the reason for your

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employment with JPMorgan ceasing?
A. Yes. My understanding is my exact role that I had was being eliminated due to downsizing, budget cuts and so forth.
Q. I see. And when did you learn that your position would be eliminated for that reason?
A. The last week of October.
Q. I see. What was your position with JPMorgan prior to leaving their employment in December of 2020?
A. My position, I was a vice president with JPMorgan Chase. I was in the -- what we call the payment controls department.
Q. And is that the same role you had with JPMorgan in March of 2020?
A. Yes.
Q. And how long had you been employed by JPMorgan as of March of 2020?
A. Since 1988.
Q. How long had you been in that role that you occupied as of March of 2020?
A. Approximately five to six years.

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Q. And can you tell me what your position was prior to taking that position?
A. Yes. Prior to coming into the payment controls department, I managed what we call the global command center.
Q. And so that would have been in approximately 2015 when you changed positions?
A. That sounds about right, yes.
Q. And how long were you in that position managing the global command center?
A. For about 10 to 11 years.
Q. Can you describe your position -- or strike that.
Can you describe your tasks in your position as of March of 2020 in the payment controls department?
A. Yes. My primary responsibility was to try to recover suspicious wire activity that was released from the bank already, wires that had already gone out into the street. My job was to attempt to recover those funds.
Q. I see. Can you tell me what your role was

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in the global command center in your prior position?
A. Sure. I managed a global team. We had three different locations, one in Bournemouth, one in India, one in Tampa. We -- it was a 24 by 17 that monitored and maintained the health of the operations platforms that are out there, making sure all the servers, all the applications are up and running, that mics are up and running, the links have dropped and so forth. It was a health center for technology and for the operations.
Q. I see. And is that an information technology role or would you describe it in a different way?
A. I would probably describe it as more of a help with the operations role with some technical parts infused in it.
Q. I see. And prior to your position there in the global command center, what was your position at JPMorgan?
A. I moved down to Tampa in 2002, and I was managing the multicurrency investigations team.
Q. And what did you do in that role?

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A. I would manage a staff of about 50 people that would do investigations for currencies not just involving U.S. dollar.
Q. What sort of investigations did that entail?
A. They were wire investigations.
Q. And how long had you been in that role before you moved on to the global command center?
A. Approximately four years, three to four years.
Q. And can you describe your position before your role in the multicurrency investigations team?
A. So I started in the bank in '88. I had left the bank roughly in '98 for approximately three and a half to four years, then came back to Chase.
My coming back to Chase was in 2002, which was the role I just mentioned to you of the multicurrency investigations manager.
Q. I see. And where were you employed during that break in your tenure at JPMorgan?
A. I had two different jobs. I was a salesperson for Lucent Technologies and then I went

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on to become a production manager for a company called TalentWorks who did television production.

Q. And prior to 1998, can you describe your positions at JPMorgan?

A. Yeah. From '88 to roughly '98 -- I started out in '88 as a wire investigator, okay? So if a wire was initiated and any claim nonreceipt or they were looking to recover the funds or return the funds, I would get involved in that investigation.

From there I went on to do what we called a CSO or customer service officer where you were a single point of contact for a portfolio of clients, high-profile clients in the bank. And then I left the bank.

Q. And did your role as a customer service officer also involve wire transfers?

A. That was one of many things it involved. You were pretty much the single point of contact for a portfolio of clients.

Q. I see. In your role as a wire investigator, do I understand correctly that you would have been involved in investigating outgoing

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wire transfers from JPMorgan to other banks?

A. That would be both incoming and outgoing wire transfers.

Q. I see. And you may have just mentioned this, but can you describe more specifically the source of investigations that you would conduct in that role?

A. Sure. The common investigations were funds might go out of the bank and be sent to another bank and that ultimate beneficiary may come in and say they don't know what it is, can you please tell me what this wire is. I don't know what it is. That was a primary type of investigation.

In addition to beneficiaries claiming nonreceipt, a remitter may come in and say, hey, we sent this wire out, but that ultimate beneficiary says he never got it. So we would engage the other financial institutions to confirm the date that the funds were credited to the account and so forth.

Q. I see. Where -- were you employed elsewhere prior to joining JPMorgan in 1988?

A. I worked for an auto interiors place many

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years ago. That might have been the lead-in job. Sorry, that was back in 1988.

Q. Yeah, it's a while ago. Can you tell me your educational background?

A. Sure. I went to Hofstra University on Long Island for approximately four semesters and left after the four semesters and went on to take the job at JPMorgan Chase.

Q. I see. And do you have any further degrees or certifications after leaving Hofstra University?

A. No.

Q. I want to now come back to March of 2020. And can you just please remind me the title of your position at that point?

A. Yes. I was a vice president in the payment controls department.

Q. And to whom did you report in that role?

A. I reported in to Jenifer Robinson.

Q. And do you know who Ms. Robinson reported to?

A. Jenifer reported in to Rakesh Korpal.

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Q. I see. And did you have a staff of -- excuse me. Did you have a staff of others at JPMorgan who reported up to you?

A. I did not have people in my org chart.

Q. So did you -- did you work with other lower ranking employees at JPMorgan at the time?

A. Yes. I was engaged with the payment controls staff on a daily basis. Me not having staff underneath myself was a matter of standard control, so they were all listed under Jenifer Robinson. But I would interact with them on a daily basis.

Q. I see. So they also reported up to Jenifer Robinson; is that correct?

A. Yes, sir.

Q. But you had a higher ranking position in the company, is that right?

A. That's correct. You can almost think of them reporting in to me on a dotted-line type of thing, but they were in Jenifer's org chart.

Q. That's helpful. Thank you.

Can you describe for me again the nature of your responsibilities in that position in the

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A. Common themes of fraud are newly opened accounts receiving in large dollar amounts or a velocity of payments over a very short period of time. That's a very common theme of fraudulent activity. A fraudulent party opening up an account, getting a flow of funds in really quickly, and eventually getting caught and getting it shut down. But that would be a common thing -- that would be a common thing of newly opened account receiving in large dollar amounts.

Q. And when you mentioned velocity, does that refer to the number of incoming transactions that occur over a period of time?

A. Yes.

Q. And when you were conducting these investigations, how would you go about determining whether an account had been newly opened or had a high velocity of payments into it?

A. If it was on JPMorgan Chase's account -- on JPMorgan Chase's books, we would see when the account was opened and the type of activity that's going in and out of that account. If it was not on

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JPMorgan Chase's books, if we were paying it out to Citibank, okay, we would really have to rely on them to tell us if they feel the transaction is fraudulent, not fraudulent and whether they're willing to restrict the account or not restrict the account.

Q. And when you were requesting that another financial institution restrict an account, would you need to provide certain information to them in support of that request?

A. If it was a phone -- can you repeat the question? Sorry, because I think I was going somewhere else with that.

Q. Yeah. When you -- when you would be requesting another financial institution to restrict funds that they had received in a transaction, would you need to provide certain information to them to support your request?

A. Yeah. The majority of the time, when we engaged another financial institution to restrict an account, that was done via SWIFT or what we would call a Fed service message. Just a way of

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communicating back and forth. We would tell them the wire is fraudulent. They -- we would attempt to get them to restrict the account. Most of the times they would restrict the account and the majority of the time they would request JPMorgan Chase send them what we call an indemnity.

Q. I see. And would you -- strike that.

Would the other banks in that situation sometimes ask you to explain the basis on which you had concluded that the transaction was fraudulent?

A. There could be times where they come in and explain why do you consider this fraudulent.

Q. So you might explain to them the indications of fraud that you had identified as part of your investigation?

A. Yes.

Q. And when you were doing that, when you were communicating with other banks in connection with these investigations, would you try to be clear and honest in your communications with the other bank?

A. We would -- we would give them -- a lot of

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times we would not know the exact details of the fraud. Citibank would come in to us and say this wire was fraudulent, but they wouldn't give us any more details.

We would go out to the beneficiary party and tell them that Citibank is claiming this to be fraudulent. Many times we would not have any more details than the remitting bank actually saying it's fraud. They didn't give us the details.

Q. What about in a situation where you were seeking to have a beneficiary's bank restrict the funds. Would you sometimes provide them information to support your belief that there had been fraud in connection with the transaction?

A. Largely only if they asked for it. Those messages would go out and say remitter advises us this transaction to be fraud and we'd leave it at that. If they came back to us and asked, we don't always have that information.

Q. You mentioned that these communications would often occur by SWIFT message; is that correct?

A. Yes, that's correct.

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Q. And can you explain to me what a SWIFT message is?

A. Sure. So SWIFT stands for Society For Worldwide Interbank Financial Telecommunications. It is a way for banks to initiate payments back and forth to each other in addition to communicate new authenticated messages back and forth to each other.

So many of these investigations, as you are asking how they originate, are originated via SWIFT. You can send a SWIFT message advising the bank to claim nonreceipt of the funds. You can send a SWIFT message giving debit authorization to return the funds back to the remitter, those types of things. But SWIFT is a way for financial institutions to talk back and forth to each other through -- through authenticated messages.

Q. And is that something different than messages communicated over the Fedwire system?

A. Yes. That's different. The large financial institutions out there are members of SWIFT, okay? But the smaller mom and top type credit union places do not belong to SWIFT, so we would

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engage them via the Fedwire services communication system.

Q. I see. Would you also have telephone communications in connection with these investigations with other financial institutions?

A. At times, always depending on the particular situation.

Q. Do you have a sense of how often, just on a rough basis, the investigation would involve telephone communications with the other banks?

A. Obviously it would be done on a daily basis depending on the situation. The best way I can describe to you, suspicious activity is driven by a timeline, okay? And if suspicious activity happened today, there's a lot more I can do on a phone call than if a suspicious activity happened last month. That phone call is not going to do a lot of good because that suspicious activity happened 30 days ago and it's going to limit the ability to recover the funds. Because 30 days in like a -- in a fraud environment is a lifetime.

So if I think you're asking about phone

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calls, it would be driven by many times the dollar amount or how recent the activity happened and if something can be done quicker.

Q. I see. So if the transaction that you were investigating was a more recent one, that might be a reason that you would have realtime telephone communications with the other financial institution rather than using service messages?

A. We would use the service message in addition to the phone call. But the phone call carries a lot of power based upon the transaction being same day or somewhat recent. It's in addition to.

Q. I see. I'm going to transition to the subject matter of this particular case. Are you -- are you familiar with a wire transfer that California caused JPMorgan to send to Chain Bridge Bank for the benefit of Blue Flame Medical on March 26 of 2020 in the amount of approximately $457 million?

A. Yes.

Q. And just by way of terminology, I hope you can agree that if I refer to the Blue Flame wire or

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the Blue Flame transaction, that's the wire transfer I'm referring to. Do you understand that?

A. Yes, sir.

Q. Can you tell me how you personally became aware of the Blue Flame wire transfer?

A. Yes. I was engaged by Rakesh Korpal to engage Chain Bridge Bank to restrict -- to hold on to those funds, to restrict those funds as there was concerns about the validity of the transaction.

Q. And had you learned about the Blue Flame wire transfer before Mr. Korpal had engaged you to reach out to Chain Bridge Bank?

A. No, that's my first recollection of having any understanding of that wire.

Q. Do you recall any discussions with anybody at JPMorgan before March 26th about the possibility of a large wire transfer being initiated by California?

A. That was the first time I was engaged with any thoughts of suspicion.

Q. I see. I think my question was slightly different, though. I meant to ask just about the

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possibility of a large wire transfer coming from the state of California.

Do you have any recollection of any conversations about a large wire transfer that was going to be sent by the state of California prior to March 26th?

A. No.

Q. Did you have any role in approving the Blue Flame wire transfer before it was released by JPMorgan?

A. I did.

Q. And can you describe your role in that process of approving the release of the Blue Flame wire transfer?

A. Sure. Any payment that's over $50 million that stops in the payment control process needs to have an email approval sent to myself, Jenifer Robinson or Rakesh Korpal to approve that they've taken the necessary actions to validate the wire with the remitter.

Q. And did you receive such an email message in connection with the Blue Flame wire transfer?

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A. I did.

Q. Do you recall the content of that message seeking approval of the wire transfer?

A. I don't know the exact details, but it would mention dollar amount, clients involved and who they spoke to to validate the transaction.

Q. Do you have a recollection of when you received that email message in connection with the approval of the Blue Flame wire transfer?

A. Sorry, could you repeat that?

Q. Do you have a recollection of when you received that email message in connection with the approval of the Blue Flame wire transfer?

A. I believe it was roughly around noon or 12:30 or somewhere in that nature if I remember.

Q. And can you tell me what, if anything, you did in response to the message you'd received regarding the approval of the wire transfer?

A. Yeah. My job in that -- in that chain, that email approval, is to make sure that the payment control operator has done their job, their necessary due diligence by engaging the client and making sure

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that they've confirmed the instructions with a valid source, okay?

So my job is to make sure that they've done their job and that's the approval, not to redo the investigations so much, but to really make sure that they've done the necessary steps to release the transaction.

Q. And did you complete that review process in connection with the Blue Flame wire transfer?

A. I did.

Q. And then did you communicate that you had approved the release of the Blue Flame wire transfer?

A. I approved the release of the Blue Flame wire transfer through their payment control department, yes.

Q. And do you recall the basis on which you made that decision to approve the release of the Blue Flame wire transfer through the payments control office?

A. Generally, what we would look for is what operator reached out to what client and spoke to what person to validate the transaction. We're making

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sure they've done their due diligence and calling, reaching out to the client to validate the transaction. So we're just really approving that they've taken the necessary steps.

Q. And sitting here today, do you have a recollection of having completed that review process in connection with this wire transfer or are you testifying about what you generally would have done in that situation?

A. I'm testifying what we -- how we generally go about these approvals.

Q. So you don't specifically recall the thought process you had in providing approval for the Blue Flame wire transfer?

A. No.

Q. Do you have an understanding about what occurred with respect to the Blue Flame wire transfer after you had given that approval step?

A. From there, as we spoke about the life cycle of a transaction, that would get released out of the payment control department and moved on to funds control to eventually be released out to the

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THE WITNESS: I just got it.
BY MR. BURKE:
Q. Mr. Coffey, are you able to access Defendant's Exhibit 91?
A. Yes.
Q. And do you recognize this email message?
A. I do.
Q. Can you tell me what it is?
A. This is my approval of the below transaction to be moved through the payment control process based --
Q. And that's -- sorry. Go ahead.
A. Based upon the due diligence that was done by the payment control operator, which I reviewed below.
Q. And the transaction at issue in these email exchanges, that's the Blue Flame Medical wire transfer that we have been discussing; is that right?
A. Yes.
Q. And can you tell me what the -- what information in these emails you would have looked at to determine that the due diligence had been

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completed to your satisfaction?
A. Yes. I'm going to make note of the dollar amount, the client name, the beneficiary name. But largely, we're looking to see that section below that says, "Natalie Gonzales confirmed payment is valid. Call-back performed on a known telephone number."
That's -- on the -- my approval is to assure that they've done their due diligence and engaged the client properly.
Q. And can you describe what a call-back is?
A. The client is going to reach out -- sorry. The payment control operator is going to reach out to the client to try to find out how they received the instructions. Did they do a call-back to a known number to make sure that this isn't some sort of fraudulent instructions and so forth.
Again, it's not something that I specialize in as a payment control operator. I'm making sure that they've done the due diligence of reaching out to the client.
Q. I see. And do you see that this email was sent at -- sent by you at 11:33 a.m. on the 26th of

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March?
A. Yes.
Q. So as you've testified previously, this was -- your approval was communicated pretty quickly after the request for approval arrived; is that right?
A. Correct.
Q. And do you recall speaking with anybody at JPMorgan about this wire transfer before you communicated your approval in this email message?
A. No.
Q. Thank you. I think you can close out of that exhibit at least for now.
I think earlier today you testified that after the wire transfer was released from JPMorgan, Mr. Korpal initiated an investigation of the transaction; is that right?
A. He had inquired me to send him a copy of the transaction.
Q. And how did he ask you to do that?
A. I believe it was via what we call a communicated message, which is a Skype message type

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of thing, internal.
Q. I see. And did he explain to you why he was requesting the details of the transaction?
A. He did not.
Q. Did you have any other basis for understanding of why he was requesting the details of the transaction?
A. Not at that time.
Q. What was the next communication you had in connection with the Blue Flame wire transfer?
A. Rakesh engaged me to call Chain Bridge Bank to have the funds held at Chain Bridge Bank as there was concerns about the validity of this transaction.
Q. And how did he engage you with that task?
A. I believe he called me.
Q. And do you recall what he told you about the transaction?
A. He was asking me to engage Chain Bridge to hold on to the funds as there was concerns about the transaction. That was the limit of the details.
Q. He told you that there were concerns about

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the transaction?
A. Yes.
Q. Do you recall whether he told you what the nature of those concerns was?
A. At that time he did not.
Q. Did you have any understanding of what the nature of the concerns with respect to the Blue Flame transaction were at that time?
A. I did not.
Q. And did you talk with anybody else at JPMorgan about the Blue Flame wire transfer before contacting Chain Bridge Bank as Mr. Korpal had requested?
A. I do not recall engaging anybody else.
Q. Did you know -- strike that.
Did you have an understanding of whether Mr. Korpal had also contacted other personnel at JPMorgan in connection with this transaction?
A. I would not know what actions he would have taken.
Q. He didn't tell you if he had reached out to others at JPMorgan about the transaction?

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A. No.
Q. And so what did you do in response to Mr. Korpal's request, if anything?
A. I -- excuse me. I engaged Chain Bridge Bank via phone and had asked to speak to somebody who could assist me with that wire transfer.
Q. And do you recall who you called at Chain Bridge Bank, or did you just call the main number for the bank?
A. I called the main number that I obtained off the Internet and spoke to whoever would -- manned that main number.
Q. I see. And do you recall what you told to whoever it was that picked up the phone?
A. Not exactly. The intent was to get me somebody that could assist me with the suspicious wire.
Q. So at the time, you viewed the Blue Flame wire transfer as a suspicious wire?
A. At the time, I was told, yes, by Rakesh that the -- that the wire was suspicious.
Q. Do you recall whether you told whoever it

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was that you spoke with who picked up the phone at Chain Bridge Bank that there were concerns of fraud with respect to the transaction?
A. Do I recall saying that; is that the question?
Q. Yes.
A. Yes.
Q. And then was your call transferred to somebody else at Chain Bridge Bank?
A. Very quickly, I was transferred to -- I believe the name was David Everton. My understanding was he was the president of the bank. But very quickly I was transferred to him.
Q. I see. And would the name David Evinger refresh your recollection at all?
A. Yes.
Q. Does that sound right?
A. Yes. Sorry.
Q. What did you discuss with -- excuse me. What did you discuss with Mr. Evinger on that phone call?
A. When I got to David Evinger, he was

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already well aware of this wire transfer. I had advised him that I was calling from JPMorgan Chase, there was some suspicion about the wire and, if I recall, he very quickly said, oh, we -- we're holding this wire right now. We have similar suspicions, too. So he had already been engaged in holding on to the funds at that time.
Q. Did you -- you shared with him that JPMorgan viewed the transaction as suspicious?
A. Yes, I'm sure I did.
Q. Did you discuss with him any of the reasons that led JPMorgan to be suspicious regarding this wire transfer?
A. I did not.
Q. Do you recall what else you learned from Mr. Evinger on the call?
A. What I recall was him clearly stating that they had suspicion about the wire, they're holding the wire. And that was really the intent of my phone call is to get them to hold the funds.
Q. So your goal in calling Chain Bridge Bank was to get them to hold the funds?

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A. Yes.
Q. Did you -- did you ask Mr. Evinger to hold the funds?
A. I'm sure I asked him to -- if they could either restrict or hold the funds. And at that point I remember -- I recall him saying to me, we've already held the funds. We had the same suspicions.
Q. Did you -- did you discuss with him whether JPMorgan was conducting an investigation regarding the Blue Flame transaction?
A. No. The intent of that first original phone call was to get them to hold the funds.
Q. Did you discuss with him whether JPMorgan would be reaching out to Chain Bridge Bank again later in the day?
A. Yes.
Q. Do you recall what you told Mr. Evinger about that?
A. I don't recall the exact words.
Q. Do you recall more generally what you communicated to Mr. Evinger?
A. The intent of the phone call was get the

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funds to be held at Chain Bridge Bank, which he advised they already were doing that, they had similar suspicions and more or less told him, okay, I appreciate that, we'll get back to you. I didn't have details of the fraud at the particular time or the suspicion or whatever as it was not privy to me at that particular moment.
Q. I see. And did you -- did you learn from Mr. Evinger anything about the nature of the underlying transaction between California and Blue Flame Medical?
A. No, not that I recall.
Q. Do you recall learning whether Chain Bridge Bank had been in contact with anybody at the state of California at that time?
A. I don't believe it was that phone call, but on one of the phone calls, they had advised us they engaged our client.
Q. Do you recall your reactions to what you learned from Mr. Evinger on the call?
A. I was -- I was appreciative of the fact that they were already holding the funds as that was

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the intent of my phone call, and I needed to report that to Rakesh to let him know that I've -- that they're holding the funds, too.
Q. I see. And did -- did the fact that Chain Bridge Bank had expressed concerns regarding the transaction heighten any concerns you had with respect to the transaction?
A. At that time, I didn't have the information to have any heightened concerns. I was merely carrying out the request of Rakesh to get the funds held.
Q. I see. And did you then discuss that conversation with Mr. Evinger with anybody else at JPMorgan?
A. I discussed it with Rakesh.
Q. Do you recall how that discussion took place?
A. I believe it was via a communicated message or Skype message advising him that I spoke to such and such, David Evinger, and he confirms they are withholding the funds, with similar suspicions.
Q. And do you recall whether Mr. Evinger told

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you whether the funds had been credited to the beneficiary in the transaction?
A. I believe he had said to us, we are holding the funds, which would be terminology that would mean it never hit the beneficiary's account. They're holding it.
Q. I see.
MR. BURKE: Zach, could you share what was Plaintiff's Exhibit 98?
BY MR. BURKE:
Q. For the record, it is a document with the Bates label JPMC-00000243.
A. Is that PX-98, guys?
Q. Yes.
A. Okay. I just opened it in front of me.
Q. Do you have that available to you, Mr. Coffey?
A. I do.
MR. SCHOENFELD: Sorry. We do not. Give us just one second. Okay. We got it. Go ahead. Sorry.
MR. BURKE: Great.

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BY MR. BURKE:
Q. So Mr. Coffey, do you recognize this communication?
A. Yes.
Q. Can you describe for me what it is?
A. This is a conversation via the internal Chase chat application.
Q. And do you see at the top that there's what looks like some email header information saying that the document -- or the email was sent on March 27th at 1:49 p.m.?
A. Yes.
Q. So do you understand this to be chat information that was pasted into an email and then sent to you by Mr. Korpal?
A. I'm not sure how this was obtained. This conversation was never sent to me, so I would say this does not appear to be an email sent from Rakesh to me. I'm not sure how this was -- it was pulled.
Q. Do you see in the header information that you're listed on the "To" line? It says Timothy Coffey?

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A. I do.
Q. But you don't recall receiving this email from Mr. Korpal?
A. No, I don't think I -- I don't think this is an email actually.
Q. Okay. Do you recognize the content of the message as a set of Skype communications between yourself and Mr. Korpal?
A. Yes.
Q. And just from looking through those communications, do they look like Skype communications in connection with the Blue Flame wire transfer on March 26th?
A. Yes.
Q. And do you see right at the very top, that communication from Mr. Korpal, it says, "Can you give me a copy of this transaction? Value today," and the "456 million Blue Flame Medical"?
A. Yes.
Q. So do you recognize that as the communication we had discussed earlier where Mr. Korpal asked you to send him the details of this

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wire transaction?
A. Yes.
Q. And so do you see you respond to his message by saying, "Yes. Sent"?
A. Yes.
Q. So would that be around the time that you shared the details of the wire transaction with Mr. Korpal?
A. Yes.
Q. And is it your recollection that you sent those details to him by email?
A. Yes, that's correct.
Q. So looking down from there, there's two lines, one marked 12:28 p.m. connected to Korpal Rakesh and then a phone number, and in the next line, it says "12:29 p.m. call with Korpal Rakesh," phone number, "has ended."
Do you understand what those lines in this document represent?
A. Yes.
Q. Can you tell me what they represent?
A. The duration of a phone call from Rakesh

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to myself.
Q. So does the Skype application that you were using keep a record of phone conversations as well as these instant message type communications?
A. I assume that to be correct by looking at this.
Q. And that phone call that is represented by those entries, do you believe that would have been around the time that Mr. Korpal requested that you reach out to Chain Bridge Bank?
A. Yes.
Q. Do you think that was the phone conversation where he related that request to you?
A. Yes.
Q. And then you -- looking down from there, there's a message from you at 12:36 p.m.
Do you see that one?
A. Yes.
Q. And you write, "I got the president of the bank... David Evinger," phone number. "They are holding the funds with similar concerns."
Do you see those lines?

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from the bank?
MR. SCHOENFELD: Objection. Just to clarify, is this specifically with respect to transactions other than this transaction.
BY MR. BURKE:
Q. I mean as a general matter when, Mr. Coffey, you were involved in investigating wire transfers from JPMorgan, was part of your role to help determine whether JPMorgan would decide to request a recall of the wire transfer?
A. Yes. Oftentimes that would be the case. Sometimes, as I mentioned earlier in my testimony, fraud has already been determined, but oftentimes we would be involved in the decision-making.
Q. And with respect to this particular transaction, the Blue Flame wire transfer, did you understand that the investigation you were involved in was at least in part meant to help determine whether JPMorgan should request a recall of the wire transfer that had been sent to Chain Bridge Bank?
MR. SCHOENFELD: Objection. You can go ahead and answer.

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THE WITNESS: The stepping away and doing factfinding was to gather information on both sides so that Chain Bridge could make a choice on what they wanted to do.
I think it's important to note here that at this point of the transaction, Chain Bridge Bank was in possession of the funds. So they really were the ultimate party who was going to make the decision on whether to return them or not. We could only give them information to assist them.
BY MR. BURKE:
Q. You could give them information to assist them, but couldn't you also make a request to them to return the funds?
A. We could -- in theory, we could make a request to return the funds. They don't have to honor that.
Q. Again, stepping back from this particular transaction and thinking more broadly about your role in investigating wire transactions, would it be common for JPMorgan to request a return of funds from the other financial institution after the completion

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of the investigation?
MR. SCHOENFELD: Objection.
THE WITNESS: Yes, it would be common for us to request a recall of funds, yes.
BY MR. BURKE:
Q. And is that what occurred in the three or four other personal protective equipment related transactions that you referred to earlier in your testimony?
A. Did that occur? Was that the question?
Q. Yes. Did JPMorgan make a request for the financial institution on the other side of the transaction to return the funds?
A. Once fraud was confirmed by the JPMorgan client, yes, we did.
Q. Mr. Coffey, if you could -- if you have available to you a document we looked at earlier today. It was Plaintiff's Exhibit 98, PX-98. It was the chat record.
A. I see it -- I see it here.
Q. I wanted to refer you to the line about maybe two-thirds of the way down the page at 12:43

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p.m. that says, "Connected to Korpal Rakesh," and then a phone number.
Do you see that line?
A. 12:43, is that the one?
Q. 12:43 p.m.
A. Yes, I see it.
Q. And then there is another intermediate message that appears to be an instant message written by you to Mr. Korpal. Do you see that one that's at 12:51?
A. Yes, I see it. Sorry.
Q. And then right after that, there's the entry at 12:53 p.m. that says a call with Mr. Korpal has ended. Do you see that one?
A. Yes.
Q. And it says a duration of nine minutes and 57 seconds?
A. Yes.
Q. Do you know whether that phone call that's recorded on this document is the phone conversation we listened to a little bit ago where it was you and Mr. Korpal and then Mr. Brough and Mr. Evinger from

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Chain Bridge Bank?
A. I believe that would be the phone call. The duration sounds about the amount of time we spoke.
Q. And so does this help to refresh your recollection at all about whether that phone call occurred with you in the office with Mr. Korpal or whether you had joined him on the phone for the call?
A. I'm sure I was in his office listening on speakerphone.
Q. I see. Do you have any recollection of why -- or of what this phone call of approximately 10 minutes with Mr. Korpal entailed?
A. Is -- is this referencing the second phone call between Rakesh and David Evinger?
Q. Well, what I'm trying to figure out is whether you had connected on the phone with Mr. Korpal and then conferenced in the people from Chain Bridge Bank or whether you were sitting in Mr. Korpal's office and had the call on speakerphone.
A. What I -- what I believe is -- what I recall is I had David Evinger's number and brought it

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into Rakesh's office to -- for him to initiate the phone call.
Q. I see. And then do you see another entry at 12:53 p.m. that says connected to Mr. Korpal. And then right after that, there's an entry at 12:54 reflecting a call with Mr. Korpal ending with a duration of one minute and two seconds?
A. Yes, I see that.
Q. And does that refresh your recollection at all about whether you had a short phone call of about a minute duration with Mr. Korpal after you had spoken with personnel from Chain Bridge Bank?
A. Yes, clearly -- clearly we did.
Q. Do you have any recollection of what you discussed with Mr. Korpal on that phone call of approximately -- or a minute and two seconds?
A. I do not. I'm sure it involved just him reiterating that he has concerns.
Q. After that discussion that we just covered with Mr. Korpal, do you know the next time that you communicated with anyone else at JPMorgan about the Blue Flame wire transaction?

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A. I do not recall. As I said before, Rakesh was driving this -- this inquiry.
Q. Do you recall Mr. Korpal contacting you with any further information about the status of the investigation?
A. I do not. I believe at some point there was a conversation about Blue Flame and we had -- the agreement was they would send a recall. That's the last kind of interaction I remember with Rakesh on this.
Q. I'm sorry, I want to make sure I understand your answer. So that you recall that at some point later you had another conversation with Mr. Korpal and there was an agreement to send the recall?
A. Yes, that's correct.
Q. And was that an agreement between you and Mr. Korpal or were you referring to some other agreement?
MR. SCHOENFELD: Objection.
THE WITNESS: It was an agreement between myself -- it was a -- it was a directive from Rakesh

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to me to engage Chain Bridge Bank to recall the funds based upon whatever interaction he had had with people internally and with David Evinger, and I was not privy to those conversations.
BY MR. BURKE:
Q. So I want to -- I want to make sure I understand, to the best of your recollection, exactly what it is Mr. Korpal told you versus what you may have understood from the context or otherwise.
So at some point Mr. Korpal contacted you and directed you to recall the funds from Chain Bridge Bank; is that right?
A. Yes.
Q. And at that point, did he explain to you why JPMorgan would be recalling the funds from Chain Bridge Bank?
A. No.
Q. So the only information you had was a direction to go ahead and recall the funds; is that right?
A. Yes.
Q. And then outside of what Mr. Korpal told

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you in that conversation, did you have an understanding of why JPMorgan was issuing the recall to Chain Bridge Bank?

A. I would assume whatever factfinding he did individually and in conjunction with David Evinger drove that decision.

Q. But that's your -- that's your assumption based on -- strike that.

Is that assumption based on standard procedure in these sorts of investigations or is it based on some other source?

A. I was not privy to any of the conversations that drove the decision for the funds to be returned. I was just directed to engage Chain Bridge Bank and agree we need to return the funds, both sides being concerned.

Q. At that point when Mr. Korpal directed you to recall the funds from Chain Bridge Bank, did you understand whether JPMorgan had been in contact with California officials about the transaction?

A. I did not know as I was not part of that conversation.

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Q. And so as we discussed earlier, you were aware at some point that Mr. Korpal had initiated those contacts with the state of California, but as to the timing of those discussions, you don't know?

A. Correct.

Q. Do you recall any other discussions with other JPMorgan personnel before that point in time when Mr. Korpal contacted you to direct you to recall the funds from Chain Bridge Bank, but subsequent to that second phone conversation we discussed earlier?

A. I do not recall any additional conversations.

Q. And what did you do, if anything, in response to Mr. Korpal's direction that you recall the funds from Chain Bridge Bank?

A. I engaged Chain Bridge Bank to advise them that we have the same concerns that they have about this particular transaction, and Rakesh's suggestion is potentially we should return the funds back based upon Chain Bridge holding onto the funds and being suspicious and we had some concerns, too.

At that point, I believe I asked him if

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they needed some sort of recall message or if they were just going to return the funds to Chase.

Q. And do you recall what the Chain Bridge personnel said to you in response?

A. Yeah, I believe he asked us to send them the standard Fed service recall message.

Q. You just referred to it as a standard Fed service recall message. Did you use the word "standard" because you had seen that happen in other transactions that you had investigated that resulted in the return of funds?

A. That -- the need for that type of message is -- can be -- is very common.

Q. It's common for a bank to want to have a written official record of a request for the return of funds?

A. Correct.

MR. SCHOENFELD: I apologize. Donald, can you hold on one second? My objection to the question about you just referred to it as a standard Fed service recall message wasn't noted on the record. I just wanted to make sure that's there.

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MR. BURKE: I didn't -- actually didn't hear anything, which is probably why it didn't end up on the record, but you're --

MR. SCHOENFELD: Sorry about that.

MR. BURKE: -- you're representing -- just to be clear, what was the objection in response to?

MR. SCHOENFELD: The objection was in response to the question, "You just referred to it as a standard Fed recall message." So I objected after that question. I apologize for interrupting. So you can go back to your question.

MR. BURKE: Yeah, no problem.

BY MR. BURKE:

Q. Did you at this point express any appreciation to the Chain Bridge personnel you spoke with for their willingness to return the funds?

A. I'm sure I did.

Q. And did you thank them for cooperating with JPMorgan on this -- on this transaction?

A. I believe I did.

Q. And do you recall whether you asked the Chain Bridge personnel you spoke with to return the

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funds as quickly as possible?
A. I don't know that I put any sort of emphasis on that, but I may have said -- I may have said that, possibly. Don't know. It would -- it would make sense that I might have.
Q. And why would it make sense to you that you might have said -- or might have asked for them to return the funds as quickly as possible?
A. This transaction investigation, due to the suspicion, had been lingering for a couple of hours now. I don't have the exact times, obviously, but it had been lingering. And the need to get word out to senior management that the situation has been taken control of is obviously important.
This was getting some senior attention and people wanted to know what the resolution decision was, and that was the emphasis to -- if there was an emphasis to send it back, that was the emphasis is to put the situation to rest.
Q. And did -- strike that.
Stepping back from this transaction and thinking about your role in connection with other

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investigations of wire transfers, when those investigations have resulted in a request for the return of funds, would you say that frequently the request is made over the Fedwire system?
MR. SCHOENFELD: Objection.
THE WITNESS: It's driven by who the recipient bank is largely. If the recipient bank is a SWIFT member, they would probably receive the SWIFT message.
As I mentioned before, some of the smaller mom and pop banks, federal credit unions and so forth, they're not part of SWIFT, so they would get a message via the Fed system -- Fed service wire system.
BY MR. BURKE:
Q. So is it common that there would be some form of a written message to communicate the recall request either by the SWIFT system or by the Fedwire system depending on the recipient?
A. Yes.
MR. BURKE: Zach, can you -- can you go ahead and play for us what had already been

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introduced as Plaintiff's Exhibit Number 69, which is an audio recording with the Bates label CBB-00002545. And I think we can just go ahead and just play the whole clip.
(Audio recording was played.)
BY MR. BURKE:
Q. Mr. Coffey, did you recognize the audio recording we just played?
A. I did.
Q. And is that an audio recording of the phone conversation we were just discussing where you called Chain Bridge Bank to -- at Mr. Korpal's direction to recall the funds from Chain Bridge Bank?
A. Yes, it was.
Q. And so you recognize your own voice on that call, right?
A. Yes.
Q. Do you recall whether there was any discussion on that phone call before the portion that appears in the recording we just played?
A. I believe that was the full recording, I believe.

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Q. Did you hear the portion of the audio recording where you say, "We're going to be recalling those funds, okay?"
A. Yes.
Q. And did you mean that as a request to Chain Bridge Bank that they return the funds that had been wired earlier in the day?
MR. SCHOENFELD: Objection.
THE WITNESS: Yes, based upon whatever factfinding was done between my boss, Rakesh, and David, I was directed to tell them to return it.
BY MR. BURKE:
Q. And did you hear the portion of the recording where you said, "We have enough concerns that we feel like we need to claw those funds back"?
A. Yes, I heard that.
Q. And was that an accurate statement?
A. That statement was based upon Rakesh's directive to please go ahead and recall the funds.
Q. At the time, did you believe that JPMorgan had enough concerns that JPMorgan felt the need to recall the funds -- excuse me, to claw back the

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funds?
A. That --
MR. SCHOENFELD: Objection.
THE WITNESS: The decision-making at that point was being driven by Rakesh. So my level of concerns or nonconcern was not factored into the equation as Rakesh was in charge of working with Chain Bridge to decision the funds.
BY MR. BURKE:
Q. When you referred to concerns, what is it you were referring to at the time?
A. Any sort of suspicion that hasn't been cleared or any red flags that are engaged in the transaction.
Q. And did you believe that JPMorgan needed to claw the funds back?
MR. SCHOENFELD: Objection.
THE WITNESS: I was not involved in the phone calls between Rakesh and the state of California and I don't know if he had separate phone calls with Rakesh and David directly. I was not involved in those phone calls, so my opinion -- my

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opinion didn't matter at that point.
BY MR. BURKE:
Q. Well, I understand that perspective, but I'm asking about what you believed at the time you made that statement. Did you believe that JPMorgan needed to recall the funds?
A. I'm trying not to repeat the same answer, but the directive from my boss was to go out and recall the funds. Whether I believed it or not wasn't part of the equation. He was directing me to engage them to recall the funds.
So whether I believed it or not, if you're asking for my professional opinion, there was enough suspicion and red flags that would be concerning.
Q. When you were -- when you were interacting with another financial institution in connection with investigating a suspicious or potentially suspicious transaction, would you strive to communicate truthfully to the other personnel at the other financial institution?
A. Yes.
MR. SCHOENFELD: Objection.

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BY MR. BURKE:
Q. And sitting here today, do you believe that the statement you made to the Chain Bridge Bank personnel that was recorded on that -- recorded during that phone call was a truthful statement?
A. Can you repeat that, the exact same question?
Q. Sitting here today, do you believe that the statement you made to Chain Bridge personnel that JPMorgan needed to claw those funds back, was that a truthful statement?
MR. GUSSMAN: Objection.
THE WITNESS: It was truthful based upon the fact that that was the direction I was getting by my boss. I might be missing what you're really asking.
BY MR. BURKE:
Q. You wouldn't make an untruthful statement in this context where you're communicating with another financial institution in cooperation to investigate a transaction, would you?
MR. SCHOENFELD: Objection. Asked and

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answered.
THE WITNESS: No, I would not.
BY MR. BURKE:
Q. Did you hear the portion of the audio recording where you thanked the Chain Bridge personnel for their cooperation in this and said that you guys did a great job?
A. Yes.
Q. From your perspective, did it seem like the investigation that was conducted in connection with the Blue Flame wire transfer was a cooperative investigation that involved both JPMorgan and Chain Bridge Bank?
A. Yes, I thought Chain Bridge was very cooperative.
Q. And did you hear the portion of the audio recording where you said, "As quickly as you can return it, that'd be great"?
A. Yes.
Q. And that was -- that was a reference to returning the funds that had been transferred as quickly as possible; is that right?

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A. Yes.
Q. And did you understand that you were calling Chain Bridge Bank on behalf of JPMorgan?
A. Yes.
Q. And you had authorization to make the request that was communicated to the Chain Bridge personnel on the phone recording, right?
A. Yes.
Q. So after that phone conversation with the Chain Bridge personnel that we just listened to, what did you do next in connection with the Blue Flame wire transfer?
A. Based upon Chain Bridge requesting a Fed service message to recall the wire, I engaged a counterpart of mine, Debra Naughton, to open up a case and send out that Fed service recall message as requested by Chain Bridge.
Q. And can you explain a little bit more about that process? How precisely does that work? Who was it that initiates the message?
A. So my counterpart, Deb Naughton, who I mentioned, she would open up the case in our wire

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investigation system, attach the transaction to the investigation and, within that -- within that case, she can generate that Fed service message.
Q. And after she's generated the Fed service message, is there something that you would need to do before the message is sent out?
A. I would need to approve the message that she sent.
Q. And so you would review the message and then provide approval so that it could be sent?
A. I would.
Q. How do you review it? Is it something that arrives by email or is there some other way that you would access the system to review the message?
A. The approval of the message is done within the PRPC application itself. So it would go into the application.
Q. What was the acronym that you just mentioned? The connection broke up a little bit.
A. No problem. P as in Peter, R as in Robert, P as in Peter, C as in Charlie. PRPC.
Q. And what does that stand for?

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A. Pega, P-e-g-a, Rules, R-u-l-e-s, Process Commander. Pega Rules Process Commander.
Q. And is that a piece of software that JPMorgan uses in connection with wire transfers or does it have some broader application?
A. It's largely involved in wire transfers. It's our investigation tool. But it also does ACH at the same time.
Q. And you referred to, I think, opening up a case in that system; is that right?
A. That's correct.
Q. And is that a step that's necessary before the recall notice can be initiated?
A. That's correct.
Q. Do you understand the purpose of that step of opening up the case?
A. We cannot generate the Fed service message without having a case opened on that particular transaction. The reason for that is, if any other future correspondence comes in pertaining to that transaction, it would automatically link to the case that's already been opened. So it's a way of

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creating an historical audit trail.
Q. And so in connection with the Blue Flame wire transfer, you did approve the service message that was then sent to Chain Bridge; is that correct?
A. I did.
Q. And do you remember the content of that service message?
A. These are standard templates that are built within the application and you really go in and pick the generic template for the recall and it populates the dates, dollar amounts and parties into it.
So it's an automated way of utilizing templates to get a recall of funds. So she picked the recall of funds, it populates the message and spits out that Fed service message.
Q. I see. So do you -- in the system, do you select the original wire transfer and then it populates that information into a recall request? Is that how it works?
A. So we save the original transaction to the case. That way, if anybody else looked up that wire

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at a future time, it would know that it already has a case opened up on it.

Q. And then when you get to the step of initiating the recall service message, does the information about the transaction automatically populates from the information on the prior transfer? Is that how it works?

A. Correct, the automation.

Q. And then is there a component of the service message that is typed into the system, like a message to the other bank?

A. Yeah, there can be. If you don't choose a template, you can use a freeform message. But in general, we try to cover things by utilizing the basic templates that we have in the system.

Q. Do you know whether in this case the service message that was generated and then sent to Chain Bridge came from a template?

A. I would -- I didn't create it. It didn't look like a freeform message. It looked like it was one of the templates that we used.

Q. At this point in time, when you were

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working on approving the service message to go to Chain Bridge Bank, did you have any understanding about whether California had requested that the wire transfer be recalled?

A. I didn't have any understanding of what was driving the recall. Again, the decision-making was being driven by Rakesh and David.

MR. BURKE: Zach, can you add what we have as tab 44 as a new exhibit? I think this is going to be Defendant's Exhibit 91, if I'm counting correctly.

MR. FERGUSON: I think it's actually 92 and I'll add it.

MR. BURKE: Thanks. Yeah, you're right.

(Defendant's Exhibit No. 92 was marked for identification.)

BY MR. BURKE:

Q. Mr. Coffey, were you able to access that new exhibit?

A. I am.

Q. So for the record, this is a document produced by JPMorgan with a Bates label JPMC-00000170. I think it would make sense to start

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with the email that begins at the top of page 3 of this PDF. That's an email from you, Mr. Coffey, to Debra Naughton at 1:42 p.m. on March 26th.

Do you see that one?

A. I think we need to -- scroll down. Sorry about that. I do see that. Sorry. Yeah.

Q. And is -- do you recognize this email?

A. I do.

Q. And is this the communication we were just discussing where you related the request to Ms. Naughton that she open up the case and then create the service message for the wire transfer?

A. That's correct.

Q. And then if you scroll up one email from there, so the second page of the PDF document, there's a response from Ms. Naughton to you at 1:50 p.m.?

A. Yes.

Q. And do you see she says, "PRPC case," and then there's a set of letters and numbers and says, "Kindly verify message"?

A. Yes, I do.

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Q. And so did you understand that to mean that she had opened up a case in the system to address the request that you had made to her?

A. She had opened up the case in the system and generated the necessary message to send to Chain Bridge.

Q. I see. So the second sentence there, "Kindly verify message," that was letting you know that the message was available for you to review?

A. Correct.

Q. And then at that point you would go into the system, and is there a button in the interface that you can click to put your approval in?

A. There's a verify button, yes.

Q. So if you look up one email from there, it's an email from you back to Ms. Naughton at 2:06 p.m., and the first line of that email is -- says, "Recall sent."

Do you see that?

A. Yes.

Q. And what did you mean by that sentence?

A. I was letting Rakesh know that the recall

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message -- the Fed service recall message has been delivered to Chain Bridge.

Q. And then right below that, there's a block of text that begins on the first line with "McLean," and then there's a date and "message text."

Do you see all of that?

A. I do.

Q. Do you understand that to be the -- at least part of the content of the service message that was sent to Chain Bridge Bank in connection with this transaction?

A. Yes.

Q. Was that something you were able to copy and paste out of the PRPC system and put into the email?

A. Yes.

Q. And so that's the message that -- or at least a component of the message that went out from JPMorgan to Chain Bridge?

A. Yes.

Q. Would there have been other information as part of the message that went out?

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A. No. This would be the context of the message.

Q. And there's a portion of this message that sort of reads like it's in code with a set of abbreviations. Can you summarize for us the contents of the message that's repeated here?

A. Are we referencing the attention line?

Q. Yes.

A. Yeah. So it's to shorten up the message. Because there's a limitation of characters in a Fed service message, there's a lot of abbreviations used that are understood between the financial institutions.

So that line reads as, "Attention investigations, refer to our fed IMAD," dot, dot, dot.

Q. And is the IMAD, is that a reference number for a wire transfer?

A. It's a reference number for a Fedwire transfer.

Q. And then can you tell us your understanding of the remainder of that message?

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A. It populates -- again, like I said to you, this is a template that pulls the information in. So nobody's keyed in the IMAD, nobody's keyed in the date, nobody's keyed in the amount. It pulls in that information into this template, which is a template we used for recall of funds.

Q. And so this was a message to Chain Bridge Bank requesting that they return the funds that had been wired to them for Blue Flame's benefit?

A. Yes.

Q. Mr. Coffey, in your career, have you seen service messages that were meant to recall funds that included the phrase "no indemnity"?

A. I have seen that attached within some messages, yes.

Q. Would you agree with me that there's no mention of the words "no indemnity," or any variation on those words, as part of this service message we're looking at here on Exhibit 92?

A. It's not mentioned in this Fed service message, no.

Q. And on the phone call you had with Chain

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Bridge personnel that we were talking about a few minutes ago, did you mention anything about no indemnity as part of that conversation?

A. The word "indemnity" was never mentioned by either party, be it Chase or Chain Bridge.

Q. So after you approved the recall message and it was sent to Chain Bridge Bank, did you do anything else in connection with the Blue Flame wire transfer?

A. No. I just continued to monitor within the JPMorgan Chase application for the return of funds.

Q. And so would you get an alert when the funds were returned, or did you have to check periodically to see whether they had arrived?

A. It could happen either way. I was checking periodically.

Q. Did you have any other phone conversations with any of the personnel at Chain Bridge Bank that day after the recall notice was sent?

A. No.

Q. You don't recall any calls with Chain

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Bridge personnel to check on the status of the recall notice or the status of Chain Bridge returning the funds?

A. I don't recall. We sent the recall message. We were monitoring for the return of funds. Once the funds came back, there really is no more need for interaction.

Q. Do you have a recollection of how long it was between JPMorgan sending the recall message and the funds being returned from Chain Bridge back to JPMorgan?

A. I don't recall the exact time frame. I do believe it took a little bit of time based upon the fact that Rakesh had continued to ask me had the funds been returned.

Q. I see. And how did he -- how did he ask you that question?

A. I believe he was coming by my cubicle and asking me had they come back yet.

Q. Did he seem anxious to have the funds returned?

A. I think, based upon the escalation that

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was going through Chase, okay, people making bosses aware of what's going on. Chain Bridge obviously was uncomfortable holding these funds and not comfortable with applying them. I think everybody was looking to put this situation to rest.

Q. Did you have any understanding at this time of whether California officials were waiting for the funds to be returned?

A. I was not involved in any of that conversation.

Q. I think I understand your answer, but I just want to make clear. I don't necessarily mean information that you received directly from California officials. I'm wondering whether you were aware, because somebody told you about discussions with California officials, that somebody in California was waiting for the funds to be returned?

A. I was not aware of that.

Q. If you return back to Exhibit 92, on the first page, there's an email from Ms. Naughton back to you at 3:35 p.m. Do you see that one? It's sort of the bottom half of the first page?

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A. I do see that.

Q. Can you explain to me what Ms. Naughton was communicating to you in this message?

A. Sure. She was confirming that the funds had been returned. She's quoting the transaction number of the -- that is going to be the transaction number between us and state of California. She's advising, "Tim, please release."

Again, just like the Fed service message, they needed to make a checker. The release of this transaction needs to make a checker, and I was to perform the release of this transaction out to state of California.

Q. And at that point, did you go into the system and approve the release of the funds back to California?

A. Yes.

Q. And is that the step that's documented in the top email that you sent, if my math is right, at 4:03 p.m. on the 26th?

A. Yes.

Q. And if you flip down to the fifth page of

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the PDF -- you might have to zoom in, too -- there's a block of text in black here, you know, black background with white text.

A. Yes.

Q. Is that -- is that an output from the bank's system that you then copied and pasted into the email?

A. This is an output from the PRPC system showing that the transaction has completed back to California state -- state of California.

Q. And Mr. Coffey, do you have any understanding of the reaction of any California officials after the funds were returned?

A. I do not, based upon my nonengagement with them.

Q. Did you ever talk to anyone at JPMorgan who shared something they had heard about California officials' reaction?

A. No.

Q. Did you understand that JPMorgan was seeking to protect California's money when it issued the recall notice to Chain Bridge Bank?

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MR. SCHOENFELD: Objection.
THE WITNESS: I would assume that that was the reason for people being concerned and the red flags involved, yes, that we were protecting all parties involved.
BY MR. BURKE:
Q. Stepping back from the Blue Flame transaction, but thinking more broadly about other investigations of wire transactions you've been involved in, is that generally JPMorgan's goal, when it -- when you would be involved in an investigation of a wire transaction that had been initiated by one of your customers, would you be seeking to protect the customer?
MR. SCHOENFELD: Objection.
THE WITNESS: Yes.
BY MR. BURKE:
Q. Mr. Coffey, do you hold a belief that Chain Bridge would have returned the funds to JPMorgan even if JPMorgan hadn't issued a recall request for the funds?
A. Yes.

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Q. And can you tell me every fact you're aware of that supports your belief that Chain Bridge would have returned the funds even if JPMorgan hadn't made the recall request?
MR. SCHOENFELD: Object to the form. You can answer.
THE WITNESS: Based upon the word -- you said -- belief is when I engaged Chain Bridge, they were already holding the funds before I even got in touch with them. So they had already started some sort of internal investigation of some of the red flags that they had saw.
My belief, again, is that Chain Bridge was suspicious of the transaction, wanted to return it, and when JPMorgan Chase, which is one of the bigger banks that is out there, came in and said, hey, we're a little suspicious, too, that was the icing on the cake they needed to send the funds back.
BY MR. BURKE:
Q. But thinking back to the phone conversations we discussed earlier today, didn't Mr. Korpal share some of the reasons that JPMorgan

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had become suspicious of the transaction on the second phone conversation that we discussed that you had with the Chain Bridge personnel?
A. He did.
MR. SCHOENFELD: Objection. Just give me a second. Objection.
BY MR. BURKE:
Q. But Chain Bridge didn't return the funds immediately after that conversation with you and Mr. Korpal, did they?
A. No.
Q. Chain Bridge didn't return the funds until after you had called them and informed them that JPMorgan would be recalling the funds, right?
MR. SCHOENFELD: Objection.
THE WITNESS: My -- my directive was to call them and ask for a recall of funds, which is what I did. What drove that decision in the background, I'm not privy to that.
Again, could have been conversations Rakesh had with state of California or conversations he had with David directly, but I can't speak on

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behalf of that.
BY MR. BURKE:
Q. I understand that perspective, but I don't think that was really my question. I think my question was simpler than that.
Just in terms of timing, Chain Bridge didn't return the funds back to JPMorgan until after you called them and told them that you would be recalling the funds; is that correct?
A. Correct. Their request to send a Fed service message is what drove the return of funds, correct.
Q. Well, on that conversation we were speaking about a little bit ago when you called the Chain Bridge personnel and informed them that JPMorgan would be recalling the funds, it was after you informed them that JPMorgan would be recalling the funds that you then discussed whether Chain Bridge would want a service message, right?
A. That is correct.
Q. And Chain Bridge didn't return the funds until after they had received the service message