EXHIBIT 62

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

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

Remote Deposition

Thursday, January 28, 2021

Videotaped deposition via Zoom of NATALIE GONZALES, a witness herein, called for examination by

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counsel 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 State of Maryland, taken at 1:00 p.m. EST, Thursday, January 28, 2021, and the proceedings being taken down by Stenotype by MARY GRACE CASTLEBERRY, RPR, and transcribed under her direction.

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APPEARANCES:

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APPEARANCES: (Continued)

On behalf of Defendant/Third-Party Plaintiff Chain Bridge Bank, N.A.:

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that's Exhibit 84, Treasurer Ma says at one point, "My office initiated a $457 million wire transfer." Did you hear that?

A. Yes, I did.

Q. Did you understand Ms. Ma to be referring to the wire that you initiated to Blue Flame Medical LLC the morning of March 26, 2020?

A. Yes, that's what it sounds like.

Q. Okay. And Ms. Ma goes on to say -- so I'll read the whole thing again: "My office initiated the $457 million wire transfer through one of our depository banks."

Did you hear that?

A. Yes.

Q. And do you understand which depository bank Treasurer Ma was referring to there?

A. Yes.

Q. And which depository bank was that?

A. JPMorgan Chase.

Q. Okay. It goes on -- doing this in bits and pieces, so I'll read it again. "My office initiated the $457 million wire transfer through one

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of our depository banks who flagged the transaction with concerns about possible fraudulent activity."

Did you hear that?

A. I heard that.

Q. And is that part of Treasurer Ma's statement accurate to the best of your knowledge?

A. I don't know.

Q. Were you involved with calls with California's depository bank, JPMorgan Chase, on March 26 after the wire had been released?

A. Other than the call-back, no, I did not speak with anyone on the phone from JPMorgan Chase.

Q. Okay. Do you know whether anyone else in the state treasurer's office did speak with JPMorgan Chase by telephone on March 26th?

A. I don't know.

MS. PORTER: Calls for speculation.

THE WITNESS: Yeah, I don't know.

BY MR. MADDEN:

Q. I'll -- let me represent to you, I can show you the article if you want to see it but there is a Sacramento Bee article around this time that

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reports that Treasurer Ma told the paper that JPMorgan Chase had, quote, had reached out to her office saying that they thought the transaction was fraudulent and were calling the FBI.

Does that refresh your recollection of any conversation that you were part of with JPMorgan Chase on or about March 26th concerning the wire transaction?

A. No. I wasn't involved in any conversations of that nature.

Q. Okay. Okay. Going back to the clip, which, again, I'm happy to replay if you would like but I'll read a little more to you. Treasurer Ma went on to testify that, "Simultaneously the Virginia bank that received the wire called director Mark Hariri," and then it continues. Did you hear that?

A. I heard that.

Q. And do you understand Treasurer Ma, when she referred to the Virginia bank, to be referring to Chain Bridge Bank, N.A.?

A. I understand that.

Q. Okay. And were you part of the

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conversation between Chain Bridge Bank, N.A. and director Mark Hariri?

MS. PORTER: Objection, vague as to time.

BY MR. MADDEN:

Q. At any point on March 26th, were you part of a conversation that involved representatives of Chain Bridge Bank on the one hand and Director Hariri on the other?

A. Yes.

Q. Do you recall who was on the phone from Chain Bridge Bank?

A. I believe it was the president of the bank and based on -- I don't remember from the day but based on emails, I know that it's David Evinger.

Q. Okay. But you don't -- other than looking at emails, you don't recall that name?

A. No.

Q. Okay. Did anyone join Mr. Evinger on that call, to your knowledge?

A. Not to my knowledge.

Q. Okay. Did Mr. Evinger tell you that a client of Chain Bridge Bank had opened Blue Flame

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Medical's bank account the previous day?
A. Yes, he did.
Q. Did Mr. Evinger tell you that the bank client who had opened that account was a political lobbyist?
A. Yes, he did.
Q. What if anything did you say in response to Mr. Evinger informing you that a bank client who was a political lobbyist had opened Blue Flame Medical's account the prior day?
A. So Mark and I were both on the phone, and the gist of what we said, I believe we asked him if the money had been credited to the client account at that time, and he said no. And we said, well, please wait until we can find out additional information.
Q. Anything else?
A. To the best of my recollection, that's about the gist of what was said in that phone conversation.
Q. Okay. And why did you ask -- sorry. Did you or Mr. Hariri ask whether the funds had been credited to the client's account, if you remember?

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A. I -- I think I might have asked that question.
Q. Okay. And why did you ask that question?
A. I had asked because there was concern expressed about the wire transfer that Chain Bridge Bank had received.
Q. Do you remember communicating to Mr. Evinger in words or substance that you were surprised to learn that Blue Flame Medical's account had been opened only the day before?
A. I don't remember expressing any opinion to Mr. Evinger about it.
Q. Okay. And I believe you said -- well, let me just get it right. Just a second.
You testified that -- that you or Mr. Hariri said, "Please wait until we can find out additional information." Do you recall that testimony?
A. Yes.
Q. What was the additional information you had in mind to find out?
A. Well --

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MS. PORTER: Objection. Ms. Gonzales testified that one of them said that but not necessarily herself. Misstates testimony.
BY MR. MADDEN:
Q. Go ahead if you understand the question, please.
A. Can you repeat the question?
Q. Sure. When -- when you or Mr. Hariri asked Mr. Evinger to please wait until we can find out additional information, did you have an understanding at the time as to what additional information you were hoping to find out?
A. No. I think it was more with respect to since we were transferring this money on behalf of the department of general services, that we needed to relay this information to the department of general services, or that the treasurer's office needed to. As I said, I didn't speak with anyone from general services so --
Q. And what was the information that you had in mind to relay to the department of general services?

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A. Again, I didn't speak with them but -- so, I mean, Mark took responsibility for that.
Q. Okay.
A. So he -- you know, we asked him to wait and I don't know what was said after that.
Q. Okay. When -- but you testified you had an understanding that we needed to relay this information to the department of general services, and I understand you didn't do the relaying, but I'm just wondering what was the "this information" that you had in mind to be relayed?
A. What we were told by Chain Bridge Bank, that the account had just been opened the day previously by a lobbyist.
Q. Okay. Anything else?
A. No.
Q. And do you have an understanding as to whether Mr. -- Director Hariri in fact conveyed that information to the department of general services?
MS. PORTER: Objection, calls for speculation.
BY MR. MADDEN:

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Q. Yeah, I'm just asking if you know one way or the other.
A. I don't know.
Q. Okay. Do you recall Mr. Evinger or anyone else telling you on this telephone call that Chain Bridge Bank would hold the money for the time being?
A. I don't remember him saying that specifically. I don't --
Q. Do you have a -- sorry. Go ahead.
A. I don't really remember his response to that. I'm -- I'm not sure.
Q. Okay. He could have said it. You just don't recall as you sit here today?
A. Correct.
MS. PORTER: Asked and answered.
BY MR. MADDEN:
Q. Do you recall -- and you may not but do you recall Mr. Evinger saying that Chain Bridge Bank would wait for your office to call them back?
A. I don't remember.
Q. Okay. Do you recall anything that Mr. Evinger or anyone else on the call asked you and

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Mr. Hariri?
A. No, I don't remember any questions.
Q. Okay. Do you recall anything else that they told you?
A. No.
Q. Other than what you've already testified to, do you recall anything you or Mr. Hariri said to the Virginia -- the Chain Bridge Bank officials on the telephone call? Strike that. My mistake.
Other than what you've already testified to, do you recall anything else that you or Mr. Hariri said to Mr. Evinger and anyone else on the call?
A. No, not other than what I've already testified to.
Q. Do you recall asking Mr. Evinger and anyone else on the call any questions that they declined to answer?
A. No.
Q. Okay. After having this telephone call with Mr. Evinger and Mr. Hariri, did you discuss the call with Mr. Hariri?

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MS. PORTER: Objection, vague as to time.
BY MR. MADDEN:
Q. In the immediate aftermath of the call, did you discuss it with Mr. Hariri?
A. Yes, probably I did.
Q. Do you recall anything about that conversation?
A. No, nothing specific. No, I -- that's just an assumption, after a call like that, that we would have talked about it with one another but I don't remember any specifics.
Q. Okay. Do you recall discussing that conversation with Chain Bridge Bank officials with anyone else in the state treasurer's office, again, in the immediate aftermath of that call?
A. No, I don't remember discussing the specifics with anybody else.
Q. Okay. And I believe you already testified that you didn't discuss the substance of that call with the department of general services yourself. Do I have that right?
A. That's correct.

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Q. How about any other California state officials in any office, that the afternoon of March 26th, did you discuss what you had learned from Chain Bridge Bank with anyone else?
A. No, not that I remember.
Q. Okay. On March 26th, 2020, were you working in the office?
A. Yes.
Q. Was Mr. Hariri in the office?
A. Yes.
Q. When you spoke with Chain Bridge Bank -- when you spoke with Chain Bridge Bank, were you together or --
A. Yes.
Q. Okay. Where did you take that call?
A. So I didn't take the call from Chain Bridge Bank. We got an email from the department of general services saying that Chain Bridge wanted someone from the treasurer's office to call them, so we initiated the call to Chain Bridge Bank from my office.
Q. Understood. I got it.

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A. No, I don't remember. I -- I don't recall.
Q. Do you know what if anything caused you to try to find Blue Flame Medical LLC on Google?
A. I think it was just mainly due to the, you know, the heightened kind of climate around procuring PPE and, you know, knowing that the State of California had come to a deal to procure PPE, and this was the company that they were going with and because of the size of the wire, I just looked up the company.
Q. Any other reasons you looked up the company?
A. No.
Q. Okay. Mr. Pirasteh writes back, "Weird. Let's get weird." Then you reply to him at 10:15 in the morning, "Really weird." Do you see that?
A. Yes.
Q. What was really weird?
A. Weird that we couldn't find them on Google.
Q. And why was it weird that you couldn't

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find Blue Flame Medical on Google?
A. Considering the amount of money that they were to receive from the state of California, you would expect a web presence for someone receiving $450 million.
Q. And -- and why would you expect that?
A. Just based on that amount of money.
Q. Fair to say or am I understanding you correctly that you thought a company to which the State of California was sending more than $450 million should probably have a web presence that you could find on Google? Am I understanding you correctly?
A. That's what I would typically expect, yes.
Q. Did it concern you when you were unable to find Blue Flame Medical on Google?
A. Yes.
Q. Other than this email exchange with Mr. Pirasteh, do you recall discussing that concern with anyone else?
A. I expressed some concern to my managers, Mark and Andre.

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Q. And what if anything else do you recall about that conversation? Or sorry. Let me take a step back.
Did you talk to Mark and Andre about that at the same time or were those separate conversations?
A. I don't really remember. I think we must have been in the room together, so I would guess at the same time.
Q. Okay. And -- and so what if anything else do you recall about that conversation with Mark and Andre?
A. You know, I expressed concern that they couldn't be found on the internet and that this was a very large wire transfer, and -- but we all agreed that based on the treasurer's office role in these transactions, it's not really our place, as long as we have the essential pieces of releasing a wire transfer, and that is the memo from the department and the warrants from the controller's office, we are, you know, legally able to initiate a wire.
So there really wasn't anything that we

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could -- it wasn't our place to do anything about it.
Q. Okay. You said you expressed concern. Did either Mark or Andre express a similar concern in response?
A. I don't really -- I don't really know what they were feeling. They didn't say anything that expressed concern. They were more assuring me of, you know, we are legally able to do this so --
Q. Do you know whether either Mark or Andre communicated to the department of general services that your office had been unable to locate Blue Flame Medical on Google?
A. I don't know anything that was said between Mark and Andre and general services.
Q. Okay. Okay. And if you'll forgive me for jumping -- jumping back, I just want to ask you a couple more questions about the call that you and Mr. Hariri had with David Evinger at Chain Bridge Bank.
A. Uh-huh.
Q. Okay. In the clip of Treasurer Ma's testimony that I played for you earlier and that's

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Exhibit 84, Treasurer Ma said, "The Virginia bank that received the wire called director Mark Hariri and informed him that the account was opened the day before by a Washington, D.C.-based lobbyist and the bank was not comfortable accepting this large wire transfer."

Do you recall hearing that?

A. Yes.

Q. And is that consistent with your recollection of the call that you and Mr. Hariri had with Mr. Evinger?

A. Well, he didn't call us.

Q. Right.

A. We called him. And can you repeat her testimony again?

Q. Of course. "The Virginia bank that received the wire called Director Mark Hariri and informed him the account was opened a day before by a Washington, D.C.-based lobbyist and the bank was not comfortable accepting this large wire transfer."

A. For the most part, it's accurate. Again, we called Chain Bridge Bank, and I only remember

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being told that the account owners were lobbyists or the account owner was a lobbyist, and I didn't know -- I don't remember anything about a Washington, D.C. based, you know, qualification. And other than that, I would say it's accurate.

Q. Okay. Did Mr. Evener tell you that Blue Flame Medical was a fraud?

A. No.

Q. Did Mr. Evinger tell you that the lobbyists who had opened the account was engaged in fraud?

A. No.

Q. Okay. Sorry. Just give me a moment, please.

Yeah. After the call that you and Mr. Hariri had with Mr. Evinger that we've been discussing, did you speak with anyone at Chain Bridge Bank at other times on March 26?

A. No, I -- that was the only conversation I recall having with anyone at Chain Bridge Bank.

Q. Okay. Are you aware that at some point on March 26th, the wired funds were returned to the

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State of California?

A. Yes.

MR. MADDEN: Okay. Let's do -- Zach, let's mark JPMC 135, please.

(Defendant's Exhibit No. 86 was marked for identification.)

BY MR. MADDEN:

Q. We are marking, putting in the chat, and Zach will shortly display on the screen the document that's been marked as Exhibit 86, which is a one-pager Bates numbered JPMC 135.

A. Okay.

Q. Ms. Gonzales, do you recognize Exhibit 86?

A. Yes.

Q. And it's an email from you to Ana Prieto who we discussed earlier, and then it's copied to Christy -- I should do this the other way again. To whom is it copied?

A. Christy Kharkwal.

Q. Kharkwal, thank you.

Who is Christy Kharkwal?

A. She is the operations manager below me, so

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she's responsible for just ensuring that, you know, our daily banking operations run smoothly so she supervises our small staff and jumps in wherever there is any need for additional support.

Q. Okay. This is a March 26th email. It's labeled as being 7:19 p.m., but again, that's -- my understanding is that's GMT, so you subtract seven hours to get Pacific Daylight Time, which would be 12:19 p.m. your time.

The subject of your email is recalled wire. Do you see that?

A. Yes.

Q. What were you referring to there?

A. I was referring to the return of the 450-plus million dollars.

Q. And at the time you sent this email, what did you understand about that return of the 450-plus million dollars?

A. I recall that I was told -- and I don't remember who told me -- that the money would be coming back. And so here I am just letting Ana know, you know, hey, I want to know where it is in the

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process, because of course if we're getting $450 million back, that's -- me being the short-term cash position person, that's a large amount of money that I'm going to have to, you know, account for and deal with.

Q. Okay. And the person who told you that the money would be coming back, did that person explain to you why?

A. No.

Q. Did that person explain to you how the money was coming back and what was causing that to happen?

MS. PORTER: Objection, compound.

THE WITNESS: Yeah, could you --

BY MR. MADDEN:

Q. Sure. Did that person explain to you what was causing that money to come back?

A. Not that I recall.

Q. Okay. You write in the body of your email, "Is it possible for JPMC to reach out to the Chain Bridge Bank and see where the wire recall is in the process?" Do you see that?

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A. Yes.

Q. What do you understand a wire recall to be?

A. I understand it to be the return of a wire transfer.

Q. And do you know whether that return of the Blue Flame wire transfer was initiated by the State of California?

A. I did not request the wire to be recalled, so I don't. It wasn't anything that I had communicated to Chase. I was told the wire was coming back so --

Q. Okay. And do you know, as you sit here today, whether someone else in the state treasurer's office requested the wire to be recalled?

A. No, I don't know that.

Q. Okay. And do you know whether JPMorgan Chase, in response to your email, in fact reached out to Chain Bridge Bank to check on the wire recall process?

A. I don't know that.

Q. Do you recall whether anyone replied to

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you, either by an email or by telephone, to tell you where that process was?

A. No, I don't remember.

Q. Okay. And did you yourself ever call Chain Bridge Bank to check on where the wire recall is in the process?

A. No.

Q. You don't remember leaving a voicemail for Mr. Evinger?

A. I don't. Did I?

Q. I'm just asking what you remember.

A. Okay. I don't remember.

Q. You don't remember doing that?

A. No.

Q. Okay. All right. Give me one second. And then am I right that at some point on March 26th, the wired funds were back in the hands of the State of California?

A. Yes.

Q. And what do you recall about that?

A. Just that our account was credited for the same amount as the wire transfer that we had sent

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out.

Q. And that's the same depository account held at JPMorgan Chase?

A. Yes.

Q. Okay. After the funds had been returned to California's depository account, did you have discussions about that with anyone?

A. Yes, I'm sure that I informed my management that the money had come back and we had possession of it. We also received an email from the department of general services saying that they were cancelling the transaction, for lack of a better term, with Blue Flame. And we also returned the warrants to the controller's office since the wire was essentially voided.

Q. Anything else you recall after -- after the wired funds had been returned?

A. No.

Q. Do you recall when you received an email from the department of general services saying that they were cancelling the transaction?

A. I mean, I know it was on that same day. I

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Q. And that's the procuring agency here?
A. I believe so, yes.
Q. "He requested to speak to someone in the California state treasurer office right away to verify the wire amount is legitimate."
Do you see that part?
A. Yes.
Q. What did you understand Ms. Chang to be informing you of there?
A. That she wanted someone from my office to contact Chain Bridge Bank.
Q. And does this refresh your memory of how you got Mr. Evinger's number and contact information to make the call that you were speaking about earlier?
A. Yes. This is what prompted me to call him.
Q. Okay. So it was this email that caused you to call him. And was Mr. Brough also on the line?
A. I don't remember speaking to a second person on the phone, so I don't know.

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Q. Okay. And that was you and Mr. Hariri? Am I pronouncing his name correctly?
A. Yes, Hariri.
Q. Now, when the phone call was made, I don't recall you saying that there was any conversation about verifying that the wire amount is legitimate, which is what's referenced here. Was there any conversation in your -- let me start that over.
When you spoke with Mr. Evinger, was there any conversation about verifying the wire amount as legitimate?
A. I don't remember specifically speaking of that, no.
Q. As a matter of fact, the conversation was all about potentially problematic aspects of the transaction involving Blue Flame, isn't that right?
MR. MADDEN: Objection to form, foundation.
BY MR. WHITE:
Q. You can answer.
A. Can you repeat the question?
Q. Sure. Let me try a different one because it was probably a bad question.

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As I heard your conversation previously, the conversation you had with Mr. Evinger was not about whether the wire amount was legitimate, is that right?
A. That's right.
Q. The topics that he raised went to whether there was something problematic with Blue Flame Medical being the recipient of the wire, isn't that right?
MR. MADDEN: Objection to form, foundation, misstates the testimony.
BY MR. WHITE:
Q. You can answer.
A. The conversation was with regard to informing the treasurer's office that the account had just been opened the day prior and that the account holder was a lobbyist. I don't remember specifically speaking about a dollar amount.
Q. I see. So -- so the conversation was not about whether the wire amount was right, correct?
A. That's accurate.

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Q. And the conversation was not about whether it was actually credited to the right account, correct?
A. No, it wasn't.
MR. MADDEN: Object -- objection to form.
BY MR. WHITE:
Q. The conversation was about whether this was a legitimate counterparty on the other side, isn't that right?
MR. MADDEN: Objection to form, foundation, misstates the testimony.
BY MR. WHITE:
Q. You can answer.
A. Yeah, I don't know if it was so much legitimacy. It was just I really couldn't speak to why he called. Apparently it was -- there was some concern. So --
Q. But the concern was not about the amount of the wire or whether it got to the correct account, was it?
A. No, in the fact that we didn't discuss the amount or the account number.

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Q. The only things Mr. Evinger brought up were that, according to him, the person who opened the account was a lobbyist and that the account had been recently opened. Is that your recollection?
A. That's what I remember.
Q. And what did -- what did that mean to you? Why did you think he was mentioning those issues?
MR. MADDEN: Objection to form, compound.
BY MR. WHITE:
Q. Let me ask one question. Why did you think he was bringing up those issues?
A. Well, I think he was probably concerned because of the size of the wire, though he didn't talk about the dollar amount. I think that it was probably definitely unusual for his bank to receive a wire of that size.
Q. And what did you understand his concern to be?
A. I --
MR. MADDEN: Objection to form, speculation.
THE WITNESS: I don't know.

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BY MR. MADDEN:
Q. So you don't know what his concern was?
MR. MADDEN: Same objection.
MS. PORTER: Asked and answered.
THE WITNESS: I don't know what his concern specifically was. I assumed he was maybe doing his due diligence. I don't know.
BY MR. WHITE:
Q. And during that phone call, did Mr. Evinger tell you that the money had already been credited to the Blue Flame Medical account?
A. No, he did not.
Q. Matter of fact, he stated the opposite, correct?
A. He didn't state it. We asked if it had been. He said no, and we asked him to wait.
Q. Ms. Gonzales, I think if we take maybe a five-minute break, I may not have any other questions but I want to check with my cocounsel. So I think the most efficient thing to do would be to go off the record for a few minutes now.
A. Okay.

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THE VIDEOGRAPHER: Off the record at 4:42.
(Recess.)
THE VIDEOGRAPHER: We are now back on the record. The time is 4:47 p.m.
BY MR. WHITE:
Q. Just one final area, Ms. Gonzales. You mentioned that you thought that Mr. Evinger was doing his diligence, I think in response to the last question I asked you.
Was he asking you any questions about Blue Flame Medical?
A. I don't remember him asking me any questions.
Q. From what it -- from what you said, it sounds like he was telling you things about Blue Flame Medical that he thought you might not know. Is that accurate?
A. That's what it seemed like.
Q. How is that him doing diligence? What did you mean by that?
MR. MADDEN: Object to form.
THE WITNESS: I don't know. It seemed to

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me like he was making sure that the wire was correct and accurate.
BY MR. WHITE:
Q. But I thought you said that there weren't any questions about the amount or the counterparty, is that right?
A. No, there --
MR. MADDEN: Objection -- objection to form. Sorry.
BY MR. WHITE:
Q. I'm sorry, Ms. Gonzales, go ahead.
A. No, there weren't any about the amount. I -- I don't really know what he was thinking.
Q. Fair enough.
MR. WHITE: That's all the questions I have, Ms. Gonzales. Thank you very much for your patience with the technology and otherwise.
MR. SCHOENFELD: No questions from JPMC.
MR. MADDEN: No further questions from defendants.
MS. PORTER: No questioning from me.
THE VIDEOGRAPHER: Okay. We are off the

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record. The time is 4:49 p.m.

(Whereupon, at 4:49 p.m. EST, the taking of the instant deposition ceased.)

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CERTIFICATE OF REPORTER

UNITED STATES OF AMERICA) ss.:
STATE OF MARYLAND)

I, MARY GRACE CASTLEBERRY, RPR, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties for the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Notary Public in and for
the State of Maryland

My commission expires: 07/18/2023