EXHIBIT 31

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

BLUE FLAME MEDICAL LLC, Plaintiff,
vs.
CHAIN BRIDGE BANK, N.A., JOHN BROUGH, and DAVID M. EVINGER, Defendants.
Civil Action No. 1:20-cv-00658

CHAIN BRIDGE BANK, N.A., Third-Party Plaintiff,
vs.
JPMORGAN CHASE BANK, N.A., Third-Party Defendant.

CONFIDENTIAL

REMOTE VIDEOTAPED DEPOSITION OF
JOANNA WILLIAMSON
located in McLean, Virginia
Sunday, April 11, 2021

Reported By:
CATHI IRISH, RPR, CRR, CLVS

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OCC typically have for you, the CFO?

A. They are typically pretty general and usually would have to do with the bank's liquidity position, asset liability management, interest rate risks, generally those types of topics. They may also ask me questions about the bank's audit process.

Q. Does the OCC set capital requirements for the bank?

A. Yes.

Q. What form do those requirements take?

A. I don't understand.

Q. Are -- does the OCC set capital ratios that the bank must comply with?

A. The OCC does set capital ratios, yes.

Q. And are you familiar with how those ratios are calculated?

A. Yes, I am.

Q. Were you familiar with how they were calculated as of March 25, 2020?

MR. MADDEN: Objection to the

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form.

THE WITNESS: Normally our capital ratios are computed and reported for quarter end so I'm not sure that I had a calculation prepared for March 25th.

BY MR. KETCHAM-COLWILL:

Q. The quarter end for 2020 would have been the end of March 2020?

MR. MADDEN: Objection to the form.

THE WITNESS: Yes.

BY MR. KETCHAM-COLWILL:

Q. And excuse my ignorance here, but what capital ratios does the bank maintain as -- in complying with OCC requirements?

A. The bank has a leverage ratio. We also have a few risk-based capital requirements. Excuse me?

Q. I didn't mean to interrupt you. Are you done?

A. Yes, I am.

Q. How is the leverage ratio calculated?

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BY MR. KETCHAM-COLWILL:

Q. I'll move on.

At some point on March 26th did you become aware that there was a hold placed on Blue Flame Medical's account?

A. I don't have a recollection of that though I believe that there was a hold placed.

Q. Do you know who directed that a hold be placed?

A. I have been copied on an e-mail that showed David Evinger asking that hold be placed.

Q. Were you involved in the decision to place that hold?

A. No.

Q. Do you know how a hold works from a bank operational perspective?

A. I am not involved with decisions to place holds or the actual placement of holds.

Q. When funds are held beyond -- sorry.

When funds are deposited into a

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customer's account and then a hold is placed and that hold lasts through the next day, how is that hold or is that hold reflected somewhere in the bank's balance sheet?

MR. MADDEN: Objection to form.

THE WITNESS: No, I don't believe holds are reflected in balance sheets.

BY MR. KETCHAM-COLWILL:

Q. So the funds come in credited to a customer's account and a hold is placed, how does the bank account for those funds?

MR. MADDEN: Objection to form.

THE WITNESS: The same as any other account. Regardless of whether it has a hold, it's going to be accounted for in the balance sheet the same.

MR. KETCHAM-COLWILL: Okay. Angie, can we go back to -- actually let's go with our tab 7. Tab 7 is Bates stamped CBB00004468.

MS. GARCIA: And it hasn't been introduced yet; correct?