EXHIBIT 82

CONFIDENTIAL - TERESA A. PESCE
US DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

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

VIDEOTAPE DEPOSITION VIA ZOOM OF:
TERESA A. PESCE
MONDAY, APRIL 5, 2021

REPORTED BY:
SILVIA P. WAGE, CCR, CRR, RPR
JOB NO. 4528852

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But I -- again, I'm not really speaking for Chain Bridge, because I don't have all the facts that were -- that Chain Bridge may have had at the time. So my facts are limited to what J.P. Morgan knew.

Q. You're aware that at one point Chain Bridge Bank contacted J.P. Morgan's client the State of California directly.

Do you remember reading that and seeing that reference?

A. Yes. Yes.

Q. Have you ever been advised your client as a bank to contact the counterparty bank's client directly in connection with the BSA investigation?

A. Have I ever advised a client to do that?

Q. Yes.

A. No, I have not.

Q. Would you?

A. I would not want to do that without checking -- doing some additional due diligence on things like privacy laws. But it would also depend on what the contact was in connection with

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because financial investigations units will frequently contact parties to a transaction to understand the transaction.

Q. Are you aware of circumstances where in connection with the BSA investigation executives from a bank have contacted the counterparty to the transaction, not the bank but the actual party? Are you aware of that ever happening?

A. I am not aware of a circumstance where that has happened.

Q. Have you ever advised one of your clients or one of your consulting clients to do so?

A. I have not made -- I have not given that advice, no.

Q. Have you ever heard of that happening, other than in situations where you gave advice?

A. I cannot say everything that happens in the context of a financial investigations unit when they're investigating particular transactions. So I can't -- I can't say that it doesn't happen ever. But it's not something that

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I would say is highly usual.

Q. Have you ever heard of it happening?

A. No.

Q. I think you're also aware that Chain Bridge Bank executives recorded conversations with, at least, J.P. Morgan banking executives.

Do you know whether those conversations were also recorded by J.P. Morgan?

A. I don't know that.

Q. Have you ever heard of that happening before where bank executives are recording a call with their counterparty bank without letting the other party know that it's being recorded? Have you ever heard of that happening?

A. I have never heard of it happening in that particular circumstance. I'm aware that financial services companies record calls all the time. I am not also aware -- I'm not going to put on my law enforcement hat and I don't know if the regulations there in Virginia are any different than they were in New York where I was where if one party consented to the recording of a conversation, it was lawful. But that's, you know, that's as much as I know about that.