

**FIRST CAUSE OF ACTION**

**Unlawful Discrimination on the Basis of Race in Violation of Title VII of the Civil Rights Act  
of 1964 and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Khavin, Shillingford, Sullivan, Liasis and Does 1-10)**

**SECOND CAUSE OF ACTION**

**Unlawful Retaliation on the Basis of Race in Violation of Title VII of the Civil Rights Act of 1964  
and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Khavin, Dubowy, Poz, Shillingford and Does 1-10)**

**THIRD CAUSE OF ACTION**

**Aiding and Abetting Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981 Violations  
(Against Defendants JPMorgan Chase, Vega, Dubowy, Poz and Does 1-10)**

**FOURTH CAUSE OF ACTION**

**Unlawful Harassment on the Basis of Race in Violation of Title VII of the Civil Rights  
Act of 1964 and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Khavin, Shillingford, Sullivan and Does 1-10)**

**FIFTH CAUSE OF ACTION**

**Failure to Take Steps to Prevent Discrimination, Retaliation and Harassment in Violation of  
Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Quix, Poz, Dubowy, Vega and Does 1-10)**

**SIXTH CAUSE OF ACTION**

**Intentional Infliction of Career Regression and Career Stagnation on the Basis of Race in**

**Violation of Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Sullivan, Liasis, Khavin, Shillingford and Does 1-10)**

**SEVENTH CAUSE OF ACTION**

**Intentional and/or Negligent Infliction of Mental, Physical and Emotional Distress**

**(Against All Defendants)**

**EIGHTH CAUSE OF ACTION**

**Unlawful Segregation on the Basis of Race in Violation of Title VII of the Civil Rights Act of 1964**

**and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Alex Khavin and Does 1-10)**

**NINTH CAUSE OF ACTION**

**Unwillingness/Failure to Promote to a Managerial Position on the Basis of Race in Violation**

**of Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Alex Khavin and Does 1-10)**

**TENTH CAUSE OF ACTION**

**Defamation of Character on the Basis of Race in Violation of Title VII of the Civil Rights Act**

**of 1964 and 42 U.S.C. § 1981**

**(Against Defendants JPMorgan Chase, Liasis, Sullivan and Does 1-10)**