

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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CANDICE LUE, :
 :
Plaintiff, : No. 16 Civ. 03207 (AJN)(GWG)
 :
- against - :
 :
JPMORGAN CHASE & CO., ALEX KHAVIN, :
FIDELIA SHILLINGFORD, JOHN VEGA, :
HELEN DUBOWY, PHILIPPE QUIX, THOMAS :
POZ, CHRIS LIASIS, MICHELLE SULLIVAN, :
and DOES 1 - 10, inclusive, :
 :
Defendants. :
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DECLARATION OF CHRIS LIASIS

CHRIS LIASIS, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury that the foregoing is true and correct:

1. I am employed as an Executive Director in the Credit Risk Middle Office of JPMorgan Chase Bank, N.A., a wholly-owned bank subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of Chase's motion for summary judgment in this action. This declaration is based on my personal knowledge, as well as my review of Chase business records.

2. I supervised Candice Lue ("Plaintiff") in the Commodities Operations Department (the "Department") in 2013 and for the first half of 2014.

3. In 2013, the Department underwent a change in infrastructure that would subsequently improve efficiency and client service. Before the change, all members of the Department handled both financial and physical commodities. As a result of the change, however, all members were assigned to handle one or the other as part of our structured training plan to build expertise in the new system. As part of this division of labor, Plaintiff,

along with other team members, was assigned to the group that handled physical commodities.

4. Up until the merger, Plaintiff had assisted with the novation process. The novation process, however, occurred primarily within the financial commodities context, not the physical commodities context, and is also time-intensive. Thus, because Plaintiff was assigned to the physical commodities group, but was spending time on novations which took her away from her duties on the physical commodities side, I directed her to focus her efforts on supporting her assigned group, and members of the financial commodities group thereafter assumed the novation process. This was consistent with our rationale to remove single person dependencies and train others.

5. During the first half of 2013, I solicited feedback from my team for strategic ways to improve business as usual ("BAU"). With regard to processing the 100+ daily e-mails the Department receives in connection with commodities transactions, Plaintiff made a suggestion that involved inputting all incoming e-mails into an Excel spreadsheet. She presented her idea to me, and I also gave her significant time to present the idea to the team.

6. However, following the presentation, my management team and I concluded that adopting Plaintiff's suggested solution would cause further delays and inefficiencies. Accordingly, her suggested solution was not implemented. At the time, I tried to explain to Plaintiff the various reasons for this decision, but she reacted defensively rather than accepting constructive feedback.

7. In fact, on many occasions during which Plaintiff received constructive feedback, Plaintiff would react aggressively and defensively, sometimes even resorting to raising her voice and talking over me.

8. In or about July 2013, I conducted Plaintiff's performance review, a true and correct copy of which is annexed hereto as Exhibit A.

9. In or about early 2014, the Department underwent a second structural change whereby the two teams that were responsible for "drafting" and "client service" were merged. This was done to ensure that if a member of the drafting team was out of the office for some reason, a client service team member could step in and pick up his or her duties, or vice versa.

10. Before this change, Plaintiff was on the drafting team. As a result of this merger of responsibilities, however, Plaintiff's drafting quota was reduced to accommodate her new responsibility to perform client service functions, which included reaching out to clients and inquiring as to the status of signed contracts and other client service related issues. Management saw this as an opportunity to broaden the teams' knowledge of processes end-to-end and remove single-person dependencies.

11. Plaintiff complained that these new (client service) duties were beneath her and were not part of the role for which she was hired. She claimed that the merger of duties relegated her to "counting pencils."

Dated: New York, New York
May 8, 2017



Chris Liasis

EXHIBIT A

Manager sections of this review are in 'display' status. Employee can view manager's comments or ratings.

Review Information	
Review Status:	Completed
Employee:	Lue,Candice (R089235)
Manager:	Shillingford,Fidelia (O024978)
Additional Manager:	N/A
Review Cycle:	01-JAN-2013 --- 31-DEC-2013
Reporting Year:	2013
Job Title:	Counterparty Risk
Tenure Date:	20-AUG-2012

Mid Year Rating	Year End Rating
Meets Expectations	Meets Expectations

Finalize Year End Performance Review - Signature Section		
User	Signature	Date
Manager	Michelle Sullivan	07-JAN-2014
Employee	Candice Lue	09-JAN-2014

Objective #1	
Objective	Measures/Target Dates
To continue in my quest (as I noted in my 2012 objective) to master the Confirmations process by finding ways to enhance efficiency, accuracy and turnaround time.	After gaining further insight into the Energy Confirmations process, I was able to identify and present an idea to my managers as to how transparency, organization, productivity, efficiency and turnaround time could be improved.
Employee Accomplishments	
<p>I created a spreadsheet to manage incoming noteworthy queries that based on its capabilities would not only enhance efficiency, accuracy and turnaround time but transparency and productivity as well. Noteworthy queries are queries which would require more thought and/or time than average to resolve.</p> <p>Functioning as what I would consider to be a query management tool or a central data resource for inputting noteworthy queries and readily extracting data, this spreadsheet model is designed to store pertinent information of all noteworthy queries in a folder on the share drive which would be accessible to all members of the Confirmations Team.</p> <p>Each column of the spreadsheet is organized to provide all the imperative information that would be needed including the option to insert a link or links to any supporting documents to enhance efficiency, accuracy and turnaround time.</p> <p>All pertinent information would be inputted by individual team members allowing transparency of important query requests on a real-time basis real-time in terms of quickly inputting (takes a couple minutes on average) noteworthy queries onto the spreadsheet as they come in and are acknowledged. The manager would no longer need to constantly chase team members to find out who is working on what and what is happening with an item or wait for a meeting to take place the next day for all members of the team to be aware of all the noteworthy query requests received.</p> <p>On a whole, this could improve productivity for the group as, instead of having a daily meeting to discuss noteworthy query requests which were received, who is working on what, etc., these meetings could be cut to a maximum of three meetings per week eliminating some dent in collective productivity - length of each meeting times the number of individuals attending times the number of meetings per week.</p> <p>There would be an emphasis on accuracy and efficiency as all team members would be working with the same notes/information and</p>	

Lue,Candice (R089235) - 2013 Performance Review

updates and not with individual notes/information stored in personal inboxes/folders/notebooks. So, if someone is out, this spreadsheet would allow for another team member(s) to obtain the query information as well as the current status to efficiently execute the requested task without delay (can help to cut down on or even eliminate any guesswork).

The spreadsheet would also work as a tracking mechanism for information such as the amount of requests for confirmations to be issued as priority where the client is not on our set priority list, help in conveying to upper level management the progress the team is making to resolve queries in terms of dates query was received and completed, number of times a particular request was made and notes about how it was resolved as well as for tracking other information as the needs arise.

Even though this spreadsheet has not been implemented, I still consider my effort to be an accomplishment of my objective.

Please see sample spreadsheet attached.

Manager Comments

Objective #2

Objective	Measures/Target Dates
To continue to expand my knowledge of the focused products which allows me to contribute more effectively to producing the quality of work required/expected of the Confirmations Team.	<p>Through intellectual curiosity, hands-on experience and taking advantage of course or seminar offerings such as the Global Commodities Groups oil sessions via conference calls, power and gas training session hosted by the Houston Team, coal knowledge share hosted by a senior team member and Athena training sessions hosted by the Projects and Marketing Middle Office Teams, thus far, I have been able to expand my knowledge of the focused products. I intend to continue along this path for an overall successful experience on the Confirmations Team and beyond.</p> <p>As I focus on my work and strive to improve efficiency and turnaround time, I realize that expanding product knowledge is a fundamental aspect of the process. Also, as more courses whether in-person or online become available, I will continue to be proactive in seeking opportunities to expand my product knowledge.</p>

Employee Accomplishments

Currently mainly focused on drafting confirms for physical products and whenever necessary maintaining a balance with financial products-related workload, with the measures I have taken to expand my knowledge of the focused products, I am now able to analyze these type of trade bookings in the risk management systems in more depth. In order to challenge myself a bit more, I've been able to draft structured/complex confirms which allows for better interpretation of the various characteristics of the focused products. In conjunction, engaging in intellectual conversations with senior team members has provided an opportunity to build upon product knowledge already acquired.

I am also better able to analyze how the confirmations flow downstream to our drafting systems queue to assess feasibility of the products templates for confirmations issuance as well as to escalate any issues observed for speedy resolution.

Manager Comments

Objective #3

Objective	Measures/Target Dates
To gain more insight from a controls perspective into the Confirmations process as well as into the intricacies involved with ISDA documentation	<p>Being aware of and internalizing the purposes of the controls that we have in place has paved a clearer path for me in conducting due diligence as per operating procedures and I've been applying the controls mindset to the various facets of my role.</p> <p>In addition, bearing in mind that our fundamental approach to drafting confirmations rests largely on rules related to ISDA documentation, I strive to learn the ins and outs of these rules to be</p>

	in compliance while drafting confirmations.
Employee Accomplishments	
<p>I've become more aware of the controls in place within the Confirmations process, especially with the implementation of the Dodd-Frank regulations and adherence to new stricter deadlines for the issuance of confirmations to the client. In line with giving key attention to the controls that govern our processes, I've perused our operations controls documentation (e.g. - Operational Control Exceptions aka OCE) and expounded upon practical experience in order to apply this knowledge to grasping the reason behind what types of deals require issuance of confirmations and which should be for internal purposes only. If/whenever necessary, in conjunction with my teammates, I will liaise with other groups such as Legal, Front, Middle or Back Office personnel to clarify any queries should a situation arise that requires conducting further due diligence to be in line with controls.</p> <p>Being instrumental in running, analyzing and distributing STS, DCPD and eConfirm MIS reports as well as the suppression and the TLM reports to our team has also enabled me to broaden my perspective of the controls within our Confirmations processes and as it relates to JPM as a whole. I understand that it is crucial to maintain adequate and accurate tracking of our confirms-related figures for optimal reporting, ensure that deals booked in our risk management systems feed to our queues appropriately and if required, engage in troubleshooting activities for resolution.</p> <p>Secondly, in line with compliance measures, I've perused ISDA documentation to familiarize myself with terminology and definitions to endeavor for practical application as I draft and analyze confirms for issuance. Literature such as the 2005 ISDA Commodity Definitions Document Listings and ISDA-related documentation available on our share drive have been great resources to me for understanding why certain terms and language get included on the confirms whether on a generic, product-specific or a deal-specific basis. Studying ISDA documentation has also aided me in cross-referencing and practically applying terminology when I help to draft novation agreements. Although ISDA documentation can be perceived as complex, I've been up to the challenge of navigating through any intricacies and becoming a better Drafting Analyst with both independent efforts and advice/guidance from senior team members.</p>	
Manager Comments	

Objective #4	
Objective	Measures/Target Dates
To continue to build upon my knowledge of the evolving systems implementations related to Athena	<p>Keeping the firms current target state architecture objectives in mind, I consider keeping abreast of the happenings revolving around Athena an integral part of my growth as I find that to be instrumental in the way in which I approach my role.</p> <p>Whether through individual exploration, team discussions or written notifications/communications, I've made the effort to acclimate myself with not only the functions of Athena as it relates to trade bookings and analysis for effectively drafting confirmations but also with new features that aim to add efficiency to the process.</p>
Employee Accomplishments	
<p>In addition to being able to analyze trade bookings in more depth through hands-on experience, by taking courses such as Athena FXO Trader Blotter and Athena Deal Modeling Training and attending training sessions hosted by the Projects and Marketing Middle Office Teams, I've observed and applied some Athena systems implementations to effectively proceed with the confirmations drafting process.</p> <p>I've continued to build upon my knowledge by taking note of and executing practical application of new Athena features such as the booking of multiple legs of a trade onto a single deal id (whereas previously having to refer to and cross-reference separate legs of the trades booked on multiple deal ids in Athena), the trade re-send tool for re-sending trades amended that may not automatically feed from Athena to our drafting queues for confirm regeneration and the inputting of an event on trades to indicate that Dodd-Frank regulations apply in order to be in compliance. As Athena continues to evolve and as more trades based on product type are migrated onto the platform, I'll continue to ensure that I expand my knowledge.</p>	
Manager Comments	

Development Plan		
Development Goal - In Progress	Actions/Resources	Progress

I will take heed and not escalate priority queries when I am not scheduled to do so unless a situation may arise where the query gets overlooked.
Manager Strength (Display) -- Sullivan, Michelle (02-JAN-2014)
Candice has an excellent work ethic and is a good team player. She takes her work seriously and always completes tasks on time and jumps in to assist where needed without being asked.
Manager Strength (Display) -- Sullivan, Michelle (02-JAN-2014)
Attention to details and responsiveness to internal and external queries.
Manager Strength (Display) -- Sullivan, Michelle (02-JAN-2014)
Ownership of BAU, Candice is always fully aware of the status of the BAU she owns and offers good transparency to the team and management with frequent updates.
Manager Opportunity (Display) -- Sullivan, Michelle (02-JAN-2014)
Candice is very good at following direction and processes that are fully documented. For Candice to continue to grow in her role she should look for ways to develop her analytic skills to identify issues and solutions for occurrences that happen outside of the normal situations.
Manager Opportunity (Display) -- Sullivan, Michelle (06-JAN-2014)
Candice would benefit from reacting to feedback in a more positive way with team members and management

Summary Comments
Employee Mid Year (Display) -- Lue, Candice (18-JUL-2013)
<p>Currently, my main focus is on drafting confirms for Physical products across Power and Gas but Ive always been cognizant of my priorities as a team member whereby if help is needed on the drafting of confirms for Financial products or Client Service duties, I always analyze each tasks priority and shift my workload accordingly.</p> <p>I am very eager to learn to effectively navigate the processes but having been on the job for less than one year some of that learning will come from a few errors and omissions both in execution of my tasks and in training. The good thing is that these errors and omissions are always noted by me and reoccurrence is either extremely minimal or none. Similarly, as I grow and continue to proactively learn on the job, initial occurrence of these few errors has not only continued to diminish but is at a minimal.</p> <p>My communication style is for the most part very thorough but that is because I usually prefer to solve queries as efficiently as possible instead of through constant back and forth emails/phone calls. For instance, if I can be proactive in taking care of a traders or marketers queries/concerns in one email without the trader or marketer having to send back for additional information, Id always opt for that. I think that doing so helps with the enhancement of productivity not only for me but also for the trader or marketer and for J.P. Morgan Chase as a whole. Each day as I learn and grow, I am getting better aware of non-disclosure information as it relates to the regulatory environment and being mindful of releasing too much information.</p> <p>My strategy for meeting and exceeding productivity goals is to not be insular in the execution of my work. I rarely ever have a cut off time for ending my work day but rather focus on completing all important tasks before leaving for the day. I also do prep work in preparation for the following business day to prevent any slow down in productivity. In my quest to further boost productivity, I do not have to be the team member scheduled to monitor emails for incoming queries in order to escalate a query (especially a priority request) that could otherwise be sitting unnoticed longer than usual to the respective person.</p> <p>In terms of identifying weaknesses and gaps in the processes, I spent hours of my personal time (after work and on weekends) working on a query management tool (see attachments) which in my humble opinion, I think could enhance efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process. As detailed in the handout I gave to my team members during my presentation, this spreadsheet was carefully thought out to include every aspect of the noteworthy query request process. Except for the addition of a column for priority client, there have been no changes done to the spreadsheet since I first presented it to management.</p> <p>Complaints about my emails being too thorough or me escalating priority queries when I am not scheduled to do so or my need to be less professional, do not do much in the enhancement of the Confirmations process as a whole. And maybe to my own detriment, but I tend to ignore these complaints and focus more on learning and growing in my position, the contribution that I can make to the Confirmations Team and by large to J.P. Morgan Chase as a whole.</p> <p>My primary duties are always my main focus and it is because of this that I made the effort to create a spreadsheet model as a central data resource that I think could have enhanced my, and the teams as a whole, efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process.</p>

**Continued below

Employee Mid Year (Display) -- Lue, Candice (18-JUL-2013)

**Continued

I've taken the initiative to self-identify courses that would be beneficial to my career development. In the less than one year that I've been on the job, I have successfully completed the following courses that I have identified on my own: Networking: Career Development, Brand YOU, Creating and Delivering Executive Summaries, Roadmap to Success Creating Vision, Taking Risks and 2012 Full Year Business Exchange. Along with learning the drafting and client service processes, I have also managed to complete 24 mandatory courses. In addition, I continue to peruse Harvard Manage Mentor (HMM), an online resource for management essentials and professional development to take advantage of tips and tools to further my efforts in enhancing my career development.

Lastly, my commute to Brooklyn is a bit challenging as unlike traveling to Downtown or Midtown Manhattan, I do not have an alternative method to get there. As someone who has always prided myself on coming into work on time it's also a bit stressful as most mornings I have to deal with the delays through the Lincoln Tunnel, on 2 other major highways as well as sometimes additional delays on the MTA for the 30 or more minute commute from Manhattan to Brooklyn.

While working at 4 New York Plaza for over a year before the Sandy Hurricane it must have been on a maximum of three occasions that I arrived at work after 9 am but accidents, emergency construction, etc. are very unpredictable in rush hour traffic especially when having to use major thoroughfares such as Route 3, 495 and the Lincoln Tunnel.

But, as long as there is any doubt that I might be able to make it in to work by 9 am, I always call the office to inform my team members even if it means making a call at 7:45 am from the bus after hearing a NJ Transit announcement about heavy delays ahead.

When I am late which is always due to traffic, my arrival time is on average 9:15 am (rarely after 9:20) so I am always still able to quickly and accurately get through running my morning report on time as well as being early for the Huddle which starts at 9:30. In any event, I will have to try for a bus before 7 am instead of between 7:15 and 7:30. (Just an FYI, in regular moving rush hour traffic it takes 45 minutes to get from my bus stop in NJ to the Port Authority and 30 minutes when there is little traffic on the road, like on the day after a major holiday.)

Traveling to 4 New York Plaza used to take me one full hour from the time I got on the train to the time I arrived at the building. My regular commute to and from Brooklyn is between 1¼ to 1½ hours but it takes 2 hours on average when there are problems with traffic. Sometimes my evening commute is worse than my morning commute. For instance, one night I sat for 2 hours in the Lincoln Tunnel due to an oil spill.

Employee Year End (Display) -- Lue, Candice (17-DEC-2013)

MY EFFORTS/ACCOMPLISHMENTS FOR THE SECOND HALF OF 2013

Innovation/Knowledge Sharing

I created a Standard Operating Procedure (SOP) entitled Knowledge Share: Investigating DCPD Reference Data Issues (file exceeds PMC attachment limits but is available upon request) as a way of giving guidance and insight to team members as they tackle the various reference data issues that can prevent the confirmations for issuance to our clients from generating in queue. This knowledge share is designed to provide a step by step guide on how to investigate DCPD reference data issues for speedy resolution and to outline some examples of reference data issues faced for further clarity.

Not only does this knowledge share detail each recommended step in the process of investigating the reference data issues, it also offers a table of contents which features hyperlinks to each section for ease of navigation, a flow chart outlining the steps in the process, detailed screenshots, the incorporation of using XML codes to interpret where the issue lies to streamline investigations and practical examples to help with maneuvering the approach to resolutions.

Knowledge Share: Investigating DCPD Reference Data Issues was shared with all members of the Confirmations Team as well as with the Physical Oil Team, individuals from the Projects Team, our Operations Risk Management (ORM) representative and managers.

All in all, as team members become more comfortable with tackling issues like the ones relating to reference data that can create obstacles in issuing confirmations to our clients in a timely manner, our team's efficiency and turnaround time can improve.

In addition to Knowledge Share: Investigating DCPD Reference Data Issues, as it relates to knowledge sharing in a broader sense, I have also provided other team members with cross-training ranging from performing drafting and other BAU tasks to conducting daily reporting.

As the department strives to enhance the teams efficiency in supporting the front office, the business and JPM as a whole, I consider these cross-trainings to be my contribution to that effort.

Self-identified Personal and Career Development Initiatives

Acknowledging that ongoing learning as it relates to personal and career development is an integral focal point for success, I continue to take the initiative to self-identify courses and activities that would be beneficial to me. I have already fulfilled the firm-wide requirement of taking a minimum of 16 hours of training per year and as for furthering these initiatives, Ive attended CIB People Agenda networking events such as Build A Bike (networking + philanthropy) and Two Truths and a Lie to meet and network with different colleagues as well as to gain insight/perspectives from senior leaders.

In conjunction, Ive successfully completed the following courses:

Harvard Manage Mentor (HMM):

Strategic Thinking, Innovation & Creativity, Customer Focus and Marketing Essentials

CCB Leader Led Series:

Controls, Leading in Times of Change with Steve Hemperly and Top 15 Career Management Tips from CFO David Owen

Other Personal and Career Development Courses:

Communication Essentials, Customer Connections: Decision Making, Interviewing: Career Development, Messes, Problems & Puzzles: Thinking About Change Risk & Uncertainty and Tips for Presenters

Additional Job-Related Courses:

Commodities - an Introduction, Commodities Products - Rules of the Road, IB TO Introduction to Lifecycle of a Trade and A Day in the Life of a Chaser

Ive also completed 8 additional mandatory courses while carrying out drafting and client service processes.

**Year End - Continued below

Employee Year End (Display) -- Lue, Candice (17-DEC-2013)

**Year End - Continued

Arrival at Work

I have accomplished my personal goal of coming into the office earlier than required. I am now usually in the office between 8:00 am and 8:30 am with an effort of being in closer to 8:00 am.

Work Ethic

I have always tried to see and understand the big picture as to what needs to be accomplished in my work environment and have always focused my contribution towards that. I do my work in a way that allows me to avoid unnecessary distractions with a goal of being a substantive team player to the Confirmations Team.

Self-motivation and striving for growth are two key elements for attaining success. I proactively look for opportunities to expand on my knowledge, share my knowledge and rise to the challenge of taking on tasks that may be perceived as complicated. By focusing on the purpose and goal of the task at hand, Im able to competently produce accurate and timely reports, effectively balance my workload, draft and analyze complex confirmations, contribute to carrying out the novation process when necessary and realize the controls in place while actioning BAU and conducting investigations. With my ability to liaise with individuals at different levels of the organization and external parties such as clients, I strive to provide a good experience from end to end.

Volunteer Work

I feel that philanthropy/volunteerism is important so I have been humbly serving for years. I had the opportunity to volunteer on behalf of J.P. Morgan Chase via Good Works for the CIB CAO People Agenda New York - Bike Building event for Action Centered Training Inc. to build bikes for needy children and for a toy drive for the Salvation Army - Greater New York Divisions Toy Shop to donate, sort and organize toys for distribution to needy children during the holiday season.

I plan to continue volunteerism efforts on behalf of JPM, as philanthropy gives me genuine pleasure and I feel that making a difference in the lives of others is worthwhile.

Employee Year End (Display) -- Lue, Candice (09-JAN-2014)

YEAR END - FINAL COMMENTS

While I appreciate the fact that my efforts are mentioned/acknowledged, I would like to take this opportunity to respond to the following statement with regards to my reception to feedback:

Candice has also taken the initiative this year to work on ways to improve BAU processes for the team. As mentioned in her year end commentary and objectives she put together an excel based query management tool and a ref data knowledge share. This displayed good initiative by Candice to seek solutions to issues highlighted in BAU. With both, I would have liked Candice to take them a step further by seeking out feedback or incorporating feedback offered by her colleagues and management to improve the final product.

Reaction to constructive feedback has should be focused as a key area of improvement for Candice in order for her to grow in her role.

For the two initiatives that I presented to improve BAU processes, I had always made it clear that, and I quote, your feedback/suggestions are most welcome.

For the query management tool that I created, some of my colleagues approved of the idea and responded as such but no further constructive feedback beyond their approval was offered. The ones who did not approve, response or feedback was not another spreadsheet. As for the support from management, I will respectfully say that such support was lackluster to non-existent. I understand not being completely sold on my idea but that in and of itself is not a constructive feedback for execution of any idea, neither is not getting responses verbally or in writing to emails sent. So, this was the kind of attitude/reaction that caused me to pull back on this effort. As, after assessing the situation, I decided that my continued pursuit could be misconstrued as overstepping my boundaries or insubordination.

For the reference data knowledge share that I created, I only received feedback from one person after discussing it in one of our huddles and the feedback was most welcomed. After meeting with her a couple times to discuss her contribution, I incorporated some of her suggestions into the knowledge share, sent out the updated knowledge share to the team and other JPMC employees and gave her credit in the email for providing the feedback. I also, as usual, mentioned in the said email containing the reference data knowledge share attachment that as always, feedback is always welcome. However, I did not get any other feedback from anyone. (Email is available upon request.)

As for my regular BAU, I have always solicited feedback on my work from the traders, marketers and legal team who I support/liase with and on most occasions incorporated those suggestions into my work with the intent of improving my efficiency, accuracy, etc. This has helped to enhance my professional growth and my ability to provide optimal service to them. (Email evidence is available upon request).

Furthermore, as I liaise with my Confirmations colleagues on a daily basis, I strive to ensure that substantive discussions ensue wherein, I maintain an openness and approachable attitude toward feedback. I am always receptive and thankful for their insight and input on matters regarding the most effective way to execute the drafting of a confirmation and performing other BAU activities.

However, I must admit though that if I know that a colleague has the tendency to be malicious or unconscionable, I will not in any way be swayed to have such person write a feedback on my behalf on my permanent work record. And as such, would refuse the suggestion of such feedback as a matter of shrewd thinking.

**Year End - Final Comments - Continued below

Employee Year End (Display) -- Lue, Candice (09-JAN-2014)

****Year End - Final Comments - Continued**

As for the comment, Candice has also taken measures to rectify issues noted at mid year in regards to her tardiness.

In the former half of the year when I was adjusting to my new challenging commute to Brooklyn (caused by the Sandy hurricane), as stated in my mid-year response, if I were late it was always due to traffic. I also noted that my average arrival time, when I was late, was 9:15 am. Now my effort is to come in between 8 and 8:30 am, traffic allowing and so far I have been successful with doing so.

In closing, I must say that it does have a dampening effect on ones morale when an employee goes above and beyond her normal work duties to do the following and is told at the end of the year that Candice continues to perform at a Meets Expectations level at year end:

- o Creating and presenting two innovative ideas with the intent of improving BAU processes.
- o Taking the initiative to take on challenging tasks such as the execution of the novation process in the absence of a colleague.
- o Fulfilling and exceeding the firm-wide requirement of taking a minimum of 16 hours of training per year by self-identifying and completing other courses which have helped to enhance my personal and career development.
- o Writing emails that enhance productivity by making sure that issues are resolved with as little back and forth as possible.
- o Completing my cross-training requirement in a timely manner which allows me to jump in and help other teammates whenever necessary.
- o Providing cross-training to other team members ranging from drafting and other BAU tasks to conducting daily reporting with the intent of enhancing the teams efficiency and productivity.
- o Going beyond my call of duty when working from the midtown office to personally go to front office staff members to inquire if they need assistance with anything work related or have any urgent issues to take care of that I could assist them with while working from that location.
- o Constantly working longer than the normal work hours to ensure the execution of important tasks.
- o Attending JPMCs networking events to meet as well as to gain insight/perspective from other JPMC employees and senior managers.
- o Volunteering on behalf of JPMC via Good Works as well as reaching out to the Confirmations Team to volunteer for the same cause.

Manager Mid Year (Display) -- Liasis, Chris (16-JUL-2013)

Candice takes her work seriously, she is responsive to the business and the team. Candice is predominantly focused on the drafting aspect of the Confirmations teams duties, this includes having a direct relationship with desk and managing their expectations. Candice is responsive to issues and has a good relationship with the team. This year we have seen radical changes in our infrastructure both front end (Endur > Athena) and back end (STS > DCP), in addition we have also merged the client service team with the drafting team, as a result Candice is now predominantly focused on drafting Physical products across Power and Gas but must recognize the balance in work-load with the Financial work-stream. Candice is constantly learning to navigate the pitfalls of our new infrastructure and processes, and learning to adapt to new management styles and demands not only driven by the business but the regulatory environment, on occasion we have seen a few errors slip through the net and more so delays of task resolution specific to drafting has been evident. Candice continues to work hard to correct this and adopt and flex her style to better manage expectations and continues to work on his communication style, strategically Candice needs to continue to identify how we can meet and exceed our productivity and needs and to identify weaknesses and gaps in our processes, Candice could be more pre-emptive to self-identify areas of opportunity to improve her skill set. Management would like to see improved expectation management with allocated tasks this includes BAU but extends to non-BAU duties, timeliness and accuracy of resolution are areas to focus on along with the new opportunity to learn Client Service tasks (along with her drafting duties) which are objectives for the remainder of the year, communication style requires continued refinement and transparency on productivity and the status of tasks in hand is also key here, managing the perception and expectation others have of Candice is paramount to her success, this is an ongoing focus area. Recognition of how Candice contributes & collaborates is just as paramount as the task in hand, self reflection of primary duties vs peripheral solutions need to be segmented to ensure the tasks in hand are being focused on, getting through the workload in an expedient and accurate fashion is increasingly more important in the environment we are in, there is also opportunity to rationalize problem solving skills, tactical vs strategic is a common concept that takes time to master I would like to see more thought in adoption of solutions and preparation of proposed changes to management and the team. Product knowledge and soft skills is one very key area that also must be addressed as well as awareness of workflow of the other aspects within the Confirmations discipline, courses are strongly recommended, Candice should self-identify appropriate courses with management. Candice should be cognizant of attendance, specific observations of start times, management have conversely seen many late evenings but the perception of being late on multiple occasions due transportation challenges is noticeable, Candice has taken note of this and is proactively adjusting to remedy this. As of Midyear Candice is ranked an M.

Manager Year End (Display) -- Sullivan, Michelle (06-JAN-2014)

Candice has shown consistency this year in her high work ethic. She takes her role very seriously and has proved to management, the business and the team that she is a professional and dependable team member. She has illustrated her ability to handle multiple processes within BAU apparently by cross training and absorbing various processes in her BAU (eConfirm, drafting physical and financial, tlm, MIS reporting.) She works quickly and completes tasks on time and offers transparency on what she is doing. She is generally a great team player and will jump to assist team members when needed. She has also completed her obligations in Skills Academy for the year and has participated in JP networking and volunteer events.

Candice has also taken the initiative this year to work on ways to improve BAU processes for the team. As mentioned in her year end commentary and objectives she put together an excel based query management tool and a ref data knowledge share. This displayed good initiative by Candice to seek solutions to issues highlighted in BAU. With both, I would have liked Candice to take them a step further by seeking out feedback or incorporating feedback offered by her colleagues and management to improve the final product.

Reaction to constructive feedback has should be focused as a key area of improvement for Candice in order for her to grow in her role.

Candice has also taken measures to rectify issues noted at mid year in regards to her tardiness. This was not an issue over the second half of the year.

Candice continues to perform at a Meets Expectations level at year end.

Discussion Tracking		
Discussion	Employee Confirm	Manager Confirm
Objectives	Y (22-JUL-2013)	N
Development/Career Plan	Y (10-SEP-2013)	N
Jan, Feb, Mar (Quarterly Discussion)	N	N
Apr, May, Jun (Mid Year)	Y (22-JUL-2013)	N
Jul, Aug, Sep (Quarterly Discussion)	N	N
Oct, Nov, Dec (Year End)	Y (06-JAN-2014)	Y (07-JAN-2014)

Attachments			
Filename	Uploaded By	Source	Date
PMC Summary - Year-End.docx	Lue, Candice	Summary	Tue Dec 17 17:53:06 CST 2013
PMC Summary - Mid-Year.docx	Lue, Candice	Summary	Thu Jul 18 09:03:13 CDT 2013
Query Management Tool - Group Presentation.docx	Lue, Candice	Objectives	Tue Jul 09 19:07:33 CDT 2013
2013 Objective 1 - Measures, Targets, Accomplishments.doc	Lue, Candice	Objectives	Mon Jul 01 09:04:29 CDT 2013
Sample Spreadsheet - Query Management Tool.xlsx	Lue, Candice	Objectives	Mon Jul 01 09:03:55 CDT 2013

PMC Summary - YEAR-END 2013

MY EFFORTS/ACCOMPLISHMENTS FOR THE SECOND HALF OF 2013

Innovation/Knowledge Sharing

I created a Standard Operating Procedure (SOP) entitled “Knowledge Share: Investigating DCP Reference Data Issues” (file exceeds PMC attachment limits but is available upon request) as a way of giving guidance and insight to team members as they tackle the various reference data issues that can prevent the confirmations for issuance to our clients from generating in queue. This knowledge share is designed to provide a step by step guide on how to investigate DCP reference data issues for speedy resolution and to outline some examples of reference data issues faced for further clarity.

Not only does this knowledge share detail each recommended step in the process of investigating the reference data issues, it also offers a table of contents which features hyperlinks to each section for ease of navigation, a flow chart outlining the steps in the process, detailed screenshots, the incorporation of using XML codes to interpret where the issue lies to streamline investigations and practical examples to help with maneuvering the approach to resolutions.

“Knowledge Share: Investigating DCP Reference Data Issues” was shared with all members of the Confirmations Team as well as with the Physical Oil Team, individuals from the Projects Team, our Operations Risk Management (ORM) representative and managers.

All in all, as team members become more comfortable with tackling issues like the ones relating to reference data that can create obstacles in issuing confirmations to our clients in a timely manner, our team’s efficiency and turnaround time can improve.

In addition to “Knowledge Share: Investigating DCP Reference Data Issues”, as it relates to knowledge sharing in a broader sense, I have also provided other team members with cross-training ranging from performing drafting and other BAU tasks to conducting daily reporting. As the department strives to enhance the team’s efficiency in supporting the front office, the business and JPM as a whole, I consider these cross-trainings to be my contribution to that effort.

Self-identified Personal and Career Development Initiatives

Acknowledging that ongoing learning as it relates to personal and career development is an integral focal point for success, I continue to take the initiative to self-identify courses and activities that would be beneficial to me. I have already fulfilled the firm-wide requirement of taking a minimum of 16 hours of training per year and as for furthering these initiatives, I’ve attended CIB People Agenda networking events such as Build A Bike (networking + philanthropy) and Two Truths and a Lie to meet and network with different colleagues as well as to gain insight/perspectives from senior leaders.

In conjunction, I’ve successfully completed the following courses:

Harvard Manage Mentor (HMM):
Strategic Thinking, Innovation & Creativity, Customer Focus and Marketing Essentials

CCB Leader Led Series:
Controls, Leading in Times of Change with Steve Hemperly and Top 15 Career Management
Tips from CFO David Owen

Other Personal and Career Development Courses:
Communication Essentials, Customer Connections: Decision Making, Interviewing: Career
Development, Messes, Problems & Puzzles: Thinking About Change Risk & Uncertainty and
Tips for Presenters

Additional Job-Related Courses:
Commodities - an Introduction, Commodities Products - Rules of the Road, IB TO Introduction
to Lifecycle of a Trade and A Day in the Life of a Chaser

I've also completed 8 additional mandatory courses while carrying out drafting and client service
processes.

Arrival at Work

I have accomplished my personal goal of coming into the office earlier than required. I am now
usually in the office between 8:00 am and 8:30 am with an effort of being in closer to 8:00 am.

Work Ethic

I have always tried to see and understand the big picture as to what needs to be accomplished in
my work environment and have always focused my contribution towards that. I do my work in a
way that allows me to avoid unnecessary distractions with a goal of being a substantive team
player to the Confirmations Team.

Self-motivation and striving for growth are two key elements for attaining success. I proactively
look for opportunities to expand on my knowledge, share my knowledge and rise to the
challenge of taking on tasks that may be perceived as complicated. By focusing on the purpose
and goal of the task at hand, I'm able to competently produce accurate and timely reports,
effectively balance my workload, draft and analyze complex confirmations, contribute to
carrying out the novation process when necessary and realize the controls in place while
actioning BAU and conducting investigations. With my ability to liaise with individuals at
different levels of the organization and external parties such as clients, I strive to provide a good
experience from end to end.

Volunteer Work

I feel that philanthropy/volunteerism is important so I have been humbly serving for years. I had the opportunity to volunteer on behalf of J.P. Morgan Chase via Good Works for the CIB CAO People Agenda New York - Bike Building event for Action Centered Training Inc. to build bikes for needy children and for a toy drive for the Salvation Army - Greater New York Division's Toy Shop to donate, sort and organize toys for distribution to needy children during the holiday season.

I plan to continue volunteerism efforts on behalf of JPM, as philanthropy gives me genuine pleasure and I feel that making a difference in the lives of others is worthwhile.

PMC Summary – Mid-Year

Currently, my main focus is on drafting confirms for Physical products across Power and Gas but I've always been cognizant of my priorities as a team member whereby if help is needed on the drafting of confirms for Financial products or Client Service duties, I always analyze each task's priority and shift my workload accordingly.

I am very eager to learn to effectively navigate the processes but having been on the job for less than one year some of that learning will come from a few errors and omissions both in execution of my tasks and in training. The good thing is that these errors and omissions are always noted by me and reoccurrence is either extremely minimal or none. Similarly, as I grow and continue to proactively learn on the job, initial occurrence of these few errors has not only continued to diminish but is at a minimal.

My communication style is for the most part very thorough but that is because I usually prefer to solve queries as efficiently as possible instead of through constant back and forth emails/phone calls. For instance, if I can be proactive in taking care of a trader's or marketer's queries/concerns in one email without the trader or marketer having to send back for additional information, I'd always opt for that. I think that doing so helps with the enhancement of productivity not only for me but also for the trader or marketer and for J.P. Morgan Chase as a whole. Each day as I learn and grow, I am getting better aware of non-disclosure information as it relates to the regulatory environment and being mindful of releasing too much information.

My strategy for meeting and exceeding productivity goals is to not be insular in the execution of my work. I rarely ever have a cut off time for ending my work day but rather focus on completing all important tasks before leaving for the day. I also do prep work in preparation for the following business day to prevent any slow down in productivity. In my quest to further boost productivity, I do not have to be the team member scheduled to monitor emails for incoming queries in order to escalate a query (especially a priority request) that could otherwise be sitting unnoticed longer than usual to the respective person.

In terms of identifying weaknesses and gaps in the processes, I spent hours of my personal time (after work and on weekends) working on a query management tool (see attachments) which in my humble opinion, I think could enhance efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process. As detailed in the handout I gave to my team members during my presentation, this spreadsheet was carefully thought out to include every aspect of the noteworthy query request process. Except for the addition of a column for "priority client," there have been no changes done to the spreadsheet since I first presented it to management.

Complaints about my emails being too thorough or me escalating priority queries when I am not scheduled to do so or my need to be less professional, do not do much in the enhancement of the Confirmations process as a whole. And maybe to my own detriment, but I tend to ignore these complaints and focus more on learning and growing in my position, the contribution that I can make to the Confirmations Team and by large to J.P. Morgan Chase as a whole.

My primary duties are always my main focus and it is because of this that I made the effort to create a spreadsheet model as a central data resource that I think could have enhanced my, and the team's as a whole, efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process.

I've taken the initiative to self-identify courses that would be beneficial to my career development. In the less than one year that I've been on the job, I have successfully completed the following courses that I have identified on my own: Networking: Career Development, Brand 'YOU', Creating and Delivering Executive Summaries, Roadmap to Success – Creating Vision, Taking Risks and 2012 Full Year Business Exchange. Along with learning the drafting and client service processes, I have also managed to complete 24 mandatory courses. In addition, I continue to peruse Harvard Manage Mentor (HMM), an online resource for management essentials and professional development to take advantage of tips and tools to further my efforts in enhancing my career development.

Lastly, my commute to Brooklyn is a bit challenging as unlike traveling to Downtown or Midtown Manhattan, I do not have an alternative method to get there. As someone who has always prided myself on coming into work on time it's also a bit stressful as most mornings I have to deal with the delays through the Lincoln Tunnel, on 2 other major highways as well as sometimes additional delays on the MTA for the 30 or more minute commute from Manhattan to Brooklyn.

While working at 4 New York Plaza for over a year before the Sandy Hurricane it must have been on a maximum of three occasions that I arrived at work after 9 am but accidents, emergency construction, etc. are very unpredictable in rush hour traffic especially when having to use major thoroughfares such as Route 3, 495 and the Lincoln Tunnel.

But, as long as there is any doubt that I might be able to make it in to work by 9 am, I always call the office to inform my team members even if it means making a call at 7:45 am from the bus after hearing a NJ Transit announcement about heavy delays ahead.

When I am late which is always due to traffic, my arrival time is on average 9:15 am (rarely after 9:20) so I am always still able to quickly and accurately get through running my morning report on time as well as being early for the Huddle which starts at 9:30. In any event, I will have to try for a bus before 7 am instead of between 7:15 and 7:30. (Just an FYI, in regular moving rush hour traffic it takes 45 minutes to get from my bus stop in NJ to the Port Authority and 30 minutes when there is little traffic on the road, like on the day after a major holiday.)

Traveling to 4 New York Plaza used to take me one full hour from the time I got on the train to the time I arrived at the building. My regular commute to and from Brooklyn is between 1¼ to 1½ hours but it takes 2 hours on average when there are problems with traffic. Sometimes my evening commute is worse than my morning commute. For instance, one night I sat for 2 hours in the Lincoln Tunnel due to an oil spill.

WHAT IS THE QUERY MANAGEMENT TOOL?

The Query Management Tool (QMT) is a spreadsheet designed to manage incoming noteworthy queries in order to enhance efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process. Noteworthy queries are queries which would require more thought and/or time than average to resolve.

Functions of the QMT

- The Query Management Tool would function as a central data resource for inputting noteworthy queries as well as a central data resource for readily extracting data.
- The spreadsheet is designed to store pertinent information of all noteworthy queries in a folder stored on the share drive making it accessible to all members of the Confirmations Team.
- All pertinent information would be inputted by individual team members (the team member who is scheduled to monitor emails or the team member who first acknowledges the query) allowing for transparency of important query requests on a real-time basis.
 - Real-time in terms of quickly inputting (takes a couple minutes on average) noteworthy queries onto the spreadsheet as they come in and are acknowledged. Or, at the team member's earliest convenience or maybe hourly by the person who is monitoring emails if that becomes the consensus.

Features of the QMT

- The QMT spreadsheet has two sheets – one for internal (within the team) queries and the other for external (other groups) queries.
- Each column of the spreadsheet is organized to provide all the imperative information that would be needed to efficiently, accurately, transparently, and quickly execute the task of a query that would require additional thought and/or time.
- **Request Date** – The date the request was made
- **Priority Level** – High, Moderate or Low
- **Priority Client** – Yes, No or N/A
- **Attention/Requesting Team Member** (internal requests sheet only) – Who is the query addressed to and who raised the request?
- **Deadline** – The deadline for the requested task to be completed
- **Source** (external requests sheet only) – Who/where is the request from?
- **Assigned Team Member(s)** – To which team member(s) is the request being assigned
- **Item** – What is being requested/subject

- **Issue/Concern** – Brief description of query request
- **Supporting Documents and Additional Supporting Documents** - The option to insert a link or links to any supporting documents
- **Status** – Shows if the query request is pending or completed
- **Number of Times Requested** (external requests sheet only) – The number of times a request was made for the same item
- **Date Completed** – Date of completion of the request
- **Name – Comments/Updates** – Name and comments/updates of the team member(s) who worked on the query

Benefits of the QMT

- The manager would no longer need to constantly chase team members to find out who is working on what and what is happening with an item.
- No need to wait for a meeting to take place the next day for all team members to be aware of all the noteworthy query requests received.
- There would be an emphasis on accuracy and efficiency as all team members would be working with the same notes/information and updates and not with individual notes/information stored in personal inboxes/folders/notebooks.
- If someone is out, this spreadsheet would allow for another team member(s) to obtain the query information as well as the current status to efficiently execute the requested task without delay (can help to cut down on or even eliminate any guesswork).
- The spreadsheet would also work as a tracking mechanism for information such as the amount of requests for confirmations to be issued as priority where the client is not on our set priority list, how many high priority requests were made, how many requests are pending/completed as well as for tracking other information as the needs arise.
- Help in conveying to upper level management the progress the team is making to resolve query requests in terms of date queries were received and completed, number of times a particular request was made and notes about how it was resolved.
- The QMT could improve productivity for the group as a whole as, instead of having the Huddles on a daily basis to discuss noteworthy query requests which were received, who is working on what, etc., these Huddles could be cut to a maximum of three times per week eliminating some dent in collective productivity in terms of length of each Huddle multiplied by the number of team members attending multiplied by the number of Huddles per week.

Your feedback /suggestions are most welcome!

OBJECTIVE 1

Measures/Targets and Accomplishment

Objective 1 – To continue in my quest (as I noted in my 2012 objective) to master the Confirmations process by finding ways to enhance efficiency, accuracy and turnaround time.

Objective 1 – Measures/Targets

After gaining further insight into the Energy Confirmations process, I was able to identify and present an idea to my managers as to how transparency, organization, productivity, efficiency and turnaround time could be improved.

Objective 1 - Accomplishment:

I created a spreadsheet to manage incoming noteworthy queries that based on its capabilities would not only enhance efficiency, accuracy and turnaround time but transparency and productivity as well. Noteworthy queries are queries which would require more thought and/or time than average to resolve.

Functioning as what I would consider to be a query management tool or a central data resource for inputting noteworthy queries and readily extracting data, this spreadsheet model is designed to store pertinent information of all noteworthy queries in a folder on the share drive which would be accessible to all members of the Confirmations Team.

Each column of the spreadsheet is organized to provide all the imperative information that would be needed including the option to insert a link or links to any supporting documents to enhance efficiency, accuracy and turnaround time.

All pertinent information would be inputted by individual team members allowing transparency of important query requests on a real-time basis – real-time in terms of quickly inputting (takes a couple minutes on average) noteworthy queries onto the spreadsheet as they come in and are acknowledged. The manager would no longer need to constantly chase team members to find out who is working on what and what is happening with an item or wait for a meeting to take place the next day for all members of the team to be aware of all the noteworthy query requests received.

On a whole, this could improve productivity for the group as, instead of having a daily meeting to discuss noteworthy query requests which were received, who is working on what, etc., these meetings could be cut to a maximum of three meetings per week eliminating some dent in collective productivity - length of each meeting times the number of individuals attending times the number of meetings per week.

There would be an emphasis on accuracy and efficiency as all team members would be working with the same notes/information and updates and not with individual notes/information stored in personal inboxes/folders/notebooks. So, if someone is out, this spreadsheet would allow for another team member(s) to obtain the query information

as well as the current status to efficiently execute the requested task without delay (can help to cut down on or even eliminate any guesswork).

The spreadsheet would also work as a tracking mechanism for information such as the amount of requests for confirmations to be issued as priority where the client is not on our set priority list, help in conveying to upper level management the progress the team is making to resolve queries in terms of dates query was received and completed, number of times a particular request was made and notes about how it was resolved as well as for other tracking information as the needs arise.

Even though this spreadsheet has not been implemented, I still consider my effort to be an accomplishment of my objective.

Please see sample spreadsheet attached.

<u>REQUEST DATE</u>	<u>PRIORITY LEVEL (Low/Mod/High)</u>	<u>PRIORITY CLIENT (Yes/No)</u>	<u>ATTENTION/REQUESTING TEAM MEMBER</u>	<u>DEADLINE</u>

<u>ITEM</u>	<u>ISSUE/CONCERN</u>	<u>SUPPORTING DOC</u>

<u>ADDL SUPPORTING DOC</u>	<u>STATUS</u> (Pending/Completed)	<u>DATE</u> <u>COMPLETED</u>

<u>REQUEST DATE</u>	<u>PRIORITY LEVEL (Low/Mod/High)</u>	<u>PRIORITY CLIENT (Yes/No)</u>	<u>DEADLINE</u>	<u>SOURCE</u>	<u>ASSIGNED TEAM MEMBER(S)</u>	<u>ITEM</u>

<u>ISSUE/CONCERN</u>	<u>SUPPORTING DOC</u>	<u>ADDL SUPPORTING DOC</u>	<u>STATUS</u> (Pending/Completed)

# OF TIMES REQUESTED	DATE COMPLETED

NAME - COMMENTS/UPDATES