



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 FIDELIA SHILLINGFORD**

FIDELIA SHILLINGFORD, 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 a Vice President in the Counterparty Risk Group ("CRG") of J.P. Morgan Investment Management Inc., a wholly-owned subsidiary of JPMorgan Asset Management Holdings Inc., which is a wholly-owned subsidiary of JPMorgan Chase Holdings LLC, which is a wholly-owned subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of Defendants' 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 am an African-American woman, and I supervised Candice Lue ("Plaintiff") while she was a member of the CRG from her hiring into that group in November 2014 until her termination in January 2016.

### **Manager "Switch"**

3. In or about 2013, Alex Khavin, an Executive Director, became the head of the CRG. Several months later, Kim Dauber, a Vice President, joined the CRG. When Dauber joined, Khavin changed the reporting structure of the group such that all junior members of the CRG, *i.e.*, analysts and associates, would report to Dauber, while all senior members, *i.e.*, Vice Presidents and Executive Directors, would report to Khavin directly. Prior to that time, everyone in the CRG reported to Khavin directly.

4. In the months leading up to Plaintiff's hiring into CRG in November 2014, I expressed to Khavin that I wanted to gain managerial experience. Thus, when the CRG began looking to hire a Credit Reporting Risk Analyst ("Reporting Analyst"), Khavin told me that the person hired to fulfill the role would report to me, and not Dauber.

5. On or about October 30, 2014, I interviewed Plaintiff. During the interview I made clear to her that I would be the supervisor of the person hired for the role, not Dauber. Other members of the CRG who interviewed Plaintiff expressed the same.

6. The ultimate decision to hire Plaintiff was mine. A true and correct copy of Plaintiff's offer letter is annexed here to as Exhibit A.

7. The individual who replaced Plaintiff, a Caucasian, reports to me as well.

### **Job Description**

8. Reporting Analysts and a Counterparty Credit Risk Analysts ("Credit Analysts") are two different positions and serve two different functions, notwithstanding their similar official job descriptions. First, the Reporting Analyst(s) reports to me, while the Credit Analysts report to Dauber. Second, the Reporting Analysts are responsible for reporting and operational functions of the CRG, while the Credit Analysts are responsible for analysis. To elaborate, Reporting Analysts prepare daily and monthly reports, including the "Monthly Counterparty Risk Exposure Report," "Limits Monitoring

Report,” and “Exception Monitoring.” In contrast, Credit Analysts are responsible for assessing risk and conducting ad hoc analyses on counterparties.

9. I informed Plaintiff that she was being hired as a Reporting Analyst.

#### **Taking Minutes and Document Collection**

10. Prior to Plaintiff’s arrival to the CRG, Baruch Horowitz, Plaintiff’s predecessor, was exclusively responsible for taking the minutes at, and collecting and distributing the materials for, the CRG’s monthly governance meeting (the “Tasks”).

11. In or about June 2014, Horowitz began a disability leave. In his absence, Khavin made the task of taking minutes temporarily rotational until Horowitz returned to work. In further recognition of Horowitz’s absence, each analyst was tasked with bringing their own materials to the monthly governance meeting and distributing them upon arrival. However, we found that this approach was inefficient because the participants were spending the first 15-20 minutes of each meeting collecting documents.

12. Horowitz did not return to work from his leave, and the status quo remained until a replacement Reporting Analyst could be hired and resume the Tasks.

#### **Work from Home**

13. In the CRG, employees are permitted to work from home (“WFH”) at the discretion of their manager. WFH enables employees to work remotely on those occasions when they are available to fulfill their job responsibilities but are otherwise unable to come into the office.

14. Prior to working from home, employees must obtain supervisor approval. An employee cannot unilaterally decide to WFH.

#### **Plaintiff’s Unsatisfactory Performance, Disrespect, and Insubordination**

15. On or about January 26, 2015, Plaintiff complained that to me that Khavin was demeaning her by assigning her the Tasks, “as if she was the help, as if this is 1910.”



16. Because I knew that Plaintiff was still very new in her role as Reporting Analyst, I was concerned with Plaintiff's ability to juggle the Tasks with her other reporting responsibilities. As such, I conferred with Khavin, and we agreed to try and accommodate Plaintiff, not because the Tasks were "demeaning," but in order to give Plaintiff time to get up to speed with her role and new responsibilities. To that end, on a temporary basis, we reinstated the rotation that had been in place during Horowitz's absence.

17. In July 2015, after Plaintiff had been in her role for the better part of a year, I decided that she had been afforded sufficient time to fully acclimate to her role. As such, I informed Plaintiff that, going forward, she was expected to complete the Tasks, which would no longer be rotational.

18. Attached as Exhibit B hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff on April 24, 2015.

19. Attached as Exhibit C hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff and HR on May 11 through May 13, 2015.

20. Attached as Exhibit D hereto is a true and correct copy of e-mail correspondence I exchanged with HR on May 27, 2015.

21. Attached as Exhibit E hereto is a true and correct copy of e-mail correspondence I exchanged with HR on July 20, 2015.

22. On July 30, 2015, Helen DuBow, the Human Resources Business Partner assigned to support CRG, and I conducted Plaintiff's 2015 mid-year review at which Plaintiff was placed on a performance improvement plan. I asked DuBow to sit in because I knew she had been monitoring the progress of an HR investigation into complaints Plaintiff had made, and I thought it was important to have an HR representative present at the review meeting.



23. Attached as Exhibit F hereto is a true and correct copy of Plaintiff's performance improvement plan.

24. Attached as Exhibit G hereto is a true and correct copy of Plaintiff's 2015 review.

25. Attached as Exhibit H hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff on July 30 and August 3, 2015.

26. Attached as Exhibit I hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff and HR on August 25, August 26, and August 27, 2015. Plaintiff ignored my August 25 e-mail, and another member of the group had to complete the Tasks for August's monthly governance meeting.

27. Attached as Exhibit J hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff on September 23, 2015.

28. Attached as Exhibit K hereto is a true and correct copy of the Written Warning that was issued to Plaintiff on September 24, 2015.

29. Attached as Exhibit L hereto is a true and correct copy of e-mail correspondence Plaintiff sent me on September 25, 2015.

30. Attached as Exhibit M hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff and HR on October 14 and October 15, 2015.

31. Attached as Exhibit N hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff and HR on October 21 and October 22, 2015.

32. Attached as Exhibit O hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff from October 20 through October 22, 2015.

33. Attached as Exhibit P hereto is a true and correct copy of e-mail correspondence I exchanged with HR on December 1, 2015.

34. Attached as Exhibit Q hereto is a true and correct copy of e-mail correspondence I exchanged with Plaintiff on December 1, 2015.

35. Following the incidents in October and December, I expressed my desire to HR to terminate Plaintiff's employment. However, notwithstanding Plaintiff's continued disrespect towards me, I did not wish to see her terminated during the holiday season, so I requested to HR that the termination occur in early January.

Dated: New York, New York  
May 08<sup>th</sup>, 2017

  
Fidelia Shillingford

# EXHIBIT A





November 6, 2014

Candice S. M. Lue  
4122 Bel Vista Court  
Lodi, New Jersey 07644

Dear Candice:

We are pleased to confirm the details of your upcoming transfer.

Please take a moment now to carefully review the information in this letter. It supersedes any previous verbal or written communication related to your transfer.

**Position:**

Your position at the time of transfer will be AM - Credit Reporting Risk Analyst, reporting to Fidelia Shillingford, in the AM COUNTER PARTY department. Your anticipated transfer date is November 7, 2014.

**Compensation:**

You will be paid consistent with JPMorgan Chase & Co. policies at an annualized base salary rate of \$75,000.00. Please note that pay and position changes can only be made on a payroll effective date.

**Benefits:**

Your benefits eligibility will be determined by the plans and policies of JPMorgan Chase as amended from time to time. Should you have questions about your benefits, call accessHR at 1-877-576-2427.

**Updates to Contact Information:**

As a transferring employee, it is your responsibility to update your contact information. You can do this through Self Service. Go to the Company home page and choose HR & Personal > My Personal Profile. It's very important to make all applicable changes, promptly, so that your contact information is accurate for mail and phone purposes.

I wish you continued success in your new role. Please call me at 614-547-7191 if I can help you in some way.

Sincerely,  
Francisco Rivera  
JPMorgan Chase Staffing

# EXHIBIT B

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**From:** Lue, Candice  
**To:** Shillingford, Fidelia X  
**Sent:** 4/24/2015 4:24:21 PM  
**Subject:** RE: Minutes and Documents for Extended Team Meeting

Hi Fidelia,

Pursuant to our conversation yesterday, I thought the issue of me being demeaned by Alex that I spoke to you about in two meetings in January for you to raise with Alex was resolved. Bearing in mind, that again, I had to go through you to convey this matter to her as, as per protocol, I am not allowed to go directly to her.

As discussed in those meetings, I feel I am being demeaned by Alex assigning me to collect documents via email from the entire team to print, sort, organize, staple then lug to the team meetings to distribute to the entire team. These are duties that are not even assigned to the administrative assistant on staff to do and duties that were the responsibility of the entire staff to do for themselves.

Also, as I have made clear in my arguments, when I was being interviewed for this position, I was asked about taking minutes at meetings and it was only after it was confirmed by me that taking minutes at these meetings would have been rotational among all the analysts that I said that would have been okay. Otherwise, that would have been the deal breaker as I would have seen the job as an Analyst/Administrative Assistant position and would have immediately lost interest.

In my first office meeting, when it was still the procedure to rotate the minutes among all the analysts, Alex asked, "Who wants to take the minutes this time?" then she volunteered me to do it. For me that was fine as it was understood that the minutes were done on a rotational basis.

However, since then, she has relegated this duty to me and only me by instead of asking "Who wants to take the minutes this time?", "in front of everyone, she 's asking me if I am taking notes and if there is a follow up announcement addressing me saying "that 's a follow up " as a signal that I am supposed to be taking the minutes.

In conjunction, and again in front of everyone, she announced that going forward I must print out everyone 's handouts for the meetings and everyone must send their documents to me instead of to the team for me to put together in one email and send to the team. As, instead of everyone going through their emails searching for the sent documents, I should be the one doing the searching then opening each person 's email, pulling their attachments and putting all the attachments together in one email so that it can be easier for everyone else to open and have the documents there. So, it is hard enough for everyone to search through their emails for the sent documents but for me, I must not only search through my emails for them, I must also open each person 's email, pull their attachments and put all those attachments together in one email to make it easier for everyone else.

Alex has also been sending me emails prior to meetings asking me if I am collecting all the documents for the meetings and printing them beforehand as well as emailing all the team 's attachments to the entire team the evening before the meeting. Bearing in mind, that this is the evening when I have to be working late due to the amount of work I have to do to prepare for the presentation when for the most part everyone else is good to leave work at a regular time.

As I have said to you in my meetings with you in January regarding this issue, "Am I the help? Is this 1910? "



Best regards,

Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | ( (212) 648 - 0936 | + [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Dauber, Kimberly S  
**Sent:** Wednesday, February 04, 2015 2:03 PM  
**To:** Lue, Candice; Shillingford, Fidelia X  
**Subject:** RE: Minutes and Documents for Extended Team Meeting

Candice -

Every analyst and/or associate on this team has been the minute taker of our Extended meetings at some time during the last 2 years. I don't think this is a function that is specifically written out in job duties because it's an ad-hoc function. However, Alex would pick a different person each time during our meetings. Most recently, it was understood that the reporting analyst would handle it. I'm fine with including additional analysts to assist you with this.

Best regards,

**Kimberly Dauber** | Vice President | J.P. Morgan Asset Management | 270 Park Ave, 9th Floor, New York, NY 10017 | T: 212-270-1655 | [kimberly.s.dauber@jpmorgan.com](mailto:kimberly.s.dauber@jpmorgan.com)

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**From:** Lue, Candice  
**Sent:** Wednesday, February 04, 2015 1:55 PM  
**To:** Shillingford, Fidelia X; Dauber, Kimberly S  
**Subject:** RE: Minutes and Documents for Extended Team Meeting

Hi Fidelia,

Just to reiterate, as previously discussed, I have never considered these tasks to be my responsibility as I had confirmed such in the interview and on the job.

Best regards,

Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ( (212) 648 - 0936 | + [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, February 04, 2015 1:38 PM  
**To:** Dauber, Kimberly S  
**Cc:** Lue, Candice  
**Subject:** Minutes and Documents for Extended Team Meeting

Hi Kim

I have discussed with Alex and she is ok with the proposal that we continue to rotate the responsibility of document collection and minutes taking for our monthly governance meeting.

I suggest that we have a schedule so that each analyst is aware of who is responsible for which month. Can you please select at least two analysts who could assist Candice with this responsibility? Once confirmed, I will fill in the appropriate names for Analyst 1 and 2 and circulate.

Thank you.

Analyst	Month
Feb	Candice
Mar	Analyst 1
Apr	Analyst 2
May	Candice
Jun	Analyst 1
Jul	Analyst 2
Aug	Candice
Sep	Analyst 1
Oct	Analyst 2
Nov	Candice
Dec	Analyst 1

Regards

*Fidelia Shillingford* | VP, Counterparty Risk Management | **J.P. Morgan Asset Management**





# EXHIBIT C

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**From:** Lue, Candice  
**Sent:** Wednesday, May 13, 2015 6:52 AM  
**To:** Shillingford, Fidelia X; Miller, Brooke A  
**Cc:** Khavin, Alex G  
**Subject:** Re: WFH

Good morning Fidelia,

With regards to your email below, after hearing back from Brooke this is what I told you on Monday under separate cover: "I will have to take off Tuesday and possibly Wednesday as sick days."

I will be taking off today as well. I was initially planning on coming in as yesterday my mother seemed to be making good progress. However, within 30 minutes of me washing her hair and she getting it dried under the hair dryer, the pain in her shoulder flared up. Maybe it was the hot dry air from the hair dryer??? That is why in my email below I said: "I can work from home today.....as I have to stay close." Meaning for the most part her pain is now at or close to a bearable level whereby I would be able to execute my regular work BAU but in the event of sudden instances as described above, I would be close by to help her.

In any event, the pain has again subsided to close to a bearable level and my mother has promised not to be anywhere near hot dry air so I think I should be okay to come into the office tomorrow.

Best regards,  
Candice

----- Original Message -----

From: Shillingford, Fidelia X  
Sent: Tuesday, May 12, 2015 09:12 AM  
To: Lue, Candice; Miller, Brooke A  
Cc: Khavin, Alex G  
Subject: RE: WFH

Thanks Candice.  
Can you let me know what your plans are for the reminder of the week?

Regards  
Fidelia Shillingford

-----Original Message-----

From: Lue, Candice  
Sent: Monday, May 11, 2015 4:39 PM  
To: Miller, Brooke A  
Cc: Khavin, Alex G; Shillingford, Fidelia X  
Subject: RE: WFH

Brooke,

Okay, thank you! Will do.

Best regards,  
Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | | (212) 648 - 0936 | [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

-----Original Message-----

From: Miller, Brooke A  
Sent: Monday, May 11, 2015 4:20 PM  
To: Lue, Candice  
Cc: Khavin, Alex G; Shillingford, Fidelia X  
Subject: RE: WFH

Hi Candice,

Per your email below, the ability to work from home is at manager discretion and is not intended for the purpose outlined below. Per the time away from work policy (attached), employees are supposed to use their sick days to care for an ill family member. If you happen to use all of your sick days, you still have vacation time and personal days available to you as well. I hope this helps. Please let me know if you have any questions. Thank you.

Kind regards,

Brooke Miller | Associate | Asset Management HR Business Partner | J. P. Morgan | 277 Park Avenue 13th floor, New York, NY 10172-0003 | 212-648-1456 | [brooke.a.miller@jpmchase.com](mailto:brooke.a.miller@jpmchase.com)

-----Original Message-----

From: Lue, Candice  
Sent: Monday, May 11, 2015 10:36 AM  
To: Shillingford, Fidelia X  
Cc: Miller, Brooke A; Khavin, Alex G  
Subject: RE: WFH

Hi Fidelia,

With all due respect, what if I should become sick during the year and need to use my sick days? Also, isn't one of the purposes of the work from home to facilitate emergencies like mine? Please discuss this matter with HR and advise.

Best regards,  
Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | | (212) 648 - 0936 | [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

-----Original Message-----

From: Shillingford, Fidelia X  
Sent: Monday, May 11, 2015 10:23 AM



To: Lue, Candice  
Subject: RE: WFH

Hi Candice

Please use your available sick days to there for your Mom; I will have Kenny take over the reporting for April in your absence.

Hope your Mom feels better soon.

Regards

Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management  
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810

-----Original Message-----

From: Lue, Candice  
Sent: Monday, May 11, 2015 6:26 AM  
To: Shillingford, Fidelia X  
Subject: WFH

Good morning Fidelia,

I can work from home today. Because of the situation below, I am not able to come into the office, as I have to stay close. Hopefully I'll be able to make it in some time this week.

Best regards,  
Candice

----- Original Message -----

From: Lue, Candice  
Sent: Friday, May 08, 2015 06:28 AM  
To: Shillingford, Fidelia X  
Subject: Sick Day

Good morning Fidelia,

I will be taking today off as a sick day to take care of my sick mother.

Best regards,  
Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | | (212) 648 - 0936 | [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

-----Original Message-----

From: Lue, Candice  
Sent: Thursday, May 07, 2015 5:58 AM  
To: JPM AM Global CRG  
Subject: WFH

Hi Team,

Due to a family emergency, I have to work from home today. I can be reached via email and communicator. If urgent, you can call me at (201) 414 - 4452.

Best regards,  
Candice

# EXHIBIT D

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**From:** Shillingford, Fidelia X  
**To:** Dubowy, Helen  
**CC:** Khavin, Alex G ; Miller, Brooke A" ; Vernon, Terri  
**Sent:** 5/27/2015 4:28:01 PM  
**Subject:** RE: Lack of Trust and Confidence AND Your Relationship with Michelle Sullivan

Thanks Helen

Given the history with Candice, I would very much prefer if someone from HR would be present during the meeting. I want to be certain that the conversation is productive, that her concerns are addressed appropriately and that she gets all the information she needs.

I can ask that she reschedule to a time that works for all; please let me know your availabilities so I can communicate with Candice.

Regards  
Fidelia Shillingford

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**From:** Dubowy, Helen  
**Sent:** Wednesday, May 27, 2015 11:21 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Khavin, Alex G; Miller, Brooke A; Vernon, Terri  
**Subject:** RE: Lack of Trust and Confidence AND Your Relationship with Michelle Sullivan

Fedelia – neither Brooke nor I can attend the call. You should work with Terri Vernon from Employee Relations for guidance. I am ccing Terri on this email. Please reach out to Terri directly. You can update Terri on the history with Candace.

If you are uncomfortable attending the meeting with Candace until you speak to Terri, just postpone the meeting.

Thanks.

-----Original Appointment-----

**From:** Shillingford, Fidelia X **On Behalf Of** Lue, Candice  
**Sent:** Wednesday, May 27, 2015 9:22 AM  
**To:** Miller, Brooke A; Dubowy, Helen  
**Subject:** FW: Lack of Trust and Confidence AND Your Relationship with Michelle Sullivan  
**When:** Wednesday, May 27, 2015 11:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Floor 9 / Team Room 3

Hi

I would appreciate if one of you would be able to attend this meeting scheduled by Candice. Let me know if the time does not work for you and I will ask her to reschedule appropriately.

Thanks in advance.

Regards  
Fidelia Shillingford

-----Original Appointment-----

**From:** Lue, Candice  
**Sent:** Tuesday, May 26, 2015 5:49 PM  
**To:** Lue, Candice; Shillingford, Fidelia X  
**Subject:** Lack of Trust and Confidence AND Your Relationship with Michelle Sullivan  
**When:** Wednesday, May 27, 2015 11:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Floor 9 / Team Room 3

Hi Fidelia,

Just wanted to discuss with you the influence my previous manager has in my current work affairs and the lack of trust and confidence I have in your management.

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | ( (212) 648 - 0936 | + [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)



# EXHIBIT E

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**From:** Dubowy, Helen  
**To:** Vernon, Terri  
**Sent:** 7/20/2015 11:40:40 PM  
**Subject:** Fw: PIP template  
**Attachments:** [Untitled].pdf

We have to figure out what to do here. This kind of behavior is not appropriate. Anyway to get John to expedite the rest of the investigation?

---

**From:** Shillingford, Fidelia X  
**Sent:** Monday, July 20, 2015 05:56 PM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G; Vega, John R.; Shillingford, Fidelia X  
**Subject:** RE: PIP template

Helen et al

I wanted to update you on a recent conversation with Candice during our scheduled one-on-one (meeting to discuss workload for the last two weeks, upcoming two weeks and any other tasks/issues).

- I asked Candice to include in her tasks for the upcoming two weeks, the responsibility for prepping documents and taking notes for the Governance meeting. She has refused.
- Candice also stated and I quote, "last week, you **bullied** me" in regards to "when will I have the exposure report completed." I explained to Candice that this role has deadlines and me asking her for the report is BAU – I am trying to manage management deadlines.

Regards  
Fidelia

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**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:05 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G; Vega, John R.  
**Subject:** RE: PIP template

Much like the PIP, I would hold off on providing any feedback at this time.

Terri Vernon  
Vice President, Human Resources Advice Direct  
(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (949) 651-6035

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**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 7:03 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

No, when last I spoke with him he noted that she brought up other issues which he has to investigate. Can I proceed with the mid-year feedback?

Regards  
Fidelia

---

**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:01 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen

**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Fidelia,  
My apologies, I thought John had reached out to you.  
Please hold off at this time with the PIP until further notice.

Terri Vernon  
Vice President, Human Resources Advice Direct  
(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (949) 651-6035

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**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 6:00 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template  
**Importance:** High

Hi Terri

Were you able to get in contact with John? Can you please advise how to proceed?  
I believe we should at least provide mid-year feedback to Candice and we can proceed with the PIP after the investigations have been completed.

Can you please give me a call to discuss?

Thank in advance

Regards  
Fidelia

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**From:** Vernon, Terri  
**Sent:** Wednesday, July 08, 2015 1:11 PM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Hi,  
Corp ER is meeting with her now. Please stay tuned for further direction.

Terri Vernon  
Vice President, Human Resources Advice Direct  
(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (949) 651-6035

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**From:** Shillingford, Fidelia X  
**Sent:** Monday, July 06, 2015 2:27 PM  
**To:** Dubowy, Helen; Vernon, Terri  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Thanks Helen

Terri, Helen  
Alex is OOO and I am planning to deliver mid-year feedback to Candice once the investigation has been completed (expected to be completed this week). Please find attached a summary of mid-year feedback for your review. This will be delivered by me with Kimberly Dauber present.

Based on the feedback and performance for mid-year, I am strongly considering placing Candice on a PIP. Terri, can you please review the PIP and let me know your thoughts. I intend to deliver the PIP separately, after the mid-year feedback.

Regards  
Fidelia

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**From:** Dubowy, Helen  
**Sent:** Monday, July 06, 2015 10:01 AM  
**To:** Shillingford, Fidelia X  
**Subject:** PIP template

As discussed. Thanks.

# EXHIBIT F



# JPMORGAN CHASE & CO.

## PERFORMANCE IMPROVEMENT PLAN

The goal of this Performance Improvement Plan is to assist the manager and the employee in defining which, and how specific performance areas or behaviors need to be improved.

Employee Name	Position Title	Employee ID	Manager Name	Department
Candice Lue	Analyst	R089235	Fidelia Shillingford	Counterparty Risk Group
Last Formal Performance Evaluation (Mid-Year)			Date: July 30th, 2015	Rating: M-
<b>Section 1.</b> Describe problem - What specifically has warranted the need for a Performance Improvement Plan?				
Candice joined the Counterparty Risk Group as a reporting analyst on November 10th, 2015. Her main responsibilities include:				
<ol style="list-style-type: none"> <li>1) Help monitor, report and manage counterparty exposures</li> <li>2) Help maintain credit administration systems and records</li> <li>3) Updating and distributing daily Counterparty reports</li> <li>4) Assist other team members with assignments, cover for associates as needed</li> </ol>				
Although Candice has been with the team for over 8 months, she has not taken on all tasks assigned to her and she is unable to deliver in the anticipated timeframe without errors. This is putting additional stress on the team as other team members are performing duties assigned to her. Additionally, from my observation and per feedback from team members, Candice is inflexible and not open to feedback.				
<b>Section 2.</b> Describe a) the previously communicated work expectations (goals, objectives) as they relate to this problem				
<u>Areas of Improvement</u>				
Job Responsibilities: Candice needs to perform job responsibilities asked; she has demonstrated refusal to perform assigned tasks.				
Time/Project Management: (i) Routine Tasks: Candice requires much longer time and assistance to perform routine assignments. This is evidenced by the fact that previous analysts who performed the job were able to solely perform the tasks within the time period at a point when it was much less streamlined (very manual). She needs to learn to efficiently manage her work in order to deliver on the exposure report and monthly reconciliation in the anticipated timeframe and without errors and (ii) Ad-hoc: Candice is unwilling or unable to take on additional workload or assignments that need quick turnaround. There are data demands that require quick turnaround (typical of a developing credit event) where we have had to leverage other personnel, despite being the point person for data.				
Attitude/Professionalism: Feedback from the team is consistent in terms of inappropriate tone of emails and verbal communication which comes across as hostile and not business appropriate. Candice needs to improve her communication specifically in regards to tone and professionalism.				
<b>Section 3.</b> Define <u>specifically</u> which skills, competencies, or behaviors must be improved, and the outcomes expected.				
<i>Skill, competency, or behavior to be improved</i>		<i>Outcomes expected and how they will be measured</i>		
a. Job Responsibilities		<ol style="list-style-type: none"> <li>1. Perform assigned projects and tasks Manager will monitor on a weekly basis</li> </ol>		
b. Time/Project Management		<ol style="list-style-type: none"> <li>1. Complete reconciliation and exposure report on time without errors</li> <li>2. Be able to process ad-hoc data demands as requested</li> <li>3. Take full ownership of reporting responsibilities Manager will monitor on a monthly basis</li> </ol>		
c. Attitude/Professionalism		<ol style="list-style-type: none"> <li>1. Improve her communication style specifically in regards to tone and professionalism Manager will monitor on a daily basis</li> </ol>		
d.				
<b>Section 4.</b> Describe the type of assistance and support available to the employee.				
Earlier in the year, Candice participated in the AM Off cycle Training 2015. The Training was aimed at providing an overview of the AM business and also providing excel and professional skills training. In addition, there are several recommended courses available in AM University focused on improving her excel skills, time management and product training.				
<b>Section 5.</b> Set specific date for a final review to assess the achievement of expected level of performance. Ensure that employee is aware that if performance does not meet expectations by final review, Corrective Action will follow. Failure to demonstrate immediate and sustained improvement and to not meet performance expectations may result in additional corrective action, up to and including termination, at any time prior or after the expiration of this review period.				Final Review on:
				September 30th, 2015

# JPMORGAN CHASE & Co.

## PERFORMANCE IMPROVEMENT PLAN

The goal of this Performance Improvement Plan is to assist the manager and the employee in defining which, and how specific performance areas or behaviors need to be improved.

Employee Name	Position Title	Employee ID	Manager Name	Department
Candice Lue	Analyst	R089235	Fidelia Shillingford	Counterparty Risk Group

.....Fidelia Shillingford.....7/30/15.....  
Manager Signature Date Employee Signature Date

*Give employee a copy of the completed form. Send copy to Employee Records: DE3-2280 REV.8/11/11*

# EXHIBIT G



Manager sections of this review are in 'draft' status. Employee cannot view manager's comments or ratings in Draft status.

Review Information	
Review Status:	In Progress
Employee:	Lue,Candice (R089235)
Manager:	Shillingford,Fidelia (O024978)
Additional Manager:	N/A
Review Cycle:	01-JAN-2015 --- 31-DEC-2015
Reporting Year:	2015
Job Title:	Counterparty Risk
Tenure Date:	20-AUG-2012

Mid Year Rating	Year End Rating
<i>The Mid Year rating is in draft status.</i>	<i>The Year End rating is in draft status.</i>

Finalize Year End Performance Review - Signature Section		
User	Signature	Date
Manager	Not Signed	N/A
Employee	Not Signed	N/A

Objective #1	
Objective	Measures/Target Dates
<p>1a) To try to be alert in identifying processes in the credit exposure reporting and reconciliation reporting that may require improvement and make the effort to propose measures that could heighten both the efficiency and accuracy.</p> <p>1b) To proactively identify and make suggestions for controls that could be implemented to mitigate risk in the overall reporting process.</p>	<p>The past year has been very tumultuous with the unfair treatment that had been meted out to me and the undue stress that I had to endure. However, through all the challenges I faced, I managed to pull through to contribute to process improvements and employ self-identified controls in my daily workload.</p> <p>Through due diligence, I was able to proactively contribute to tackling the many data quality issues directly associated with the quest to automate the Exposure Report. With that said, I have identified and investigated errors in this said report and to contribute to improving the overall reporting process, I prepared analyses of my findings and sent these analyses to the Tech Team to resolve data quality issues in an effort to improve accuracy and efficiency.</p>
Employee Accomplishments	
<p>It has always been a part of my objective to make contributions to process improvement initiatives to benefit the department by identifying areas and/or issues where enhancements would serve well. With that said, I took the initiative to employ data validation techniques to prevent or mitigate system errors which have a negative effect on Reporting accuracies, efficiency and productivity time. In my quest to share my knowledge, I outlined an example of one of these data validation techniques in a six page document which I sent via email to members of the credit risk reporting team and also saved it on the teams shared drive for access to all. This data validation technique is also incorporated as an appendix in the Monthly Exposure Report SOP.</p> <p>Further to the afore-stated, having a control mindset has enabled me to suggest the need for and create a folder called Email Verifications From Business within the Monthly Counterparty Exposure folder on the teams shared drive to save Exposure Report related email correspondence upon which we received verifications on variance analysis, exposure logic, etc. for future reference and for audit. Similarly, this technique was employed with the Reconciliation Report to save and track correspondence related to trade and broker exception related verifications and investigatory results. In conjunction, I have stressed the need for additional controls and data vetting mechanisms to different levels of management in an effort to curtail the numerous data quality issues which contribute to keeping the</p>	

Lue,Candice (R089235) - 2015 Performance Review

reporting process very manual, time consuming and at times overwhelming.

Also, when the Counterparty Risk Group (CRG) was leveraging the Spotfire application to extract counterparty exposure data from Newton, in order to improve productivity time, efficiency and mitigate the risk of Excel crashes due to data volume overload, I suggested the need to curtail the data that was extracted from the application by leveraging only essential columns with data for producing the Exposure Report. This idea was also implemented and offered efficiencies whereby productivity time improved in spending valuable time successfully producing the Exposure Report rather than troubleshooting Excel crashes and data loading issues that caused slowdowns and halting of the process.

#### Manager Comments

### Objective #2

Objective	Measures/Target Dates
To continue to take ownership of the exposure reporting process by having a thorough understanding of the process, data and variances with an aim for accurate, timely submissions.	I have tried to stay focused in order to understand and continue to learn the process and proactively conduct research and analysis to explain variances, investigate and escalate data quality issues while striving for accurate, timely submissions.

#### Employee Accomplishments

I continue to proactively take ownership of the Exposure Report by understanding the process, conducting variance analysis, data integrity checks and follow ups. I present analysis and trends at the Monthly Governance Meeting for the Exposure Report (as I also do for the Reconciliation Report and AM Counterparty Dashboard).

I have been able to execute my work in a timely manner while employing as much due diligence as possible to deal with the numerous data quality issues I experience which require manual intervention to detect and escalate during this transition period to automate the Exposure Report. As data quality issues arose throughout the process, I have been instrumental in independently self-identifying, analyzing, investigating, preparing analysis for and escalating these abnormalities to the Tech Team and then conducting follow ups until the issues have been resolved. I have also conducted UAT testing for data quality issue resolution and system enhancements.

By leading knowledge sharing sessions which focused on the Exposure Reporting process, I was able to communicate to the Tech Team a more detailed view of the efforts and analysis required to produce the Exposure Report. This in turn helped with the departmental initiative for report automation and increasing the frequency of producing the report in the future.

#### Manager Comments

### Objective #3

Objective	Measures/Target Dates
To continually work on enhancing my product knowledge to a level that allows me to execute my daily tasks with optimal competence.	I have self-identified and taken training courses in Asset Management University and Risk Management University, respectively, conducted continuous independent research, attended seminars, collaborated with teammates and participated in an analyst training program.

#### Employee Accomplishments

I can without reservation say that even though opportunities will always arise for me to learn new things, I have gained the required knowledge of the credit-related products to competently execute the tasks of my role as a Credit Reporting Risk Analyst in the Asset Management Counterparty Risk Group.

I have self-identified and taken training courses in Asset Management University and Risk Management University, respectively such as Asset Management Credit Risk, Managing Credit Risk and Counterparty Credit Risk (Measurement) as well as conducted continuous independent research to enhance my product knowledge. I also attended the Asset Management On-Trac Analyst Training Program (an orientation for new Asset Management analysts) from 2/23 to 3/6/15 which had a focus on strengthening knowledge of Global Investment Management and Global Wealth Management business and products. After completing the Analyst Training Program, I did a knowledge share presentation for the team where I spoke about some of the products that were presented during the program.

#### Manager Comments



Development Plan		
Development Goal - Completed	Actions/Resources	Progress
With the continuously evolving reporting deadlines based on new requirements from senior management, I will be able to enhance my prioritization skills by developing new strategies to efficiently and effectively organize and prioritize the workload to meet the requirements of the changing deadlines. This experience will play an integral role in the enhancement of my prioritization skill.	I try to stay focused to complete my BAU assignments. I continue to manage my time accordingly to fulfill the demands of my workload and effectively prioritize my tasks and ad-hoc assignments to the best of my ability.	The past year has been very tumultuous. With the unfair treatment that had been meted out to me and the undue stress that I had to endure, for now, I will just take it one day at a time.
Development Goal - Completed	Actions/Resources	Progress
Through consistent liaisons, I am able to communicate intellectually with team members, the Business, Technology and other groups which has helped me to enhance my cross-functional knowledge and understanding of other areas of the business. This broader perspective and knowledge will continue to help to boost my efficiency and improve results. Continuous liaisons with people on all levels also enhance my communication skills and gives me the confidence to function effectively in a company as JPM.	I have identified teammates with the right attitude and have liaised with them to expand my knowledge and strengthen my understanding of the business and its products. I have also broadened my knowledge perspectives of the business through consistent liaisons both verbally and in writing with members of the Tech Team and business contacts from the various lines of business while concurrently executing the tasks to fulfill completion of the Monthly Exposure and Reconciliation Reports. Asking questions and conducting appropriate due diligence have proved helpful in ensuring optimal accuracy and minimizing risk.	I continue to liaise with team members, the business and Tech to enhance collaboration and knowledge.
Development Goal - Completed	Actions/Resources	Progress
Taking additional courses to develop a deeper understanding of the various trading products that have been helpful in me executing my daily tasks with optimal competence by leveraging Asset Management University, Risk Management University and conducting independent research.	<p>Example courses</p> <ul style="list-style-type: none"> <li>o Asset Management Credit Risk Done</li> <li>o Managing Credit Risk Done</li> <li>o Counterparty Credit Risk (Measurement) Done</li> <li>o Personal Development courses (leveraging Harvard Manage Mentor) ongoing <ul style="list-style-type: none"> <li>o Completed HMM courses: Innovation Implementation and Global Collaboration</li> </ul> </li> <li>o Attended AM On-Trac Analyst Training Program from 2/23 to 3/6/15</li> </ul> <p>Will continue to self-identify courses and note accordingly on PMC</p>	I have fulfilled all of my mandatory training requirements for 2015 in addition to other training courses I have self-identified.
Development Goal - In	Actions/Resources	Progress

<b>Progress</b>		
I will be considering pursuing my CFA license to enhance my overall professional skills as well as my financial career.	<p>I was placed on a Performance Improvement Plan in retaliation for raising racial discrimination against me to HR and was also put on Written Warning effective up to November 30, 2015 with the expectation being "that Candice perform the job responsibilities for which she was hired; she is expected to print all materials for our monthly team meeting and provide copies for each member."</p> <p>With that said, all ambitious development plans have been put on hold as, based on the stipulations of these two severe punishments, a performance improvement plan and a written warning, I am denied access to all of the companys progressive benefits. These benefits include sponsorship from the company to pursue my CFA license.</p>	The past year has been very tumultuous. With the unfair treatment that had been meted out to me and the undue stress that I had to endure, for now, I will just take it one day at a time.
<b>Manager's Comments</b>		

<b>Career Plan</b>	
<b>Career Goal</b>	<b>Term</b>
The past year has been very tumultuous. With the unfair treatment that had been meted out to me and the undue stress that I had to endure, for now, I will just take it one day at a time.	Short Term (0-12 months)
<b>Manager Comments</b>	

<b>Strengths &amp; Opportunities</b>
<b>Employee Strength (Display) -- Lue, Candice (17-DEC-2015)</b>
1. My ability to liaise both verbally and in writing with individuals on all levels as it relates to enhancing the Reporting process and the quality of my work
<b>Employee Strength (Display) -- Lue, Candice (17-DEC-2015)</b>
2. My ability to meet critical deadlines under stressful/intense circumstances
<b>Employee Strength (Display) -- Lue, Candice (17-DEC-2015)</b>
3. My ability to identify areas for process improvement and take the initiative to employ the means necessary to do so
<b>Employee Strength (Display) -- Lue, Candice (17-DEC-2015)</b>
4. My gossip free discipline that allows me to refrain from discussing team members private, personal or professional situations and/or issues with other team members to influence them or to gain favor from these said team members
<b>Employee Opportunity (Display) -- Lue, Candice (17-DEC-2015)</b>
<p>I am currently on Written Warning up to 11/30/2015 with the expectation being "that Candice perform the job responsibilities for which she was hired; she is expected to print all materials for our monthly team meeting and provide copies for each member." With that said, all ambitious development plans have been put on hold as, with a written warning, I am denied access to all of the companys progressive benefits.</p> <p>Since "she is expected to print all materials for our monthly team meeting and provide copies for each member" is such a major issue that it has landed me on written warning, I would have appreciated if my hiring process had been a bit more transparent as, if I were aware that</p>



this demeaning task was a job responsibility "for which [I] was hired" or even had known that it would have become a part of my duties, I would NOT have accepted this job.

#### Employee Opportunity (Display) -- Lue, Candice (17-DEC-2015)

\*Continued - In the meantime, however, I will continue to do my core analytic duties which include ad-hoc tasks to the best of my ability and under the circumstances.

#### Manager

*There are no comments available from the manager(s);  
comments may not exist or be in draft status.*

#### Summary Comments

##### Employee Mid Year (Display) -- Lue, Candice (04-AUG-2015)

I do not know when my managers comments were snuck in here (bearing in mind that the managers comments are usually updated in PMC for the employee to read them before the sit down occurs). But, when I did my mid-year performance review with her in the presence of Helen Dubowy from HR on 7/30/15 at 12pm, the only thing I was presented with was a one page PDF (see attached). When I questioned how I would respond, I was told by both of them that any comments I have with regards to what is on the said PDF must be sent directly to Fidelia via email as they would be forgoing the usual PMC process and using this different process ("the PDF process") for my mid-year review. The only thing I needed to do in PMC as per the email (see trail attached) from Fidelia is to go into PMC and check that we had a mid-year discussion.

In any event, this ploy will not deter me from my message so please see below, as I was instructed to do, my 8/3/15 email response to Fidalias PDF:

Fidelia:

Since I was raised in a household where TRUTH matters, I will not compromise my dignity to fully respond to or to sign off on the malicious and mendacious comments you have made about me and my work in your PDF attachment. These are fabricated comments made about me in retaliation for me speaking up and complaining about racial discrimination against me to HR.

With that said, I am a bit perturbed as to why I am denied the use of the companys Performance Management Central (PMC) portal for my mid-year performance review where my permanent work record would be electronically stored and where I would have the opportunity to tell the TRUTH instead of me responding via email with any comments to you where the said email response will be stored in your work/computer file versus this companywide proprietary platform provided for this use.

Which other team members are doing duties assigned to me? Would that be the half a person designated to help out due to the recognized fact that there is a lack of human resources on the Reporting side? Wasnt this the said reason for two of my predecessors leaving the job? So, I am being blamed for the lack of human resources now? The half a person is stressed because he wants to move on from doing reporting work and may I respectfully say, working with you. His new position is now or should be that of a credit risk analyst on the Credit Analysis side. I would have been stressed too if I were him. In how many meetings and one on ones have I raised the obvious issue of the need for additional human resources to you? In how many of these meetings did you agree with what I had to say (whether or not you were being disingenuous) until you were told that you will not be provided with any additional resource and then you ultimately got half a person?

Would the previous analysts you talked about being more favorable than I am in terms of executing their work on time, etc, include the one who is the teams running joke? The said one you imitated on Tuesday, July 28, 2015 where you put your hands in the air and said as he complained, yes complained, I can only do one thing at a time? Or, would it be the one who resigned after two months on the job due to being overwhelmed with work and not having a work/life balance? You, yourself are well over your head with work. To that, I will just say that when I go home, I want to feel as if I am at home, not at work.

**\*\*8/3/15 Email Response Continued Below\*\***

##### Employee Mid Year (Display) -- Lue, Candice (04-AUG-2015)

**\*\*8/3/15 Email Response Continued\*\***

Improve my communication style specifically in regards to tone and professionalism. - If you are referencing the emails in which I complained about being treated as the help (and I bet you are), I think my standing up has been misconstrued. In those emails I do write rhetorical questions such as Am I the help? Is this 1910? because of the demeaning treatment being meted out to me. Putting what you dont want to see in an email, the TRUTH, does not make the email unprofessional. Even though Ive been discouraged by you time and

again not to put things in email, it is the means I use to protect myself from these vicious mendacities. Sadly, not even this means is teflon enough to do so. As long as what I write in these emails can be said under penalty of perjury, they should not be deemed unprofessional.

She has not taken on all tasks assigned to her. The ONLY tasks I have refused to take on are the tasks I noted when I reported racial discrimination against me to HR.

The foregoing speaks volume as to why I am denied the use of the companywide Performance Management Central (PMC) portal. Your comments are disingenuous and can be easily refuted. But, so no one will see the TRUTH, my performance review has been relegated to a one page PDF to be filed away in Employee Records and any comments I have must be sent to you, not to be inputted in an electronic format where I have the opportunity to respond for everyone to see. Now it has become clearer to me why on the afternoon of Tuesday, January 13, 2015 you unsuccessfully ordered me to remove my comments from PMC refuting the malicious and mendacious comments (a trait which I now realize is the trend) my previous manager made on my 2014 year-end review.

With you using these said comments as an albatross around my neck, I being treated as the help and for the most part working under duress, its amazing that with fairness respected it would show that under the circumstances, I have done a pretty good job.

Having a manager who will fabricate things to make me seem incompetent (and I had sent you a three page email on this prior of which HR is aware) is a blight on any career success I could or would have had at JP Morgan. I had made a request to HR to have you removed as my manager as I have a lack of trust and confidence in you. I consider you to be the enabler, the facilitator and the coordinator of the second class treatment from Alex Khavin that has been meted out to me.

I had so much hope for this position. Its amazing how bad managers can turn good employees into bad employees. (Shake my head).

A PRINTED COPY OF THIS EMAIL AND THE ATTACHMENT HAVE BEEN SENT TO EMPLOYEE RECORDS MAILBOX DE3-2280 FOR THEIR RECORDS

Best regards,  
Candice

**Employee Year End (Display) -- Lue, Candice (21-OCT-2015)**

Working under circumstances where it is a constant fight to protect my dignity and to defend my integrity and my reputation has been challenging. Simply put, using the refuted, malicious and mendacious comments my former manager fought tooth and nail to put on my 2014 year end performance review as an albatross around my neck, I being treated as the teams help, having a manager who will fabricate things to make me seem incompetent or to unfairly, whether verbally or in writing, give the impression for me to be seen as incompetent, has not been easy. (Examples available upon request).

However, I have managed and am still managing to pull through. The records will show that both my punctuality and my attendance are in pretty good standing. Of the 12 sick days I have for 2015, I have used eight three to help to take care of my sick mother after I was denied the benefit of working from home to do so and four of the other five sadly, because of the repercussions of the undue stress I have endured working under the circumstances mentioned above. The overwhelming reason for any lateness I might have had is due to issues beyond my control with public transportation.

I can without reservation say that even though opportunities will always arise for me to learn new things, I have gained the required knowledge of the procedures and/or processes as well as the credit-related products to competently execute the tasks of my role as a Credit Reporting Risk Analyst in the Asset Management Counterparty Risk Group. Whereby, I have been able to share such knowledge in the form of contributing to Standard Operating Procedures such as the Monthly Exposure Report and Daily MIS Report and by writing and distributing Standard Operating Procedures of my own such as Tableau (Web Version): Quick Guide for CRG Exposure Dashboard, Daily Limits Monitoring and Preparing Private Bank Structured Products and Deposits Reports. By leading knowledge sharing sessions which focused on the Exposure Reporting process, I was able to communicate to the Tech Team a more detailed view of the efforts and analysis required to produce the Exposure Report. This in turn helped with the departmental initiatives for report automation and increasing the frequency of producing the report in the future. Ive also conducted training sessions for ad-hoc reporting processes for new Counterparty Risk Group team members and summer intern. In addition, Im arranging a Tableau (Web Version) CRG Exposure Dashboard follow up training session with a member of the Tech Team for the Counterparty Risk Group to discuss additional points of interest and/or queries.

In conjunction, I continue to proactively take ownership of the Monthly Exposure and Reconciliation Reports, two core functions of my role by understanding these processes, conducting variance analysis, data integrity checks and follow ups and working on ad-hoc reporting and projects where needed. I have also been able to execute my work in a timely manner while employing as much due diligence as possible to deal with the numerous data quality issues I experience which require manual intervention to detect and escalate during this transition period to automate the Exposure Report. As data quality issues arose throughout the process, I have been instrumental in



independently self-identifying, analyzing, investigating, preparing analysis for and escalating these abnormalities to the Tech Team and then conducting follow ups until the issues have been resolved. I have also conducted UAT testing for data quality issue resolution and system enhancements. Having said that, if one error/oversight is detected upon second review, such error/oversight should not be construed as having a lack of knowledge of work which is one of the unfairness I face with doing this job.

YEAR END SUMMARY CONTINUED BELOW

**Employee Year End (Display) -- Lue, Candice (21-OCT-2015)**

YEAR END SUMMARY CONTINUED

It has always been a part of my objective to make contributions to process improvement initiatives to benefit the department by identifying areas and/or issues where enhancements would serve well. With that said, I took the initiative to employ data validation techniques to prevent or mitigate system errors which have a negative effect on Reporting accuracies, efficiency and productivity time. In my quest to share my knowledge, I outlined an example of one of these data validation techniques in a six page document which I sent via email to members of the credit risk reporting team and also saved it on the teams shared drive for access to all. This data validation technique is also incorporated as an appendix in the Monthly Exposure Report SOP. Further to the afore-stated, having a control mindset has enabled me to suggest the need for and create a folder called Email Verifications From Business within the Monthly Counterparty Exposure folder on the teams shared drive to save Exposure Report related email correspondence upon which we received verifications on variance analysis, exposure logic, etc. for future reference and for audit. Similarly, this technique was employed with the Reconciliation Report to save and track correspondence related to trade and broker exception related verifications and investigatory results. Also, when CRG was leveraging the Spotfire application to extract counterparty exposure data from Newton, in order to improve productivity time, efficiency and mitigate the risk of Excel crashes due to

data volume overload, I suggested the need to curtail the data that was extracted from the application by leveraging only essential columns with data for producing the Exposure Report. This idea was also implemented and offered efficiencies whereby productivity time improved in spending valuable time successfully producing the Exposure Report rather than troubleshooting Excel crashes and data loading issues that caused slowdowns and halting of the process.

I have completed all mandatory trainings through the third quarter. I have self-identified and taken training courses in Asset Management University, Risk Management University and Harvard Manage Mentor, respectively such as Asset Management Credit Risk, Managing Credit Risk, Counterparty Credit Risk (Measurement) and HMM Innovation Implementation as well as conducted continuous independent research to enhance my knowledge and skill base. Im currently taking the HMM Global Collaboration training course. I also attended the Asset Management On-Trac Analyst Training Program (an orientation for new Asset Management analysts) from 2/23 to 3/6/15 which focused on strengthening knowledge of Global Investment Management and Global Wealth Management and enhancing technical and presentation skills. Ive attended company wide and Global Investment Management seminars and townhalls throughout the year to enhance personal and professional development. In conjunction, I have identified teammates with the right attitude and have liaised with them to expand my knowledge and strengthen my understanding of the business and its products. I have also broadened my knowledge perspectives of the business through consistent liaisons both verbally and in writing with members of the Tech Team and business contacts from the various lines of business while concurrently executing the tasks to fulfill completion of the Monthly Exposure and Reconciliation Reports. Asking questions and conducting appropriate due diligence have proved helpful in ensuring optimal accuracy and minimizing risk.

YEAR END SUMMARY CONTINUED BELOW

**Employee Year End (Display) -- Lue, Candice (21-OCT-2015)**

YEAR END SUMMARY CONTINUED

I continue to pursue philanthropic/volunteer opportunities on behalf of J.P. Morgan Chase via Good Works. For 2015, I volunteered for Dress for Success clothing drive and sorting event to donate, sort and organize professional attire and accessories for individuals in need of work and interview attire. While attending the AM On-Trac Analyst Training Program, I volunteered for the Feeding Children Everywhere event to provide 75,000 healthy meal kits to children in need both locally and internationally. Although the roster was full when I tried to sign up on the Good Works website for the Operation Backpack sorting event, I participated in the drive whereby I donated school supplies to help students living in NYC homeless shelters obtain school supplies to prepare for the school year. This fall, I participated in the Home Away From Home Wish List Ronald McDonald House NY Donation Drive whereby I donated food and hygienic supplies to help make the transition for pediatric cancer patients and their families smooth.

As I said, my less than one year in the Credit Reporting Risk Analyst position has been challenging. Not because of the jobs workload or its knowledge requirements but because of the forces I have mentioned earlier that have plagued my tenure. And, having a manager in whom I have a lack of trust and confidence has not been conducive to the situation. However, at the end of the day, I still have a job to do. Whether I have to work long hours to get it done or I have to employ due diligence to prevent or mitigate risks, I will just have to focus. It is with this mentality that I have been able to and continue to pull through.



**Manager Mid Year (Display) -- Shillingford, Fidelia (30-JUL-2015)**

During our mid-year dialogue, I discussed with Candice her strengths and areas of improvement.

The following strengths were highlighted: (i) Candice is adept at following procedures (ii) She proactively follows up on key issues and (iii) Candice is diligent at identifying course work to extend her knowledge.

The areas of improvement which were discussed included (i) The need for Candice to perform job responsibilities asked; (ii) Take full responsibility for the tasks assigned, particularly the exposure report and (iii) Candice needs to improve her communication specifically in regards to tone and professionalism.

Candice will need to address her development areas in order for her to meet expectations by year end. Candice has been placed on a PIP to address her areas of improvement. We will be meeting regularly to discuss her progress.

**Discussion Tracking**

Discussion	Employee Confirm	Manager Confirm
Objectives	Y (07-APR-2015)	Y (30-JUL-2015)
Development/Career Plan	Y (07-APR-2015)	Y (30-JUL-2015)
Jan, Feb, Mar (Quarterly Discussion)	N	N
Apr, May, Jun (Mid Year)	Y (03-AUG-2015)	Y (30-JUL-2015)
Jul, Aug, Sep (Quarterly Discussion)	N	N
Oct, Nov, Dec (Year End)	N	N

**Attachments**

Filename	Uploaded By	Source	Date
2015 Year End Evaluation Template - Candice Lue.pdf	Lue, Candice	Summary	Mon Oct 26 16:19:14 CDT 2015
Candice Lue - 2015 Year End PMC Summary.pdf	Lue, Candice	Summary	Wed Oct 21 12:52:56 CDT 2015
Email Trail - Mid-Year Review - PIP.pdf	Lue, Candice	Summary	Mon Aug 03 21:27:32 CDT 2015
C Lue PIP July 2015.pdf	Lue, Candice	Summary	Mon Aug 03 21:27:03 CDT 2015

## 2015 Final Analyst/Associate Evaluation

### Personal summary for:

Name: Candice Lue

Level: Analyst

Class: First Year Analyst in Asset Management (Nov. 2014 – Present)

### Major projects / reviews completed last 12 months

Date	Project/ Counterparty	Description/Type	Team Members (CE, LOB, etc.)	Task Completed / Role Performed
Nov. 2014 - Present	Project / BAU	Monthly Exposure and Reconciliation Reports	Candice Lue	<p>I continue to proactively take ownership of these reports by understanding these processes, conducting variance analysis, data integrity checks and follow ups while employing as much due diligence as possible to deal with the numerous data quality issues I experience which require manual intervention to detect and escalate during this transition period to automate the Exposure Report. As data quality issues arose throughout the process, I have been instrumental in independently self-identifying, analyzing, investigating, preparing analysis for and escalating these abnormalities to the Tech Team and then conducting follow ups until the issues have been resolved.</p> <p>I present analysis and trends at the Monthly Governance Meeting.</p>
Dec. 2014 - Jan. 2015	Project	Process Improvement Mechanism	Candice Lue	Having a control mindset has enabled me to suggest the need for and to create a folder called Email Verifications From Business within the Monthly Counterparty Exposure folder on the team's shared drive to save Exposure Report related email correspondence upon which we received verifications on variance analysis, exposure logic, etc. for future reference and for audit. Similarly, this technique was employed with the Reconciliation Report to save and track correspondence related to trade and broker exception related verifications and investigatory results.
Jan. 2015 – Feb. 2015	Project	Standard Operating Procedure (SOP) and Knowledge Sharing	Candice Lue; Fidelia Shillingford; Fixed Income Portfolio Group	I wrote a SOP for the Weekly MBS TBA Report (US Mortgage TBA Counterparties and US OTC Counterparties Ratings Report) and provided training to a Fixed Income Portfolio Group for the transition of this reporting process out of the Counterparty Risk Group.
Feb. 2015	Project	Process Improvement Mechanism	Candice Lue	When CRG was leveraging the Spotfire application to extract counterparty exposure data from Newton, in order to improve productivity time, efficiency and mitigate the risk of Excel crashes due to data volume overload, I suggested the need to curtail the data that was extracted from the application by leveraging only essential columns with data for producing the Exposure Report. This idea was also implemented and offered efficiencies whereby productivity time improved in spending valuable time successfully producing the Exposure Report rather than troubleshooting Excel crashes and data loading issues that caused slowdowns and halting of the process.
April 2015	Project	Knowledge Sharing	Candice Lue; Tech Team	By leading knowledge sharing sessions which focused on the Exposure Reporting process, I was able to communicate to the Tech Team a more detailed view of the efforts and analysis required to produce the Exposure Report. This in turn helped with the departmental initiative for report automation and increasing the frequency of producing the report in the future.
June 2015	Project	User Tool Workflow and Assessment Tool (UWAT)	Candice Lue; Gaurav Kishore	Conducted annual risk classification of User Tool (UT) Monthly Exposure Report which entailed completing the risk classification questionnaire in UWAT system and the UT data gathering template.
June 2015	Project	Process Improvement Mechanism	Candice Lue	While continuing to take the initiative to employ data validation techniques to prevent or mitigate system errors which have a negative effect on Reporting accuracies, efficiency and productivity time, in my quest to share my knowledge, I outlined an example of one of these data validation techniques in a six page document which I sent via email to members of the credit risk reporting team and also saved it on the team's shared drive for access to all. This data validation technique is also incorporated as an appendix in the Monthly Exposure Report SOP.
June 2015	Project	Standard Operating Procedures (SOPs)	Candice Lue	I contributed to SOPs such as Monthly Exposure Report and Daily MIS Report. I wrote SOPs such as Daily Limits Monitoring, Activities Missing Primary SPN in CMS Report Tracking and Investigations and Preparing Private Bank Structured Products and Deposits Reports.



## 2015 Final Analyst/Associate Evaluation

June 2015 & Aug. 2015	Project	Knowledge Sharing	Candice Lue; Nikhil Saxena; Ali Dang-Ngoc; Jon Dorfman	I conducted training sessions for ad-hoc reporting processes (e.g. - Daily MIS Report, Daily Limits Monitoring, Preparing Private Bank Structured Products and Deposits Reports) for summer intern and new CRG team members, respectively.
Aug. 2015 - Present	Project	GIM CRO Packet & Prime Brokerage Exposure Account Level Analysis	Candice Lue	I prepare the exposure reporting portion for GIM CRO Packet. I prepare the Prime Brokerage Exposure Account Level Analysis for GIM CRO.
Aug. 2015 - Present	Project	UAT Testing	Candice Lue	I conduct UAT testing for exposure reporting data quality issue resolution and system enhancements.
Sept. 2015	Project	Standard Operating Procedure (SOP)	Candice Lue	I wrote SOP Tableau (Web Version): Quick Guide to CRG Exposure Dashboard to help CRG team members navigate the exposure dashboard to leverage and extract exposure data for counterparty annual reviews.
Sept. 2015	Project	RCSA Project for Audit	Candice Lue	I conducted analysis of a selected population of MAGIC approvals versus CMS approvals within Dec. 2014 to Aug. 2015 time period to determine if any of these approvals in MAGIC were entered days after the CMS approval date.
Oct. 2015	Project	Knowledge Sharing	Candice Lue; Gokul Nedunchezhiyan	I'm arranging a Tableau (Web Version) CRG Exposure Dashboard follow up training session with a member of the Tech Team for the Counterparty Risk Group to discuss additional points of interest and/or queries.
Oct. 2015 - Present	Project	AM CRO Packet	Candice Lue	I prepare and submit the entire CRG submission of AM CRO Packet which entails preparing exposure reporting portion and liaising with team members to obtain monthly commentary, key initiatives and money market portions to incorporate into the packet. Throughout 2015, I still prepared and submitted the exposure reporting portion for this packet.
Oct. 2015 - Present	Project	AM Dashboard	Candice Lue	I prepare the dashboard and present analysis and trends at the Monthly Governance Meeting.

### Firm wide initiatives

Description: Special Projects, Recruiting, Technology, Networking , etc.

#### Volunteer/Philanthropic Opportunities

I continue to pursue volunteer/philanthropic opportunities on behalf of J.P. Morgan Chase via Good Works. For 2015, I volunteered for Dress for Success clothing drive and sorting event to donate, sort and organize professional attire and accessories for individuals in need of work and interview attire. While attending the AM On-Trac Analyst Training Program, I volunteered for the Feeding Children Everywhere event to provide 75,000 healthy meal kits to children in need both locally and internationally. Although the roster was full when I tried to sign up on the Good Works website for the Operation Backpack sorting event, I participated in the drive whereby I donated school supplies to help students living in NYC homeless shelters obtain school supplies to prepare for the school year. This fall, I participated in the Home Away From Home Wish List Ronald McDonald House NY Donation Drive whereby I donated food and hygienic supplies to help make the transition for pediatric cancer patients and their families smooth.

#### Seminars/Townhalls

I've attended company wide and Global Investment Management seminars and townhalls throughout the year to enhance personal and professional development. Examples include AM Analyst Townhalls with AM CEO, Mary Erdoes, Global Investment Management and Risk Management Townhalls, Finance and Risk Roadmap Speaker Series, Control Functions Speaker Series – Understanding and Managing Fiduciary Risk and People Council Fitch and Moody's Analyst Sessions on Banking.

#### Analyst Training Program

I also attended the Asset Management On-Trac Analyst Training Program (an orientation for new Asset Management analysts) from 2/23 to 3/6/15 which focused on strengthening knowledge of Global Investment Management and Global Wealth Management and enhancing technical and presentation skills.

### Key strengths ("3+")

- **Strength 1:** My ability to liaise both verbally and in writing with individuals on all levels as it relates to enhancing the Reporting process and the quality of my work
- **Strength 2:** My ability to meet critical deadlines under stressful/intense circumstances
- **Strength 3:** My ability to identify areas for process improvement and take the initiative to employ the means necessary to do so
- **Strength 4:** My gossip free discipline that allows me to refrain from discussing team members' private, personal or professional situations and/or issues with other team members to influence them or to gain favor from them

10/26/2015

Page 2

## 2015 Final Analyst/Associate Evaluation

### Development areas ("3-")

I am currently on Written Warning up to 11/30/2015 with the expectation being *"that Candice perform the job responsibilities for which she was hired; she is expected to print all materials for our monthly team meeting and provide copies for each member."* With that said, all ambitious development plans have been put on hold as, with a written warning, I am denied access to all of the company's progressive benefits.

Since *"she is expected to print all materials for our monthly team meeting and provide copies for each member"* is such a major issue that it has landed me on "written warning", I would have appreciated if my hiring process had been a bit more transparent as, if I were aware that this demeaning task was a job responsibility *"for which [I] was hired"* or even had known that it would have become a part of my duties, I would NOT have accepted this job. In the meantime, however, I will continue to do my core analytic duties which include ad-hoc tasks to the best of my ability and under the circumstances.

### AM University

- Name the 3 courses taken throughout the year

I have self-identified and taken training courses in Asset Management University, Risk Management University and Harvard Manage Mentor, respectively such as Asset Management Credit Risk, Managing Credit Risk, Counterparty Credit Risk (Measurement) and HMM Innovation Implementation as well as conducted continuous independent research to enhance my knowledge and skill base. I'm currently taking the HMM Global Collaboration training course.

### Manager to provide balanced feedback from team reviews:

3 Key strengths:


3 Key development areas:




Working under circumstances where it is a constant fight to protect my dignity and to defend my integrity and my reputation has been challenging. Simply put, using the refuted, malicious and mendacious comments my former manager fought tooth and nail to put on my 2014 year end performance review as an albatross around my neck, I being treated as the team's help, having a manager who will fabricate things to make me seem incompetent or to unfairly, whether verbally or in writing, give the impression for me to be seen as incompetent, has not been easy. (Examples available upon request).

However, I have managed and am still managing to pull through. The records will show that both my punctuality and my attendance are in pretty good standing. Of the 12 sick days I have for 2015, I have used eight – three to help to take care of my sick mother after I was denied the benefit of working from home to do so and four of the other five sadly, because of the repercussions of the undue stress I have endured working under the circumstances mentioned above. The overwhelming reason for any lateness I might have had is due to issues beyond my control with public transportation.

I can without reservation say that even though opportunities will always arise for me to learn new things, I have gained the required knowledge of the procedures and/or processes as well as the credit-related products to competently execute the tasks of my role as a Credit Reporting Risk Analyst in the Asset Management Counterparty Risk Group. Whereby, I have been able to share such knowledge in the form of contributing to Standard Operating Procedures such as the Monthly Exposure Report and Daily MIS Report and by writing and distributing Standard Operating Procedures of my own such as Tableau (Web Version): Quick Guide for CRG Exposure Dashboard, Daily Limits Monitoring and Preparing Private Bank Structured Products and Deposits Reports. By leading knowledge sharing sessions which focused on the Exposure Reporting process, I was able to communicate to the Tech Team a more detailed view of the efforts and analysis required to produce the Exposure Report. This in turn helped with the departmental initiatives for report automation and increasing the frequency of producing the report in the future. I've also conducted training sessions for ad-hoc reporting processes for new Counterparty Risk Group team members and summer intern. In addition, I'm arranging a Tableau (Web Version) CRG Exposure Dashboard follow up training session with a member of the Tech Team for the Counterparty Risk Group to discuss additional points of interest and/or queries.

In conjunction, I continue to proactively take ownership of the Monthly Exposure and Reconciliation Reports, two core functions of my role by understanding these processes, conducting variance analysis, data integrity checks and follow ups and working on ad-hoc reporting and projects where needed. I have also been able to execute my work in a timely manner while employing as much due diligence as possible to deal with the numerous data quality issues I experience which require manual intervention to detect and escalate during this transition period to automate the Exposure Report. As data quality issues arose throughout the process, I have been instrumental in independently self-identifying, analyzing, investigating, preparing analysis for and escalating these abnormalities to the Tech Team and then conducting follow ups until the issues have been resolved. I have also conducted UAT testing for data quality issue resolution and system enhancements. Having said that, if one error/oversight is detected upon second review, such error/oversight should not be construed as having a lack of knowledge of work which is one of the unfairness I face with doing this job.

It has always been a part of my objective to make contributions to process improvement initiatives to benefit the department by identifying areas and/or issues where enhancements would serve well. With that said, I took the initiative to employ data validation techniques to prevent or mitigate system errors which have a negative effect on Reporting accuracies, efficiency and productivity time. In my quest to share my knowledge, I outlined an example of one of these data validation techniques in a six page document which I sent via email to members of the credit risk reporting team and also saved it on the team's shared drive for access to all. This data validation technique is also incorporated as an appendix in the Monthly Exposure Report SOP. Further to the afore-stated, having a control mindset has enabled me to suggest the need for and create a folder called Email Verifications From Business within the Monthly Counterparty Exposure folder on the team's shared drive to save Exposure Report related email correspondence upon which we received verifications on variance analysis, exposure logic, etc. for future reference and for audit. Similarly, this technique was employed with the Reconciliation Report to save and track correspondence related to trade and broker exception related verifications and investigatory results. Also, when CRG was leveraging the Spotfire application to extract counterparty exposure data from Newton, in order to improve productivity time, efficiency and mitigate the risk of Excel crashes due to



data volume overload, I suggested the need to curtail the data that was extracted from the application by leveraging only essential columns with data for producing the Exposure Report. This idea was also implemented and offered efficiencies whereby productivity time improved in spending valuable time successfully producing the Exposure Report rather than troubleshooting Excel crashes and data loading issues that caused slowdowns and halting of the process.

I have completed all mandatory trainings through the third quarter. I have self-identified and taken training courses in Asset Management University, Risk Management University and Harvard Manage Mentor, respectively such as Asset Management Credit Risk, Managing Credit Risk, Counterparty Credit Risk (Measurement) and HMM Innovation Implementation as well as conducted continuous independent research to enhance my knowledge and skill base. I'm currently taking the HMM Global Collaboration training course. I also attended the Asset Management On-Trac Analyst Training Program (an orientation for new Asset Management analysts) from 2/23 to 3/6/15 which focused on strengthening knowledge of Global Investment Management and Global Wealth Management and enhancing technical and presentation skills. I've attended company wide and Global Investment Management seminars and townhalls throughout the year to enhance personal and professional development. In conjunction, I have identified teammates with the right attitude and have liaised with them to expand my knowledge and strengthen my understanding of the business and its products. I have also broadened my knowledge perspectives of the business through consistent liaisons both verbally and in writing with members of the Tech Team and business contacts from the various lines of business while concurrently executing the tasks to fulfill completion of the Monthly Exposure and Reconciliation Reports. Asking questions and conducting appropriate due diligence have proved helpful in ensuring optimal accuracy and minimizing risk.

I continue to pursue philanthropic/volunteer opportunities on behalf of J.P. Morgan Chase via Good Works. For 2015, I volunteered for Dress for Success clothing drive and sorting event to donate, sort and organize professional attire and accessories for individuals in need of work and interview attire. While attending the AM On-Trac Analyst Training Program, I volunteered for the Feeding Children Everywhere event to provide 75,000 healthy meal kits to children in need both locally and internationally. Although the roster was full when I tried to sign up on the Good Works website for the Operation Backpack sorting event, I participated in the drive whereby I donated school supplies to help students living in NYC homeless shelters obtain school supplies to prepare for the school year. This fall, I participated in the Home Away From Home Wish List Ronald McDonald House NY Donation Drive whereby I donated food and hygienic supplies to help make the transition for pediatric cancer patients and their families smooth.

As I said, my less than one year in the Credit Reporting Risk Analyst position has been challenging. Not because of the job's workload or its knowledge requirements but because of the forces I have mentioned earlier that have plagued my tenure. And, having a manager in whom I have a lack of trust and confidence has not been conducive to the situation. However, at the end of the day, I still have a job to do. Whether I have to work long hours to get it done or I have to employ due diligence to prevent or mitigate risks, I will just have to focus. It is with this mentality that I have been able to and continue to pull through.



## Lue, Candice

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**From:** Lue, Candice  
**Sent:** Monday, August 03, 2015 8:53 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Dubowy, Helen; Khavin, Alex G; Vega, John R.; Vernon, Terri; Donnelly, John L  
**Subject:** RE: Mid-Year Review - PIP  
**Attachments:** C Lue PIP July 2015.pdf

Fidelia:

Since I was raised in a household where TRUTH matters, I will not compromise my dignity to fully respond to or to sign off on the malicious and mendacious comments you have made about me and my work in your PDF attachment. These are fabricated comments made about me in retaliation for me speaking up and complaining about racial discrimination against me to HR.

With that said, I am a bit perturbed as to why I am denied the use of the company's Performance Management Central (PMC) portal for my mid-year performance review where my permanent work record would be electronically stored and where I would have the opportunity to tell the TRUTH instead of me "responding via email with any comments to you" where the said email response will be stored in your work/computer file versus this companywide proprietary platform provided for this use.

Which other team members are doing duties assigned to me? Would that be the "half a person" designated to help out due to the recognized fact that there is a lack of human resources on the Reporting side? Wasn't this the said reason for two of my predecessors leaving the job? So, I am being blamed for the lack of human resources now? The "half a person" is stressed because he wants to move on from doing reporting work and may I respectfully say, working with you. His new position is now or should be that of a credit risk analyst on the Credit Analysis side. I would have been stressed too if I were him. In how many meetings and one on ones have I raised the obvious issue of the need for additional human resources to you? In how many of these meetings did you agree with what I had to say (whether or not you were being disingenuous) until you were told that you will not be provided with any additional resource and then you ultimately got "half a person"?

Would the previous analysts you talked about being more favorable than I am in terms of executing their work on time, etc, include the one who is the team's running joke? The said one you imitated on Tuesday, July 28, 2015 where you put your hands in the air and said as he complained, yes complained, "I can only do one thing at a time"? Or, would it be the one who resigned after two months on the job due to being overwhelmed with work and not having a work/life balance? You, yourself are well over your head with work. To that, I will just say that when I go home, I want to feel as if I am at home, not at work.

"Improve my communication style specifically in regards to tone and professionalism." - If you are referencing the emails in which I complained about being treated as the help (and I bet you are), I think my standing up has been misconstrued. In those emails I do write rhetorical questions such as "Am I the help? Is this 1910?" because of the demeaning treatment being meted out to me. Putting what you don't want to see in an email, the TRUTH, does not make the email unprofessional. Even though I've been discouraged by you time and again not to put things in email, it is the means I use to protect myself from these vicious mendacities. Sadly, not even this means is teflon enough to do so. As long as what I write in these emails can be said under penalty of perjury, they should not be deemed unprofessional.

"She has not taken on all tasks assigned to her." The ONLY tasks I have refused to take on are the tasks I noted when I reported racial discrimination against me to HR.

The foregoing speaks volume as to why I am denied the use of the companywide Performance Management Central (PMC) portal. Your comments are disingenuous and can be easily refuted. But, so no one will see the TRUTH, my performance review has been relegated to a one page PDF to be filed away in "Employee Records" and any comments I have must be sent to you, not to be inputted in an electronic format where I have the opportunity to respond for everyone to see. Now it has become clearer to me why on the afternoon of Tuesday, January 13, 2015 you unsuccessfully ordered me to remove my comments from PMC refuting the malicious and mendacious comments (a trait which I now realize is the trend) my previous manager made on my 2014 year-end review.

With you using these said comments as an albatross around my neck, I being treated as the help and for the most part working under duress, it's amazing that with fairness respected it would show that under the circumstances, I have done a pretty good job.

Having a manager who will fabricate things to make me seem incompetent (and I had sent you a three page email on this prior of which HR is aware) is a blight on any career success I could or would have had at JP Morgan. I had made a request to HR to have you removed as my manager as I have a lack of trust and confidence in you. I consider you to be the enabler, the facilitator and the coordinator of the second class treatment from Alex Khavin that has been meted out to me.

I had so much hope for this position. It's amazing how bad managers can turn good employees into bad employees. (Shake my head).

A PRINTED COPY OF THIS EMAIL AND THE ATTACHMENT HAVE BEEN SENT TO EMPLOYEE RECORDS – MAILBOX DE3-2280 FOR THEIR RECORDS

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Shillingford, Fidelia X  
**Sent:** Thursday, July 30, 2015 4:43 PM  
**To:** Lue, Candice  
**Cc:** Dubowy, Helen; Shillingford, Fidelia X  
**Subject:** Mid-Year Review - PIP

Candice

Attached is the Performance Improvement Plan we discussed. We will meet on a regular basis to discuss your progress on these areas.

Additionally, can I ask that you please confirm in PMC that we had the mid-year discussion.

Regards  
Fidelia



# JPMORGAN CHASE & CO.

## PERFORMANCE IMPROVEMENT PLAN

The goal of this Performance Improvement Plan is to assist the manager and the employee in defining which, and how specific performance areas or behaviors need to be improved.

Employee Name	Position Title	Employee ID	Manager Name	Department
Candice Lue	Analyst	R089235	Fidelia Shillingford	Counterparty Risk Group
Last Formal Performance Evaluation ( Mid-Year)			Date: July 30th, 2015	Rating: M-
<b>Section 1.</b> Describe problem - What specifically has warranted the need for a Performance Improvement Plan?				
Candice joined the Counterparty Risk Group as a reporting analyst on November 10th, 2015. Her main responsibilities include:				
<ol style="list-style-type: none"> <li>1) Help monitor, report and manage counterparty exposures</li> <li>2) Help maintain credit administration systems and records</li> <li>3) Updating and distributing daily Counterparty reports</li> <li>4) Assist other team members with assignments, cover for associates as needed</li> </ol>				
Although Candice has been with the team for over 8 months, she has not taken on all tasks assigned to her and she is unable to deliver in the anticipated timeframe without errors. This is putting additional stress on the team as other team members are performing duties assigned to her. Additionally, from my observation and per feedback from team members, Candice is inflexible and not open to feedback.				
<b>Section 2.</b> Describe a) the previously communicated work expectations (goals, objectives) as they relate to this problem				
<u>Areas of Improvement</u>				
Job Responsibilities: Candice needs to perform job responsibilities asked; she has demonstrated refusal to perform assigned tasks.				
Time/Project Management: (i) Routine Tasks: Candice requires much longer time and assistance to perform routine assignments. This is evidenced by the fact that previous analysts who performed the job were able to solely perform the tasks within the time period at a point when it was much less streamlined (very manual). She needs to learn to efficiently manage her work in order to deliver on the exposure report and monthly reconciliation in the anticipated timeframe and without errors and (ii) Ad-hoc: Candice is unwilling or unable to take on additional workload or assignments that need quick turnaround. There are data demands that require quick turnaround (typical of a developing credit event) where we have had to leverage other personnel, despite being the point person for data.				
Attitude/Professionalism: Feedback from the team is consistent in terms of inappropriate tone of emails and verbal communication which comes across as hostile and not business appropriate. Candice needs to improve her communication specifically in regards to tone and professionalism.				
<b>Section 3.</b> Define <u>specifically</u> which skills, competencies, or behaviors must be improved, and the outcomes expected.				
<i>Skill, competency, or behavior to be improved</i>		<i>Outcomes expected and how they will be measured</i>		
a. Job Responsibilities		<ol style="list-style-type: none"> <li>1. Perform assigned projects and tasks Manager will monitor on a weekly basis</li> </ol>		
b. Time/Project Management		<ol style="list-style-type: none"> <li>1. Complete reconciliation and exposure report on time without errors</li> <li>2. Be able to process ad-hoc data demands as requested</li> <li>3. Take full ownership of reporting responsibilities Manager will monitor on a monthly basis</li> </ol>		
c. Attitude/Professionalism		<ol style="list-style-type: none"> <li>1. Improve her communication style specifically in regards to tone and professionalism Manager will monitor on a daily basis</li> </ol>		
d.				
<b>Section 4.</b> Describe the type of assistance and support available to the employee.				
Earlier in the year, Candice participated in the AM Off cycle Training 2015. The Training was aimed at providing an overview of the AM business and also providing excel and professional skills training. In addition, there are several recommended courses available in AM University focused on improving her excel skills, time management and product training.				
<b>Section 5.</b> Set specific date for a final review to assess the achievement of expected level of performance. Ensure that employee is aware that if performance does not meet expectations by final review, Corrective Action will follow. Failure to demonstrate immediate and sustained improvement and to not meet performance expectations may result in additional corrective action, up to and including termination, at any time prior or after the expiration of this review period.				Final Review on:
				September 30th, 2015

# JPMORGAN CHASE & CO.

## PERFORMANCE IMPROVEMENT PLAN

The goal of this Performance Improvement Plan is to assist the manager and the employee in defining which, and how specific performance areas or behaviors need to be improved.

Employee Name	Position Title	Employee ID	Manager Name	Department
Candice Lue	Analyst	R089235	Fidelia Shillingford	Counterparty Risk Group

.....Fidelia Shillingford.....7/30/15.....  
Manager Signature Date Employee Signature Date

*Give employee a copy of the completed form. Send copy to Employee Records: DE3-2280 REV.8/11/11*



# EXHIBIT H

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**From:** Lue, Candice  
**To:** Shillingford, Fidelia X  
**CC:** Dubowy, Helen ;Khavin, Alex G" ;Vega, John R. ;Vernon, Terri ;Donnelly, John L"  
**Sent:** 8/3/2015 1:52:05 PM  
**Subject:** RE: Mid-Year Review - PIP  
**Attachments:** C Lue PIP July 2015.pdf

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"Improve my communication style specifically in regards to tone and professionalism." - If you are referencing the emails in which I complained about being treated as the help (and I bet you are), I think my standing up has been misconstrued. In those emails I do write rhetorical questions such as "Am I the help? Is this 1910?" because of the demeaning treatment being meted out to me. Putting what you don't want to see in an email, the TRUTH, does not make the email unprofessional. Even though I've been discouraged by you time and again not to put things in email, it is the means I use to protect myself from these vicious mendacities. Sadly, not even this means is teflon enough to do so. As long as what I write in these emails can be said under penalty of perjury, they should not be deemed unprofessional.

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A PRINTED COPY OF THIS EMAIL AND THE ATTACHMENT HAVE BEEN SENT TO EMPLOYEE RECORDS – MAILBOX DE3-2280 FOR THEIR RECORDS

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ( (212) 648 - 0936 | + [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**Sent:** Thursday, July 30, 2015 4:43 PM  
**To:** Lue, Candice  
**Cc:** Dubowy, Helen; Shillingford, Fidelia X  
**Subject:** Mid-Year Review - PIP

Candice

Attached is the Performance Improvement Plan we discussed. We will meet on a regular basis to discuss your progress on these areas.  
Additionally, can I ask that you please confirm in PMC that we had the mid-year discussion.

Regards  
Fidelia



# JPMORGAN CHASE & CO.

## PERFORMANCE IMPROVEMENT PLAN

The goal of this Performance Improvement Plan is to assist the manager and the employee in defining which, and how specific performance areas or behaviors need to be improved.

Employee Name	Position Title	Employee ID	Manager Name	Department
Candice Lue	Analyst	R089235	Fidelia Shillingford	Counterparty Risk Group
Last Formal Performance Evaluation (Mid-Year)			Date: July 30th, 2015	Rating: M-
<b>Section 1. Describe problem - What specifically has warranted the need for a Performance Improvement Plan?</b>				
<p>Candice joined the Counterparty Risk Group as a reporting analyst on November 10th, 2015. Her main responsibilities include:</p> <ol style="list-style-type: none"> <li>1) Help monitor, report and manage counterparty exposures</li> <li>2) Help maintain credit administration systems and records</li> <li>3) Updating and distributing daily Counterparty reports</li> <li>4) Assist other team members with assignments, cover for associates as needed</li> </ol> <p>Although Candice has been with the team for over 8 months, she has not taken on all tasks assigned to her and she is unable to deliver in the anticipated timeframe without errors. This is putting additional stress on the team as other team members are performing duties assigned to her. Additionally, from my observation and per feedback from team members, Candice is inflexible and not open to feedback.</p>				
<b>Section 2. Describe a) the previously communicated work expectations (goals, objectives) as they relate to this problem</b>				
<u>Areas of Improvement</u>				
<p>Job Responsibilities: Candice needs to perform job responsibilities asked; she has demonstrated refusal to perform assigned tasks.</p> <p>Time/Project Management: (i) Routine Tasks: Candice requires much longer time and assistance to perform routine assignments. This is evidenced by the fact that previous analysts who performed the job were able to solely perform the tasks within the time period at a point when it was much less streamlined (very manual). She needs to learn to efficiently manage her work in order to deliver on the exposure report and monthly reconciliation in the anticipated timeframe and without errors and (ii) Ad-hoc: Candice is unwilling or unable to take on additional workload or assignments that need quick turnaround. There are data demands that require quick turnaround (typical of a developing credit event) where we have had to leverage other personnel, despite being the point person for data.</p> <p>Attitude/Professionalism: Feedback from the team is consistent in terms of inappropriate tone of emails and verbal communication which comes across as hostile and not business appropriate. Candice needs to improve her communication specifically in regards to tone and professionalism.</p>				
<b>Section 3. Define specifically which skills, competencies, or behaviors must be improved, and the outcomes expected.</b>				
<i>Skill, competency, or behavior to be improved</i>		<i>Outcomes expected and how they will be measured</i>		
a. Job Responsibilities		<ol style="list-style-type: none"> <li>1. Perform assigned projects and tasks Manager will monitor on a weekly basis</li> </ol>		
b. Time/Project Management		<ol style="list-style-type: none"> <li>1. Complete reconciliation and exposure report on time without errors</li> <li>2. Be able to process ad-hoc data demands as requested</li> <li>3. Take full ownership of reporting responsibilities Manager will monitor on a monthly basis</li> </ol>		
c. Attitude/Professionalism		<ol style="list-style-type: none"> <li>1. Improve her communication style specifically in regards to tone and professionalism Manager will monitor on a daily basis</li> </ol>		
d.				
<b>Section 4. Describe the type of assistance and support available to the employee.</b>				
<p>Earlier in the year, Candice participated in the AM Off cycle Training 2015. The Training was aimed at providing an overview of the AM business and also providing excel and professional skills training. In addition, there are several recommended courses available in AM University focused on improving her excel skills, time management and product training.</p>				
<b>Section 5. Set specific date for a final review to assess the achievement of expected level of performance. Ensure that employee is aware that if performance does not meet expectations by final review, Corrective Action will follow. Failure to demonstrate immediate and sustained improvement and to not meet performance expectations may result in additional corrective action, up to and including termination, at any time prior or after the expiration of this review period.</b>				<b>Final Review on:</b>  <b>September 30th, 2015</b>

# JPMORGAN CHASE & CO.

## PERFORMANCE IMPROVEMENT PLAN

The goal of this Performance Improvement Plan is to assist the manager and the employee in defining which, and how specific performance areas or behaviors need to be improved.

Employee Name	Position Title	Employee ID	Manager Name	Department
Candice Lue	Analyst	R089235	Fidelia Shillingford	Counterparty Risk Group

.....Fidelia Shillingford.....7/30/15.....  
Manager Signature Date Employee Signature Date

*Give employee a copy of the completed form. Send copy to Employee Records: DE3-2280 REV.8/11/11*



# EXHIBIT I

---

**From:**  
**To:** Vernon, Terri  
**Sent:**  
**Subject:** RE: Monthly CRG Governance Meeting

Agree – it probably makes sense. I just want to be extra careful on this one. I am sure it will escalate – no matter what we do.

Thank you for your help.

---

**From:** Vernon, Terri  
**Sent:** Thursday, August 27, 2015 10:21 AM  
**To:** Dubowy, Helen  
**Subject:** RE: Monthly CRG Governance Meeting

There is a cable outage in my area so I can't get online to see what the PIP says. I think we move to a WW.

Thoughts?

Terri Vernon  
Vice President, Human Resources Advice Direct  
(888) 703-5555 / [H.R.Advice.Direct@jpmchase.com](mailto:H.R.Advice.Direct@jpmchase.com)  
Direct - 949) 651-6035

-----Original Message-----

**From:** Dubowy, Helen  
**Sent:** Thursday, August 27, 2015 10:12 AM Eastern Standard Time  
**To:** Shillingford, Fidelia X  
**Cc:** Vernon, Terri; Poz, Thomas I  
**Subject:** Re: Monthly CRG Governance Meeting

Fidelia, I will let Terri advise on next steps. Why don't you schedule time on her calendar as soon as possible. Thank you.

---

**From:** Shillingford, Fidelia X  
**Sent:** Thursday, August 27, 2015 10:04 AM  
**To:** Dubowy, Helen  
**Cc:** Vernon, Terri; Poz, Thomas I; Shillingford, Fidelia X  
**Subject:** FW: Monthly CRG Governance Meeting

Hi Helen

Please see below.

Candice has once again refused to perform tasks requested (see yellow highlighted text).

What are the next steps here?

Regards

Fidelia

---

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, August 26, 2015 4:25 PM  
**To:** Poz, Thomas I  
**Subject:** FW: Monthly CRG Governance Meeting

Hi

Please be advised that Candice has once again refused to perform this task.

I had a quick meeting with her on a separate topic but I mentioned to her that I have saved all my documents in the shared folder for the governance meeting and asked if she has reached out to the other team members for their information.

She gave me blank stare with no response; to which my response was, "We had a conversation during your mid-year review where I highlighted certain areas that needs to be improved. This is one of the areas – refusing to perform your duties. This is unacceptable."

She replied, "She has no further comments."

If tomorrow, she has not completed the required ask, I will inform HR and seek guidance on the next steps.

Regards

Fidelia

---

**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, August 25, 2015 11:18 AM  
**To:** Lue, Candice  
**Cc:** Poz, Thomas I  
**Subject:** RE: Monthly CRG Governance Meeting

Hi

Can you pls remind all members to save their documents in the shared folder so that you can print for the meeting? Note that Asia does not have access to the shared folder so pls save Tim's info and print.

In regards to meeting notes; the responsibility will be divided up among all analysts with each taking turn every month. I will send a schedule in a separate email to all analysts.

Regards

Fidelia

-----Original Appointment-----

**From:** Kulda, Eileen **On Behalf Of** Khavin, Alex G  
**Sent:** Tuesday, August 25, 2015 10:25 AM  
**To:** Leung, Joyce L; Avetyan, Tatevik; Vroom, Ryan W; Shillingford, Fidelia X; Dauber, Kimberly S; Poz, Thomas I; Zambon, M Sol; Nguyen, Fiona N; Lue, Candice; Gorniak, Hubert; Dang Ngoc, Ali; Dorfman, Jon

**Cc:** Kishore, Gaurav; Cheung, Timothy KF; Ng, Kenneth T

**Subject:** Monthly CRG Governance Meeting

**When:** Thursday, August 27, 2015 8:30 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Conference room 9B or see below for dial in number

Agenda:

1. Prior Meeting Follow-ups
2. Dashboard & Broker Reconciliation
3. MIS and Credit Trends Discussion
4. Limits Monitoring
5. Counterparty Exposure Report
6. MMF and Liquidity Trigger Breaches and Key Themes
7. Policies, Procedures and Practices Discussion
8. Any other Business

**Audio conferencing details:**

Name: Alexandra Khavin

International direct: +1 857 318 0900

US Toll free: 1 888 575 5762 (JPMC)

Chairperson passcode: 68517031 then #

Participant passcode: 15204032 then #



# EXHIBIT J

---

**From:** Lue, Candice  
**To:** Shillingford, Fidelia X  
**Sent:** 9/23/2015 7:48:19 PM  
**Subject:** RE: Monthly Meeting tomorrow

You can continue to be disingenuous and willful as much as you want to but this is stemming from the racial discrimination charge I raised with HR. As I said in our impromptu meeting earlier today, I have no further comments on this matter.

Best regards,

Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ( (212) 648 - 0936 | + [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

---

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, September 23, 2015 2:03 PM  
**To:** Lue, Candice  
**Subject:** FW: Monthly Meeting tomorrow

Candice

As discussed, you were brought in to assist with my roles and responsibilities. At the time of hire, specific functions were outline but as with any other job, overtime, more will be assigned. It is rather disrespectful and insubordinate for you to refuse to perform a responsibility assigned by your immediate manager.

This is one of my responsibilities which I am off boarding to you given my increasing workload and it's my expectations that you fully pick this responsibility on going forward.

Regards

Fidelia

---

**From:** Lue, Candice  
**Sent:** Wednesday, September 23, 2015 1:03 PM  
**To:** Shillingford, Fidelia X

**Subject:** Re: Monthly Meeting tomorrow

Please be advised that I will be sending out and printing the Exposure Report (a PDF) for tomorrow's meeting.

Best regards,  
Candice

---

**From :** Shillingford, Fidelia X  
**Sent :** Wednesday, September 23, 2015 12:44 PM  
**To :** Lue, Candice  
**Subject :** Monthly Meeting tomorrow

I reviewed the Dashboard and its good; thank you.

Pls bring copies of the Dashboard, Exposure and Canada SL Limits monitoring for tomorrow. No exceptions for Reconciliation so we can just say that.

In the folder the exposure report is in PPT can we only keep the PDF version?

Regards

Fidelia



# EXHIBIT K

# JPMORGAN CHASE & CO.

## WRITTEN WARNING

Employee's Name: Candice Lue	Employee SID R089235	LOB/Business Unit: Counterparty Risk Group	Date: MM/DD/YYYY 09/24/2015
<b>WRITTEN WARNING RESTRICTIONS PERIOD</b>			
<b>Beginning Date:</b> 09/24/2015			
<b>Ending Date:</b> 11/30/2015			
<p><b>REASON(S) FOR THIS WARNING</b> - Describe specific examples of the problem(s) and the date(s) the problem(s) occurred.</p> <p>Candice was placed on a PIP effective July 30th, 2015. Areas of improvement included (a) Job responsibilities – refusal to perform assigned tasks; (b) Time/Project Management – efficiently manage her work in order to deliver on the exposure report and monthly reconciliation in the anticipated timeframe and without errors; and (c) Attitude/Professionalism – inappropriate tone of emails and communication</p> <p>Candice continues to have issues regarding her job responsibility, specifically (a) above.</p> <p>On August 25th, 2015, I sent her an email requesting that she print the documents for our monthly team meeting on August 27th, 2015. Note, this falls under her job responsibility: 'Updating and distributing daily Counterparty Reports.' She did not respond to my email. In a separate meeting, I reminded her of the responsibility to print the documents; initially she provided no response but a 'fixed' look. She later responded, "I have no further comments." I then reminded Candice of our conversation during her mid-year review and told her that this was 'unacceptable.'</p> <p>Note Candice, did not print the materials of other team members including my materials; she only printed her materials. This responsibility had to be picked up by an Associate within the team.</p> <p>Also, on September 23rd, 2015, there was another incident. Candice was asked to print only the documents for which she is responsible and that of her manager for the monthly team meeting on September 24th and she again refused</p>			
<p><b>MANAGEMENT EXPECTATIONS</b> - Indicate performance expectations, plan of action and time frames for improvement.</p> <p>It is my expectation that Candice perform the job responsibilities for which she was hired; she is expected to print all materials for our monthly team meeting and provide copies for each team member.</p>			
Manager's Name: Fidelia Shillingford			
Manager's Signature: Fidelia Shillingford			Date: 09/24/2015

**EMPLOYEE'S ACKNOWLEDGEMENT** - My signature indicates that I have read this warning and have received a copy. While I am not necessarily expressing my agreement with the reasons for this warning, I fully understand that:

1. I may receive additional corrective action and/or be terminated at any time during or after the written warning restrictions period if my performance continues to not meet expectations, there is not immediate and sustained improvement or if another performance issue arises.
2. I am not eligible to receive a promotion or transfer, or to apply for tuition assistance or a position through job posting during the written warning restrictions period specified above. In addition, this written warning may affect any incentive pay or bonus I may be eligible to receive.
3. I may attach a separate statement to this form.
4. I may contact the Employee Assistance Program (EAP) if personal concerns are affecting my performance.
5. I understand that my employment is "at-will" which means that either I or the firm may terminate my employment at any time, for any or no reason. My employment is subject to the firm's policies and procedures as in effect from time to time. It is my responsibility to read and understand these policies, and if I have any questions now or in the future it is my responsibility to make the appropriate inquiries.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_ JPMORGAN CHASE 000090

# EXHIBIT L



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**From:** Lue, Candice  
**To:** Shillingford, Fidelia X  
**CC:** Poz, Thomas I ;Dubow, Helen" ;Vernon, Terri  
**Sent:** 9/25/2015 1:50:02 PM  
**Subject:** Written Warning - 9/24/15  
**Attachments:** C. Lue - Written Warning - 9-24-15.pdf

Fidelia,

As is evidenced in the attached "Written Warning" dated 9/24/15 that you presented to me in a meeting yesterday, you continue to be the enabler, the facilitator, the coordinator and the enforcer of the second class treatment which originated from Alex Khavin and has been meted out to me. This is why, I have repeatedly asked HR to remove you as my manager to prevent you from carrying out these unlawful acts against me. However, it is including HR's failure to prevent these unlawful acts against me that has caused you to continue to harass me on a monthly basis since Alex Khavin and/or cohorts subtly made it solely your job to enforce the second class treatment against me whereby I am ordered to print, collate, staple and lug the presentation materials of each of the team members to the monthly meetings.

I just wanted to also note that the only thing I witnessed with the associate you mentioned is, after chatting with you at your desk, the said associate went around telling people to print copies of their presentation materials for the team then to give them to him for him to take into the meeting. He did not print, collate and staple the said presentation materials for each team member as, like Alex Khavin, you are enforcing as solely my job to do. This act by the associate is another ploy concocted by you to rationalize your unlawful behavior (another one of your plays, different person).

As you noted on your copy of the said Written Warning, I have refused to sign off on this document.

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ( (212) 648 - 0936 | + [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

# EXHIBIT M

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**From:** Shillingford, Fidelia X  
**Sent:** Thursday, October 15, 2015 11:51 AM  
**To:** Dubowy, Helen; Vernon, Terri  
**Cc:** Poz, Thomas I  
**Subject:** FW: Sept. 2015 Exposure Report - Blanks in Tableau for Current Exposure, Gross Exposure and Net Exposure Fields

**Importance:** High

All

These are the patronizing and accusatory emails that I receive from Candice on a frequent basis. The environment has become toxic and inoperable.

Instead of directing my time and effort into my work; my efforts are channeled on internalizing how to approach Candice on a task and/or how to respond appropriately to these emails. In effect, my primary focus has shifted to managing my interactions and the work has become secondary.

I cannot continue to be productive in this environment. Can we please have a conversation this afternoon; if your schedules permit?

Regards  
Fidelia

---

**From:** Lue, Candice  
**Sent:** Thursday, October 15, 2015 9:19 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Poz, Thomas I  
**Subject:** RE: Sept. 2015 Exposure Report - Blanks in Tableau for Current Exposure, Gross Exposure and Net Exposure Fields

That is why I said that you are being deliberate.

If I would have spotted this potential issue during my review, like the other data quality and potential data quality issues that I've spotted and escalated to Tech, I would have done the same with this one, as you have seen.

Please note that besides inquiring if the blanks meant zero during our conversation, I also brought up the point that there might be a possibility that values did not feed into the system so those exposure fields appear blank. At that point, we BOTH agreed that I would follow up with Tech.

It is because of my due diligence that I was able to self-identify and independently follow up on the other data quality issues without (with emphasis) you directing me to do so.

Please note that in light of the afore-mentioned, there is no way that I would be making "assumptions" – and incidentally, that is an insult to my hard work.

You are a very unfair person and yes, knowing the numerous data quality issues that we experience for which I have self-identified, investigated, prepared analysis for and escalated to the Tech team, if there is a very minimal or ONE oversight, you do not need to unfairly give the impression for me to be seen as being incompetent.

Please bear in mind that unlike you, the company understands that there is a propensity that incidents of oversight will happen whether with you, me or anybody and that is why per the company's protocol, a second reviewer is required.

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, October 14, 2015 9:39 PM  
**To:** Lue, Candice  
**Cc:** Poz, Thomas I  
**Subject:** Re: Sept. 2015 Exposure Report - Blanks in Tableau for Current Exposure, Gross Exposure and Net Exposure Fields

Candice to clarify, this abnormality was overlooked by you.

As part of the secondary review, I spotted this. Subsequent to which I called you over to inquire about it. You noted and I quote "that blank indicates zero exposure." To which my response was, "Why do we see zero or negative in other rows but not this one."

I then directed you to send an email to Tech to confirm if this should be zero or maybe an indication of some underlying data quality issue.

As I stated before, I expect that you would independently follow up on such abnormalities and not make any assumptions. My email is not intended to marginalize the work you have done on the data quality but simply to emphasize that you need to be diligent. Knowing the numerous data quality issues that we experience, you need to always ask questions when something seems amiss.

Regards  
Fidelia

---

**From:** Lue, Candice  
**Sent:** Wednesday, October 14, 2015 07:03 PM  
**To:** Shillingford, Fidelia X  
**Cc:** Poz, Thomas I  
**Subject:** RE: Sept. 2015 Exposure Report - Blanks in Tableau for Current Exposure, Gross Exposure and Net Exposure Fields

Fidelia,

You are being deliberate. You are well aware that we both noticed this abnormality while reviewing the exposure report when I was over at your desk this afternoon. At that time, when we looked at this together, we both agreed that I would follow up with the Tech Team. I subsequently raised this abnormality to the Tech Team at today's Tech Meeting and also via the email below.

As you know, throughout the September month end exposure reporting process this month, I have self-identified, investigated, prepared analysis and escalated several data quality issues and potential data quality issues to the Tech Team for further investigation and resolution. You were copied on all the emails and in conjunction with these emails, I have kept you in the loop of any updates as I continuously liaised with Tech to resolve the data quality issues.

Furthermore, between last week and this week, I have been in the office until 9:15 / 9:20pm on some days and averaged 8pm for the rest of the days analyzing the exposure data, conducting the required time consuming investigations and



analysis preparation to escalate data quality issues to the Tech Team for resolution. Just like with the previous months' exposure reports as we continue with the transition to automation, I have self-identified, investigated, prepared analysis and escalated several data quality issues to the Tech Team for resolution and continuously liaised with them accordingly.

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, October 14, 2015 5:40 PM  
**To:** Lue, Candice  
**Subject:** RE: Sept. 2015 Exposure Report - Blanks in Tableau for Current Exposure, Gross Exposure and Net Exposure Fields

Candice

I expect that when you see these abnormalities that you don't make assumptions but always reach out to the Tech team for confirmation.

Regards  
Fidelia

---

**From:** Lue, Candice  
**Sent:** Wednesday, October 14, 2015 5:36 PM  
**To:** Nedunchezhiyan, Gokulakrishnan; CPTY DQ  
**Cc:** Shillingford, Fidelia X  
**Subject:** Sept. 2015 Exposure Report - Blanks in Tableau for Current Exposure, Gross Exposure and Net Exposure Fields  
**Importance:** High

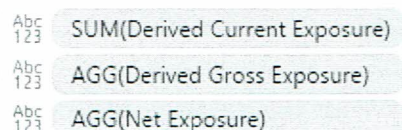
Hi Gokul,

As discussed in today's Tech meeting, we noticed some blanks for current exposure, gross exposure and net exposure fields in Tableau for COB 9/30/15 data. Please see screenshots from Tableau below. Could you please confirm if these blanks mean that the exposure values should be zero or if there was a feeding issue whereby these exposures did not populate?

If there is supposed to be a specific value (other than zero), could you please confirm the respective values?

Many thanks!

Best regards,  
Candice



Abc  
123 SUM(Derived Current Exposure)

Abc  
123 AGG(Derived Gross Exposure)

Abc  
123 AGG(Net Exposure)



**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

# EXHIBIT N



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**From:** Shillingford, Fidelia X  
**To:** Dubowy, Helen; Vernon, Terri  
**CC:** Poz, Thomas I  
**Sent:** 10/22/2015 8:26:27 PM  
**Subject:** FW: Monthly Governance Meeting  
**Attachments:** RE: Monthly CRG Governance Meeting

All

I did not receive a response from Candice; however, pls note she did not perform the task assigned.

Candice emailed only her materials for the team meeting. We had to request the help of another analyst to coordinate the materials. This analyst printed all the materials, organized into a packet and brought copies to the meeting.

See also attached a response from Candice in regards to a responsibility which I recently assigned to her.

Please let me know where we now stand on this.

Thanks

Regards  
Fidelia

---

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, October 21, 2015 11:51 AM  
**To:** Lue, Candice  
**Subject:** Monthly Governance Meeting

Hi Candice

Friendly reminder that our Monthly Governance meeting is scheduled for tomorrow morning; please ensure all materials are ready to go. Liaise with the Officers and Analyst regarding their materials.

Thanks

Regards  
Fidelia



# EXHIBIT O

---

**From:** Lue, Candice  
**Sent:** Thursday, October 22, 2015 3:07 PM  
**To:** Shillingford, Fidelia X  
**Cc:** Poz, Thomas I  
**Subject:** RE: Monthly CRG Governance Meeting

With ALL due respect, your statement is untrue.

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Shillingford, Fidelia X  
**Sent:** Thursday, October 22, 2015 8:59 AM  
**To:** Lue, Candice  
**Cc:** Poz, Thomas I  
**Subject:** RE: Monthly CRG Governance Meeting

Yes the email does not explicitly state that but we had an offline conversation and I did tell that to you.

Regards  
Fidelia

---

**From:** Lue, Candice  
**Sent:** Wednesday, October 21, 2015 8:50 PM  
**To:** Shillingford, Fidelia X  
**Cc:** Poz, Thomas I  
**Subject:** FW: Monthly CRG Governance Meeting  
**Importance:** High

Fidelia,

Let me respectfully say that it takes very little intellect for anyone to see that the full trail of the email attachment you referenced gave no directive of the transitioning to me of PRESENTING the Dashboard at the Monthly Governance Meeting. Your directive was only ordering me to print same.

However, I can take a shot at presenting the Dashboard at tomorrow's team meeting.

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

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**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, October 21, 2015 6:35 PM  
**To:** Lue, Candice  
**Subject:** RE: Monthly CRG Governance Meeting  
**Importance:** High

Candice

Please note, as previously discussed, it's your responsibility to co-ordinate the materials for tomorrow's team meeting. Additionally, as discussed (pls reference attached email) I have transitioned the responsibility of the Dashboard to you; you are expected to talk to it tomorrow and have copies available for the team members.

<< Message: FW: Monthly Meeting tomorrow >>  
Regards  
Fidelia

---

**From:** Lue, Candice  
**Sent:** Wednesday, October 21, 2015 5:58 PM  
**To:** JPM AM Global CRG  
**Subject:** RE: Monthly CRG Governance Meeting

Please see attached September 2015 Monthly Exposure and Reconciliation Reports for tomorrow's meeting.

<< File: AM Counterparty Risk Exposure Concentration Summary 2015-9 - FINAL.pdf >>  
<< File: September 2015 Reconciliation - Exceptions.pdf >>

Best regards,  
Candice

**Candice Lue** | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ☎ (212) 648 - 0936 | ✉ [Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)

---

**From:** Dang Ngoc, Ali  
**Sent:** Wednesday, October 21, 2015 11:51 AM  
**To:** JPM AM Global CRG  
**Subject:** RE: Monthly CRG Governance Meeting

Hi team,

Attached are the EMEA Limits Report and Canada Loan Limits Tracker for tomorrow's meeting.

<< File: CRG -EMEA Limits Monitoring - Oct 2015.xlsx >> << File: Daily Limits Monitoring - September 2015 Canada Loan and Collateralization.xlsx >>

Best regards,

N. Ali Dang Ngoc  
Analyst

---

J.P. Morgan Asset Management  
Counterparty Risk Group  
[ali.dangngoc@jpmchase.com](mailto:ali.dangngoc@jpmchase.com)  
[www.jpmorgan.com/assetmanagement](http://www.jpmorgan.com/assetmanagement)  
270 Park Avenue Fl. 09  
New York, NY 10017  
Phone: 212-648-0037

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**From:** Dauber, Kimberly S  
**Sent:** Tuesday, October 20, 2015 12:41 PM  
**To:** JPM AM Global CRG  
**Subject:** RE: Monthly CRG Governance Meeting

Attached are the RCC slides and most recent Policy & Procedures for this month's governance meeting.

<< File: Risk Control Comm slide.pptx >> << File: Counterparty Risk Group\_9.08.2015.docx >> << File: Counterparty Risk Asset Management 05272015\_Aproved by Donna.pdf >>

Best regards,

**Kimberly Dauber** | Vice President | J.P. Morgan Asset Management | 270 Park Ave, 9th Floor, New York, NY 10017 | T: 212-270-1655 | [kimberly.s.dauber@jpmorgan.com](mailto:kimberly.s.dauber@jpmorgan.com)

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**From:** Cheung, Timothy KF  
**Sent:** Tuesday, October 20, 2015 3:11 AM  
**To:** JPM AM Global CRG  
**Subject:** Monthly CRG Governance Meeting

Hi team,

Please see the below materials for the meeting on Thursday. Thank you.

- I. Trading with non-approved counterparty:  
N/A
- II. Counterparties with outstanding trades exceed soft limits:  
N/A
- III. ISDA trigger monitoring



Trigger: Current NAV < 30% of the NAV on agreement/fund launch date (Day 0)

Counterparty: Redacted

FX Forwards only

Fund Name	Fund Launched/ISDA agreement Date (Day 0)	September 30, 2015	Current month as a % of Day 0
JPMorgan Asia Pacific Income Securities Investment Trust (Equity Balanced-Fund of Fund)	585,298,716	5,144,857,600	879%

Comments: No trigger breached. Redacted is rated A2 and A- by Moody's and S&P respectively, which is above the credit rating trigger of Ba1 (Moody's) and BB+ (S&P).

# EXHIBIT P

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**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, December 01, 2015 9:38 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Poz, Thomas I  
**Subject:** FW: Meeting Materials  
**Attachments:** Re: Meeting Materials; SecureZIP Attachments.zip  
  
**Importance:** High

Terri, Helen

I feel I should let you know what actually transpired.

I went over to Candice's desk and explained to her that Ryan will be responsible for organizing the materials for the Governance meeting tomorrow. However, he is WFH tomorrow and as such, could she coordinate with him on the task. Candice simply turned her head and began to click on her computer. I stood there for a couple of seconds waiting for an answer. When she refused to respond, I asked her what her response is because I need to let Ryan know who will be working with him. Without turning to me, she responds, "I have no comments."

I find Candice to be very disrespectful and this behavior is not acceptable; especially given that she is on a written warning which expired yesterday and which I could like to keep in effect. Pls advise on the process for extending the warning.

See also attached response from Candice in regards to the below email.

Regards  
Fidelia

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**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, December 01, 2015 9:46 AM  
**To:** Lue, Candice  
**Cc:** Poz, Thomas I  
**Subject:** Meeting Materials  
**Importance:** High

Candice

For the record, I have asked you to co-ordinate with Ryan to prepare the documents for our monthly team meeting tomorrow and you have refused.  
Note that the other analysts have been assisting with this task for the past few months. Ryan will be WFH tomorrow and so I wanted a backup person.

Regards  
Fidelia

# EXHIBIT Q



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**From:** Lue, Candice  
**Sent:** Tuesday, December 01, 2015 9:29 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Poz, Thomas I  
**Subject:** Re: Meeting Materials

For the record, your PLOYS which are cover ups for the unlawful behavior being meted out to me will not stand. There is no "other analyst" who is being ordered to have everyone in the department send their documents to them to print, collate, staple and lug to the monthly meetings.

Your plays ONLY consist of "other analysts" asking team members to give their printed, collated and stapled documents to them for them to put the documents in order as per the agenda and take them into the meeting. Again, that's all your plays consist of.

Furthermore, please be advised that this racial discrimination against me has been escalated to the point where these play compromises will not be effective.

Regards,  
Candice

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**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, December 01, 2015 09:45 AM  
**To:** Lue, Candice  
**Cc:** Poz, Thomas I  
**Subject:** Meeting Materials

Candice

For the record, I have asked you to co-ordinate with Ryan to prepare the documents for our monthly team meeting tomorrow and you have refused.

Note that the other analysts have been assisting with this task for the past few months. Ryan will be WFH tomorrow and so I wanted a backup person.

Regards  
Fidelia