

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CANDICE LUE,

Plaintiff,

- 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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No. 16 Civ. 03207 (AJN)(GWG)

DECLARATION OF JOHN VEGA

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

1. I was employed as an Executive Director in the Employee Relations Department of JPMorgan Chase Bank, N.A., a wholly-owned bank subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of 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.

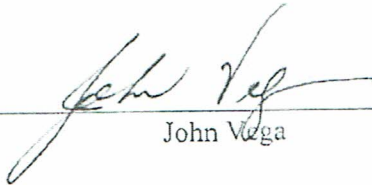
2. In June and July 2015, based on a referral from Terri Vernon, a Vice President on the HR Advice Direct team, I conducted an HR investigation into certain complaints made by Candice Lue. Specifically, Ms. Lue complained that Alex Khavin and Fidelia Shillingford were discriminating against her on the basis of her race because they directed her to take minutes at, and collect and distribute documents for, the group's monthly governance meeting.

3. My investigation revealed that Plaintiff's predecessor, a more senior, Caucasian male, Baruch Horowitz, had been assigned these tasks before Ms. Lue joined the group.

Additionally, I determined that Ms. Lue's job description encompassed the tasks about which she was complaining. Accordingly, I concluded that no discrimination had occurred.

4. Ms. Lue's 2015 mid-year review was postponed due to my ongoing investigation, which was delayed as a result of Ms. Lue's vacation in June 2015.

Dated: New York, New York
May 9, 2017


John Vega