

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK, COUNTY OF NEW YORK

CIVIL ACTION NO.: 16 CV 3207 (AJN) (GWG)

CANDICE LUE, an individual,
Plaintiff

v.

JPMORGAN CHASE & CO. a Delaware Corporation; ALEX KHAVIN, an individual; FIDELIA SHILLINGFORD, an individual; JOHN VEGA, an individual; HELEN DUBOWY, an individual; PHILIPPE QUIX, an individual; THOMAS POZ, an individual; CHRIS LIASIS, an individual; MICHELLE SULLIVAN, an individual; and DOES 1 - 10, inclusive,

Defendants

EXHIBITS

D – FF

**IN OPPOSITION/RESPONSE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

DOCKET #s 89-100

EXHIBIT D

(Complaint to Julie Johnson about Michelle Sullivan)

Lue, Candice

From: Lue, Candice
Sent: Monday, January 12, 2015 9:02 AM
To: Johnson, Julie HR
Cc: Leopold, Robin; Ramos-Cafarelli, Clarissa; Henderson, Susan R; NAMR CIB HRST; HR Advice Direct
Subject: Complaint: Michelle Sullivan – I Need Help
Attachments: Complaint - Michelle Sullivan.pdf

Ms. Johnson:

I am respectfully asking for your assistance with the complaint I have attached as I feel as if I have reached my wit's end with this matter.

Best regards and Happy New Year!
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

Lue, Candice

From: Johnson, Julie HR
Sent: Monday, January 12, 2015 11:22 AM
To: Lue, Candice
Cc: Leopold, Robin; Ramos-Cafarelli, Clarissa; Henderson, Susan R; NAMR CIB HRST; HR Advice Direct
Subject: RE: Complaint: Michelle Sullivan – I Need Help

Candice,

Thanks for your email. I understand that Nancy Sebastian from the HR Advice Direct team has already reached out to you to review the issues you raised. She will be your main point of contact going forward.

Julie

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Subject: Complaint: Michelle Sullivan – I Need Help

This is a desperate plea for help.

I was trying my hardest to pick up the pieces of my morale (please see my two year PMC history) and move forward to execute the duties of my new position which started on November 10, 2014 to the best of my ability. However, I continue to be hunted and haunted by my former manager, Michelle Sullivan who seems bent on derailing, smearing and destroying the financial career I've worked so hard to pursue.

During my college matriculation as a business student, my dream was always to work at JPMC, to work with managers who could help me to cultivate and build a successful financial career at one of the finest financial institutions. However, in the two years that I spent with Michelle Sullivan as my manager, it has been anything but.

Over the two years, she used my PMC – my permanent work record as a means to surreptitiously carry out her devious deeds whether by writing malicious, mendacious, and defamatory comments of her own (all of which I have debunked in my PMC responses) or by ordering me to send feedback requests to employees loyal to her to write malicious feedbacks on my PMC (please see the comments I made on my PMC for 2013 year end).

Please understand that I am by no means saying that I am a perfect employee so it is not and has never been my wish to have only the best of my abilities and/or efforts reported on my PMC. However, when there is little to no truth in the areas that are reported as "opportunities" and such can be debunked with solid proofs, a manager, as in the case of Michelle Sullivan should not be allowed to continue to defame an employee's character without the unbiased intervention of a third party.

Even though my position in the Global Commodities Group - Confirmations Team was eliminated effective November 9, 2014 due to the sale of the physical commodities business and I am currently in a new position, Michelle adamantly requested via HR that she be the one to write comments on my PMC for my 2014 year end review. What good intentioned, professional manager would be fighting tooth and nail to have her comments on my PMC? It was these said malicious comments and the performance rating of "Below Meets Expectations" that she gave me which have propelled me to seek help from the higher echelon of HR staff as I have suffered far too long from being hunted by her.

It broke and continues to break my heart to know that the harder I tried to make beneficial contributions and to help to improve the process of my former team (as outlined in my PMCs), the more pushback I got from Michelle Sullivan and her reinforced help Chris Liasis, who as her former manager and I will safely say confidant, started the defamation of my character (please see my 2013 mid year PMC response where I went line by line to debunk his less than accurate statements). To this day, I

cannot figure out what these two individuals have against me. However, I am/was not the only one they had/have treated this way.

During the transition period of the sale of the physical commodities business and even after I got my 60 day notice of termination, I continued to perform my duties at the highest professional level with optimal accuracy and quick turnaround time. In fact, one day before my date of termination, I got an email (on which Michelle was copied) from a senior co- worker with whom I was working on a transition project thanking me for the "speedy turnaround" in completing the project he had asked me to work on. One day before my date of termination.

I was instrumental in providing thorough cross-training to the team. I came into work on time, all my work was on schedule and with optimal accuracy, my reports were run on time, if needs be that I stay late to complete a time sensitive task, I did so. I served as back up for teammates who were on vacation for extended periods of time and never called out sick to use any of my seven unused sick days as spite or malice for being terminated. In fact, on November 7, 2014 (my last day in the department), I had six unused sick days.

Throughout high school and college, this has always been my work ethic and this is the same work ethic that I brought with me to JPMC. Case in point, one of the fourteen scholarships/awards that I received at my high school graduation was for perfect attendance. I also got an award for my many hours of volunteering. And, working here at JPMC, I have always sought and continue to seek opportunities to volunteer via JPMC's Good Works. The last volunteer activity that I did on behalf of JPMC was on December 12, 2014. It was for a toy drive for the Salvation Army - Greater New York Division's Toy Shop where I donated, sorted and organized toys for distribution to needy children during the holiday season.

However, with the foregoing being the example of my dedicated contribution to JPMC and my attitude towards work, Michelle Sullivan had always written and still continues to write disparaging comments on my PMC which includes this time, giving me a performance rating of "Below Meets Expectations". This is truly painful. It has been a distraction for my new position and it has caused me a great deal of undue stress as I think her intent is purely malicious.

Prior to accepting that position in Global Commodities Group – Confirmations Team, I worked as a temp in Global Commodities Group –Settlements Team where my then manager once told me based on my performance, *"You have something extra."* When I informed the representative at ICAP Energy Limited (JPMC's major broker) that I was moving on to another position, she wrote back telling me, *"Being extremely selfish Candice, this news is with much regret. You have managed the JPM accounts better than anyone in the 10 years I have looked after them. I would be very happy to endorse this to your line manager if you let me know who it is? Are you staying at JPM? Thank you SO much for all your help."*

I shared this email with the then manager of the department who informed me that she shared it with Charlie Coignard. The said department manager was also the one who recommended me for the Confirmations Team position where I subsequently ended up reporting to Michelle Sullivan. As for my current position in Asset Management, I can only describe my two month tenure there as "I hit the ground running."

I was an over achiever in high school and I was an over achiever in college from which I graduated third from the former and Summa Cum Laude from the latter. I have been awarded with scholarships, awards and accolades from these two institutions that would require the use of one full page to list them all. This is the same mentality of hard work that has caused me to not only fulfill but to exceed the company's line of business training requirements in a more than timely manner.

Just for transparency, I had previously reached out to Charlie Coignard, Michelle Sullivan's and Chris Liasis' manager when my regular duties were taken away from me and I was given duties that consisted of using the majority of my BAU to call clients to ask them if they had received issued trade confirmations and when can we expect a returned signed copy.

Because of how I was able to execute my regular duties competently and was able to thoroughly train other co-workers on how to do those said duties whereby when they were taken away from me, they were moved over to or shared amongst those co-workers and I was left pretty much "counting pencils", after discussing the matter with Michelle Sullivan and Chris Liasis proved fruitless, I escalated the downgrade of my duties to Charlie Coignard. As, as an ambitious, forward thinking individual who has proven that I can produce a high quality of work at a professional level and that I have the ability to successfully tackle challenges in ever-changing environments and take on challenges in demanding, time-sensitive environments to add value to the department and in turn the company as a whole, I thought Michelle Sullivan's and Chris Liasis' actions were extreme sabotage.

The response to my complaint was pretty much "this is the new role. If you don't like it, you can resign", exact word used. I also took the opportunity to let Charlie know about the less than truthful and comments with malicious intent that Michelle and Chris had been putting on my PMC, his response to that was "*maybe that's how the manager feels*". I then informed him that I had put statements on my PMC debunking those inflammatory comments and he said, "*that's what it's there for*". But should it just "be there"? Shouldn't it be screaming to a third party who reviews these PMCs, "HR, there is a problem" or something like that? Upon the directive of Charlie, I had to meet with Michelle and Chris again. An enraged Chris addressed me, "*this is not going to take long, you don't even have to sit down..... You are going to do whatever we assign you. If you don't want to do it, we need to know now.....*" On one of Charlie's future visits to the office where I worked, he did follow up with me by asking me "*how are things since our meeting?*" My response to him was "*I'm okay. I make my work be my main focus*". What more could I have said?

With seemingly no possible reprimand and clearly an attempt to get back at me for escalating matters to her manager, Michelle was free again to write her usual less than truthful and comments with malicious intent on my 2014 mid-year review.

Going forward, I did the work that they gave me to do to the best of my ability and with never another complaint until my termination date of November 7, 2014. Before departing, I shook Michelle Sullivan's hand and wished her well and she wished me the same. I had just accepted my new position the day before on November 6 and I did not tell anyone in the department that on November 10, 2014 I would be working in my new position.

I do not know if it is because Michelle Sullivan's real wish for me to be permanently terminated from JPMC had failed and this would be her last opportunity to smear my credibility why she provided those malicious, mendacious and defamatory "opportunities" comments along with a performance rating of "Below Meets Expectations" for my 2014 year end review but for whatever the reason, IT IS WRONG and based on my responses to them (see my PMC), goes against JPMC's Code of Conduct.

I'd appreciate if you'd order a full investigation into this matter and request a copy of any email correspondence between HR and Michelle Sullivan with regards to my 2014 year end review. As, I believe her adamancy in making sure that she provided the comments and performance rating for my 2014 year end review should have raised a red flag to HR as again, no good intentioned, professional manager would be fighting tooth and nail to have her comments and performance rating put on a subordinate's PMC. Unless, the manager has way too much time on her hands or she has a vendetta against the subordinate.

I look forward to your help and the vindication of my character so that I can once again see JPMC as the fine institution I had always envisioned it to be.

Best regards and Happy New Year!

Lue, Candice

From: Lue, Candice
Sent: Thursday, February 12, 2015 5:24 PM
To: Johnson, Julie HR
Cc: Sebastian, Nancy R
Subject: RE: Complaint: Michelle Sullivan – I Need Help
Attachments: Complaint - Michelle Sullivan.pdf

Hello Julie,

Just spoke with Nancy Sebastian who told me that per her investigations into the concerns that I raised (please see attached), she will be closing out this case as she has found nothing malicious per my complaint.

I must say that I am very disappointed with Nancy's decision considering that I have provided so much evidence to prove malicious intent.

Best regards,
Candice

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From: Lue, Candice
Sent: Monday, January 12, 2015 11:29 AM
To: Johnson, Julie HR
Cc: Leopold, Robin; Ramos-Cafarelli, Clarissa; Henderson, Susan R; NAMR CIB HRST; HR Advice Direct
Subject: RE: Complaint: Michelle Sullivan – I Need Help

Thank you Julie. Much appreciated.

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Lue, Candice

From: Lue, Candice
Sent: Tuesday, February 17, 2015 11:53 AM
To: Martins, Jack N
Subject: FW: Complaint: Michelle Sullivan – I Need Help
Attachments: RE: Update; Complaint - Michelle Sullivan.pdf

Hi Jack,

I received your voicemail and thanks so much!

However, as much as I would or should be interested in appealing this case via the appeals process you mentioned, there is a feeling of lack of confidence that I now have in the system that prohibits me from moving forward with this appeals process.

Best regards,
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Lue, Candice

From: Rivera, Michael S
Sent: Thursday, November 06, 2014 8:57 AM
To: Lue, Candice
Cc: Sullivan, Michelle T
Subject: RE: Project - Paul Gendron Master Confirms

Thanks Candice, appreciate the speedy turnaround. Question, what about the items flagged as "N/A" – there is no master confirm for those?

Thanks again,
M

From: Lue, Candice
Sent: Wednesday, November 05, 2014 6:18 PM
To: Rivera, Michael S
Cc: Sullivan, Michelle T
Subject: RE: Project - Paul Gendron Master Confirms

Hi Mike,

Following up from our discussion, please see attached spreadsheet. It's also saved here along with the respective master confirms: G:\Confirms\Drafting\Paul Gendron\ - Project - Paul Gendron Master Confirms

Regards,
Candice

Candice Lue | J.P. Morgan | Corporate & Investment Bank | Global Commodities Group | Tele: (212) 623 - 3774 | Email: Candice.Lue@jpmorgan.com | Hotline: (480) 634 - 9373 | Fax: (917) 464 - 8347
JPMC Internal Use Only

From: Rivera, Michael S
Sent: Wednesday, November 05, 2014 12:24 PM
To: Lue, Candice
Subject: FW: Project - Paul Gendron Master Confirms

From: Rivera, Michael S
Sent: Friday, October 31, 2014 10:36 AM
To: Lue, Candice
Cc: Sullivan, Michelle T
Subject: Project - Paul Gendron Master Confirms

Candice – I've got a project for you to work on, let's discuss when you have a chance. Basically, we need to gather up the master confirms for Paul's deals and file them in Mercuria's share so the HOU team has access to all that information. And we'd want to make sure that any info we share is only for clients who have consented to share information. Should be straightforward.

Thanks,
M

EXHIBIT DD

(Malicious and Mendacious “red meat” Email)

From: Vernon, Terri
To: Vega, John R.
Sent: 7/21/2015 3:12:29 PM
Subject: Call me when you can!

Candice Lue issue this morning. She is refusing to do work when a MD asked her to prepare copies of a report for a meeting tomorrow.
Philippe Quix (the MD) called me directly.

??

Terri Vernon
Vice President, Human Resources Advice Direct
(888) 703-5555 / HR.Advice.Direct@jpmchase.com
Direct: Terri.Vernon@jpmchase.com / (919) 651-6035

Categorically false.
RED MEAT.
Defendant Philippe Quix(MD)
NEVER asked me to
prepare copies of a
report.
CL

From: Vernon, Terri
To: Vega, John R.
Sent: 7/21/2015 9:38:58 PM
Subject: Candice Liu

There was another issue today where Candice refused to do work that a MD asked her to do (make copies)
They are getting frustrated and ready to pull the trigger.

Help!

Terri Vernon
Vice President, Human Resources Advice Direct
(888) 703-5555 / HR.Advice.Direct@jpmchase.com

Direct: Terri.Vernon@jpmchase.com / (949) 651-6035

*Categorically false.
This NEVER happened.
CL*

EXHIBIT DD-1

(Alex Khavin's Replacement (Thomas Poz) Announcement – January 6, 2016)

Lue, Candice

From: Philippe Quix <targetedemail@jpmchasebroadcast.com>
Sent: Wednesday, January 06, 2016 4:18 PM
Subject: Organization Announcement

GLOBAL INVESTMENT MANAGEMENT

J.P.Morgan
Asset Management

Organization Announcement

As you know, **Tom Poz** has been serving as interim Head of the Counterparty Risk Group for Global Investment Management, while Alex Khavin is out on extended leave. I am pleased to announce that Tom will assume the role on a full-time basis going forward, reporting to me.

Tom has been with J.P. Morgan for 15 years. He has been a Credit Officer in the Counterparty Risk Group since 2013, covering North America. He transitioned to Asset Management from the CIB, where he spent the prior nine years in the FIG Global Credit Risk Management unit covering banks, broker-dealers and clearinghouses. Altogether, Tom has 22 years credit experience covering financial institutions.

Please join me in congratulating Tom on his appointment to this critical role in our organization.



Philippe Quix
Chief Risk Officer,
Global Investment Management

This message was sent to all AM Risk employees.

JPMC INTERNAL USE ONLY

EXHIBIT DD-2

(Alex Khavin and Thomas Poz – JPMorgan Chase “Culture Ambassadors”)

IMA Culture and Conduct Program

Culture Ambassadors

LOB	Ambassadors		LOB	Ambassadors	
Alternatives	Emilio Quines	Lawrence Fuchs	O & C	Karin Bleyer	
Equities	Danielle Hines Jon Brachle	Scott Davis Andrew Stern	Client Service	Brian Bergere Scot Hawthorne	Amie Smith Laura Del Prato
Fixed Income	Steve Lear Erin Spalsbury	Molly Sheinberg	Highbridge	John Olivia	
Liquidity	Cecilia Junker		Finance	Paul Przybylski	
Solutions	Chris Sedigzad Jake Tadros Livia Wu	Maddi Dessner Mike Nelson Silvia Trillo	Operations / Tech	Chris Matzys Paul Pricoli	Rob Ascenzi
Funds	Brandon Ritter Frank Tonnemaker Raleigh Peters	Tim Dunatis Will Davis	Risk	Alex Khavin ✱	Thomas Poz ✱
Institutional	Chris Daley	Joe Steccato	Marketing	Benji Baer Branden Crouch	Jena Cogswell

EXHIBIT DDD

(Email Declining HR's Appeal Proposal)

From: Lue, Candice
To: Martins, Jack N
Sent: 2/17/2015 4:52:03 PM
Subject: FW: Complaint: Michelle Sullivan – I Need Help
Attachments: ATTACH000.eml; Complaint - Michelle Sullivan.pdf

Hi Jack,

I received your voicemail and thanks so much!

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EXHIBIT EE

(Emails ridiculing my inability to attend work due to severe mental stress, emotional anxiety and physical pain)

From: Shillingford, Fidelia X
To: Vega, John R.
Sent: 7/31/2015 3:22:26 PM
Subject: RE: Sick Day

Baruch Horowitz went on
disability due to stress, etc.
(Am. Compl. #107).

CL

I won't be surprise if she takes disability

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

From: Vega, John R.
Sent: Friday, July 31, 2015 9:24 AM
To: Shillingford, Fidelia X
Subject: RE: Sick Day

I am not surprised.....

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

From: Shillingford, Fidelia X
Sent: Friday, July 31, 2015 9:15 AM
To: Vega, John R.
Subject: FW: Sick Day

As expected...

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

From: Lue, Candice
Sent: Friday, July 31, 2015 6:27 AM
To: Shillingford, Fidelia X
Cc: Kulda, Eileen; Poz, Thomas I
Subject: Sick Day

Good morning,

I am very stressed. I'm having a headache, nausea and a sharp pain in my side. I will not be in today.

Best regards,
Candice

From: Shillingford, Fidelia X
To: Vega, John R.
Sent: 7/31/2015 3:19:51 PM
Subject: RE: Sick Day

3 to help my mother after
her fall and I was denied
the company's WFH benefit.
4 due to undue stress
caused by being treated
as a second class citizen/
the help/house slave.
CZ

I believe 7 out of 12.

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

From: Vega, John R.
Sent: Friday, July 31, 2015 9:27 AM
To: Shillingford, Fidelia X
Subject: RE: Sick Day

How many days for this year has she taken?

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

From: Shillingford, Fidelia X
Sent: Friday, July 31, 2015 9:15 AM
To: Vega, John R.
Subject: FW: Sick Day

As expected...

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Candice

From: Shillingford, Fidelia X
To: Vega, John R.
Sent: 8/3/2015 6:36:12 PM
Subject: RE: Sick Day
Attachments: RE: Mid-Year Review - PIP

Yes, did you not see her email in response to the PIP (see attached).

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

From: Vega, John R.
Sent: Monday, August 03, 2015 12:29 PM
To: Shillingford, Fidelia X
Subject: RE: Sick Day

Did she come in today?

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

From: Shillingford, Fidelia X
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As expected...

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Subject: Sick Day

Good morning,

I am very stressed. I'm having a headache, nausea and a sharp pain in my side. I will not be in today.

Best regards,
Candice

EXHIBIT EE-1

(Lack of Trust and Confidence in Manager Fidelia Shillingford)

From: Shillingford, Fidelia X
To: Vega, John R.
Sent: 7/31/2015 3:19:51 PM
Subject: RE: Sick Day

I believe 7 out of 12.

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

From: Vega, John R.
Sent: Friday, July 31, 2015 9:27 AM
To: Shillingford, Fidelia X
Subject: RE: Sick Day

How many days for this year has she taken?

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

From: Shillingford, Fidelia X
Sent: Friday, July 31, 2015 9:15 AM
To: Vega, John R.
Subject: FW: Sick Day

As expected...

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

From: Lue, Candice
Sent: Friday, July 31, 2015 6:27 AM
To: Shillingford, Fidelia X
Cc: Kulda, Eileen; Poz, Thomas I
Subject: Sick Day

Good morning,

I am very stressed. I'm having a headache, nausea and a sharp pain in my side. I will not be in today.

Best regards,
Candice

3 to help my mother after her fall and I was denied the company's WFH benefit.
4 due to undue stress caused by being treated as a second class citizen / the help / house slave. CZ

From: Shillingford, Fidelia X
To: Vega, John R.
Sent: 7/31/2015 3:22:26 PM
Subject: RE: Sick Day

Baruch Horowitz went on
disability due to stress, etc.
(Am. Compl. # 107). CZ

I won't be surprise if she takes disability

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

From: Vega, John R.
Sent: Friday, July 31, 2015 9:24 AM
To: Shillingford, Fidelia X
Subject: RE: Sick Day

I am not surprised.....

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

From: Shillingford, Fidelia X
Sent: Friday, July 31, 2015 9:15 AM
To: Vega, John R.
Subject: FW: Sick Day

As expected...

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

From: Lue, Candice
Sent: Friday, July 31, 2015 6:27 AM
To: Shillingford, Fidelia X
Cc: Kulda, Eileen; Poz, Thomas I
Subject: Sick Day

Good morning,

I am very stressed. I'm having a headache, nausea and a sharp pain in my side. I will not be in today.

Best regards,
Candice

From: Shillingford, Fidelia X
To: Dieudonne, Franklin
Sent: 3/31/2015 4:36:03 PM
Subject: FW: WFH - Monday April 6

*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*

From: Lue, Candice
Sent: Tuesday, March 31, 2015 11:07 AM
To: Shillingford, Fidelia X
Subject: RE: WFH - Monday April 6

Hi Fidelia,

For Monday, my doctor's appointment is at 3pm and I will have my blackberry with me. My personal cell phone number is [REDACTED]

Regarding Holy Thursday, I just wanted to let you know that I usually take the day off in addition to Good Friday for religious purposes (Easter observance). However, because of the workload/human resource shortage, I elected to work from home on Holy Thursday. Also, please be advised that if I were to come into the office on Holy Thursday, I would have to leave by 3pm to be home no later than 5pm. If I work from home then I'll be able to work until 5pm (2 hours more).

Easter is the holiest Christian holiday in my family. J

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

From: Shillingford, Fidelia X
Sent: Tuesday, March 31, 2015 10:40 AM
To: Lue, Candice
Subject: RE: WFH - Monday April 6

Thanks Candice for the heads-up.

Can you please advise what your availability will be on Monday? Are you planning to take time off in the morning or afternoon for your doctor's appointment? Also, please provide number(s) that you can be reached at when WFH?

Lastly, given that you will be off on Friday and WFH on Monday; can I ask that you please come into the office on Thursday? I am ok with you leaving on time on Thursday, if needs be. Please ask Eileen to remove the WFH on Thursday.

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*

From: Lue, Candice
Sent: Monday, March 30, 2015 10:19 AM
To: Shillingford, Fidelia X; Kulda, Eileen
Subject: WFH - Monday April 6

Hi Fidelia/Eileen,

I have a doctor's appointment on Monday, April 6 and need to work from home. Can I be added to the team calendar for WFH?

Thanks and 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

From: Shillingford, Fidelia X <fidelia.x.shillingford@jpmorgan.com>
To: Dieudonne, Franklin <Franklin.Dieudonne@itg.com>
Sent: 3/16/2015 1:34:02 PM
Subject: FW: Not Feeling Well

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, March 16, 2015 8:20 AM
To: Shillingford, Fidelia X
Subject: Re: Not Feeling Well

Hi Fidelia,

Pursuant to the email below, I am having severe pain in my trapezius muscle which started on Friday and escalated yesterday evening which resulted in me being up most of last night.

This usually happens due to stress like what occurred when I had to take 2 days off in January.

Please be advised that even though there is a heavy workload, this stress is not directly related to BAU but moreso other issues/forces that seem to continually get intertwined into my daily work.

I will discuss in more details when I return to the office.

Best regards,
Candice

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

From: Lue, Candice
Sent: Monday, March 16, 2015 07:32 AM
To: Shillingford, Fidelia X; Kulda, Eileen
Subject: Not Feeling Well

Hi Fidelia/Eileen,

I'm not feeling well today and will not be able to make it into the office.

Eileen - Can you please cancel/reschedule the 2:30 pm meeting I have with Philippe today?

Thanks and regards.

Best regards,
Candice

From: Sullivan, Michelle T
To: Shillingford, Fidelia X
Sent: 5/14/2015 2:11:58 AM
Subject: Re: Sick Days

Always 'happy' to be a part
of my affairs. CZ

Hi.

I'm happy to help.

Do you have access to Global Absence Tracking? That is what I used for sick and vacation tracking but I don't have access to her profile now.

We can screen share together and I can show you how to pull that info and also rec it back to my calendar and emails.

I think I was pretty good about updating it timely but may have missed a few in her final weeks.

Thanks,
Michelle

From : Shillingford, Fidelia X
Sent : Wednesday, May 13, 2015 07:08 PM
To : Sullivan, Michelle T
Subject : Sick Days

Hi Michelle

Sorry to bother you again but can you please advise how many sick days Candice was eligible for in 2014 and how many she used?

Trying to confirm how many she would be entitled to in 2015.

Thanks in advance

Fidelia Shillingford

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,

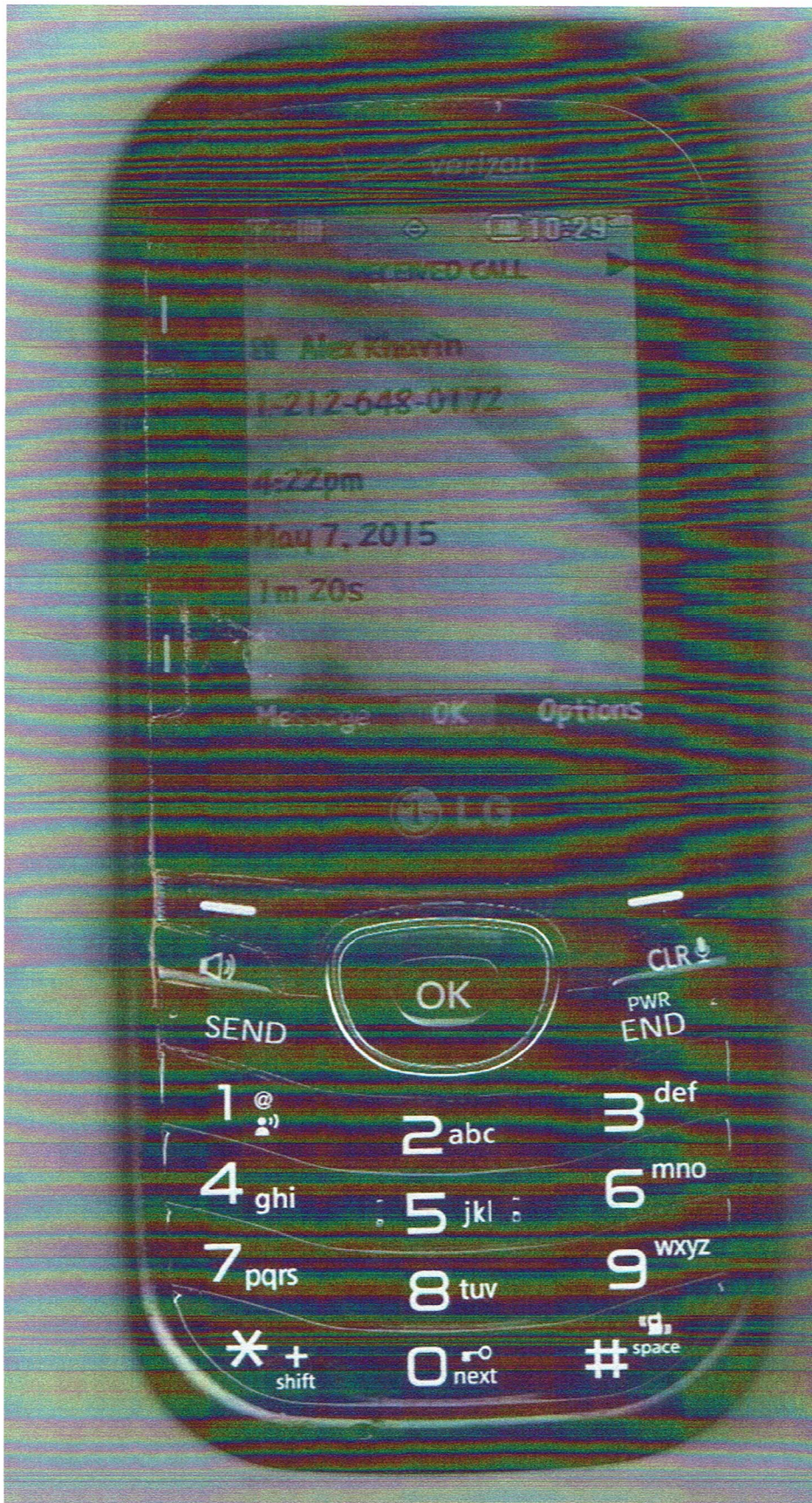
Just wanted to discuss with you the influence my previous manager has in my current work affairs and the lack of trust and confidence I have in your management.

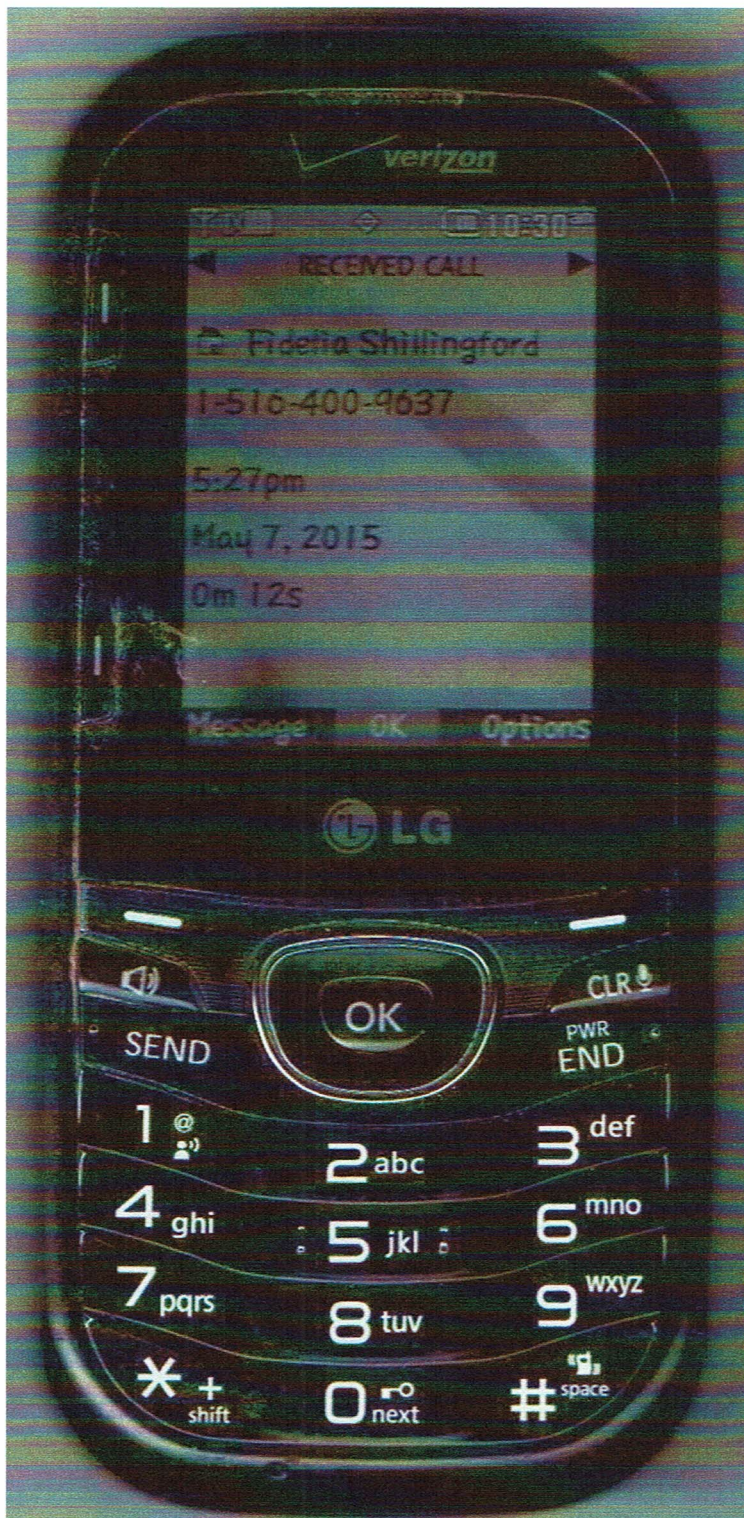
Best regards,
Candice

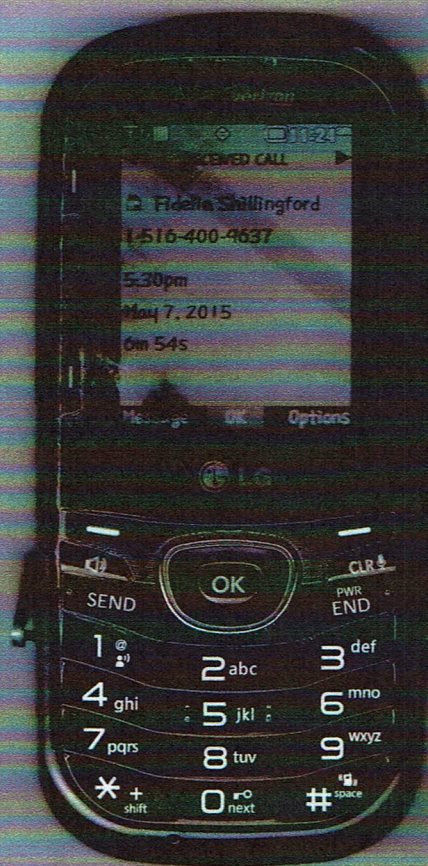
Candice Lue | Asset Management | Counterparty Risk Group | **J.P. Morgan** | 270 Park Avenue, 9th Floor, New York, NY 10017 | ((212) 648 - 0936 | + Candice.Lue@jpmorgan.com

EXHIBIT EE-2

(Records of Khavin's and Shillingford's May 7, 2015 Telephone Calls and
Shillingford's Initial Response to my May 7, 2015 Email before She Spoke with Khavin.)







From: Lue, Candice <candice.lue@jpmorgan.com>
To: Shillingford, Fidelia X <fidelia.x.shillingford@jpmorgan.com>
Sent: 5/7/2015 2:50:03 PM
Subject: Re: WFH

Thank you Fidelia.

Best regards,
Candice

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

From: Shillingford, Fidelia X
Sent: Thursday, May 07, 2015 08:55 AM
To: Lue, Candice
Subject: RE: WFH

Hi
Hope all is well. Let me know if you need to take time off.

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: 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 F

(Written Warning)

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
WRITTEN WARNING RESTRICTIONS PERIOD			
Beginning Date: 09/24/2015			
Ending Date: 11/30/2015			
REASON(S) FOR THIS WARNING - Describe specific examples of the problem(s) and the date(s) the problem(s) occurred. <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>			
MANAGEMENT EXPECTATIONS - Indicate performance expectations, plan of action and time frames for improvement. <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 no 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: _____

Lue, Candice

From: Lue, Candice
Sent: Friday, September 25, 2015 8:50 AM
To: Shillingford, Fidelia X
Cc: Poz, Thomas I; Dubowy, Helen; Vernon, Terri
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 ploys, 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

* In their quest to cover/mitigate the Employment Racial Discrimination that was perpetrated against me, the HR legal representatives were subtly trying to shift my claim of Employment Racial Discrimination against me, from Khavin, the main perpetrator who is White unto Shillingford, the conduit of Khavin's said Employment Racial Discrimination, who is Black. And, Shillingford, a servile employee, was willing to take on this position as a badge of honor in service to her "masters".

However, and pursuant to Title VII of the Civil Rights Act of 1964 - EEOC Compliance Manual Section 15 – Race and Color Discrimination - The decisionmaker's race: *"The race of the decisionmaker may be relevant, but is not controlling.(55) In other words, it should not be presumed that a person would not discriminate against members of his own race. As the Supreme Court has noted, "[b]ecause of the many facets of human motivation, it would be unwise to presume as a matter of law that human beings of one definable group will not discriminate against other members of their group."(56).*

CL

EXHIBIT FF

(Fidelia Shillingford's 2012 – 2014 year end performance ratings)

Name	AMOC Member	Bottom Multiple Years?	2014 Rating	2013 Rating	2012 Rating	Officer Title	Action	Action Date	Current Direct Supervisor	2014 TC
[REDACTED]	Di Iorio, Felice	No	M-	M	M	Other	Corrective Action-PIP	3/31/2015	Messick, Bryan Keith	56,000
[REDACTED]	Di Iorio, Felice	No	N	M	O	Other	Corrective Action-PIP	3/31/2015	Adkins, Justin	56,000
[REDACTED]	Di Iorio, Felice	No	M-	O	O	Other	Corrective Action-PIP	12/11/2014	Liu, Patricia S	55,000
[REDACTED]	Di Iorio, Felice	No	M-	M	O	Other	Development Plan	3/31/2015	Handy, Shella R	55,000
[REDACTED]	Di Iorio, Felice	No	M-	T	O	Other	Development Plan	3/31/2015	Francis, Ashley Rice	55,000
[REDACTED]	Di Iorio, Felice	No	N	T	O	Other	Leave of Absence	3/31/2015	Mourn, Francesca Sharkey	55,000
[REDACTED]	Di Iorio, Felice	No	M-	O	O	Other	Role change within AM		Gunn, Megan Anna	55,000
[REDACTED]	Di Iorio, Felice	No	M-	O	O	Other	Development Plan		Venkatadri, Vasuda	51,948
[REDACTED]	Di Iorio, Felice	No	M-	M	M+	Other	Development Plan		Zaborowski, Robert J	51,000
[REDACTED]	Di Iorio, Felice	No	M-	M	M	Other	Talent Reassignment	3/31/2015	Bush, William Prescott	51,000
[REDACTED]	Di Iorio, Felice	No	M-	M+	M	Other	Development Plan	3/31/2015	Trapnell, Judson W.	50,750
[REDACTED]	Di Iorio, Felice	No	M-	M	M	Other	Corrective Action-PIP	3/31/2015	O'Brien, Robert F	50,000
[REDACTED]	Di Iorio, Felice	No	M-	O	O	Other	Development Plan		Venkatadri, Vasuda	49,384
[REDACTED]	Di Iorio, Felice	No	M-	M+	O	Other	Development Plan	3/31/2015	Minter Jr, John Claer	49,000
[REDACTED]	Di Iorio, Felice	No	M-	M	M+	Other	empty		Ebeid, Meghan	47,900
[REDACTED]	Gunselman, Gregg	2 Years	M-	M-	M	VP	Role change within AM	10/26/2015	Chodos, Jason	210,000
[REDACTED]	Gunselman, Gregg	No	M-	M	M	MD	Role change within AM	10/26/2015	Mushnell, Christopher	539,000
[REDACTED]	Gunselman, Gregg	No	M-	M	M	MD	Development Plan	10/26/2015	Malinowski, Kenneth	270,000
[REDACTED]	Gunselman, Gregg	No	M-	M+	M+	VP	Development Plan	10/27/2015	O'Malley, Joseph B	255,736
Shillingford, Fidelia	Gunselman, Gregg	No	M-	M	M+	VP	Development Plan	10/26/2015	Khavin, Alexandra	130,000
[REDACTED]	Gunselman, Gregg	No	M-	O	O	ASSC	Development Plan	10/26/2015	De Lisi, Brian W.	95,000
[REDACTED]	Gunselman, Gregg	No	M-	M	O	ASSC	Corrective Action-PIP	10/26/2015	Herrold, Lyndsay Dianne	89,000
Lue, Candice S. m.	Gunselman, Gregg	No	M-	O	O	Other	Corrective Action-PIP	10/26/2015	Shillingford, Fidelia	75,000