

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

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

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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

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**EXHIBITS**

**H – HH-1**

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

**DOCKET #s 89-100**

# EXHIBIT H

*(Job Descriptions)*

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## Job Description

### AM - Credit Reporting Risk Analyst-140084006

#### Description

J.P. Morgan Asset Management is a leading asset manager for individuals, advisors and institutions. Our investment professionals are located around the world, providing strategies that span the full spectrum of asset classes.

As one of the largest asset and wealth managers in the world, with assets under supervision of \$2.1 trillion and assets under management of \$1.4 trillion (as of December 31, 2012), we provide global market insights and a range of investment capabilities that few other firms can match.

J.P.Morgan Asset Management Risk Management is committed to being a world-class leader in risk management, maintaining a system of strong controls, providing guidance and clear direction on key risk principles, proactively managing risks and achieving a consistent balance between our business goals and deployment of capital. AM Risk Management employs people around the world and ensures strong risk management discipline throughout the lines of business within AM. The JPMAM Counterparty Risk Group, with assistance from regional risk personnel, supervises credit risk arising from counterparty activities conducted on behalf of clients.

#### Job Responsibilities:

The ideal candidate must possess a strong risk and control mindset, be very detailed oriented, have excellent analytical and written/verbal communication skills as well as be able to work under pressure and able to deliver on multiple tight, time sensitive timelines. Specific responsibilities will include:

- Performing on-going monitoring and periodic reviews of the creditworthiness of approved counterparties - *Credit Analysis*.
- Working with large volumes of data to conduct adhoc analyses on counterparties and exposures as needed
- Updating and distributing daily Counterparty reports
- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

#### Qualifications

#### Qualifications and Skills:



- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Demonstrated fundamental credit analysis skills
- Exceptional analytical skills (naturally inquisitive/intellectually curious)
- Superior attention to detail
- Demonstrated interest in/ knowledge of global financial markets and current regulatory/legislative agendas
- Self-starter with strong project management skills - be able to independently manage multiple tasks and priorities under tight deadlines
- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

**Job Risk****Primary Location** US-NY-New York-270 Park Avenue / 02317**Organization** RISK**Schedule** Full-time**Job Type** Standard**Shift** Day Job**Employee Status** Regular**Recruiter** Francisco Rivera**Hiring Manager** Kimberly Dauber**Salary Grade / Level** 501[Privacy & Security](#) | [Terms & Conditions](#) | [USA Patriot Act Certification / Recertification](#) | [Sitemap](#) |[Cookies Policy](#)

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## Job Description

### AM - Counterparty Credit Risk Analyst-140107911

#### Description

##### AM – Counterparty Risk Analyst

J.P. Morgan Asset Management is a leading asset manager for individuals, advisors and institutions. Our investment professionals are located around the world, providing strategies that span the full spectrum of asset classes.

J.P.Morgan Asset Management Risk Management is committed to being a world-class leader in risk management, maintaining a system of strong controls, providing guidance and clear direction on key risk principles, proactively managing risks and achieving a consistent balance between our business goals and deployment of capital. AM Risk Management employs people around the world and ensures strong risk management discipline throughout the lines of business within AM. The JPMAM Counterparty Risk Group, with assistance from regional risk personnel, supervises credit risk arising from counterparty activities conducted on behalf of clients.

#### Job Responsibilities:

- The ideal candidate must possess a strong risk and control mindset, be very detailed oriented, have excellent analytical and written/verbal communication skills as well as be able to work under pressure and able to deliver on multiple tight, time sensitive timelines. Specific responsibilities will include:
- Performing on-going monitoring and periodic reviews exposures
- Working with large volumes of data to conduct adhoc analyses as needed
- Updating and distributing Counterparty reports
- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

#### Qualifications

##### Qualifications and Skills:

- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Exceptional analytical skills (naturally inquisitive/intellectually curious)

- Superior attention to detail
- Demonstrated interest in/ knowledge of global financial markets and current regulatory/legislative agendas
- Self-starter with strong project management skills - be able to independently manage multiple tasks and priorities under tight deadlines
- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

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## Job Description

### AM - Credit Reporting Risk Analyst-140084006

#### Description

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As one of the largest asset and wealth managers in the world, with assets under supervision of \$2.1 trillion and assets under management of \$1.4 trillion (as of December 31, 2012), we provide global market insights and a range of investment capabilities that few other firms can match.

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#### Job Responsibilities:

The ideal candidate must possess a strong risk and control mindset, be very detailed oriented, have excellent analytical and written/verbal communication skills as well as be able to work under pressure and able to deliver on multiple tight, time sensitive timelines. Specific responsibilities will include:

- Performing on-going monitoring and periodic reviews of the creditworthiness of approved counterparties
- Working with large volumes of data to conduct adhoc analyses on counterparties and exposures as needed
- Updating and distributing daily Counterparty reports



- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

**Qualifications****Qualifications and Skills:**

- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Demonstrated fundamental credit analysis skills
- Exceptional analytical skills (naturally inquisitive/intellectually curious)
- Superior attention to detail
- Demonstrated interest in/ knowledge of global financial markets and current regulatory/legislative agendas
- Self-starter with strong project management skills - be able to independently manage multiple tasks and priorities under tight deadlines
- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

**Job Risk****Primary Location** US-NY-New York-270 Park Avenue / 02317**Organization** RISK**Schedule** Full-time**Job Type** Standard**Shift** Day Job**Employee Status** Regular**Recruiter** Francisco Rivera**Hiring Manager** Kimberly Dauber**Salary Grade / Level** 501

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- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

#### Qualifications

#### Qualifications and Skills:



- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Demonstrated fundamental credit analysis skills
- Exceptional analytical skills (naturally inquisitive/intellectually curious)
- Superior attention to detail
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- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

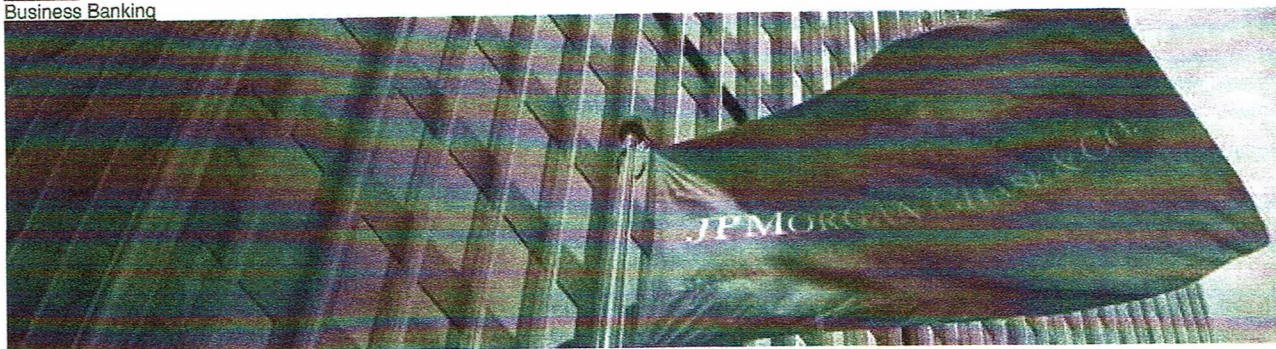
**Job Risk****Primary Location** US-NY-New York-270 Park Avenue / 02317 **FL.9****Organization** RISK**Schedule** Full-time**Job Type** Standard**Shift** Day Job**Employee Status** Regular**Recruiter** Francisco Rivera (Z)**Hiring Manager** Kimberly Dauber**Salary Grade / Level** 501[Privacy & Security](#) | [Terms & Conditions](#) | [USA Patriot Act Certification](#) / [Recertification](#) | [Sitemap](#) |[Cookies Policy](#)

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J.P.Morgan Asset Management Risk Management is committed to being a world-class leader in risk management, maintaining a system of strong controls, providing guidance and clear direction on key risk principles, proactively managing risks and achieving a consistent balance between our business goals and deployment of capital. AM Risk Management employs people around the world and ensures strong risk management discipline throughout the lines of business within AM. The JPMAM Counterparty Risk Group, with assistance from regional risk personnel, supervises credit risk arising from counterparty activities conducted on behalf of clients.

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- Working with large volumes of data to conduct adhoc analyses on counterparties and exposures as needed
- Updating and distributing daily Counterparty reports

- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

**Qualifications****Qualifications and Skills:**

- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Demonstrated fundamental credit analysis skills
- Exceptional analytical skills (naturally inquisitive/intellectually curious)
- Superior attention to detail
- Demonstrated interest in/ knowledge of global financial markets and current regulatory/legislative agendas
- Self-starter with strong project management skills - be able to independently manage multiple tasks and priorities under tight deadlines
- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

**Job Risk****Primary Location** US-NY-New York-270 Park Avenue / 02317**Organization RISK****Schedule** Full-time**Job Type** Standard**Shift** Day Job**Recruiter** Francisco Rivera**Hiring Manager** Fidelia Shillingford**Salary Grade / Level** 501

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# EXHIBIT H-3

(JPMorgan Chase & Co.'s Promotion Criteria)



# Promotion Criteria

## Asset Management Associate

	Criteria
<b>Performance</b>	<ul style="list-style-type: none"> <li>At least 2 years of M or above performance, with rating of M+/E in year of promotion               <ul style="list-style-type: none"> <li>For those in the GWM and GIM Analyst Programs, 3<sup>rd</sup> year Analyst rating of M or better and minimum of M or better in prior year</li> <li>For those in a Corporate Analyst Program Analyst rating of M or better and minimum of M or better in prior year</li> </ul> </li> </ul> <p><i>Behavior must be consistent with the firm's business principles, leadership standards and risk, control and regulatory expectations</i></p>
<b>Tenure</b>	<ul style="list-style-type: none"> <li>A minimum of 3 years of relevant industry/functional Analyst level experience</li> <li>A minimum of 1 year of service at JPMC               <ul style="list-style-type: none"> <li>A minimum of 3 years in Program for those in the GWM and GIM Analyst Programs</li> <li>A minimum of 2.5 years in Program for those in a Corporate Analyst Program</li> </ul> </li> </ul>
<b>Scope</b>	<ul style="list-style-type: none"> <li>Extent of contribution in area of expertise to be determined based on LOB and role</li> <li>Requires minimal direct supervision</li> <li>Responsible for decisions that require independent thought/action and are guided by policies or established practices</li> <li>Emerging subject area expert in a specific skill set, business area or product</li> <li>Leads/coordinates direct or allocated resources</li> </ul>
<b>Potential</b>	<ul style="list-style-type: none"> <li>Candidates should clearly be operating at Associate level and demonstrate ability and willingness for continued advancement over a multi-year period</li> </ul>

*Those in formal Analyst training programs follow program guidelines*

# EXHIBIT H-4

*(Alex Khavin's Cover up Job Description)*



**From:** Khavin, Alex G  
**To:** Vernon, Terri  
**CC:** Shillingford, Fidelia X  
**Sent:** 5/27/2015 7:12:53 PM  
**Subject:** Candice Lue - Reporting Analyst Rec and other details

Total Farce.  
See my Job Description  
in Exhibit H. CL

Terri-

As requested, please see Candice's Reporting Role description below. Also as an FYI, when we were hiring Candice, we did not know if the reporting function would remain with us as there was the potential for the whole function to move out of our group. We communicated to Candice at time of hire that her role may be moved to another group.

For your convenience I am also including below the general description of responsibilities for some of our other analysts who are Credit Analysts (this specific one is for an analyst we hired almost at the same time as Candice).

Also per your request, here are some general overviews of the responsibilities currently performed by other Analysts/Associates on our team on certain initiatives:

Technology Initiatives:

Take notes on follow ups from meetings

Prepare materials for meeting

Gather feedback from other group members, consolidate into a centralized document, make edits/changes as requested by team members, group head. Print and distribute materials at meetings

Investment Risk Process:

Take notes on follow ups during meetings, distribute to meeting participants

Prepare materials for the meeting –gather documentation, print and distribute at meetings

Asset Management Risk Senior Management Meetings:

Gather information from credit officers and all credit analysts on overdue names

Gather information from credit officers and all credit analysts on new names completed



Pull information from reporting team on Limits and trading breaches, follow up with credit officers on reasons and record

Put together information into a centralized package, receive sign off from group manager, circulate to centralized business team

#### Limits Initiative:

Take notes on follow ups from meetings

Prepare materials for meetings

Gather feedback from group members, consolidate information as necessary, make edits/changes as requested by team members, group head. Print and distribute materials at meetings

#### Description of Reporting role in Taleo:

**AM Counterparty Risk - Analyst/Associate - Risk and Reporting Analyst- New York**

#### **Department Description:**

AM Risk Management employs people around the world and ensures strong risk management discipline throughout the lines of business within AM. The JPMAM Counterparty Risk Group, with assistance from regional risk personnel, supervises credit risk arising from counterparty activities conducted on behalf of clients. Additionally, the team is responsible for managing Crisis reporting.

#### **Roles and Responsibilities:**

The ideal candidate must possess a strong risk and control mindset, be very detail oriented, have excellent analytical and written/verbal communication skills as well as be able to work under pressure and deliver on multiple tight, time sensitive timelines. Additionally, the right candidate must understand and challenge the numbers, and be able to tell the story behind them. Specific responsibilities include:

- Updating and distributing daily Counterparty reports
- Help monitor, report and manage counterparty exposures
- Help maintain credit administration systems and records
- Assist other team members with assignments, cover for associates as needed
- Manage approval and related data within associated systems
- Record and communicate counterparty approvals, rejections, suspensions or other changes and generally support associates with related inquiries

**Qualifications:**

- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Understanding of investment securities, derivatives, trading and settlement, financing and the risks associated therewith
- Understanding of counterparty credit risk and counterparty exposures, a plus
- Strong analytical, quantitative, and investigative problem-solving abilities
- Excellent relationship building skills with the ability to listen well and influence others
- Strong interpersonal skills
- Strong working knowledge of Microsoft suite of applications (especially Excel and PowerPoint)
- A self-starter who is organized and consistently meets deliverables
- Comfortable leading an initiative or playing a support role on the broader team

**Description of Credit Analyst (1<sup>st</sup> year) role in Taleo:**

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**Job Responsibilities:**

The ideal candidate must possess a strong risk and control mindset, be very detailed oriented, have excellent analytical and written/verbal communication skills as well as be able to work under pressure and able to deliver on multiple tight, time sensitive timelines. Specific responsibilities will include:

- Performing on-going monitoring and periodic reviews of the creditworthiness of approved counterparties



- Working with large volumes of data to conduct adhoc analyses on counterparties and exposures as needed
- Updating and distributing daily Counterparty reports
- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

#### **Qualifications and Skills:**

- Undergraduate degree with 1+ years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Demonstrated fundamental credit analysis skills
- Exceptional analytical skills (naturally inquisitive/intellectually curious)
- Superior attention to detail
- Demonstrated interest in/ knowledge of global financial markets and current regulatory/legislative agendas
- Self-starter with strong project management skills - be able to independently manage multiple tasks and priorities under tight deadlines
- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

---

Alex Khavin

Executive Director

J.P. Morgan Asset Management

[alex.khavin@jpmorgan.com](mailto:alex.khavin@jpmorgan.com)

270 Park Avenue, floor 9

Phone: 212-648-0172

Fax: 917-463-0245

Mobile: 917-414-2776

# EXHIBIT H-5

(Emails between Fidelia Shillingford and Alex Khavin re: My 2014 Year End  
Performance Review)



---

**From:** Khavin, Alex G  
**To:** Shillingford, Fidelia X  
**Sent:** 12/10/2014 5:25:00 PM  
**Subject:** RE: Year End Review for Candice

Yes, of course.

---

**Alex Khavin**  
Executive Director  
J.P. Morgan Asset Management  
alex.g.khavin@jpmorgan.com  
270 Park Avenue, floor 9  
Phone: 212-648-0172  
Fax: 917-463-0245  
Mobile: 917-414-2776

---

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, December 10, 2014 10:54 AM  
**To:** Khavin, Alex G  
**Subject:** RE: Year End Review for Candice

Will do – can I get this to you later in the week?

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:** Khavin, Alex G  
**Sent:** Wednesday, December 10, 2014 10:49 AM  
**To:** Shillingford, Fidelia X  
**Subject:** RE: Year End Review for Candice

Yes, I think her review should mostly be from her previous manager, however, any items you can note to highlight would be helpful as well.

Can you send me the managers review and rating and what you think you would add?

Thanks.

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

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, December 10, 2014 10:34 AM Eastern Standard Time  
**To:** Khavin, Alex G  
**Subject:** Year End Review for Candice

Hi Alex

Hope all is well with you and the family.

How do we handle Candice's review? Are expectations that her yearend review be completed by her former manager? In previous conversations with her former manager, she noted that she had completed her review in PMC. From our end, I would believe she would be too new to rate but let me know your thoughts.

Regards

Asking Defendant  
Alex Khavin what todo.  
CL

**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: Sullivan, Michelle T  
To: Shillingford, Fidelia X ;Cabrera-Vargas, Ana J  
Sent: 12/12/2014 7:20:05 PM  
Subject: RE: Candice Review

Asking Defendant Michelle  
Sullivan what to do.  
c2

Hi Fidelia,

This can be done directly in PMC.

Please select Candice and under the "Performance Review Information" you will see a section for 'Additional Manager'

Both the employee and the manager are able to edit this field.

I have included a screen shot from my view below as an example.

**Performance Management Central**

Home  
Performance Review  
Objectives  
Development/Career Plan  
Strengths & Opportunities  
Summary Comments  
Discussion Tracking  
Sign Review/Ratings  
Feedback on Others  
Feedback for Myself  
Employee Bio  
Talent Review  
Reports  
LOB Links  
Corporate Links  
JobConnect  
Training Central

Employee: Sullivan,Michelle T. Search Reporting Year: 2014 ▼

### Perf Review at a Glance

**Instructions:** This page allows you to view the entire review in read-only format the Attachment List section below. You may also add an Additional Manager and

**For Managers:** Under the Manager Display section, only Direct Managers and Rc employee. Click on "Hide All" when manager comments should not be displayed

#### Manager Status

The manager portion of this review is currently in 'draft' status - The employ

#### Review Information

Review Status:	In Progress
Employee:	Sullivan,Michelle T. (V337433)
Manager:	Coignard,Charles (F015824)
Additional Manager:	N/A (Edit)
Review Cycle:	01-JAN-2014 --- 31-DEC-2014 (Edit)
Reporting Year:	2014
Job Title:	Transaction Processing Mgr
Tenure Date:	24-MAY-2010

Thanks,

Michelle Sullivan| Vice President | GCG | J.P. Morgan | 4 Chase Metrotech Center, 13th Floor, Brooklyn, NY| T: 212 623 5646|

[michelle.t.sullivan@jpmorgan.com](mailto:michelle.t.sullivan@jpmorgan.com)

JPMC Internal Use Only

From: Shillingford, Fidelia X  
Sent: Friday, December 12, 2014 11:04 AM  
To: Cabrera-Vargas, Ana J  
Cc: Sullivan, Michelle T  
Subject: RE: Candice Review

Sure, how do I add Michelle as an additional manager?

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:** Cabrera-Vargas, Ana J  
**Sent:** Thursday, December 11, 2014 4:57 PM  
**To:** Shillingford, Fidelia X  
**Cc:** Sullivan, Michelle T  
**Subject:** Candice Review

Hi Fidelia, Hope all is well. As you are aware, Michelle Sullivan is the prior manager for Candice Lue , new joiner in your team. Given Candice spent most of the year in Michelle's organization, she would be writing the year end review. If you have any relevant fdbck please feel free to provide to Michelle so she can include.

Can you please add Michelle to Candice's review as an additional manager in PMC? This will give her the ability to enter manager comments for year end. Pls confirm back when you've done so.

Thanks, Ana

---

**Ana Cabrera-Vargas** | Vice President | CIB Human Resources  
JPMorgan, 1 Chase Manhattan Plaza, 22nd Floor, New York, NY 10005-1401  
\* E-mail: [ana.cabrera-vargas@jpmorgan.com](mailto:ana.cabrera-vargas@jpmorgan.com) ( Tel: (646) 582-7396 ) Fax: (212) 270-4715  
HR/Benefits related questions can be directed to AccessHR (877-576-2427)



---

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

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

6 Months later asking  
Defendant Michelle Sullivan  
what to do. @L

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

# EXHIBIT H-6

*(Job Descriptions for Shillingford's January 2016 Caucasian Hire and Credit Analysis  
August 2016 Hire)*

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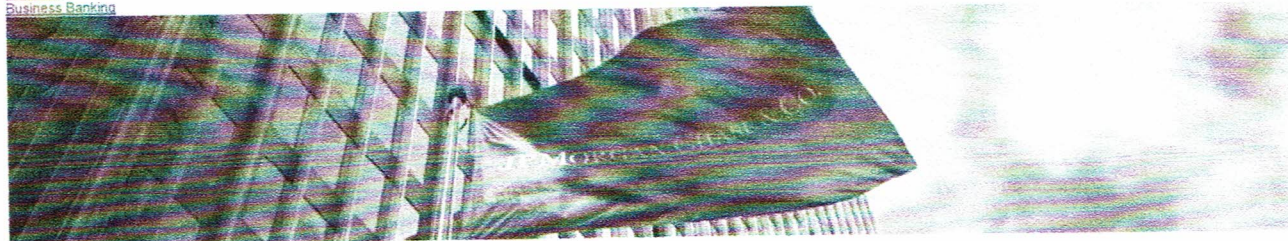
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## Job Description

Asset Management, Global Investment Management - Counterparty Risk Analyst, NY-160002112

## Job Description



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J.P. Morgan Asset Management, Risk Management is committed to being a world

class leader in risk management; maintaining a system of strong controls, providing guidance and clear direction on key risk principles, proactively managing risk and achieving a consistent balance between our business goals and deployment of capital.

AM Risk Management employs people around the world and ensures strong risk management discipline throughout the lines of business within AM. The JPM AM Counterparty Risk Group with assistance from regional risk personnel supervises credit risk arising from counterparty activities conducted on behalf of clients.

**Specific responsibilities include:**

- Updating and distributing Counterparty reports
- Working with large volumes of data to conduct on-going analyses and periodic reviews of Counterparty Credit exposures
- Monitor and report counterparty exposures to Senior Management as required
- Performing periodic reconciliation of the various AM platforms to our independent credit risk system
- Assist in maintaining credit administration system and records
- Contributing to the development, enhancement, and periodic review of risk assessment methodologies and reporting capabilities and preparing Management presentations

**Qualifications**

The ideal candidate must possess a strong risk and control mindset:

- Be very detailed oriented
- Have excellent analytical and written/verbal communication skills
- Must be able to work under pressure and deliver on multiple tight, time sensitive timelines
- Team player
- Self-starter with strong project management skills
- Demonstrated interest in/knowledge of global financial markets and products
- Strong Excel/PowerPoint/MS Office skills and experience with Tableau preferred

JPMorgan Chase is an equal opportunity and affirmative action employer Disability/Veteran.

**Job Risk**

**Primary Location** US-NY-New York-270 Park Avenue / 02317

**Organization** ASSET MANAGEMENT

**Schedule** Full-time

**Job Type** Standard

**Shift** Day Job

**Corporate Brand** JPMorgan Chase & Co.

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**Job Description****Asset Management, Global Investment Management - Counterparty Risk Reporting Analyst - NY-160069076****Job Description****JPMorgan**

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**Counterparty Risk Reporting Analyst**

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**Specific responsibilities include:**

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- Working with large volumes of data to conduct on-going analyses and periodic reviews of Counterparty Credit exposures
- Monitor and report counterparty exposures to Senior Management as required
- Performing periodic reconciliation of the various AM platforms to our independent credit risk system
- Assist in maintaining credit administration system and records
- Contributing to the development, enhancement, and periodic review of risk assessment methodologies and reporting capabilities and preparing Management presentations

**Qualifications**

The ideal candidate must possess a strong risk and control mindset:

- Be very detailed oriented
- Have excellent analytical and written/verbal communication skills
- Must be able to work under pressure and deliver on multiple tight, time sensitive timelines
- Team player
- Self-starter with strong project management skills
- Demonstrated interest in/knowledge of global financial markets and products
- Strong Excel/PowerPoint/MS Office skills and experience with Tableau preferred

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**Job Risk****Primary Location**US-NY-New York-270 Park Avenue / 02317**Organization** ASSET MANAGEMENT**Schedule** Full-time**Job Type** Standard**Shift** Day Job**Corporate Brand** JPMorgan Chase & Co.**How to Navigate on This Page**

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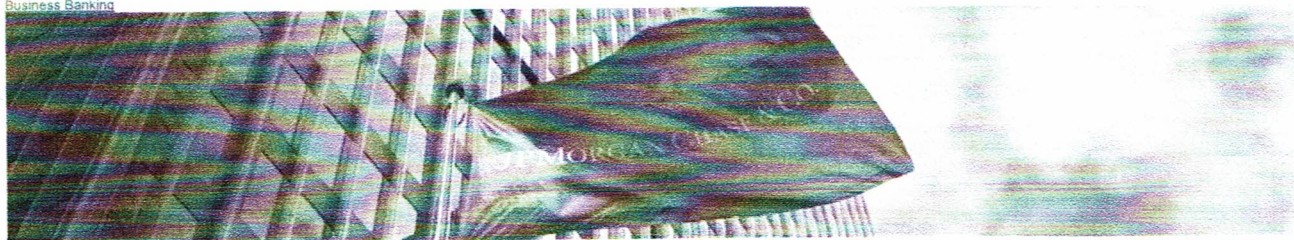
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## Job Description

Asset Management Risk – Global Investment Management - Counterparty Risk Analyst - NY-160081690

## Job Description

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J.P.Morgan Asset Management Risk Management is committed to being a world-class leader in risk management, maintaining a system of strong controls, providing guidance and clear direction on key risk principles, proactively managing risks and achieving a consistent balance between our business goals and deployment of capital. AM Risk Management employs people around the world and ensures strong risk management discipline throughout the lines of business within AM. The JPMAM Counterparty Risk Group, with assistance from regional risk personnel, supervises credit risk arising from counterparty activities conducted on behalf of clients.

#### Job Responsibilities:

- The ideal candidate must possess a strong risk and control mindset, be very detail oriented, have excellent analytical and written/verbal communication skills as well as be able to work under pressure and deliver on multiple tight, time sensitive timelines. Specific responsibilities will include:
- Performing on-going monitoring, periodic exposure reviews, and annual credit analyses
- Working with large volumes of data to conduct ad hoc analyses as needed
- Updating and distributing Counterparty reports
- Contributing to team-wide efforts such as risk assessment methodology enhancements, portfolio-wide reviews and preparing management presentations

#### Qualifications

- Undergraduate degree with 1 to 3 years of relevant work experience - strong academic performance with coursework in economics, statistics, and finance; knowledge of exchange-traded products and derivatives preferred
- Experience analyzing Banks and/or Broker-Dealers a plus, but not a requirement
- Exceptional analytical skills (naturally inquisitive/intellectually curious)
- Superior attention to detail
- Demonstrated interest in/ knowledge of global financial markets and current regulatory/legislative agendas
- Self-starter with strong project management skills - be able to independently manage multiple tasks and priorities under tight deadlines
- Excellent team player
- Strong PowerPoint/ Excel /MS Office skills

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#### Job Risk

**Primary Location** US-NY-New York-270 Park Avenue / 02317

**Organization** ASSET MANAGEMENT

**Schedule** Full-time

**Job Type** Standard

**Shift** Day Job

**Corporate Brand** JPMorgan Chase & Co.

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# EXHIBIT HH

(Proof of My Feedback Solicitation and Acceptance and the Ploy Set Up by Sullivan and Liasis Using Black Employee, Ine Lolomari)

---

**From:** Sullivan, Michelle T  
**To:** Lolomari, Ine  
**CC:** Liasis, Chris  
**Sent:** 9/9/2013 8:09:01 PM  
**Subject:** RE: Catch Up

Sounds good. Let us know how it goes.

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 | [michelle.t.sullivan@jpmorgan.com](mailto:michelle.t.sullivan@jpmorgan.com)  
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---

**From:** Lolomari, Ine  
**Sent:** Monday, September 09, 2013 3:03 PM  
**To:** Liasis, Chris; Sullivan, Michelle T  
**Subject:** FW: Catch Up

FYI!  
Michelle doing on Wed, might be in Midtown Thursday

---

**From:** Lue, Candice  
**Sent:** 09 September 2013 15:00  
**To:** Lolomari, Ine  
**Subject:** RE: Catch Up

Thanks Ine J See you on Wednesday.

Candice

**Candice Lue**  
J.P. Morgan | Investment Bank - Global Commodities  
[Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)  
T: (212) 623 - 3774  
4 New York Plaza, 9th Floor, NY, NY 10004  
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-----Original Appointment-----

**From:** Lolomari, Ine  
**Sent:** Monday, September 09, 2013 2:54 PM  
**To:** Lue, Candice  
**Subject:** Catch Up  
**When:** Wednesday, September 11, 2013 11:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** TBD

Hi Candice,  
I'm sorry it's been a while since you sent this to me. I think this is fantastic and I been meaning to catch up with you about it.

<< Message: FW: Knowledge Share - Investigating DCPD Reference Data Issues >>  
Ine

Defendants Michelle Sullivan  
and Chris Liasis plotting  
behind my back with horizontal  
racist /servile Black employee,  
Ine Lolomari to justify their  
racially stereotypical claim  
that I am "uppity /arrogant";  
don't accept feedback.

As my response to Ine shows,  
I was very happy to get her  
feedback.  
CL



# EXHIBIT HH-1

(Sullivan and Liasis Using Ine Lolimari - PMC Feedback Request)

---

**From:** Sullivan, Michelle T  
**To:** Liasis, Chris  
**Sent:** 11/7/2013 12:53:00 PM  
**Subject:** Re: It's that time again

Hey,

Did you want me to reach out to HR prior to the meeting?

I have it scheduled for 4 today. I'll forward you the invite when I am in the office.

Michelle

---

**From:** Sullivan, Michelle T  
**Sent:** Wednesday, November 06, 2013 02:53 PM  
**To:** Liasis, Chris  
**Subject:** FW: It's that time again

Let me know if you want to join tomorrow's meeting. She is quite challenging to talk to- VERY DEFENSIVE!

---

**From:** Sullivan, Michelle T  
**Sent:** Wednesday, November 06, 2013 2:53 PM  
**To:** Lue, Candice  
**Subject:** RE: It's that time again

Hello Candice,

I'm putting something on the calendar for tomorrow to discuss in person as I am concerned that you think your colleagues wouldn't provide unbiased feedback. Feedback is meant to be constructive to help with continued career development.

I have asked all the non-second reviewers who have responded to my email thus far to include both Linda and Cecille where they have left one off. Also, I think it's important to reach out to various disciplines for feedback. I thought line might be a good one for you b/c I know you met with her on your DCPD SOP and thought she could offer insight from a non-BAU perspective.

Additionally, as your manager I can request feedback on my employees through PMC in lieu of you reaching out to you to do so.

Thanks,  
Michelle

---

**From:** Lue, Candice  
**Sent:** Wednesday, November 06, 2013 2:02 PM  
**To:** Sullivan, Michelle T  
**Subject:** RE: It's that time again

Hi Michelle,

I don't mean to be rude, accusatory or in any way disrespectful but I think you are steering me to people who are likely to write less flattering comments on my permanent work record.

I try to send PMC requests to people who I think based on my overall experience working here would be to some degree fair in giving their feedback on my work and who would or are likely to write an assessment of my performance without bias or underlying malice.

As for Ine, I do not work with her on a daily basis in terms of the duties I perform here so I do not think that she would be able to provide enough insight for an assessment of my performance as the PMC requires.

Regards,  
Candice

**Candice Lue**

J.P. Morgan | Investment Bank - Global Commodities  
[Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)  
T: (212) 623 - 3774  
4 New York Plaza, 9th Floor, NY, NY 10004  
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---

**From:** Sullivan, Michelle T  
**Sent:** Tuesday, November 05, 2013 7:02 PM  
**To:** Lue, Candice  
**Subject:** RE: It's that time again

Please include Linda Murphy too and what about Ine?

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 |  
[michelle.t.sullivan@jpmorgan.com](mailto:michelle.t.sullivan@jpmorgan.com)  
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---

**From:** Lue, Candice  
**Sent:** Tuesday, November 05, 2013 7:00 PM  
**To:** Sullivan, Michelle T  
**Subject:** RE: It's that time again

Hi Michelle,

Pursuant to your request below, I am requesting feedback from the following people for year-end performance:

Cecille Taylor-Simpson  
Tom Moore  
Brendan Kelly  
Kim Fagan  
Gerald Nemec

Thanks,

**Candice Lue**

J.P. Morgan | Investment Bank - Global Commodities  
[Candice.Lue@jpmorgan.com](mailto:Candice.Lue@jpmorgan.com)  
T: (212) 623 - 3774  
4 New York Plaza, 9th Floor, NY, NY 10004  
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---

**From:** Sullivan, Michelle T  
**Sent:** Tuesday, October 08, 2013 12:41 PM  
**To:** ENERGY CONFIRMATIONS NY  
**Subject:** It's that time again

Hello Team,



Please send me a list of ppl that you will be soliciting feedback from for yearend performance.

Gerry- Will fill you in on this process separately as you are new to this.

Thanks,

Michelle Sullivan | Global Commodities Group | J.P. Morgan | 4 New York Plaza, 9th Floor, NY, NY 10004 | T: 212 623 5646 |  
[michelle.t.sullivan@jpmorgan.com](mailto:michelle.t.sullivan@jpmorgan.com)

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