

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

J – MM

IN OPPOSITION/RESPONSE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT

DOCKET #s 89-100

EXHIBIT J

(Notice of Right to Sue Letter)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: **Candice Lue**
4122 Bel Vista Court
Lodi, NJ 07644

From: **New York District Office**
33 Whitehall Street
5th Floor
New York, NY 10004



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

520-2015-03588

Orfelino Genao,
Investigator

(212) 336-3642

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)



More than 180 days have passed since the filing of this charge.



Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.



The EEOC is terminating its processing of this charge.



The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**



The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

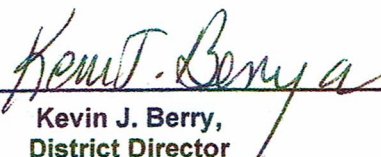


The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission


Kevin J. Berry,
District Director

2-8-2016

(Date Mailed)

Enclosures(s)

CC: **Diane Padilla**
Employee Relations Manager
JPMORGAN CHASE & COMPANY
10 South Dearborn Street, 20th Floor
Chicago, IL 60603

EXHIBIT JJ

(Plaintiff Candice Lue's Completed Termination Process Including Severance and Retention Payments)

Rivera, Francisco Z



Rivera, Francisco Z
In a meeting
VP



not the position is at 501

No the role is a 501 - it is how all the analyst are set up

1st year analyst on the team

WHICH BTW all have a number of yrs experience

But I hear you loud and clear



Lue, Candice just emailed you pdf of 2013 Comp Summary

9:47 AM



Rivera, Francisco Z got it

9:47 AM

thank you

i will do my best for you

I know your last day is comming soon *



Lue, Candice thank you! 😊

9:47 AM



Rivera, Francisco Z lots of OT

9:48 AM



Lue, Candice yeah, Nov. 9 *

9:48 AM



Rivera, Francisco Z crazy

9:48 AM

Last message received on 11/6/2014 at 9:48 AM. *

JPMORGAN CHASE & CO.

September 26, 2014

Candice Lue
4122 Bel Vista Court
Lodi, NJ 07644

Dear Candice,

Due to changes in our business, our staffing needs have changed. As a result, your position will be eliminated and your employment with JPMorgan Chase & Co. and all of its affiliates (the "Firm") will terminate effective 11/09/2014 (your "Termination Date"). This notice letter ("Notice Letter") describes the severance pay and related benefits and services for which you will be eligible based on the terms of the JPMorgan Chase Severance Pay Plan (the "Severance Plan").

While we do not anticipate any changes regarding your job elimination, JPMorgan Chase reserves the right to rescind this Notice Letter or change your Termination Date for any reason.

Notice Period

Your notice period begins immediately as of the date of this Notice Letter and ends on your Termination Date ("Notice Period"). During your Notice Period, you will continue to be treated as an active employee and will be expected to continue performing your assigned duties, unless otherwise directed by your manager. Generally, you will be asked to work during your Notice Period unless otherwise directed by your manager. Any period of non-working notice will reduce the severance paid to you by a correlating amount. You will continue to receive your regular wages during this Notice Period, unless you are a commissioned employee or have been otherwise instructed by your manager. If you fail to perform in a satisfactory manner or leave the Firm before your Termination Date without having been released by your manager, you will not be eligible for the severance pay and related benefits and services described in this Notice Letter.

Severance Pay

If you do not secure another position within the Firm by your Termination Date, you will be eligible for a payment equal to 4 weeks of severance-eligible compensation reduced by any non-working Notice Period, in accordance with the terms of the Severance Plan. Your severance payment will be paid to you in one lump sum, provided that you timely execute and return the enclosed Release Agreement ("Release").

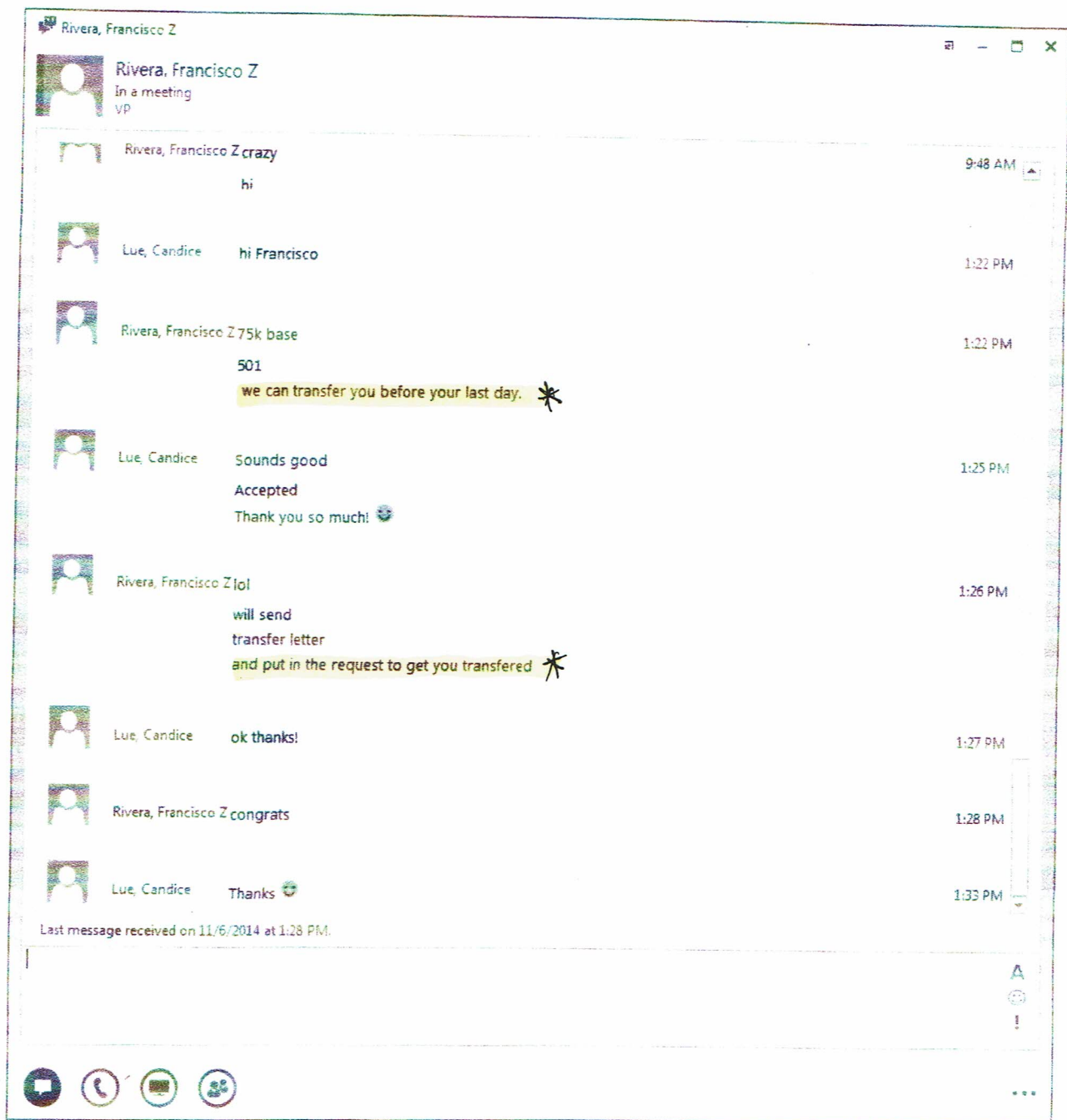
The severance pay and related benefits and services outlined in this letter (which are conditioned upon signing the Release), exceed any pay and/or benefits you would be eligible to receive if you do not sign the Release.

If the Firm receives your executed Release within the required time frame, your severance payment will be made as soon as administratively feasible on the Firm's regular payroll schedule. Your severance payment will be reduced by any period of non-working notice.

Applicable taxes and other legally required deductions will be withheld from your severance payment. No benefit deductions/contribution will be taken from your severance payment for any benefits you are participating in when your employment ends.

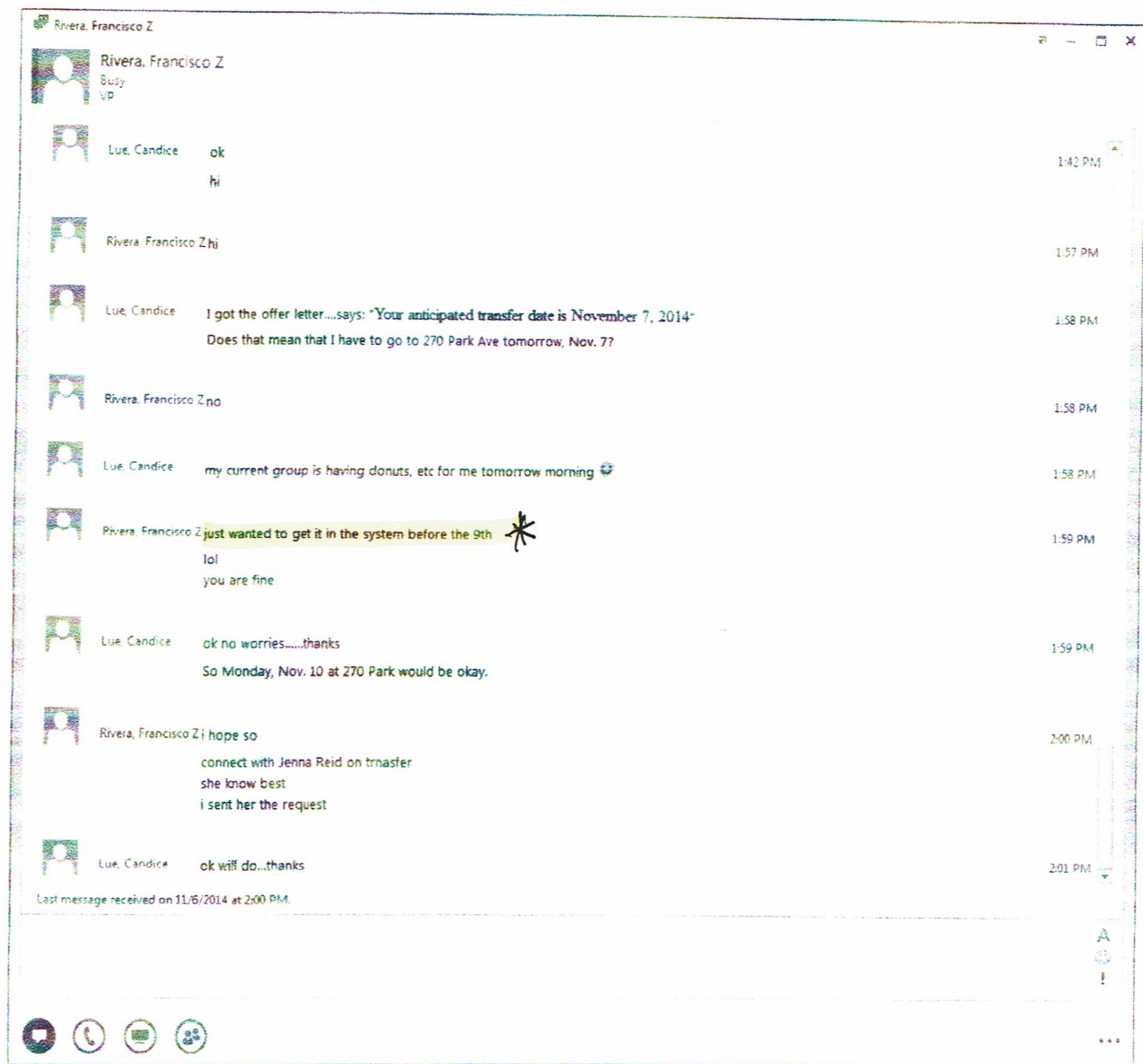
Please Note: Because your severance payment is not considered eligible benefits pay under the JPMorgan Chase 401(k) Savings Plan or Retirement Plan, any 401(k) Savings Plan contributions, as well as Retirement Plan pay credits, will end as of your Termination Date.

If for any reason the number of weeks of severance pay described in this letter differs from the number of weeks that you are eligible to receive under the Severance Plan, you will receive the number of weeks specified in the



Thursday, November 06, 2014

Rivera, Francisco Z	hi candice	9:15 AM
Lue, Candice	hi Franscisco	9:22 AM
Rivera, Francisco Z	hi	9:22



Thursday, November 06, 2014

Rivera, Francisco Z	hi candice	9:15 AM
Lue, Candice	hi Francisco	9:22 AM
Rivera, Francisco Z	hi	9:22 AM
Lue, Candice	*Francisco	9:22 AM

View Pay Statement

JPMORGAN CHASE & CO.

Candice Lue

JPMorgan Chase Bank

Advice Number: 51630037

1111 Polaris Parkway Columbus, OH 43240

Phone 212-270-6000

To ensure security integrity, please log off after browsing by selecting 'log off' from the pull down list.

[View a Different Paycheck](#)[Printer-friendly version](#)[FAQ](#)

Candice S. m. Lue 4122 Bel Vista Court Lodi, NJ 07644 SID		Company: 802 Department: 027653 Location: 4 Chase Metrotech Ctr	TAX DATA: Marital Status: S Allowances: 2 Addl. Percent: 0.000 Addl. Amount: \$0.00 Wrk State: NY Res State: NJ Local: Local Hourly Rate: 29.133495 Shift: N/A	Federal: 2 State: 2 Local: 0	
Pay Date:	11/14/2014				
Pay Begin Date:	11/01/2014				
Pay End Date:	11/15/2014				
Other Pay Begin Dt:	10/13/2014				
Other Pay End Dt:	10/26/2014				

Severance Payment
C/L

Summary				
Period	Fed Taxable Gross	Total Taxes	Total Deductions	Net Pay
Current	4,661.54	1,983.48	0.00	2,678.06

Earnings						Taxes	
Description	Period Begin Date	Period End Date	Hours	Rate	Amount	Description	Amount
Lump Sum Sev Pay	11/01/2014	11/09/2014			4,661.54	Federal	1,165.39
						Medicare	67.59
						Social Security	289.01
						NJ Withholding	13.05
						NY Withholding	448.44
Total:					4,661.54	Total:	1,983.48

Before Tax Deductions		After Tax Deductions		Additional Information	
Description	Amount	Description	Amount	Description	Amount
Total:		Total:		Medicare Taxable Wages	4,661.54
				* Added to Taxable Wages	

Net Pay Distribution					
Payment Type	Account Type	Account Number	Amount	Paycheck Number	
Direct Deposit	Checking	xxxxxx	2,678.06	51630037	

[Return](#)

View Pay Statement

Candice Lue

JPMORGAN CHASE & CO.

JPMorgan Chase Bank

Advice Number: 52186344

1111 Polaris Parkway Columbus, OH 43240

Phone 212-270-6000

To ensure security integrity, please log off after browsing by selecting 'log off' from the pull down list.

Retention Payment
CL[View a Different Paycheck](#)[Printer-friendly version](#)[FAQ](#)

Candice S. m. Lue 4122 Bel Vista Court Lodi, NJ 07644		Company: 802 Department: 132935 Location: 270 Park Avenue Pay Date: 12/31/2014 Pay Begin Date: 12/16/2014 Pay End Date: 12/31/2014 Other Pay Begin Dt: 11/24/2014 Other Pay End Dt: 12/07/2014	TAX DATA: Federal State Local Marital Status: S S Allowances: 2 2 0 Addl. Percent: 0.000 0.000 0.000 Addl. Amount: \$0.00 \$0.00 \$0.00 Wrk State: NY Res State: NJ Local Hourly Rate: 36.056306 Shift: N/A
---	--	---	---

Period	Fed Taxable Gross	Total Taxes	Total Deductions	Net Pay
Current	13,985.00	5,950.62	0.00	8,034.38
YTD	94,373.19	29,633.71	3,166.43	62,266.14

Earnings							Taxes		
Description	Period Begin Date	Period End Date	Hours	Rate	Amount	YTD Amount	Description	Amount	YTD Amount
* Retention Award	05/19/2014	11/01/2014			13,985.00	13,985.00	Federal	3,496.25	16,756.59
Holiday Pay						2,379.15	Medicare	202.78	1,368.41
Overtime Pay						16,435.06	Social Security	867.07	5,851.14
Regular Base Pay						53,901.36	NJ Withholding	39.16	43.36
Vacation						4,476.75	NY Withholding	1,345.36	5,614.21
Sick Pay						1,165.35			
Straight Time Pay						990.54			
Personal Day						233.07			
Annual Cash Incentive Award						1,500.00			
Total:					13,985.00	95,066.28	Total:	5,950.62	29,633.71

Before Tax Deductions			After Tax Deductions			Additional Information		
Description	Amount	YTD Amount	Description	Amount	YTD Amount	Description	Amount	YTD Amount
Dental Maintenance Org		135.60	Employee Stock Purchase		600.00	Medicare Taxable Wages	13,985.00	94,373.19
Medical PPO		492.00	401(k) Per-Pay Contribution		1,864.67	Imputed Basic Life*		8.67
Vision		74.16				* Added to Taxable Wages		
Total:		701.76	Total:		2,464.67			

Net Pay Distribution				
Payment Type	Account Type	Account Number	Amount	Paycheck Number
Direct Deposit	Checking	XXXX	8,034.38	52186344

[Return](#)

Lue, Candice

From: Rubenstein, Stuart
Sent: Tuesday, October 07, 2014 1:20 PM
To: GCG Ops All
Cc: Gangavarapu, Silpa R
Subject: FW: J.P. Morgan Completes Sale of Physical Assets

From: John Anderson and Mike Camacho [<mailto:ibbroadcast@ib.jpmorgan.com>]
Sent: Friday, October 03, 2014 2:39 PM ✱
Subject: J.P. Morgan Completes Sale of Physical Assets

J.P.Morgan

Message from John Anderson and Mike Camacho

As you may have seen, the firm's ✱ sale of some of its physical commodities ✱ businesses to Mercuria closed today. To read the press release, click [here](#).

REDACTED

Lue, Candice

From: Sullivan, Michelle T
Sent: Friday, October 10, 2014 12:18 PM
To: Lue, Candice
Subject: RE: Retention Payment

Conversation with
Michelle Sullivan
Re: Retention Payment
CL

Hi Candice,

HR confirmed the below. The release is required for both the severance and the retention but the payment are sent separately.

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

JPMC Internal Use Only

From: Sullivan, Michelle T
Sent: Wednesday, October 08, 2014 5:52 PM
To: Lue, Candice
Subject: Retention Payment

Hi Candice,

Per HR, Retention will be paid a couple pay periods after a release is signed and returned.

I don't believe you have been given this yet so I have followed up on the status.

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

JPMC Internal Use Only

J.P.Morgan

PERSONAL AND CONFIDENTIAL

May 19, 2014

Candice Lue
4122 Bel Vista Court
Lodi NJ 07644
USA

Dear Candice,

As you know, J.P.Morgan ("JPMC" or the "Company") has recently announced the sale of its physical commodities business (the "Sale") to Mercuria (the "Buyer"). We anticipate that the Sale will close in the 3rd quarter of 2014.

For purposes of this letter agreement:

- "Closing Date" shall mean the date that the Sale, is completed as determined by J.P.Morgan.
- "Transition Period" shall mean the time from February 1, 2014 to the Closing Date.

You have been identified by management as an employee whose continued employment, knowledge and skill is important to a successful transition of the Commodities business to The Buyer. In recognition of your value during this period and to encourage your continued employment and commitment through the Transition Period, you will be eligible to receive, in addition to your current base salary, a payment (the "Retention Payment") calculated as follows:

The greater of:

- 30% of your 2014 Annualized Base Salary multiplied by a fraction, the numerator of which is the number of whole weeks you worked from February 1, 2014 through the end of the Transition Period, and the denominator of which is 52; OR
- your 2013 Incentive Compensation multiplied by a fraction, the numerator of which is the number of whole weeks you worked from February 1, 2014 through the end of the Transition Period, and the denominator of which is 52.

The Retention Payment is subject to reductions for all lawful withholdings.

To receive the Retention Payment, you must satisfactorily (as determined by JPMC management in its sole discretion) perform your assigned job duties and stay in your position until the end of the Transition Period, unless in management's discretion, you are released earlier.

This Retention Payment is subject to all of the terms and conditions detailed in the TERMS AND CONDITIONS OF RETENTION PAYMENT included with this letter and will be paid within 60 days following (i) the completion of the Transition Period and (ii) termination of employment in a single lump sum, reduced by applicable tax withholdings, provided that you execute and timely submit, and do not revoke, a release of claims (within 30 days following the completion of the Transition Period and termination) in a form provided by JPMC.

Generally, eligibility for this Retention Payment is subject to your continued, active employment until the end of the Transition Period. As noted above, we currently expect the Transition Period to end in the 3rd quarter 2014 and therefore, for the avoidance of doubt, you would not be eligible to receive any incentive award for the performance year 2014.

This letter, the Retention Payment and all of its terms and conditions are strictly confidential. You may not discuss this letter, the Retention Payment or its terms and conditions with anyone, other than your legal or financial

J.P.Morgan

advisors, provided they agree to preserve such confidentiality. If you violate this confidentiality requirement, you will not receive the Retention Payment and may be subject to disciplinary action, up to and including termination.

If you have previously been awarded JPM Restricted Stock Units ("RSUs") and in the event you (i) remain continuously employed by JPMC or one of its affiliates during the Transition Period, and (ii) execute a release agreement, your outstanding RSUs awarded under the JPMorgan Chase & Co. Long-Term Incentive Plan will continue to vest in accordance with your award agreement and associated terms and conditions. For avoidance of doubt, your RSUs will remain subject to various provisions of the terms and conditions your awards, such as, but not limited to, obligations, cancellation and recovery.

Nothing in this letter or the attached summary constitutes a guarantee of employment, and, as always, you remain an employee-at-will which means that you or JPMC can terminate your employment at any time for any reason.

During the Transition Period you may begin to seek alternate employment, including with the Company. To pursue open job opportunities at the Company, please go to [Job Connect](#) to create an online search profile and to review job opportunities. The Company will also provide career transition services for you to use; further details of these services will be provided in due course.

This letter and associated TERMS AND CONDITIONS are intended to comply with Section 409A of the Internal Revenue Code and shall be interpreted in a manner to comply with Section 409A of the Internal Revenue Code. This letter and the attached 'Terms and Conditions of Retention Payment' are governed by the laws of jurisdiction in which you are employed.

Please carefully review the following TERMS AND CONDITIONS. Please retain a copy of this letter and the attachment for your files.

We appreciate your commitment to aiding with the work associated with the successful sale to the Buyer.

If you have any questions, please contact Silpa Gangavarapu at (646) 582-7364 or silpa.r.gangavarapu@jpmorgan.com.

Sincerely,

Jennifer L Silverman

Jennifer L. Silverman
Managing Director
J.P.Morgan

TERMS AND CONDITIONS OF RETENTION PAYMENT

In order to receive the Retention Payment specified in the attached letter:

- You must continue active employment and continue to perform your current or assigned job duties satisfactorily during the "Transition Period".
- During the Transition Period, you will continue to be subject to all applicable job performance standards, human resources and other applicable policies and the JPMC Code of Conduct, all as in effect and amended by JPMC from time to time. Your eligibility for this Retention Payment is conditioned on your compliance with and satisfaction of such standards and policies, including continued compliance with the GCG compliance manual.
- As a condition and in consideration of receipt of the Retention Payment, you must timely execute a Release Agreement in a form to be provided to you by the Company which includes a waiver by you of all employment-related claims against the Company. You will receive such Release Agreement at the close of the Transition Period.

You will not receive any portion of this Retention Payment if:

- You resign from your position for any reason prior to end of the Transition Period or your employment is terminated for cause. ("Cause" means deficient performance, violation of JPMC's policies or the Code of Conduct or negligence or misconduct, as determined in JPMC's sole discretion);
- You do not successfully complete your job duties, including the successful completion of your transition work, as determined by JPMC;
- You accept a different position within JPMC or one of its affiliates or subsidiaries prior to the end of the Transition Period;
- You do not timely execute the required Release Agreement after the Transition Period;
- You revoke the Release Agreement.

Miscellaneous

Retention Payments are in addition to, and are not part of, your base salary or any other type of variable compensation, and not considered covered compensation for purposes of JPMC's employee benefit plans.

JPMC management will administer the Retention Payment and the terms and conditions outlined in this summary. JPMC management will have complete and final authority to interpret these terms and conditions in the event of any ambiguities, inconsistencies or disputes as to payment eligibility or terms. This letter contains the entire understanding of the parties with respect to the terms and conditions of the Retention Payment and supersedes any prior verbal or written communication. Any modifications to the Retention Payment or the attached letter must be in writing signed by JPMC management.

From: Sullivan, Michelle T
To: Shillingford, Fidelia X
CC: Miller, Brooke A ;Cabrera-Vargas, Ana J"
Sent: 1/14/2015 7:05:01 PM
Subject: RE: Candice Lue EOY Ranking and Commentary

She was not eligible for cash incentive per her retention document. *

If she has any questions she can reach out to me or HR to clarify.

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
JPMC Internal Use Only

From: Shillingford, Fidelia X
Sent: Wednesday, January 14, 2015 2:03 PM
To: Sullivan, Michelle T
Cc: Miller, Brooke A
Subject: RE: Candice Lue EOY Ranking and Commentary

Hi

She is not eligible from my pool; I was told that she would be part of yours. I have finalized the review in PMC.

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: Sullivan, Michelle T
Sent: Wednesday, January 14, 2015 1:52 PM
To: Shillingford, Fidelia X
Subject: RE: Candice Lue EOY Ranking and Commentary

Hi-Candice hasn't reached out. I was going to send her a note to see when she was free, but wanted to check with you first.

I think Comp discussions are next week and I have been told that PMCs need to be finalized (signed, etc) before then.

I don't believe she is eligible (at least not from my pool) but want to be consistent.

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
JPMC Internal Use Only

From: Shillingford, Fidelia X
Sent: Tuesday, January 06, 2015 6:18 PM
To: Sullivan, Michelle T
Cc: Miller, Brooke A; Cabrera-Vargas, Ana J
Subject: Re: Candice Lue EOY Ranking and Commentary

Hi

Happy New Year to you as well.

Yes, your feedback and rating has been inputted in PMC and also communicated to Candice. I have also advised her that she should also schedule some time to discuss with you.

EXHIBIT K

(Emails showing Plaintiff, Candice Lue, who is Black, was the only analyst ordered/assigned to do the Employment Racially Discriminatory tasks)

Lue, Candice

From: Khavin, Alex G
Sent: Monday, December 22, 2014 8:00 AM
To: Lue, Candice
Subject: RE: CRG Extended Team Meeting Documents for Monday December 22

Candice-

Where are the meeting minutes?

Minutes for the November 2014
Governance Meeting, my first ever
governance meeting in the Counterparty
Risk Group (CRG).

My join date was November 10, 2014.
CL

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: Lue, Candice
Sent: Friday, December 19, 2014 9:08 PM
To: AM Counterparty Risk Group
Subject: CRG Extended Team Meeting Documents for Monday December 22

Hi Team,

Please see attached the following documents for Monday's meeting. Also located here on shared drive:

- Canada Securities Limits
- AM Dashboard
- Daily Market Indicator Monitoring Sheet
- AM Counterparty Exposure Report
- Reconciliation Report

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

Lue, Candice

From: Khavin, Alex G
Sent: Tuesday, January 20, 2015 2:18 PM
To: Lue, Candice
Subject: FW: Follow Ups from CRG Extended Team Meeting December 22, 2014
Attachments: AM Counterparty Risk Procedures Document docx 12-14-2014 (2).docx

Candice-

As I had requested, are you collecting all the attachments necessary for the meeting and printing beforehand? We also need to send to Asia a full pack tonight so they have access to it during the meeting.

Alex

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: Dauber, Kimberly S
Sent: Tuesday, January 20, 2015 1:14 PM
To: Vroom, Ryan W; Haider, Mohammad Z; Lue, Candice; AM Counterparty Risk Group
Subject: RE: Follow Ups from CRG Extended Team Meeting December 22, 2014

Hello all;

The most recent version of Procedures are attached. There has been no changes since our last discussion but I think it would be best to discuss as a group to determine if further updates are necessary.

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

From: Vroom, Ryan W
Sent: Tuesday, January 20, 2015 12:31 PM
To: Haider, Mohammad Z; Lue, Candice; AM Counterparty Risk Group
Subject: RE: Follow Ups from CRG Extended Team Meeting December 22, 2014

Ryan
Create/provide RCC slide to include with Extended Meeting materials – See Attached.

Ryan W. Vroom, CPA
J.P. Morgan Asset Management

From: Haider, Mohammad Z
Sent: Tuesday, January 20, 2015 12:28 PM

Lue, Candice

From: Shillingford, Fidelia X
Sent: Monday, February 23, 2015 5:13 PM
To: Ng, Kenneth T
Cc: Dauber, Kimberly S; Nguyen, Fiona N; Lue, Candice
Subject: RE: Governance meeting

Thank you!

***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: Ng, Kenneth T
Sent: Monday, February 23, 2015 5:13 PM
To: Shillingford, Fidelia X
Cc: Dauber, Kimberly S; Nguyen, Fiona N; Lue, Candice
Subject: RE: Governance meeting

Sure, NP!

From: Shillingford, Fidelia X
Sent: Monday, February 23, 2015 5:12 PM
To: Ng, Kenneth T
Cc: Dauber, Kimberly S; Nguyen, Fiona N; Lue, Candice
Subject: Governance meeting

Hi Kenny

Given that both Candice and Fiona are out this week; can you pls take minutes. We will resume to as schedule for the following meetings.

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*

Shillingford only instructed the non-Black analyst to do the minutes, nothing about the printing, etc. for the other members' of the team presentation materials.

I am the only team member Shillingford had ever directed to do those tasks.

CL

Lue, Candice

From: Khavin, Alex G
Sent: Thursday, April 23, 2015 8:26 AM
To: Lue, Candice
Subject: RE: April 2015 Governance Meeting

Thanks - can you please in the future include in the email you send out to everyone with all the attachments?

Best,

Alex

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

Even when I did not do
the minutes, it was still
my job to email it to
everyone "with all the
attachments". CZ

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

From: Lue, Candice
Sent: Thursday, April 23, 2015 8:25 AM
To: Khavin, Alex G
Subject: RE: April 2015 Governance Meeting

Hi Alex,

Fiona has the follow ups. Attached is the email she sent out from the last 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

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

From: Khavin, Alex G
Sent: Thursday, April 23, 2015 8:12 AM
To: Lue, Candice
Subject: RE: April 2015 Governance Meeting

Candice, do you have the follow ups from last meeting?

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

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

From: Lue, Candice
Sent: Wednesday, April 22, 2015 6:46 PM
To: JPM AM Global CRG
Subject: RE: April 2015 Governance Meeting

Hi Team,

Please see attached for tomorrow's meeting.

- March 2015 Monthly Exposure Report
- March 2015 Monthly Reconciliation Report
- March 2015 AM Dashboard
- April 2015 Canada Securities Lending Limits Report

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

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

From: Vroom, Ryan W
Sent: Wednesday, April 22, 2015 5:11 PM
To: JPM AM Global CRG
Subject: April 2015 Governance Meeting - RCC Slide

All,

Please see the attached RCC slide for March 2015 (April Meeting).

Best,

Ryan W. Vroom, CPA
Analyst

J.P. Morgan Asset Management
Ryan.W.Vroom@JPMorgan.com
www.jpmorgan.com/assetmanagement
270 Park Avenue - 9th Floor
New York, NY 10017
Phone: 212.648.1691

Lue, Candice

From: Shillingford, Fidelia X
Sent: Tuesday, June 23, 2015 1:53 PM
To: Haider, Mohammad Z; Khavin, Alex G; Poz, Thomas I; Kishore, Gaurav; Leung, Joyce L; Gorniak, Hubert; Dauber, Kimberly S; Cheung, Timothy KF; Zambon, M Sol; Vroom, Ryan W; Avetyan, Tatevik; Ng, Kenneth T; Nguyen, Fiona N; Lue, Candice; Gorniak, Hubert
Subject: RE: CRG Governance Meeting 5/28: Follow-ups

All
In preparation for our team meeting; please ensure that you have actioned your 'follow ups' below.

Also, please save all necessary documents in the respective folder: [REDACTED]
[REDACTED] in a printable format. I will print the copies and bring to the meeting on Thursday. Tim, please email your docs to me.

Please ensure that all materials are available in the folder by Wednesday 3pm; otherwise you will have to bring a hard copy to the meeting.

Fiona, given that Candice is out; can you take the meeting minutes. Thanks in advance.

Regards
Fidelia

Shillingford asked the non-Black analyst to take the meeting minutes, "given that Candice is out" but for the printing, etc. of the non-Black team members' presentation materials, Shillingford who is Black and a Vice President had to do those tasks herself. CZ

From: Shillingford, Fidelia X
Sent: Thursday, May 28, 2015 10:57 AM
To: Haider, Mohammad Z; Khavin, Alex G; Poz, Thomas I; Kishore, Gaurav; Leung, Joyce L; Gorniak, Hubert; Dauber, Kimberly S; Cheung, Timothy KF; Zambon, M Sol; Vroom, Ryan W; Avetyan, Tatevik; Ng, Kenneth T; Nguyen, Fiona N; Lue, Candice
Subject: RE: CRG Governance Meeting 5/28: Follow-ups

Thanks Zeeshan.
Follows on my end completed.

Regards
Fidelia Shillingford

From: Haider, Mohammad Z
Sent: Thursday, May 28, 2015 10:34 AM
To: Khavin, Alex G; Poz, Thomas I; Kishore, Gaurav; Leung, Joyce L; Shillingford, Fidelia X; Gorniak, Hubert; Dauber, Kimberly S; Cheung, Timothy KF; Zambon, M Sol; Vroom, Ryan W; Avetyan, Tatevik; Ng, Kenneth T; Nguyen, Fiona N; Lue, Candice
Subject: CRG Governance Meeting 5/28: Follow-ups

Team – here are the follow-ups I captured from this morning's governance meeting.

All

- CRG policy and finalized procedures document may be shared internally, if requested.
- Can only share designated 1 page CRG Overview documents externally, unless:
 - Required under SMA IMA
 - Required under AiFMD regulatory directive for specific activity types

Lue, Candice

From: Shillingford, Fidelia X
Sent: Monday, July 20, 2015 4:53 PM
To: Lue, Candice
Subject: RE: One-on-One

Discussion and Follow ups:

1. I asked that you include in your tasks for the next two weeks, the responsibility for the Governance meeting which is due this coming Thursday. Please reach out to the team to have them save the relevant documents in the shared drive (see attached email for sample email) and bring copies to the meeting. Also, you are responsible for taking meeting notes. Note, last month I solicited the help of Nikhil in sorting/compiling documents; please work with him if you need assistance.
2. We established that your timeframe for updating the PowerPoint presentation on average is 6hrs (give or take some)
3. You would get back to me on the planned vacation for the remainder of the year by end of the week



RE: CRG
Governance Me...


Regards
Fidelia

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

From: Shillingford, Fidelia X
Sent: Monday, July 20, 2015 9:12 AM
To: Shillingford, Fidelia X; Lue, Candice
Subject: One-on-One
When: Monday, July 20, 2015 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Alex Office

Hi Candice

Let's resume our One-on-Ones.

Please find attached a template which I would like you to use (standard template used by the team: path - ; kindly fill out as appropriate and bring two copies to the meeting.

Thanks in advance.

<< File: 1-1 Template.xlsx >>

Regards
Fidelia

Nikhil was the Summer intern.
For the June 2015 Monthly Governance Meeting, Shillingford who is Black and a VICE PRESIDENT did the printing, etc. of the non-Black team members' presentation materials with the help of the summer intern, Nikhil.

CL

Lue, Candice

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

Eileen Kulda is the white administrative assistant who these duties were never assigned to.
Eileen Kulda was not even as much as asked to print for the group, the meeting agenda she sent out.
* I was directed to do that. CL

-----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 #

Lue, Candice

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

Shillingford has never given these directives to any of the non-Black analysts and/or associates on the team.

Nothing "Friendly" about this "reminder".

CL

EXHIBIT KK

(Kimberly Dauber's Email and Ryan Vroom's Statement)

Lue, Candice

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

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

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**
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810

Lue, Candice

From: Lue, Candice
Sent: Thursday, July 23, 2015 2:18 PM
To: Vega, John R.
Subject: Job Description: AM - Credit Reporting Risk Analyst
Attachments: RE: Minutes and Documents for Extended Team Meeting

Hello John,

As requested, I have provided a screenshot below from JobConnect of my job description.

Also, I just wanted to respectfully refute the statement that you made where you said that you were told by Fidelia Shillingford and Alex Khavin that Baruch Horowitz, my predecessor who stayed the longest on the job was responsible for the minutes and the printing, etc. of everyone's Governance Meeting presentation materials.

However, before I do that, let me just ask: if this was a regular task for the job that was done by my first predecessor during the 2 years before me joining the team and up to 5 months before my arrival, why wasn't it a part of my job description? Why was it "suddenly scrubbed" from the job description of my second and third predecessors during the 5 months they preceded me?

To refute, please see the email from Kim Dauber attached that states, "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.... However, Alex would pick a different person each time during our meetings." Please note that Kim did not say that Baruch Horowitz was the minutes taker. Also note that she made no mention of document collecting and printing, etc. because no other analyst and/or associate was demeaned during the 2 years before me joining the team.

My second reason to refute your statement is that at 8:20am on May 28, 2015 when Alex went to pick up something from the printer, a teammate who I will leave unnamed and who was also a teammate of Baruch Horowitz asked her, "So now when we have documents to print, we send it to an analyst (laughs)?" Alex's response: "(laughs) I have to print it for myself."

Funny, it seems as if only Fidelia and Alex have any knowledge of Baruch Horowitz having the responsibility of the taking of the minutes and the printing, etc. of everyone's Governance Meeting presentation materials during his more than 1 year tenure.

EXHIBIT L

(Work from Home Denial Email)

Lue, Candice

From: Lue, Candice
Sent: Thursday, May 07, 2015 6:20 PM
To: Shillingford, Fidelia X
Cc: Khavin, Alex G
Subject: RE: WFH

Hi Fidelia,

Pursuant to our telephone conversation, with regards to the email below, please be advised that I sent it out because this is what I see everyone else in the group doing, including two other analysts that did it this said week.

However, since I'm treated at a lower/different standard from everyone else, as directed by you and Alex, I will send you an email letting you know about my situation, asking you for permission to work from home and you will communicate accordingly to the group.

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

-----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 [REDACTED]

Best regards,
Candice

Lue, Candice

From: Nguyen, Fiona N
Sent: Wednesday, March 11, 2015 7:50 AM
To: JPM AM Global CRG
Subject: WFH

Hi all,

I will be working from home today due to a mild headache. I can be reachable at [REDACTED] or via communicator.

Fiona Nguyen
Analyst - Counterparty Risk Group
J.P. Morgan Asset Management
270 Park Ave, 9th Floor, New York, NY 10017
T: 212-270-3909 | C: 916-335-7109 | fiona.n.nguyen@jpmorgan.com

Lue, Candice

From: Nguyen, Fiona N
Sent: Wednesday, May 06, 2015 7:55 AM
To: AM Counterparty Risk Group
Subject: WFH

Hi all,

I am not feeling well today and will be working from home, available via email, communicator and [REDACTED].

Fiona

Lue, Candice

From: Ng, Kenneth T
Sent: Tuesday, May 05, 2015 8:26 AM
To: Dauber, Kimberly S; AM CRG NY
Subject: Tuesday

Hi Kim

I'm not feeling well this morning and will be working from home available via e-mail, communicator or reachable at [REDACTED]

Kenny.

Lue, Candice

From: Kishore, Gaurav
Sent: Monday, May 11, 2015 8:06 AM
To: JPM AM Global CRG
Subject: Working from Home Today

I'm having an early morning meeting with EMEA and therefore WFH today. I can be reached at [REDACTED]

Regards,
Gaurav

Gaurav Kishore
Executive Director, Counterparty Risk Management
270 Park Ave, 9th Floor
New York, NY 10017
212 - 648 -0816
gaurav.kishore@jpmchase.com

Lue, Candice

From: Shillingford, Fidelia X
Sent: Monday, December 08, 2014 7:53 AM
To: JPM AM Global CRG
Subject: WFH Today

All
WFH today. Faith had a fever last night and has the cold. Staying home to monitor her.

Fidelia Shillingford

Lue, Candice

From: Lue, Candice
Sent: Tuesday, March 31, 2015 5:18 PM
To: Shillingford, Fidelia X; Kulda, Eileen
Subject: RE: WFH - Monday April 6 / Holy Thursday April 2

Hi Fidelia,

Following up from our conversation, since taking off Holy Thursday for religious observance has always been a part of my tradition/upbringing, I'll just take the day off as a vacation day.

Hi Eileen,

Can you please update the team calendar for me on Holy Thursday (April 2) as a vacation day? It's currently on calendar as 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: 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. ☺

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

Lue, Candice

From: Lue, Candice
Sent: Wednesday, April 01, 2015 8:04 AM
To: Kulda, Eileen; Shillingford, Fidelia X
Subject: Re: WFH - Monday April 6 / Holy Thursday April 2

Thanks Eileen!

Best regards,
Candice

From: Kulda, Eileen
Sent: Wednesday, April 01, 2015 07:56 AM
To: Lue, Candice; Shillingford, Fidelia X
Subject: RE: WFH - Monday April 6 / Holy Thursday April 2

Good morning Candice,

The vacation calendar has been updated.

Thanks,

Eileen

From: Lue, Candice
Sent: Tuesday, March 31, 2015 5:18 PM
To: Shillingford, Fidelia X; Kulda, Eileen
Subject: RE: WFH - Monday April 6 / Holy Thursday April 2

Hi Fidelia,

Following up from our conversation, since taking off Holy Thursday for religious observance has always been a part of my tradition/upbringing, I'll just take the day off as a vacation day.

Hi Eileen,

Can you please update the team calendar for me on Holy Thursday (April 2) as a vacation day? It's currently on calendar as 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: Lue, Candice
Sent: Tuesday, March 31, 2015 11:07 AM
To: Shillingford, Fidelia X
Subject: RE: WFH - Monday April 6

Hi Fidelia,

Lue, Candice

From: Lue, Candice
Sent: Monday, March 16, 2015 8:22 AM
To: Shillingford, Fidelia X; Kulda, Eileen
Subject: Re: Not Feeling Well

Thanks. I have to take a sick day.

Best regards,
Candice

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

From: Shillingford, Fidelia X
Sent: Monday, March 16, 2015 08:17 AM
To: Lue, Candice; Kulda, Eileen
Subject: Re: Not Feeling Well

Sorry message was sent before I was complete. Will you be WFH or taking a sick day.

Regards
Fidelia Shillingford

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

From: Shillingford, Fidelia X
Sent: Monday, March 16, 2015 08:16 AM
To: Lue, Candice; Kulda, Eileen
Subject: Re: Not Feeling Well

Feel better.
Will you be WFH or

----- 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

EXHIBIT L-1

(Heartlessness in Work from Home Denial Email Trail)

From: Shillingford, Fidelia X <fidelia.x.shillingford@jpmorgan.com>
To: Avetyan, Tatevik <Tatevik.Avetyan@jpmorgan.com>; Dauber, Kimberly S" <kimberly.s.dauber@jpmorgan.com>; Gorniak, Hubert" <hubert.gorniak@jpmorgan.com>; Haider, Mohammad Z" <mohammad.z.haider@jpmorgan.com>; Khavin, Alex G" <alex.g.khavin@jpmorgan.com>; Kishore, Gaurav" <gaurav.kishore@jpmchase.com>; Kulda, Eileen <eileen.kulda@jpmorgan.com>; Lue, Candice <candice.lue@jpmorgan.com>; Ng, Kenneth T" <kenneth.t.ng@jpmorgan.com>; Nguyen, Fiona N <fiona.n.nguyen@jpmorgan.com>; Poz, Thomas I <thomas.i.poz@jpmorgan.com>; Vroom, Ryan W" <ryan.w.vroom@jpmorgan.com>; Zambon, M Sol <m.sol.zambon@jpmorgan.com>
Sent: 5/8/2015 2:03:05 PM
Subject: FW: Sick Day

As per Defendant Alex Khavin's directive, I had to send an email to Defendant Fidelia Shillingford letting her know my situation then Shillingford should be the one communicating

FYI

Fidelia Shillingford | VP, Counterparty Risk Management | J.P. Morgan Asset Management
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1910

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

From: Lue, Candice
Sent: Friday, May 08, 2015 6:28 AM
To: Shillingford, Fidelia X
Subject: Sick Day

After being denied the company's work from home benefit, I had to fake the day off as a "sick day!" CL

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

-----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

From: Lue, Candice
To: Shillingford, Fidelia X ;Ng, Kenneth T
CC: Dauber, Kimberly S
Sent: 5/11/2015 9:36:05 PM
Subject: RE: Exposure Report

I was denied the work from home benefit so I had to take three additional days off as "sick days". I did NOT need to spend the whole day caring for my mother, I just had to stay close to help her with basic things with not much interference with my regular BAU. CL

Hi All,

Just a FYI - in pursuance to my email below, because my work from home is at manager's discretion and needs to be approved by my manager, I will have to take off Tuesday and possibly Wednesday as sick days.

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: Lue, Candice
Sent: Monday, May 11, 2015 10:47 AM
To: Shillingford, Fidelia X; Ng, Kenneth T
Cc: Dauber, Kimberly S
Subject: RE: Exposure Report

Hi All,

As long as it is okay for me to work from home, I will be able to execute my regular BAU. I just have to be close to my mother at this time as she needs some help due to the recent injury she sustained.

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: Monday, May 11, 2015 10:42 AM
To: Ng, Kenneth T
Cc: Lue, Candice; Dauber, Kimberly S
Subject: RE: Exposure Report

Kenny
I may need more than the 50%, if Candice is out.

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: Ng, Kenneth T
Sent: Monday, May 11, 2015 10:36 AM
To: Shillingford, Fidelia X
Cc: Lue, Candice; Dauber, Kimberly S
Subject: RE: Exposure Report

Sure, no problem. I can work on the 50% that was assigned to me at the beginning of the month.

From: Shillingford, Fidelia X
Sent: Monday, May 11, 2015 10:25 AM

To: Ng, Kenneth T
Cc: Lue, Candice; Dauber, Kimberly S
Subject: Exposure Report
Importance: High

Hi Kenny

In Candice's absence; can you please take over the report for April?

We can meet today to determine what was completed and what needs to be done.

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
To: Shillingford, Fidelia X
Sent: 5/12/2015 2:12:03 PM
Subject: Automatic reply: WFH

Hello,

I am out of the office.

For BAU inquiries: please email AM_CRG_NY@jpmorgan.com

For reporting related inquiries: please contact Fidelia Shillingford and Kenny Ng

Fidelia: (212) 648 – 1810 or Fidelia.X.Shillingford@jpmorgan.com

Kenny: (212) 270 – 5668 or Kenneth.T.Ng@jpmorgan.com

Have a great day! ☺

Kenny Ng was one of my predecessors.
CL

Best regards,
Candice

From: Shillingford, Fidelia X
To: Kulda, Eileen
CC: Lue, Candice
Sent: 5/12/2015 2:37:04 PM
Subject: FW: WFH

Being denied the company's work from home benefit, I HAD to take the day off as a "sick day" while my three days of BAU piled up. CL

Hi Eileen
Can you please add to the calendar – sick day?

Regards
Fidelia Shillingford

From: Lue, Candice
Sent: Tuesday, May 12, 2015 9:13 AM
To: Shillingford, Fidelia X
Subject: Automatic reply: WFH

Hello,

I am out of the office.

For BAU inquiries: please email AM_CRG_NY@jpmorgan.com

For reporting related inquiries: please contact Fidelia Shillingford and Kenny Ng
Fidelia: (212) 648 – 1810 or Fidelia.X.Shillingford@jpmorgan.com
Kenny: (212) 270 – 5668 or Kenneth.T.Ng@jpmorgan.com

Have a great day! ☺

Best regards,
Candice

EXHIBIT L-2

(Work from Home Denial – Still expected to meet hard deadlines)

From: Lue, Candice
To: Shillingford, Fidelia X ;Ng, Kenneth T
CC: Dauber, Kimberly S
Sent: 5/11/2015 3:46:04 PM
Subject: RE: Exposure Report

Hi All,

As long as it is okay for me to work from home, I will be able to execute my regular BAU. I just have to be close to my mother at this time as she needs some help due to the recent injury she sustained.

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: Monday, May 11, 2015 10:42 AM
To: Ng, Kenneth T
Cc: Lue, Candice; Dauber, Kimberly S
Subject: RE: Exposure Report

Even though Shillingford asked for more than 50%, Kenny Ng only did his 50% (product split) meaning that I had 3 days of BAU still undone because of being denied the privilege of work from home and I was still expected to meet the hard deadlines. CL

Kenny
I may need more than the 50%, if Candice is out.

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: Ng, Kenneth T
Sent: Monday, May 11, 2015 10:36 AM
To: Shillingford, Fidelia X
Cc: Lue, Candice; Dauber, Kimberly S
Subject: RE: Exposure Report

Sure, no problem. I can work on the 50% that was assigned to me at the beginning of the month.

From: Shillingford, Fidelia X
Sent: Monday, May 11, 2015 10:25 AM
To: Ng, Kenneth T
Cc: Lue, Candice; Dauber, Kimberly S
Subject: Exposure Report
Importance: High

Hi Kenny
In Candice's absence; can you please take over the report for April?
We can meet today to determine what was completed and what needs to be done.

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

Lue, Candice

From: Ng, Kenneth T
Sent: Wednesday, May 06, 2015 12:09 PM
To: Shillingford, Fidelia X
Cc: Lue, Candice; Dauber, Kimberly S
Subject: RE: April 2015 - Exposure Report Product Split

Sure thing, I'll still have 50% available for reporting and credit until that hopeful day comes. ☺

From: Shillingford, Fidelia X
Sent: Wednesday, May 06, 2015 12:07 PM
To: Ng, Kenneth T
Cc: Lue, Candice; Dauber, Kimberly S
Subject: FW: April 2015 - Exposure Report Product Split

Hi Kenny

As agreed, you will continue to provide support for the Monthly Exposure reporting until such time it can be automated. Hopefully soon ☺!

I have asked Candice to list the tasks that she needs your help on this month; see below, highlighted in yellow.

Can you liaise with Candice on the below. Thanks in advance; as always, I appreciate your help with this process.

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, May 04, 2015 6:04 PM
To: Shillingford, Fidelia X
Subject: RE: April 2015 - Exposure Report Product Split

Hi Fidelia,

Candice

Newton Products (Repo, TBAs, Bank Loans, Structured Products (P-Notes, CLNs, Warrants), Securities Trading, Options)
Securities Trading - SCRM
Brazil Swaps
FX Forwards (EMEA, US, Japan, Asia)
Prime Brokerage (EMEA, US, Japan, Asia)
Exchange Traded Futures (EMEA, US, Japan, Asia)
Highbridge Products (Prime Brokerage, OTC Derivatives, Exchange Traded Futures, Deposits)

Kenny

Securities Lending (Canada and EMEA)
OTC Derivatives (US, EMEA)
Deposits (EMEA and GRA)
Excess Cash + Time Deposits (Asia and EMEA)
Stable Value Wrap

A true and correct copy of my, Plaintiff, Candice Lue's email dated May 4, 2015 and time stamped 6:04 PM should be on JPMC's server. Shillingford doctored this said email prior to forwarding to Kenny Ng (my predecessor and "half a person") and his manager, Kimberly Dauber. Paraphrased, the opening paragraph of my said email stated: As per your [Shillingford's] request, please see below the Product split between myself and Kenny..."

CL

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: Lue, Candice
To: Shillingford, Fidelia X
Sent: 4/8/2015 2:00:03 PM
Subject: Reporting Analyst Workload

Hi Fidelia,

Pursuant to previous conversations and as we are all aware and have acknowledged, with the workload, the deadlines and the evolving deadlines based on new requirements from senior management that are required for the reporting analyst position, more than one person is needed to do this job.

With that said, even with the highest level of prioritization and time management, I am still overwhelmed with work.

Once again, I am requesting a realistic and firm solution to 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

EXHIBIT LL

(Projects I worked on during my tenure in the Counterparty Risk Group)

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	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. I present analysis and trends at the Monthly Governance Meeting.
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

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:

Lue, Candice

From: Lue, Candice
Sent: Friday, August 14, 2015 4:23 PM
To: Saxena, Nikhil
Subject: RE: Thank you

You're most welcome Nik! It was a pleasure working with you. 😊

All the best!

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: Saxena, Nikhil
Sent: Friday, August 14, 2015 4:21 PM
To: Lue, Candice
Subject: Thank you

Candice,

Since today is my last day, I wanted to thank you for all the help you provided me over the past summer. I learned a lot from your guidance and I appreciate all the time you devoted to teaching me. Hopefully that MIS SOP is a big hit! Best of luck with everything in the future. Thanks again!

Sincerely,

Nikhil Saxena
Summer Analyst

J.P. Morgan Asset Management
Counterparty Risk Group
nikhil.saxena@jpmchase.com
270 Park Avenue, Floor 9
New York, NY 10017
Phone: 212 270 8049



Lue, Candice

From: Quix, Philippe
Sent: Tuesday, November 17, 2015 6:11 PM
To: Shillingford, Fidelia X; Gorniak, Hubert; Bhogal, Harjeet S; Lue, Candice
Cc: Lampione, Peter R; Peters, Christopher K
Subject: RE: Exposure Data Quality Issues - Brief Update

As discussed – please take Peter and Chris through these → they should help resolving this and engage with outside groups that need to do things better upstream.



SecureZIP
Attachments.zip

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

From: Shillingford, Fidelia X
Sent: Monday, November 16, 2015 10:28 AM
To: Shillingford, Fidelia X; Quix, Philippe; Gorniak, Hubert; Bhogal, Harjeet S; Lue, Candice
Subject: Exposure Data Quality Issues - Brief Update
When: Tuesday, November 17, 2015 12:15 PM-12:45 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Team Room 2

Because of the urgency of the matter I brought to light, Quix in turn had to convene other meetings with senior managers who reported directly to him.

Note: If the data on the Exposure Report is not correct, information provided to upper level management up to and possibly including the CEO will also be incorrect.
CL

Phil

I wanted to keep you abreast of the data quality issues with exposure (current and peak).

I know you are just back from Asia but Harjeet is going on vacation beginning Wednesday and I would like him to be a part of the meeting.

I promise this will be a brief overview and we can do a follow up later.

I will provide any material at the meeting.

Regards
Fidelia

<< File: SecureZIP Attachments.zip >>

Audio conferencing details:

Name: FIDELIA SHILLINGFORD
International direct: +1 857 318 0900
US Toll free: 1 888 575 5762 (JPMC)
Participant passcode: 71491590 then #

Through my due diligence, after bringing numerous data quality issues plaguing the integrity of the Exposure Report on which I worked to light, Defendant Shillingford had to escalate the matter to Defendant Philippe Quix, Managing Director and Global Investment Management Chief Risk Officer by convening this meeting.

Participants: Quix, Head of Tech Team, 2 other employees (1 tech team member via phone and the other vice president on the Reporting side of CRG), Shillingford and Lue.
CL

Lue, Candice

Subject: Exposure Data Quality Issues - Brief Update
Location: Team Room 2
Start: Tue 11/17/2015 12:15 PM
End: Tue 11/17/2015 12:45 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Shillingford, Fidelia X
Required Attendees: Quix, Philippe; Gorniak, Hubert; Bhogal, Harjeet S; Lue, Candice

Phil

I wanted to keep you abreast of the data quality issues with exposure (current and peak).
I know you are just back from Asia but Harjeet is going on vacation beginning Wednesday and I would like him to be a part of the meeting.

I promise this will be a brief overview and we can do a follow up later.
I will provide any material at the meeting.

Regards
Fidelia

EXHIBIT M

(Absent from Work Ample/Advanced Notices)

Subj: **Re: Not Feeling Well**
Date: 10/17/2014 7:10:02 A.M. Eastern Standard Time
From: michelle.t.sullivan@jpmorgan.com
To: [CandiceLue](#) [REDACTED]

Ok. Hope you feel better soon.

From: CandiceLue [REDACTED] [mailto:CandiceLue [REDACTED]]
Sent: Friday, October 17, 2014 06:02 AM
To: Sullivan, Michelle T; Elkins, Sebastian J
Subject: Not Feeling Well

Hi Michelle/Seb,

I'm not feeling well. I won't be able to make it into work today.

Regards,
Candice

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[REDACTED]


Subj: **Candice - Not feeling well**
Date: 9/25/2013 6:11:14 A.M. Eastern Standard Time
From: [CandiceLue\[REDACTED\]](#)
To: chris.liasis@jpmorgan.com, michelle.t.sullivan@jpmorgan.com

Good Morning Chris/Michelle,

I woke up this morning with a very stiff neck and have not gotten any ease thus far. I will have to take the day off to monitor it / see if I can get some relief.

Hopefully I will be fine to come in tomorrow,

Regards,
Candice



Subj: **Not Feeling Well**
Date: 5/12/2014 5:17:23 A.M. Eastern Standard Time
From: [CandiceLue@](#)
To: michelle.t.sullivan@jpmorgan.com, chris.liasis@jpmorgan.com, sebastian.j.elkins@jpmorgan.com

Hi Michelle/Chris/Seb,

I'm not feeling well. I won't be able to make it into work today.

Regards,
Candice




Subj: **Not feeling well**
Date: 4/7/2014 5:49:27 A.M. Eastern Standard Time
From: [CandiceLue@\[REDACTED\]](mailto:CandiceLue@[REDACTED])
To: michelle.t.sullivan@jpmorgan.com, chris.liasis@jpmorgan.com

Hi Michelle/Chris,

I'm not feeling well. I won't be able to make it into work today.

Regards,
Candice



Subj: **Not Feeling Well**
Date: 2/24/2014 6:39:00 A.M. Eastern Standard Time
From: [CandiceLue\[REDACTED\]](#)
To: michelle.t.sullivan@jpmorgan.com, chris.liasis@jpmorgan.com

Hi Michelle/Chris,

I'm not feeling well - having cold/flu-like symptoms. I will not be able to come into the office today.

Regards,
Candice

[REDACTED]

Subj: **Re: Not Feeling Well Today - Candice**
Date: 5/15/2013 6:40:45 A.M. Eastern Daylight Time
From: Chris.Liasis@jpmorgan.com
To: [CandiceLue\[REDACTED\]](mailto:CandiceLue[REDACTED])
CC: kerry.l.chapman@jpmorgan.com

Ok, thks for letting us know, get well.

From: CandiceLue[REDACTED] [mailto:CandiceLue[REDACTED]]
Sent: Wednesday, May 15, 2013 06:39 AM Eastern Standard Time
To: Liasis, Chris
Cc: Chapman, Kerry L
Subject: Not Feeling Well Today - Candice

Good Morning Chris,

I'm not feeling well today - still experiencing the pain/stiff neck I've been having since yesterday. With that said, I will not be able to come into the office today.

Regards,
Candice

This email is confidential and subject to important disclaimers and conditions including on offers for the purchase or sale of securities, accuracy and completeness of information, viruses, confidentiality, legal privilege, and legal entity disclaimers, available at <http://www.jpmorgan.com/pages/disclosures/email>.

[REDACTED]

Subj: **Re: Candice - Not feeling well**
Date: 9/26/2013 7:04:23 A.M. Eastern Daylight Time
From: michelle.t.sullivan@jpmorgan.com
To: [CandiceLue\[REDACTED\]](#)

Ok. Thanks for the email.

From: CandiceLue[REDACTED] [mailto:CandiceLue[REDACTED]]
Sent: Thursday, September 26, 2013 05:58 AM
To: Sullivan, Michelle T
Subject: Re: Candice - Not feeling well

Good Morning Michelle,

There has been some progress in both the pain and the movement in my neck but as a precaution, I need to give it more attention and time to heal. With that said, I will not be coming in today.

See you tomorrow.

Regards,
Candice

In a message dated 9/25/2013 6:40:41 P.M. Eastern Daylight Time, michelle.t.sullivan@jpmorgan.com writes:

Ok. Thanks for the update.

From: CandiceLue[REDACTED] [mailto:CandiceLue[REDACTED]]
Sent: Wednesday, September 25, 2013 06:31 PM
To: Sullivan, Michelle T
Subject: Re: Candice - Not feeling well

Thanks Michelle.

I am still in pain but it's not as bad as this morning. I cannot definitively say if I will be able to come in tomorrow but I'll let you know. If you do not hear from me in the morning, it means I'll be coming in.

Candice

In a message dated 9/25/2013 7:30:38 A.M. Eastern Daylight Time, michelle.t.sullivan@jpmorgan.com writes:

Hello Candice,

Thanks for the email. I will let the team know. I hope you feel better.

Michelle

From: CandiceLue[REDACTED] [mailto:CandiceLue[REDACTED]]
Sent: Wednesday, September 25, 2013 07:11 AM
To: Liasis, Chris; Sullivan, Michelle T
Subject: Candice - Not feeling well

Good Morning Chris/Michelle,

I woke up this morning with a very stiff neck and have not gotten any ease thus far. I will have to take the day off to monitor it / see if I can get some relief.

Hopefully I will be fine to come in tomorrow,

Regards,
Candice

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EXHIBIT MM

(Would not have accepted the position in the Counterparty Risk Group if I was told that
Defendant Fidelia Shillingford would have been my manager)

Lue, Candice

From: Lue, Candice
Sent: Tuesday, July 21, 2015 5:50 AM
To: Vega, John R.
Subject: Development Plan / Manager Concerns
Attachments: 2015 Performance Review - Development Plan - Candice Lue.pdf

Hello John,

As requested, please see attached my development plan from my 2015 PMC.

However, as previously articulated, let me respectfully reiterate that I have a lack of trust and confidence in my current manager, Fidelia Shillingford, as I conceive her to be the enabler, the facilitator and the coordinator of the second class treatment that has been meted out to me and which is the matter at hand.



Also, as she herself stated in my interview with her on October 30, 2014, "I'm about getting my work done. Some people don't like me. You may not like me" and as I correctly interpreted it to be, she creates a stressful and to an extent hostile working environment. That is why I said that I would not have accepted the position if I had known that my manager would have been switched to her.

In light of the foregoing and as I told you at our meeting on July 8, 2015, I see my current manager as being a blight on any future career development that I could or would have here at JPM and as such, I am once again requesting her removal as my manager.

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

Candidate Name
Lue, Candice S. M. (5148489)

Date	Events	Details	Comments	By
Jul 11, 2014 8:35 PM	Work experience - Added	Investment Banking Operations Associate; Adecco Financial; 02/2010 - 07/2010		Candidate
Jul 11, 2014 8:35 PM	Work experience - Added	Analyst/Consultant ; Adecco Financial; 09/2008 - 09/2009		Candidate
Jul 11, 2014 8:35 PM	Work experience - Added	Advanced Investment Data Operations Analyst; Adecco Financial; 09/2011 - 08/2012		Candidate
Jul 11, 2014 8:35 PM	Application process - Start	Profile process - Start The submission is incomplete		Candidate
140062260 (CIB F&BM – Reporting & Planning Analysis- Analyst- New York)				
Oct 2, 2014 10:17 PM	 Status changed to Has Declined in step Submit to Manager	Unacceptable salary/ compensation package, Event date: Oct 2, 2014, 10:17 PM		Josh Meltz
Oct 2, 2014 10:16 PM	Moved to step Submit to Manager	Event date: Oct 2, 2014, 10:16 PM		Josh Meltz
Oct 2, 2014 10:16 PM	Status changed to To be HM screened in step Submit to Manager	Event date: Oct 2, 2014, 10:16 PM		Josh Meltz
Oct 2, 2014 10:16 PM	Moved to step Reviewed	Event date: Oct 2, 2014, 10:16 PM		Josh Meltz
Oct 2, 2014 10:16 PM	Status changed to Recruiter Interview in step Reviewed	Event date: Oct 2, 2014, 10:16 PM		Josh Meltz
Oct 2, 2014 10:16 PM	Status changed to Ready to Move to Reviewed in step New	Event date: Oct 2, 2014, 10:16 PM		Josh Meltz
Sep 18, 2014 5:41 PM	Status changed to Recommend in step New	Event date: Sep 18, 2014, 5:41 PM		Josh Meltz
Sep 18, 2014 5:26 AM	Applied online	Internal (Internal) The submission is complete		Candidate
Sep 18, 2014 5:23 AM	Education - Added	Business Administration - Finance and Economics; Montclair State University; 09/2004 - 05/2008		Candidate
Sep 18, 2014 5:23 AM	Work experience - Added	Energy Confirmations Drafting Analyst; J.P. Morgan Chase;		Candidate

Subj: **Re: Position with UBS**
Date: 11/13/2014 9:57:21 P.M. Eastern Daylight Time
From: CandiceLue [REDACTED]
To: [REDACTED]@adeccona.com [Adecco Recruiter]

Hi [REDACTED], [Adecco Recruiter]

Sorry I missed your call. Thank you so much for the consideration! However, I was able to secure another position at JPM just in the nick of time.

Thank you so much for all your help and continued success to you and Adecco.

Best regards,
Candice

→ [Adecco Recruiter]

In a message dated 11/13/2014 4:51:25 P.M. Eastern Standard Time, [REDACTED]@adeccona.com writes:

Hi Candice.

REDACTED

Subj: **Re: Conversion to FTE - Candice Lue**
Date: 8/1/2012 9:57:55 P.M. Eastern Daylight Time
From: [CandiceLue](#)
To: kirk.1.davis@jpmorgan.com
CC: candice.lue@jpmorgan.com

Hi Kirk,

Thanks for the offer. However, I have decided to pass on it at this time. Reason being, I initially thought and as was advertised, that this position was at the associate level (IB Ops - Global Commodities - NA Energy Confirmation Drafting - Associate - NY-120043233 at JPMorgan Chase). In addition, the annual base salary is much lower than I was expecting.

Thanks again.

Regards,

Candice Lue
[REDACTED]

In a message dated 8/1/2012 4:26:04 P.M. Eastern Daylight Time, candice.lue@jpmorgan.com writes:

Candice Lue

J.P. Morgan | Investment Bank - Global Commodities

Candice.Lue@jpmorgan.com

T: (212) 623-3774

4 New York Plaza, 9th Floor, NY, NY 10004

From: Davis, Kirk 1
Sent: Wednesday, August 01, 2012 4:19 PM
To: Lue, Candice
Subject: RE: Conversion to FTE

Hi Candice,

As discussed, please find the JPMorgan benefits package attached.

[REDACTED]

Your pre-taxed employee Medical insurance contribution would be:

Option 1: \$44.00 per pay period

Option 2: \$20.50 per pay period

Regards,

Kirk

From: Lue, Candice
Sent: Wednesday, August 01, 2012 11:33 AM
To: Davis, Kirk 1
Subject: RE: Conversion to FTE

Hi Kirk,

Thanks. I left a message on your voicemail. You can call me back whenever you get a chance. My cell phone number is [REDACTED].

Thanks & Regards,

Candice Lue

J.P. Morgan | Investment Bank - Global Commodities

Candice.Lue@jpmorgan.com

T: (212) 623-3774

4 New York Plaza, 9th Floor, NY, NY 10004

From: Davis, Kirk 1
Sent: Wednesday, August 01, 2012 11:01 AM
To: Lue, Candice
Subject: Conversion to FTE

[REDACTED]

Hi Candice,

I will be handling your conversion to full time. Can you please give me a call ASAP to discuss?

Regards,

Kirk

Kirk Davis | Investment Banking Experienced and Executive Recruiting | **J.P.Morgan** | 277 Park Avenue, 12th Floor New York, NY | T: 212.622.8141 | kirk.1.davis@jpmorgan.com | jpmorgan.com/careers

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