## 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**

N-2-PP

IN OPPOSITION/RESPONSE TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
DOCKET #s 89-100

# EXHIBIT N-2

(Emails with Alex Khavin, Fidelia Shillingford, HR Rep., Brooke Miller and Kimberly Dauber re: My 2014 Year End Performance Review)

From:

Lue, Candice Khavin, Alex G

To: CC:

Miller, Brooke A

Sent:

1/5/2015 11:10:02 AM

Subject:

Re: My Year End Review

Hi Alex

I included Kim because at first she was the hiring manager and she was the one who did the coordination of my interviews and I think was instrumental in my subsequent hiring.

Since due to the year end review done by my previous manager will result in a note stating that "you've hired a M-person in your department" and she played such a big role in my hiring. I thought I'd include her as well.

Best regards.

Candice

Best regards.

From: Khavin, Alex G

Sent: Sunday, January 04, 2015 09:16 PM

To: Lue. Candice Cc: Miller. Brooke A

Subject: RE: My Year End Review

Thanks for the background, however, Kim is not your manager, Fidelia is and I am unsure why you have involved her in this exchange- can you please let me know?

As I said, I will schedule something for us when I am in the office on Monday.

Alex

----Original Message----

From: Lue, Candice

Sent: Friday, January 02, 2015 09:09 AM Eastern Standard Time

**To:** Khavin, Alex G; Shillingford, Fidelia X Cc: Miller, Brooke A; Dauber, Kimberly S

Subject: RE: My Year End Review

Hi Alex.

Thanks for making this possible. In order to prepare for the meeting, I'd appreciate if you and Kim could please take a "refresher" look at my 2 year PMC history.

I have had one of the most trying times working under my previous manager and even after having my cathartic moment on November 7, 2014, she is still bent on derailing, smearing and destroying the financial career I've tried so hard to pursue. Now she's making sure that my/your record states that "you've hired a M- person in your department." This is the performance rating that was conveyed to me that she has submitted to HR for my 2014 year end review.

I just wanted to assure you that you did not hire a M- person as throughout all my life which includes working in my previous position, I'd always been an over achiever.

I do not want my previous manager's malicious comments against me to put a smear on the department's credibility as how they have put and continue to put a smear on mine. That is what I hope to discuss at this 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

From: Khavin, Alex G

Sent: Wednesday, December 31, 2014 5:21 PM

To: Lue, Candice; Shillingford, Fidelia X Cc: Miller, Brooke A; Dauber, Kimberly S Subject: RE: My Year End Review

#### Candice-

I will have Eileen set something up for when we are all back. Please let us know the topic so we can be prepared.

Best,

Alex

----Original Message----From: Lue. Candice

Sent: Wednesday, December 31, 2014 02:49 PM Eastern Standard Time

To: Shillingford, Fidelia X

Cc: Miller, Brooke A; Khavin, Alex G; Dauber, Kimberly S

Subject: RE: My Year End Review

Hi Fidelia.

Please note that this meeting is separate and apart from what you have stated in your email below.

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, December 31, 2014 2:36 PM

To: Lue, Candice

Cc: Miller, Brooke A; Khavin, Alex G Subject: RE: My Year End Review

Hi

As discussed in your yearend review, the feedback and rating is from your prior manager. HR has noted that this is the practice given that you spent most of the year with the prior manager. Please note that these are her views and I strongly urge that you have a conversation with her.

Any questions in regards to the process, please reach out to our HR rep - Brooke Miller.

#### 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: Wednesday, December 31, 2014 2:17 PM

To: Khavin, Alex G; Dauber, Kimberly S; Shillingford, Fidelia X

Subject: My Year End Review

HI All.

It is imperative that I have a meeting with you with regards to my year end review which was done by my former manager, Michelle Sullivan.

I'd appreciate if you would suggest a convenient time that would be best for you to meet with me.

Thanks in advance.

Best regards and Happy New Year! Candice

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

From:

Lue, Candice

To:

Dauber, Kimberly S

Sent:

1/2/2015 9:10:00 PM

Subject:

RE: My Year End Review

Thanks Kim. Sent an invite.

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: Dauber, Kimberly S

Sent: Friday, January 02, 2015 3:39 PM

To: Lue. Candice

Subject: Re: My Year End Review

I understand. Let's discuss on Monday. Set up a time for just the 2 of us.

Best regards,

Kimberly Dauber, Vice President J.P. Morgan Asset Management 270 Park Avenue, 9th Floor New York, NY 10017

Phone: 212-270-1655 Mobile: 201-892-2272

kimberly.s.dauber@jpmorgan.com

From: Lue, Candice

Sent: Friday, January 02, 2015 09:09 AM To: Khavin, Alex G; Shillingford, Fidelia X Cc: Miller, Brooke A; Dauber, Kimberly S Subject: RE: My Year End Review

Hi Alex.

Thanks for making this possible. In order to prepare for the meeting, I'd appreciate if you and Kim could please take a "refresher" look at my 2 year PMC history.

I have had one of the most trying times working under my previous manager and even after having my cathartic moment on November 7, 2014, she is still bent on derailing, smearing and destroying the financial career I've tried so hard to pursue. Now she's making sure that my/your record states that "you've hired a M- person in your department." This is the performance rating that was conveyed to me that she has submitted to HR for my 2014 year end review.

I just wanted to assure you that you did not hire a M- person as throughout all my life which includes working in my previous position, I'd always been an over achiever.

I do not want my previous manager's malicious comments against me to put a smear on the department's credibility as how they have put and continue to put a smear on mine. That is what I hope to discuss at this 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

From: Khavin, Alex G

Sent: Wednesday, December 31, 2014 5:21 PM

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Candice-

I will have Eileen set something up for when we are all back. Please let us know the topic so we can be prepared.

Best.

Alex

----Original Message-----

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Sent: Wednesday, December 31, 2014 02:49 PM Eastern Standard Time

To: Shillingford, Fidelia X

Cc: Miller, Brooke A; Khavin, Alex G; Dauber, Kimberly S

Subject: RE: My Year End Review

Hi Fidelia,

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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

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Sent: Wednesday, December 31, 2014 2:36 PM

To: Lue, Candice

Cc: Miller, Brooke A; Khavin, Alex G Subject: RE: My Year End Review

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Any questions in regards to the process, please reach out to our HR rep - Brooke Miller.

#### 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: Wednesday, December 31, 2014 2:17 PM

To: Khavin, Alex G; Dauber, Kimberly S; Shillingford, Fidelia X

Subject: My Year End Review

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I'd appreciate if you would suggest a convenient time that would be best for you to meet with me.

Thanks in advance.

Best regards and Happy New Year! Candice

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

From:

Shillingford, Fidelia X

To:

Khavin, Alex G

Sent:

12/17/2014 11:28:05 PM

Subject:

Candice YE

I spoke with Brooke; her advice was that Michelle (Candice former manager) should provide feedback and rating as the bulk of her time was spent within that group. In addition, the YE review should be jointly conducted – with both me and Michelle present.

Given this is the practice; I will reach out to Michelle for her feedback and incorporate into PMC. I also intend to have an in-depth conversation as to why she strongly believes that Candice is an M-. Could you pls be a part of this conversation.



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

# **EXHIBIT NN**

(The Monthly Governance Meeting Was Also Referred to as CRG Extended Team Meeting)

From:

Dauber, Kimberly S

Sent:

Wednesday, February 04, 2015 2:04 PM

To:

Shillingford, Fidelia X

Cc:

Lue, Candice, Nguyen, Fiona N; Ng, Kenneth T

Subject:

RE: Minutes and Documents for Extended Team Meeting

Sure.

Analyst 1 will be Fiona Analyst 2 will be Kenny

Fiona and Kenny – can you two please take turns with Candice collecting the documents, taking the minutes and PDF/save documents in the shared folder for our monthly extended meetings?

Thank you.

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: 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	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

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 | Tr. 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

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 | 2 (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	

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?

Alex Khavin

Executive Director
J.P. Morgan Asset Management
<u>alex.g.khavin@jpmorgan.com</u>
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: Q:\Governance\CRG Meeting Materials\2014\12 Dec 2014

- 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

From:

Lue, Candice

Sent:

Tuesday, January 20, 2015 2:28 PM

To:

Khavin, Alex G

Subject:

RE: Follow Ups from CRG Extended Team Meeting December 22, 2014

\*

Hi Alex.

Yes and I'm checking in with teammates on availability of attachments where necessary.

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: 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

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

These tasks were only for the Monthly Governance Meeting/ Extended Team Meeting, 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: 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:

Haider, Mohammad Z

To:

Lue. Candice

Sent:

11/26/2014 8:34:02 PM

Subject:

RE: Follow Ups from CRG Extended Team Meeting November 26, 2014

#### Good job!

#### M. Zeeshan Haider

Analyst

J.P. Morgan Asset Management
Counterparty Risk Group
mailto:Mohammad.Z.Haider@JPMorgan.com
www.jpmorgan.com/assetmanagement
270 Park Avenue - 9th Floor
New York, NY 10017

J.P. Morgan

Phone: 212.648.1710

From: Lue, Candice

Sent: Wednesday, November 26, 2014 3:32 PM

To: AM Counterparty Risk Group

Subject: Follow Ups from CRG Extended Team Meeting November 26, 2014

Hi Team,

Please see minutes from today's team meeting below. If anything should be added/updated, please kindly advise. The minutes have also been saved on the shared drive: Q:\Governance\CRG Meeting Materials\2014\11 Nov 2014



#### <u>Announcements</u>

- Risk Control Self Assessment (RCSA) Procedures
  - o Review/analysis should be conducted on an ongoing basis (not just annually).
    - Identify risks, controls and how our policies and procedures are effective.
  - o Please bring copy of policies and procedures to team meetings for discussion on how the document should be updated (e.g. to include any additional information for further clarification).
- We should place items in scope and/or issues to be addressed into the following categories accordingly: 1) True Exceptions, 2) Issues to be fixed by the Business, 3) Issues to be fixed by CRG
- After December 2014, CRG will no longer be producing the Net Indebtness and NAV Decline Reports (please see Follow Ups below for more details).
- As of next month, issues need to be reported accordingly (examples include feed issues and inability to obtain any exposure figures).
- For reporting, please ensure that we are properly indicating collateral and highlight areas in which we are pledging an additional amount of collateral where maybe we should not be.
- For Risk Committee Meetings, we need to ensure that we are reporting our statistics in terms of Credit and Technology.

#### Follow Ups

Team

Ensure that all materials to be discussed in CRG Extended Team meeting are prepared and distributed on the day before the meeting.

Ensure correct and complete data for India and Taiwan counterparties is submitted to Kim for inclusion in the RCC slide for 2015.

From:

Lue. Candice

To:

Haider, Mohammad Z

CC:

Shillingford, Fidelia X

Sent:

12/19/2014 5:06:05 PM \*

Subject:

RE: Follow Ups from CRG Extended Team Meeting November 26, 2014

You got it.

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: Haider, Mohammad Z

Sent: Thursday, December 18, 2014 6:18 PM

To: Lue, Candice Cc: Shillingford, Fidelia X

Subject: RE: Follow Ups from CRG Extended Team Meeting November 26, 2014

Hi Candice,

X

In addition to the below, when Alex calls for 'All Other Business' during the extended team meeting – could you please remind folks that they need to provide input on the attached proposals I've circulated regarding changes to CMS in 2015? The deadline is Jan 9, 2015.

Thanks!

#### M. Zeeshan Haider

Analyst

J.P. Morgan Asset Management
Counterparty Risk Group
mailto:Mohammad.Z.Haider@JPMorgan.com
www.jpmorgan.com/assetmanagement
270 Park Avenue - 9th Floor

New York, NY 10017 Phone: 212.648.1710



From: Haider, Mohammad Z

Sent: Friday, December 12, 2014 3:15 PM
To: Lue, Candice; AM Counterparty Risk Group

Subject: RE: Follow Ups from CRG Extended Team Meeting November 26, 2014

Team,

Given that I am out of the office on Dec 22, I am supplying updates regarding my follow-up items from our previous extended team meeting below:

#### Redacted

response from Sandeep. We can respond accordingly should we want technology to integrate a new template into the SRGT application in CMS. I turn to the team for guidance on how we'd like to proceed.

Work with Gaurav and Candice to compile equities limits monitoring reports received on a daily basis in between CRG Extended Team meetings so that a complete record of breaches is available for discussion in the next CRG Extended

From:

Shillingford, Fidelia X

Sent:

Tuesday, August 25, 2015 11:18 AM

To:

Lue, Candice

Cc:

Poz, Thomas I

Subject:

RE: Monthly CRG Governance Meeting

Hi

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

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

#### Regards

Fidelia

----Original Appointment----

From: Kulda, Eileen On Behalf Of Khavin, Alex G Sent: Tuesday, August 25, 2015 10:25 AM

To: Leung, Joyce L; Avetyan, Tatevik; Vroom, Ryan W; Shillingford, Fidelia X; Dauber, Kimberly S; Poz, Thomas I;

Zambon, M Sol; Nguyen, Fiona N; Lue, Candice; Gorniak, Hubert; Dang Ngoc, Ali; Dorfman, Jon

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

Subject: Monthly CRG Governance Meeting

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

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

#### Agenda:

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

### \*

### Audio conferencing details:

Name: Alexandra Khavin

International direct: +1 857 318 0900 US Toll free: 1 888 575 5762 (JPMC) Chairperson passcode: 68517031 then # Participant passcode: 15204032 then #

# **EXHIBIT NN-1**

(Proof of Working Late in Preparation for CRG's Monthly Governance Meeting)

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

Attachments:

Canada Securities Limits FINAL.xlsx; AM Counterparty Monthly Dashboard -Nov 2014 FINAL.xlsx; Daily Market Indicator Monitoring Sheet - 12.19.2014.pdf; AM Counterparty Risk Exposure Concentration Summary 2014-11 with Product Slides v4 FINAL.pptx; November

2014 Reconciliation.xlsx

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 (pmorgan.com)

From:

Lue, Candice

Sent: To: Wednesday, April 22, 2015 4:05 PM Shillingford, Fidelia X; Ng, Kenneth T

Subject:

RE: March Exposure Report - Final Version

Attachments:

**Bilateral Derivatives** 

Hi Fidelia.

I will stay in the office a bit later today to finalize the exposure report and obtain your signoff for distribution following your additional feedback. I'll go home after completion and report is okay for tomorrow.

- 1) Joyce and Gokul both came back last night with confirmation on the India Securities Trading Exposures India Securities Trading Exposures are in Newton. We leveraged Newton for DVP.
- 2) Please see attached the emails from the PMs about the derivatives variance re commodity market comment
- 3) Page 3 DB net exposure increase appears to be driven mainly by FX
- 4) Page 4 Line on the date of exposure removed

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, April 22, 2015 3:34 PM

To: Lue, Candice; Ng, Kenneth T

Subject: Re: March Exposure Report - Final Version

#### Thanks

I haven't had a chance to fully review but I hope to provide feedback by 6pm latest. If you have to leave early, that's ok. Any changes, you can make at home and print first thing before the meeting.

I did look at the 2nd draft you gave me yesterday. Had a few things.

- 1. Did we confirm re India exposures
- 2. Comment on the commodities market, I just want to read the email before agreeing
- 3. Page 3 DB net exp grew by \$1b MoM, can we understand why. It might be driven by FX or PB. Just want to be prepared if this question is raised.
- 4. Page 4, pls remove the line on the date of exposure; towards the bottom left

Fidelia Shillingford

From: Lue, Candice

**Sent**: Wednesday, April 22, 2015 10:56 AM **To**: Shillingford, Fidelia X; Ng, Kenneth T

Subject: RE: March Exposure Report - Final Version

Hi Fidelia,

## **EXHIBIT O**

(Proof Kimberly Dauber was the hiring manager for the Credit Reporting Risk Analyst position in the Counterparty Risk Group)

Thanks for responding Kimberly! Sure, I will be able to meet with you this week. Wednesday or Thursday at 8:30am or 9am would be fine.

Best regards, Candice

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

From: Dauber, Kimberly S

Sent: Monday, October 27, 2014 12:17 PM

To: Lue, Candice

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Hello Candice:

Thank you for your interest in the Credit Reporting Risk Analyst position. I would like to meet with you to discuss the position and your skills in more detail.

I see that you're located in at the Brooklyn office. Would you be available to meet with me sometime this week? Let me know what day / time works best for you.

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: Monday, October 27, 2014 10:11 AM

To: Dauber, Kimberly S

Subject: AM - Credit Reporting Risk Analyst-140084006

Good Morning Kimberly,

I am Candice Lue and I currently work as an Energy Confirmations Drafting Analyst in the Global Commodities Group. I thought I'd touch base with you as I have interest in the captioned position that is being advertized on Job Connect and for which you are named as the hiring manager.

I have already expressed my interest by submitting an application but hoped that you would take a closer look at my resume by me reaching out personally to you. I have attached a copy of my said resume and as you can see, I have a diverse background that would be complementary to the duties that are required for this position.

Please let me know if you will be willing to meet with me to further discuss my abilities and qualifications. However, if that is not necessary at this time, let me take the opportunity to wish you success with your chosen candidate.

Best regards,

Candice

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

From:

Lue, Candice

Sent:

Monday, October 27, 2014 3:02 PM

To:

Dauber, Kimberly S

Subject:

RE: AM - Credit Reporting Risk Analyst-140084006

Thanks Kimberly. I will see you then.

Best regards, Candice

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

From: Dauber, Kimberly S

Sent: Monday, October 27, 2014 2:49 PM

To: Lue, Candice

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Great. Let's meet at 8:30 on Thursday. Can you meet me in the lobby of 270 Park Avenue?

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: Monday, October 27, 2014 12:35 PM

To: Dauber, Kimberly S

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Thanks for responding Kimberly! Sure, I will be able to meet with you this week. Wednesday or Thursday at 8:30am or 9am would be fine.

Best regards, Candice

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

From: Dauber, Kimberly S

**Sent:** Monday, October 27, 2014 12:17 PM

To: Lue, Candice

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Hello Candice;

From:

Lue, Candice

Sent:

Wednesday, October 29, 2014 9:22 AM

To:

Dauber, Kimberly S

Subject:

RE: AM - Credit Reporting Risk Analyst-140084006

Not a problem. ©

Best regards, Candice

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

From: Dauber, Kimberly S

Sent: Wednesday, October 29, 2014 9:14 AM

To: Lue, Candice

Subject: Re: AM - Credit Reporting Risk Analyst-140084006

Great! Thanks so much for accommodating my schedule.

Best regards,

Kimberly Dauber, Vice President J.P. Morgan Asset Management 270 Park Avenue, 9th Floor New York, NY 10017

Phone: 212-270-1655 Mobile: 201-892-2272

kimberly.s.dauber@jpmorgan.com

From: Lue, Candice

Sent: Wednesday, October 29, 2014 09:07 AM

To: Dauber, Kimberly S

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Good Morning Kimberly,

Thanks for the heads up. How about Wednesday (today) at 5:30pm?

Best regards, Candice

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

From: Dauber, Kimberly S

Sent: Tuesday, October 28, 2014 9:52 PM

To: Lue, Candice

Subject: Re: AM - Credit Reporting Risk Analyst-140084006

Hi Candice - sorry for the last minute request but I may not be in the office on Thursday. Are you available Wednesday 3-6 or Friday 8-10 or 2-6?

Best regards,

Kimberly Dauber, Vice President J.P. Morgan Asset Management 270 Park Avenue, 9th Floor New York, NY 10017

Phone: 212-270-1655 Mobile: 201-892-2272

kimberly.s.dauber@jpmorgan.com

From: Lue, Candice

Sent: Monday, October 27, 2014 03:01 PM

To: Dauber, Kimberly S

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Thanks Kimberly. I will see you then.

Best regards, Candice

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

From: Dauber, Kimberly S

Sent: Monday, October 27, 2014 2:49 PM

To: Lue, Candice

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Great. Let's meet at 8:30 on Thursday. Can you meet me in the lobby of 270 Park Avenue?

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:** Monday, October 27, 2014 12:35 PM

To: Dauber, Kimberly S

Subject: RE: AM - Credit Reporting Risk Analyst-140084006

Subject:

Location:

Risk Reporting Analyst Position Team Room #3 , 270 Park Avenue, 9th Floor

Start: End:

Thu 10/30/2014 5:00 PM Thu 10/30/2014 5:30 PM

**Show Time As:** 

Tentative

Recurrence:

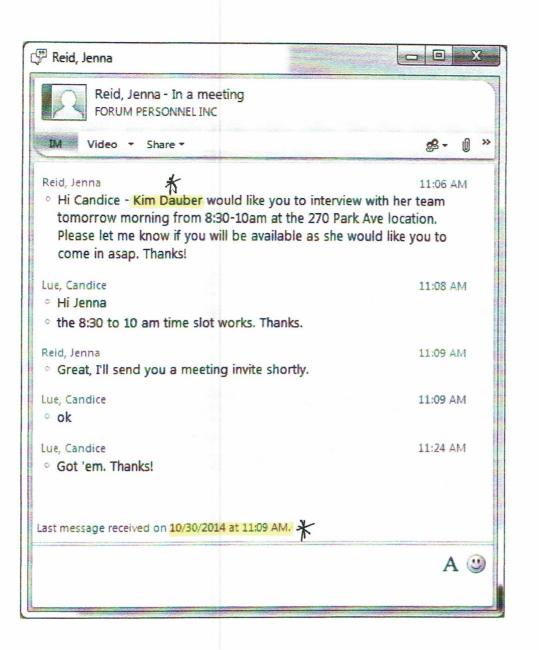
(none)

**Meeting Status:** 

Not yet responded

Organizer: Required Attendees:

Dauber, Kimberly S Shillingford, Fidelia X; Lue, Candice



Subject:

Location:

Risk Reporting Analyst Alex's office, 270 Park Avenue, 9th Floor

Start: End:

Mon 11/3/2014 8:30 AM Mon 11/3/2014 9:00 AM

Show Time As:

Tentative

Recurrence:

(none)

**Meeting Status:** 

Not yet responded

Organizer:

Required Attendees:

Dauber, Kimberly S Khavin, Alex G; Lue, Candice

1 49 Start:

Localion. 3051

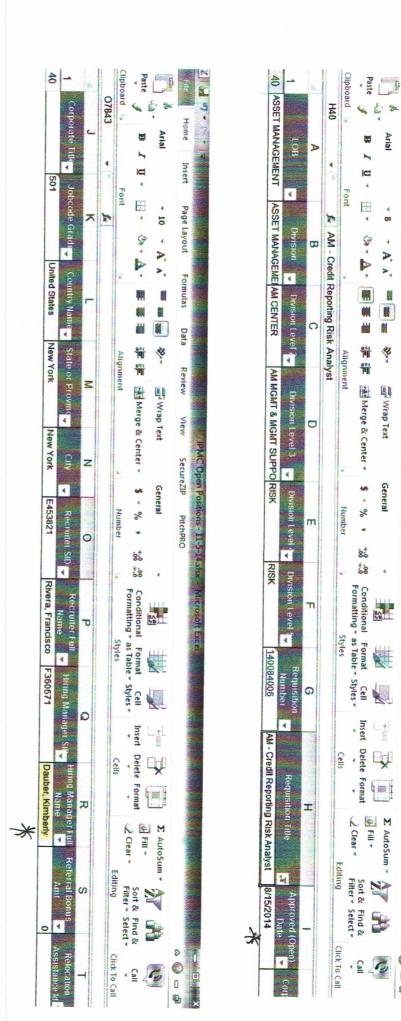
> 50× 100 1 15000 Ce

AM - Credit Reporting Risk Analyst - Full-time US-NY-New York

Job Posting: Aug 15, 2014 - Job Number: 140084006

Job Status: Active (Accepting Job Submissions)

Submission Status: Final Candidate - Updated: Nov 5, 2014 \*\*
View/Edit Submission | View Email Messages | Withdraw



X 5 .

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## AM - Credit Reporting Risk Analyst (140084006)

Status Filled

Status Details

Requisition Type Professional Hired Candidates 1 out of 1

Filled

Recruiter
Rivera, Francisco
Hiring Manager

Hiring Manager Shillingford , Fidelia Department

AM COUNTER PARTY

Primary Location

United States > New York > New York > 270 Park Avenue / 02317

Alerts

#### ACE Candidate Alert

No alert has been set.

#### Request More Information

The alert will be triggered when a candidate meets the following condition:

A candidate meeting all the required criteria achieves a result of at least 0%.

## History

	Date	Event	Detail	Ву
	Nov 6, 2014, 10:43:41 PM	Requisition Filled	Filled	Rivera, Francisco (E453821)
	Nov 6, 2014, 10:43:20 PM	Employee Hired	Hired "Candice S. M. Lue (5148489)"	Rivera, Francisco (E453821)
	Nov 6, 2014, 10:43:06 PM	Last Position Accepted	Last Position Accepted	Rivera, Francisco (E453821)
*	Nov 5, 2014, 6:07:08 PM	Hiring Manager Modified	Hiring Manager changed to "Fidelia Shillingford"	Rivera, Francisco (E453821)
	Oct 15, 2014, 11:29:52 PM	Candidates Matched From this Requisition	Candidates from this requisition were matched to 140094654.	Rivera, Francisco (E453821)
	Aug 15, 2014, 9:26:57 PM	Requisition Posted	The requisition has been posted on the following Career sections: Corporate, Syracuse University Veterans Technology Program, Internal.	Rivera, Francisco (E453821)
	Aug 15, 2014, 9:26:12 PM	Requisition Saved as Open	Saved as Open	Rivera, Francisco (E453821)
	Aug 15, 2014, 9:25:42 PM	Requisition Duplicated	Created from Duplication of "140029763"	Rivera, Francisco (E453821)

### Reports

This requisition will not be included in the daily recruiting report.



#### 🚵 AM - Credit Reporting Risk Analyst 🗀 - Full-time

US-NY-New York

Job Posting: Aug 15, 2014 - Job Number: 140084006

Job Status: Active (Accepting Job Submissions)

Submission Status: Final Candidate - Updated: Nov 5, 2014 View/Edit Submission | View Email Messages | Withdraw



Rivera, Francisco Z In a meeting

A Thursday, November 06, 2014 Rivera, Francisco Zhi candice 9:15 AM hi Franscisco 9:22 AM Rivera, Francisco Zhi 9:22 AM 9:22 AM No mention of working with
Fidelia Shillingford.
CL Rivera, Francisco Z do you get overtime? 9:22 AM I see you are 401 and am working on an offer for you my sid e453821 9:23 AM yes i get overtime Last message received on 11/6/2014 at 9:48 AM.



8 ~ 0 X

9:23 AM

Rivera, Francisco Zok

tell me what was you W2 for last year I see your base is 60,600

lue

Lue Candice

V2 was about \$83 000

9:24 AM

N.

Rivera, Francisco Z did you get a bonus

9:24 AM

ue, Candice

yes - \$1,500

9:25 AM

Quick question - is the AM - Credit Reporting Risk Analyst-140084006 position a 501 or 502 level?

Rivera, Francisco Z 501

9:25 AM

1st year analyst the base structure is different

you will not get overtime

but with bonuses you will make more

ue, Candice what's the salary range?

9:25 AM

Election 1

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

#### Rivera, Francisco Z



Rivera, Francisco Z In a meeting

Rivera, Francisco Z 1st yr analyst in risk is base of 70k

9.27 AM

bornus is discresionary and we do not communicate it but its greater that 1500

U

Lue, Candice

I'll be working the same amount of hours as do I in my current position and there will be no overtime paid for Credit Reporting Risk Analyst position......I'm looking for minimum base \$75,000

33 AM

Rivera, Francisco Z can you please double check how much you made in 2013 - based on # you gave it looks like 20k in overtime (seems very high)

9:33 AM \_

Lue, Candice

last year my salary was about \$83,000

FYI - remember that the comp stucture is very different

9:33 AM

Rivera, Francisco Z send me PDF

9:34 AM

Lue Candir

that's how much i earned last year - the \$83,000 includes the overtime and the \$1,500 bonus

9:34 Alvi

Rivera, Francisco Z the bonus will get you hight that where you were

9:34 AM

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



bonuses are not guaranteed 🗳

9:35 AM

9:35 AM

9:39 AM

9:39 AM

∌ - □ X

Rivera, Francisco Znope

nut its how we all get paid

i can circel back

in Me@ipmc

you can download a compy of your earnings for 2013

can you please send to me

I will need it to make a case for you

Lue, Candice with my skills, experience, etc., would it be possible for position level to be 502?

also, im looking for something comparable to what im used to earning

looking into getting pdf....

Rivera, Francisco Z send me the PDF

not the positon 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 expirence

But I hear you loud and clear

Last message received on 11/8/2014 at 9:48 AM.

## EXHIBIT 0-1

(JPMorgan Chase's HR Department Rejection of My Credit Reporting Risk Analyst Position Application)

Date	Events	Details	Comments	Ву
Nov 6, 2014 11:14 PM	Status changed to Has Declined in step New			System
Oct 14, 2014 5:27 PM	Applied online	Internal (Internal) The submission is complete		Candidate
Oct 14, 2014 5:24 PM	Education - Added	Business Administration - Finance and Economics; Montclair State University; 09/2004 - 05/2008		Candidate
Oct 14, 2014 5:24 PM	Work experience - Added	Energy Confirmations Drafting Analyst; J.P. Morgan Chase; 08/2012 - Present Date		Candidate
Oct 14, 2014 5:24 PM	Work experience - Added	Index Services Analyst; Kelly Services; 08/2010 - 07/2011		Candidate
Oct 14, 2014 5:24 PM	Work experience - Added	Research Assistant; Kelly Services; 11/2009 - 02/2010		Candidate
Oct 14, 2014 5:24 PM	Work experience - Added	Investment Banking Operations Associate; Adecco Financial; 02/2010 - 07/2010		Candidate
Oct 14, 2014 5:24 PM	Work experience - Added	Analyst/Consultant ; Adecco Financial; 09/2008 - 09/2009		Candidate
Oct 14, 2014 5:24 PM	Work experience - Added	Advanced Investment Data Operations Analyst; Adecco Financial; 09/2011 - 08/2012		Candidate
Oct 14, 2014 5:24 PM	Application process - Start	Profile process - Start The submission is incomplete		Candidate
140084006 (AM - Cre	edit Reporting Risk Analyst)	11		
Nov 6, 2014 10:43 PM	Hired	Start Date: Fri Nov 07 08:00:00 EST 2014, Event date: Nov 6, 2014, 10:43 PM		Francisco Rivera

Date	Events	Details Comments	Ву
Nov 6, 2014 10:43 PM	Status changed to Transfer in step Hire	Event date: Nov 6, 2014, 10:43 PM	Francisco Rivera
Nov 6, 2014 10:43 PM	Moved to step Hire	Event date: Nov 6, 2014, 10:43 PM	Francisco Rivera
Nov 6, 2014 10:43 PM	Offer 1 - Accepted	Event Date: Nov 6, 2014, 10:43 PM	Francisco Rivera
Nov 6, 2014 10:42 PM	Offer 1 - Extended (Written)	AM - Transfer Notice - Candice S. M. Lue, Your Offer of Employment for AM - Credit Reporting Risk Analyst/ 140084006	Francisco Rivera
Nov 6, 2014 10:35 PM	Offer 1 - Created		Francisco Rivera
Nov 6, 2014 10:35 PM	Offer 1 - The offer letter has been replaced. See the link in "Details" column.	AM - Transfer Notice - , Your Offer of Employment for /	Francisco Rivera
Nov 5, 2014 6:16 PM	Moved to step Offer	Event date: Nov 5, 2014, 6:16 PM	Francisco Rivera
Nov 5, 2014 6:16 PM	Status changed to Offer to be made in step Offer	Event date: Nov 5, 2014, 6:16 PM	Francisco Rivera
Nov 5, 2014 6:16 PM	Moved to step Submit to Manager	Event date: Nov 5, 2014, 6:16 PM	Francisco Rivera
Nov 5, 2014 6:16 PM	Status changed to Confirmed Source Code in step Submit to Manager	Event date: Nov 5, 2014, 6:16 PM	Francisco Rivera
Nov 5, 2014 6:16 PM	Status changed to Recruiter Interview in step Reviewed	Event date: Nov 5, 2014, 6:15 PM	Francisco Rivera
Nov 5, 2014 6:16 PM	Moved to step Reviewed	Event date: Nov 5, 2014, 6:15 PM	Francisco Rivera
Nov 5, 2014 6:15 PM	Revert	going to hire h	er Francisco Rivera
Oct 30, 2014 6:53 PM	Status changed to Rejected in step New	pid not meet minimum qualifications, Event date: Oct 30, 2014, 6:49 PM	Francisco Rivera
Oct 28, 2014 6:38 PM	Status changed to Ready to Move to Reviewed in step New	Event date: Oct 28, 2014, 6:38 PM	Francisco Rivera
Oct 24, 2014 6:20 AM	Applied online	Internal (Internal) The submission is	Candidate

## **EXHIBIT 00**

(Additional Proof That Kimberly Dauber Is A Liar)

Subj: Miscella

Miscellaneous - Lue v. JPMorgan Chase & Co., et al

Date:

3/22/2017 10:25:09 P.M. Eastern Daylight Time

From: To: CC: CandiceLue

akaplan@seyfarth.com
rwhitman@seyfarth.com

Mr. Kaplan:

I am in receipt of the, I guess, thousands of pages of emails, etc. with regards to my prior job that you sent to me. And, while I await the opportune time(s) to refute where necessary, I just thought that in the meantime I would submit to you what would be my repudiation for the "mid year eval" written about me by Kim Dauber that I found among the first thousands of pages, where she stated the following:

#### "Candice:

I haven't had much interaction with her. My comments are based on statements made to me by others:

- 3+ Good presentation skills delivers the monthly exposure report professionally.
- 3- Unapproachable has declined to assist all of her colleagues at one time or another. Doesn't engage in any group discussions, not willing to extend her participation in any group events."

First off, "Others" did not have to tell Kim Dauber that I have "Good presentation skills – delivers the monthly exposure report professionally" because attending the Counterparty Risk Group Monthly Governance Meetings where I delivered these said presentations was not only mandatory for Ms. Dauber but Ms. Dauber herself had complimented me on my delivery on at least one occasion.

Secondly, even though Ms. Dauber claimed that she was told "by others" that I was "Unapproachable" maybe she should have inserted her own opinion of my said "unapproachability" especially considering what I wrote about her for her "mid year eval" (see attached).

Ms. Dauber is, however, correct that I did not engage, at least not much, in "any group discussions" and that is because of how I was raised. I am not into gossiping. I usually either make no comment or tell one exactly how I feel to his/her face. But, I did have opportunities to engage in more intellectually stimulating and sometimes humorous discussions on a more individual basis especially with the other two individuals that I used to work late evenings with.

"Discussions" such as the ones about the first of my three predecessors as articulated in my email of August 3, 2015 (Exhibit C included in my Amended Complaint) and in my "Response to Request No. 35" of my "Response to Defendants' First Request for Production of Documents" dated September 19, 2016 that I had previously sent to you, do not pique my interest so I definitely stay clear of them.

With regards to "not willing to extend her participation in any group events" the following are the group events for which I "extended [my] participation" during my one year tenure in Ms. Dauber's department:

- AM Risk Management People's Council Event Breakfast with Senior Managers\*
- Holiday Analyst/Associate Group lunch organized by KIMBERLY DAUBER
- Women in Risk Exchange (WIRE) seminar (December 2014 at 8AM sharp)
- AM Risk Management People Council Fitch and Moody's Analyst Sessions on Banking (2) Council chaired by Defendant Alex Khavin
- Risk Management Seminar with a Risk Management Executive Director (RSVPed but wasn't able to make it because of my Mother's injury)
- May 2015 Chartered Financial Analyst (CFA) "Good Luck Reception" (Counterparty Risk Group event organized by Kim Dauber) – even though the malicious and mendacious lies and unfair performance rating that Defendant Michelle Sullivan put on my 2014 year end performance review made me ineligible to participate in this program
- Attended 2 out of the 2 "Open Mic" events put on by Defendant Alex Khavin
- Risk Management Charity Event to make cards for sick children in the hospital
- 2014 Holiday Group Lunch
- 2014 Risk Management holiday reception
- 2014 Asset Management holiday party
- 2014 Risk Management AMCRO holiday reception
- Participated in the Counterparty Risk Group's holiday event "White Elephant"
- Defendant Thomas Poz's surprise birthday reception organized by Defendant Alex Khavin
- Group's send-off reception for an associate
- Group's congratulatory reception for two employees' promotions
- Participation in JPMC's "Good Works" volunteerism:

- Dress for Success Clothing Drive
- Salvation Army Toy Drive
- Donated to Operation Backpack and Home Away From Home Wish List Ronald McDonald House because volunteering slots were filled when I went to register.

Please also see written proofs attached of my willingness to assist former colleagues - bearing in mind that when these "colleagues" can leave work at an average time of 5PM (Kimberly Dauber was usually out of the office **by 5PM**), my average time to leave the office was between 7PM and 9PM and, no, this was not unique to me being in this position, the position demanded these long hours.

I must admit that I am in shock by these comments by Kimberly Dauber because even though I acknowledged her distance during my stance against the racial discrimination that was perpetrated against me during my tenure in the department, I always tried to greet her pleasantly which overall, was reciprocated when I passed her in the corridor, etc. and I made sure to send her my personal condolences via email when I learned about the death of her husband. Most of the group did go to see her at her house after her said husband's death but I was not in attendance for that so who knows, maybe that's why the comment "not willing to extend her participation in any group events".

Respectfully,

Candice Lue

P.S. - You don't have to open the attachment if you don't want to but as is obvious, I have hard copies of its contents.

<sup>\*</sup> Please note that this event was put on by AM Risk Management People's Council on which Kimberly Dauber was a member and she also played a role in its planning. It so happened that only two (2) people attended this event and those two people were **myself** and another one of JPMC's employees. No one else besides me from the Counterparty Risk Group attended this "Kimberly Dauber" event.

From:

Lue. Candice

Sent:

Monday, June 01, 2015 8:59 AM

To:

Khavin, Alex G

Subject:

RE: YTD Feedback for Kim

Hi Alex.

Please see feedback below for Kim.

Even though Kim seems to be a bit distant recently, I still contend that her being initially introduced to me as my future manager played a big part in me accepting my current position. I find her to be kind, helpful and warm.

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: Khavin, Alex G

Sent: Tuesday, May 26, 2015 8:19 AM

To: Khavin, Alex G

Subject: YTD Feedback for Kim

As part of our ongoing review process, and to prepare for the upcoming mid-year reviews, could you please send me your thoughts on Kim's performance, from your specific interactions with her, in a 3+/3- format.

If you would prefer that I call you to discuss, or would like to discuss in person, please let me know.

I am trying to get all feedback together by Monday, June 1st.

Thank you ahead of time,

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:

Lue. Candice

Sent:

Thursday, December 04, 2014 10:57 AM

To:

Cheung, Timothy KF; Dauber, Kimberly S; Khavin, Alex G; Leung, Joyce L

Subject:

RE: Assistance

Thanks Kim/Tim. No worries, I'll look into this and advise

Best regards. Candice

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

From: Cheung, Timothy KF

Sent: Thursday, December 04, 2014 10:42 AM

To: Dauber, Kimberly S; Khavin, Alex G; Leung, Joyce L

Cc: Lue, Candice

Subject: RE: Assistance

Hi Kim.

It'd be great if Candice can help to raise Securities Trading requests for the names highlighted in yellow first (as they're covered by analysts in NYC) for IM-FI All Region. We will raise the rest next week. Thanks.

REDACTED



Regards

From: Dauber, Kimberly S

Sent: Thursday, December 04, 2014 11:39 PM

To: Khavin, Alex G; Leung, Joyce L; Cheung, Timothy KF

Cc: Lue, Candice Subject: Assistance

Hi Joyce & Tim;

Alex indicated that you need some assistance with CMS. Candice has volunteered to assist. Please let her know what you need her to do.

Thank you.

Best regards.

Kimberly Dauber I Vice President [ J.P. Morgan Assit Management | 270 Park Ave. 91: Floor, New York, NY 10017 1T. 212-270-1855 : kimberly.s.dauber@jpmorgan.com

From:

Lue. Candice

Sent:

Friday, August 14, 2015 4:23 PM

To: Subject: Saxena, Nikhii 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,

Nikhii Saxena Summer Analyst

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

J.P. Morgan

From:

Lue, Candice

Sent:

Tuesday, April 14, 2015 5:55 PM

To:

Haider, Mohammad Z

Subject:

RE: Upcoming Fireside Chat with Ashley Bacon - Call for Questions

Thanks Z!

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: Haider, Mohammad Z

Sent: Tuesday, April 14, 2015 5:48 PM

To: Lue, Candice

Subject: RE: Upcoming Fireside Chat with Ashley Bacon - Call for Questions

Ah – good question, Candice. Thank you for sharing! I've made a note.

M. Zees han Haider Associate

J.P. Morgan Asset Management
Counterparty Risk Group
mailto:Mohammad.Z.Haider@JPMorgan.com
www.jpmorgan.com/essetmanagement
273 Park Avenue - 9th Floor
New York, NY 10017
Phone, 212,648,1710

From: Lue, Candice

Sent: Tuesday, April 14, 2015 5:45 PM

To: Haider, Mohammad Z

Subject: RE: Upcoming Fireside Chat with Ashley Bacon - Call for Questions

Hi Zeeshan.

Here's my question for the Fireside Chat with Ashley.

In his annual letter to shareholders, Jamie Dimon warned that government regulations put in place after the 2008 financial crisis could make it harder for banks to respond in the next financial crisis. Considering this sentiment, what steps are being taken or are there controls that are being put in place to mitigate or to avert the risk of having what happened in 2008 happening again?

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 | 32 Candice Lue@jpmorgan.com

From: Haider, Mohammad Z

Sent: Friday, March 13, 2015 5:10 PM

To: Zambon, M Sol; Vroom, Ryan W; Avetyan, Tatevik; Lue, Candice; Ng, Kenneth T; Nguyen, Fiona N; Koch, Lauren C; Xanthos, Dimitrios G; Desai, Vidhi V; Charles, Sterling W; Benabdeljelil, Kelthoum N; Lee, Mark P; Cheung, Timothy KF

Subject: Upcoming Fireside Chat with Ashley Bacon - Call for Questions

Hello all.

I'm working with a few colleagues to arrange a fireside chat with Ashley specifically for Analysts & Associates in Risk Management from across the firm. It'll take place in NY, although we're still trying to nail down time on Ashley's calendar (most likely May, I'm told).

In the meantime, I'm reaching out to solicit your questions. Anything you've ever wanted to ask Ashley about career development, mobility, compensation, business strategy, or any other (work-related) topic – it's all fair game! If you'd rather speak directly with me than type something up, that's absolutely fine – let me know and we'll setup a time.

Lastly, please feel free to circulate this note to anyone I've missed (apologies in advance).

Thank you.

Best regards,

Z

M. Zeeshan Heider Associate

J.P. Morgan Asset Management Counterparty Risk Group mailto:Mohammad.Z.Haider@JPMorgan.com www.jamorgan.com/assetmanagement 270 Park Avenue - 9th Floor New York, NY 19017 Phone: 212 648 1710

J.P. Morgan

From:

Taylor-Simpson, Cecille

Sent:

Friday, October 17, 2014 12:50 PM

To:

Lue, Candice

Subject:

Re: Friday

#### Candice,

This is to say goodbye as next Friday will be my last day and I will be on vacation. I know you will find another assignment in JPM (so keep at it) and I am hoping you do as I know you are a very strong and dedicated worker. Never doubt your abilities as I have seen the work you do and you will be an asset to any team that you land on. The right fit is out there for you.

I admired the way you acquired your training and then turned around and trained your teammates. You will benefit from that in the long run.

All the Best!!

Cecille

PS. Contact info: email:



Cecille Taylor-Simpson [ J.P. Morgan Chase | GCCG | Energy 🖾 cecille taylor-simpson@ipmorgan.com | 🕿 212.622-5544

From:

Dauber, Kimberly S

To: Sent: Khavin, Alex G 6/18/2015 8:19:01 PM

Subject:

RE: MId year evals

# Redacted

# Redacted

#### Candice:

I really haven't had much interaction with her. My comments are based on statements made to me by others:

3+

Good presentation skills – delivers the monthly exposure report professionally.

3-

- Unapproachable has declined to assist all of her colleagues at one time or another.
- Doesn't engage in any group discussions, not willing to extend her participation in any group events.

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: Dauber, Kimberly S

Sent: Wednesday, June 17, 2015 5:08 PM

To: Khavin, Alex G Cc: Dauber, Kimberly S Subject: MId year evals

# Redacted

## EXHIBIT 00-1

(Ryan Vroom's and Fiona Nguyen's Emails - Monthly Governance Meeting "Tasks")

From:

Vroom, Ryan W

Sent:

Wednesday, September 23, 2015 4:04 PM Nguyen, Fiona N; JPM AM Global CRG

To: Cc:

Dauber, Kimberly S

Subject:

RE: Monthly CRG Governance Meeting - Procedures

All,

Please print your materials and provide them to me. I will be collating and bringing tomorrow.

Best,

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

From: Nguyen, Fiona N

Sent: Wednesday, September 23, 2015 4:00 PM

To: JPM AM Global CRG Cc: Dauber, Kimberly S

Subject: RE: Monthly CRG Governance Meeting - Procedures

All.

Please see attached CRG's latest Procedures.

Regards, Fiona

From: Lue, Candice

Sent: Wednesday, September 23, 2015 3:16 PM

To: JPM AM Global CRG

Subject: RE: Monthly CRG Governance Meeting - Exposure Report

Please see attached August 2015 Monthly Exposure Report for tomorrow's meeting. Also, there were no true exceptions to report for the August 2015 Monthly 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

From: Cheung, Timothy KF

Sent: Tuesday, September 22, 2015 10:54 PM

To: JPM AM Global CRG

Subject: Monthly CRG Governance Meeting

From:

Nguyen, Fiona N

Sent:

Wednesday, October 21, 2015 6:19 PM

To:

Lue, Candice

Subject:

RE: Monthly CRG Governance Meeting

Ok, I'll bring the rest then.

From: Lue, Candice

Sent: Wednesday, October 21, 2015 6:14 PM

To: Nguyen, Fiona N

Subject: RE: Monthly CRG Governance Meeting

Hey Fiona,

Don't worry about it. I'll take care of that for the Exposure and Reconciliation Reports and bring these to the 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

From: Nguyen, Fiona N

Sent: Wednesday, October 21, 2015 6:09 PM

To: Lue, Candice

Subject: RE: Monthly CRG Governance Meeting

Hey Candice – Can you give me the printout for collating?

Thanks!

From: Lue, Candice

Sent: Wednesday, October 21, 2015 5:58 PM

To: JPM AM Global CRG

Subject: RE: Monthly CRG Governance Meeting

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

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

<< File: September 2015 Reconciliation - Exceptions.pdf >>

## **EXHIBIT** P

(Sick Days Due to Mental, Physical and Emotional Distress)

From:

Lue, Candice

Sent:

Friday, January 23, 2015 6:27 AM

To:

Shillingford, Fidelia X

Cc: Subject: Kulda, Eileen Re: Sick

Hi Fidelia,

I am still not feeling well and won't be in today.

Best regards, Candice

---- Original Message -----From: Shillingford, Fidelia X

Sent: Thursday, January 22, 2015 07:39 AM

To: Lue, Candice Cc: Kulda, Eileen Subject: Re: Sick

Ok, feel better.

---- Original Message -----From: Lue, Candice

Sent: Thursday, January 22, 2015 06:04 AM

To: Shillingford, Fidelia X

Cc: Kulda, Eileen Subject: Sick

Hi Fidelia,

I am not feeling well and will not be coming into work today.

From:

Lue, Candice

Sent:

Monday, March 16, 2015 8:20 AM

To: Subject: Shillingford, Fidelia X

Subject.

Re: Not Feeling Well

Hi Fidelia,

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

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

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

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

Best regards, Candice

---- Original Message -----From: Lue, Candice

Sent: Monday, March 16, 2015 07:32 AM To: Shillingford, Fidelia X; Kulda, Eileen

Subject: Not Feeling Well

Hi Fidelia/Eileen,

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

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

Thanks and regards.

From:

Sent:

Lue, Candice Friday, July 24, 2015 6:24 AM Shillingford, Fidelia X Kulda, Eileen; Poz, Thomas I

To:

Cc:

Subject:

Sick Day

Good morning Fidelia,

I'm suffering from nausea and a headache. I won't be able to come in today.

From:

Lue, Candice

Sent:

Friday, July 31, 2015 6:27 AM Shillingford, Fidelia X

To:

Cc:

Kulda, Eileen; Poz, Thomas I

Subject:

Sick Day

Good morning,

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

From:

Lue, Candice

Sent:

Friday, October 23, 2015 6:30 AM Shillingford, Fidelia X; Poz, Thomas I Kulda, Eileen

To:

Cc: Subject: Sick Day

Good morning,

I'm not feeling well today. Will be taking a sick day. Best regards,

Candice

From:

Lue, Candice

Sent:

Monday, April 20, 2015 11:16 AM

To:

Shillingford, Fidelia X

Subject:

RE: Open "MIKE" time!

Hi Fidelia.

I have a little issue with one of the items Alex touched on at the "Open Mike". (3)

Honestly, I did not know how to address it at the time but I have been seriously thinking about it.

I have a dependency on meditation music that I listen to when I am overwhelmed or under severe work related stress. ® Alex said that the portfolio managers have a problem with the use of headphones so she suggested that in the mornings especially, we should refrain from using the headphones, especially those of us who sit at the end of the rows.

Sad thing is, I need the music which again, is strictly meditation music to assist me throughout "those days." I was wondering if an exception could be made in this matter.

Thanks for your help! @

Best regards, Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 | 2 (212) 648 - 0936 | Candice.Lue@jpmorgan.com

----Original Appointment----

From: Lue, Candice

Sent: Thursday, March 26, 2015 5:32 PM

To: Khavin, Alex G

Subject: Accepted: Open "MIKE" time!

When: Wednesday, April 15, 2015 4:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: TBD

Being treated as the help/ house slave for the Counterparty Risk Group
Was so overwhelming that
I started having a
dependency on meditation
music to assist me throughout "those days".

### **EXHIBIT PP**

("Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" Dated November 16, 2016")

### Candice Lue

November 22, 2016

United States District Court
of the Southern District of New York
Pro Se Intake Unit
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 200
New York, New York 10007

RE: Civil Action No.: 16 CV 3207 (AJN) (GWG) – Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" Dated November 16, 2016

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.

To Whom It May Concern:

Attached is a copy of my Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016 which I have sent to the Defendants' attorneys, Robert Whitman and Anshel Kaplan.

Please file this Response in the Court's docket.

Respectfully, Candice S.M. Lug

Candice Lue

Attachment: Copy of my Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016.

Certificate of Mailing

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

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

Civil Action No.: 16 CV 3207 (AJN) (GWG)

RESPONSE TO
"DEFENDANTS' RESPONSES TO
PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS"
DATED NOVEMBER 16, 2016

I pro se Plaintiff, Candice Lue hereby respond to Defendants' JPMorgan Chase & Co. ("JPMorgan Chase"), Alex Khavin ("Khavin"), Fidelia Shillingford ("Shillingford"), John Vega ("Vega"), Helen Dubowy ("Dubowy"), Philippe Quix ("Quix"), Thomas Poz ("Poz"), Chris Liasis ("Liasis"), Michelle Sullivan ("Sullivan") and DOES 1 through 10, inclusive (collectively "Defendants") "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016 as follows:

### STATEMENT

Defendants objected to three out of my five Requests for Production of Documents and provided on a CD labeled "JPMorgan Production No. 1 in Response to Plaintiff's First Set of Document Requests" documents for the other two in response to my "First Set of Document Requests".

#### DOCUMENT REQUEST NO. 1

Official reason for my January 6, 2016 termination with proof [pursuant to the letter dated July 8, 2016 requesting my official reason for termination which I sent to the Defendants' attorneys and the said attorneys response – see attached]

### RESPONSE TO DOCUMENTS DEFENDANTS PROVIDED FOR REQUEST NO. 1

The "Recommendation for Termination" document that is provided reveals the pathetic effort as it relates to Terri Vernon's pretextual reasons for my unlawful and retaliatory termination - Bearing in mind that my January 6, 2016 termination happened within half an hour of receiving an email from Defendant Philippe Quix, Defendant Khavin's direct manager, naming a replacement for the said Khavin as Head of the Counterparty Risk Group for Global Investment Management. I was called away from doing my work and told that I was terminated with immediate effect after that email announcement about Khavin, who is the racist who caused the initiation of this lawsuit because of her disparate treatment against me.

As the only Black analyst on her team, Khavin treated me as if I were a house slave, she assigned me to a subpar manager (Defendant Shillingford), solely on the basis of my race, who engaged in horizontal racism on behalf of the said Khavin and she unfairly treated me at a double standard as it related to utilizing a company benefit. With that said, it is obvious that my January 6, 2016 termination was in direct correlation with the "secrecy of Khavin's unexplained absence from the office" and her replacement. My January 6, 2016 termination was also in retaliation for me raising claims of Khavin's employment racial discrimination against me to HR and me reporting the said claims to the Equal Employment Opportunity Commission (EEOC) and not due to performance issues which is based on unlawful pretext.

First off, in Ms. Vernon's "Recommendation for Termination" she should have explicitly stated the "assigned tasks I refused to perform" - the said racially discriminatory "assigned tasks"

that caused the initiation of this lawsuit. The said task that as the only Black Analyst in the Counterparty Risk Group, as if I were the house slave for the non-Black members of the group and reminiscent of the 1800s plantation style living, in the era of slavery when Blacks had to serve their masters and their masters' families, racist, Defendant Alex Khavin assigned solely to me to do (see more in my Amended Complaint), a task that she had never asked of or assigned to any of the non-Black employees to do.

Ms. Vernon should have also noted that the written warning that she referenced with the only expectation from Defendant Shillingford being: "It is my expectation that Candice perform the job responsibilities for which she was hired; she is expected to print all materials for our monthly team meeting and provide copies for each member" was issued to me on one of the said days. September 24, 2015, that I was "expected" to be the team's house slave but I took a stance against the said racist and second class treatment. The "expectation" was that, instead of the non-Black members of the team, including non-Black members on my job level, clicking the print button on their computers, going to the printer, picking up their printed presentation materials for the monthly team meeting, making sure that the pages are in order and binding them together with a stapler, the said non-Black team members should be sending their presentation materials to me via email and I must be the one clicking on the print button, collating their presentation materials, stapling them. then on my own, lugging all of these printed materials (13 copies for each of the non-Black team members' presentation) to the monthly meetings where the said non-Black team members will be waiting to be served. Just like in the plantation style living era where the slave cooks the dinner. sets the table then takes the food to the table where the White master and his family will be waiting to be served. However, because of my continued peaceful stance against this form of employment racial discrimination, on the said day of the September 2015 monthly team meeting, I was issued the afore-referenced written warning.

In her "Recommendation for Termination" document, Ms. Vernon is right about one thing which is, "Candice has had numerous conversations with Employee Relations and Management". Yes, I have had numerous conversations with Employee Relations and Management telling them that "Alex Khavin has been treating me as if I am the help, as if it is 1910", Shillingford is the enabler, the facilitator, the coordinator and the enforcer of the said racist treatment that Alex Khavin had been meting out to me and that it was unfair as the only Black analyst on the team to be treated at a double standard. If at a minimum, JPMorgan Chase & Co. Employee Relations and Management had respected my dignity as a 100% human being, we would not have had this lawsuit today.

#### DOCUMENT REQUEST NO. 2

Proof of any or all emails that were deemed "unprofessional" by JPMorgan Chase & Co. managers that, as per Defendant Thomas Poz, was one of the reasons for my firing.

### RESPONSE TO DOCUMENTS DEFENDANTS PROVIDED FOR REQUEST NO. 2

The majority of the emails that the Defendants provided to satisfy "Request No. 2" of my "First Set of Document Requests" are emails that I had provided as Exhibits in my Amended Complaint. For example, the emails between Terri Vernon's "Recommendation for Termination" and Fidelia Shillingford's mendacious email of May 11, 2015 to Brooke Miller are emails that I had provided as Exhibits in my Amended Complaint. So, if these are the emails that have been utilized by the Defendants as proof of my "inappropriate/unprofessional tone", as I said in the email dated August 3, 2015 which is a part of Exhibit C in my Amended Complaint, "Putting what you don't want to see in an email, the TRUTH, does not make the email unprofessional [or inappropriate]".

The **only** emails that the Defendants have provided as proof of my emails being "inappropriate/unprofessional" are emails sent **only** to the said Defendants/perpetrators of the employment racial discrimination against me. These emails are merely evidence that I took an

assertive stance against unlawful and pretextual retaliation against me for me raising claims of employment racial discrimination against me to HR, me reporting the said claims to the Equal Employment Opportunity Commission (EEOC) and me taking a stance against the employment racial discrimination that was perpetrated by the said Defendants against me as, for one, no human being should be treated as a second class citizen and secondly, treating an employee as such is in violation of Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981.

Included as another proof of my emails being "inappropriate/unprofessional" is an email dated October 22, 2015, in which I responded to a barefaced lie from Shillingford saying, "With ALL due respect, your (Shillingford's) statement is untrue". What was I expected to do, just shut up and have the Defendant lie on me to garner material for her unlawful, retaliatory and pretextual argument against me? Also included in the batch of "email proofs" is an email dated October 15, 2015 (page 36 on CD) from Shillingford where after I called her out for being deliberate and disingenuous, again, for her trying to garner more unlawful, retaliatory and pretextual argument against me, she reported me to HR as causing a "toxic and inoperable" environment. Besides the fact that Shillingford was the one causing the "toxic and inoperable" environment by being deliberate and disingenuous, what did Shillingford and HR expect me to do, to shut up and be maligned?

After observing Khavin's unrepentant, unapologetic and condescending behavior towards me in the April 24, 2015 meeting I had with her and suspecting that racial discrimination against Blacks must be a conduct that is ratified and condoned by JPMorgan Chase for one of its senior level managers and most importantly one of its senior level managers who was an APPOINTED JPMorgan Chase "culture ambassador", yes, that's, Khavin, to respond to my concern of racial discrimination against me in that manner, I decided that going forward most, and possibly all, of my correspondence with regards to the disparate treatment that was being meted out to me on the basis of my race would be in writing. With that said and as is evidenced in the pretextual and retaliatory

written warning that Shillingford placed me on (Exhibit F included in my Amended Complaint), while I responded in writing via emails to issues regarding me being treated as a house slave reminiscent of the 1800s plantation style living, in the era of slavery when Blacks had to serve their masters and their masters' families, verbally, my response was "no comment" or "I have no further comment".

My emails were not meant to be "unprofessional or inappropriate" as I was raised well and this can be verified by all the teachers, professors, etc. I have had in my life. My emails were meant to take a stance against bigotry, a stance against retaliation in the form of pretext for taking a stance against that said bigotry and to expose JPMorgan Chase's acts of condoning and ratifying employment racial discrimination by its managers. As it relates to my regular work emails, there is none that the Defendants can produce as being "unprofessional or inappropriate".

The September 23, 2015 through October 6, 2015 email trail that is provided in which Defendant Shillingford was attempting to give credence to her fallacious July 30, 2015 "performance improvement plan" and her September 24, 2015 written warning and to shore up her pretextual material to validate my impending retaliatory and unlawful firing is over exaggerated and uncalled for. Where is my "My Bad" email response to her for recognizing that I made a mistake by organizing the facilities from "right to left" instead of from "left to right" as she wanted them? Shillingford did not provide that email but I have, see attached. As a matter of fact, instead of responding to my "My Bad" email from which she said she "reviewed the updated version" she went back to the old email trail where she was attempting to make me seem incompetent to try to make me seem even more incompetent with her easily refuted argument about "call loans". With regards to this task, the fact is, the order of maturity of the products could be argued based on interpretation as it relates to my work experience versus Shillingford's as I stated in my September 30, 2015 (pages 7 - 8 on the CD) email to her. Case in point, after consulting with another team member, (Tatevik), Shillingford obtained a bubble chart on the order of maturity of all the products

from an official Counterparty Risk Group presentation. And, based on this bubble chart, Shillingford put her and my personal interpretation as it relates to work experience aside and gave the final directive that going forward we would put the products in order of maturity solely based on the bubble chart from the official Counterparty Risk Group presentation. Thus, her final statement, "Note, I have updated the Excel file – no further action is required from you (for now)".

This explanation, in conjunction with my said "My Bad" email attached, should show how deliberate and disingenuous Shillingford really is. But again, what better way for a horizontal racist, Shillingford, to shore up pretextual material than to try to make me seem incompetent.

In any event, let me just get back to Fidelia Shillingford's mendacious email of May 11, 2015 to Brooke Miller, Asset Management HR Representative. Defendant Shillingford said that "Please note that we (Alex and I) have had several conversations with Candice regarding meeting minutes letting her know that this type of responsibility is performed by all team members in varying situations. And that this is a responsibility which comes with the job" which is a LIE as first off, the responsibility to take the monthly team meeting minutes was taken away from all the non-Black analysts and associates and assigned solely to me, the only Black analyst on the team. As Kimberly Dauber, the manager for the non-Black analysts and associates stated in her February 4, 2015 email, "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.... Alex would pick a different person each time during our meetings. Most recently, it was understood that the reporting analyst (me, Candice Lue) would handle if" – as in, assigned solely to me.

Also, I have never had such "several conversations" with Shillingford or Khavin individually or with both Defendants together. The **ONLY** conversation I had with Shillingford as such was to let her know that it was unfair for Khavin to treat me "as if I am the help and as if this is 1910" - Please bear in mind that Shillingford never responded verbally or in writing to my April 24, 2015 email that she forwarded to Brooke Miller on May 11, 2015 with the afore-stated

malicious and mendacious statement. The ONLY conversation I had with Alex Khavin as such was in the ONE meeting I had with her on April 24, 2015 where as I stated in paragraph 9 of my Amended Complaint, "I tried my best to articulate to her [Defendant Khavin] how I felt about her treating me "as if I am the help and as if this is 1910" whereby in addition to solely assigning the task of the taking of the monthly meeting minutes to me, she also ordered that I do the printing, collating, stapling and lugging of the presentation materials of all the non-Black members of the team to the meeting. See proof of this in Khavin's May 27, 2015 email (Exhibit B in my Amended Complaint) where she stated: "Fidelia and I have specifically asked you (as in, assigned solely to me) to take on this task, repeatedly.... My expectation has not changed and I expect there will be one package for the monthly meeting put together by you (as in, assigned solely to me) and sent out ahead of the meeting..."

The result of my April 24, 2015 meeting with Khavin was her being condescending, unapologetic and unrepentant, telling me that "it is your job and I expect you to do it. If you need help [for the printing, collating and stapling] go and ask the [White] administrative assistant to help you" (to do a job that she should have assigned to the White administrative assistant in the first place).

I have never objected to taking meeting minutes. As I said in Exhibit A – EEOC Intake Questionnaire – Question # 6 – page 2 which is included in my Amended Complaint "I joined the department on November 10. 2014 and during my interview, one of the questions that was asked of me was "how do you feel about taking minutes at meetings?" Since this task was not listed on my job description (as it was an ad-hoc task rotated among all the analysts and associates, not assigned to any one person), to ensure that I would be taking on an Analyst position and not an Analyst/Administrative Assistant position, I asked the interviewer if the taking of the minutes would solely be my duty. Her answer to me was "no, the taking of the meeting minutes is rotated among all the analysts and associates in the group". However, at this opportune time there was no

mention of the printing, etc. of everyone on the team's presentation materials because that was non-existent. I was fine with the taking of the minutes arrangement because at my previous position in the same company, our department did not have an administrative assistant so for the one meeting that the taking of minutes was required, it was rotated among the analysts in the group and I was a part of that rotation."

However, as I said in paragraph 8 of my Amended Complaint, "for two years prior to me joining the team, Khavin had made the taking of the minutes for the monthly meeting rotational among the six non-Black analysts and associates in the group as again, she did not want to demean any of them by making it seem as if it was the task of any one of them. But again, in her act of lack of respect and disparate treatment against Blacks, Khavin assigned the task of taking the minutes for the monthly team meeting to me, an analyst as well, as solely my job." As the first and only Black analyst on the team as I said in paragraph 172 of my said Amended Complaint "the humiliation from this treatment caused me so much mental anguish as, by now, some of the non-Black team members, including the ones on my level were looking at me as if, "what a relief? We now have her to do that" [take the monthly meeting meetings].

The racist, Defendant Khavin, solely assigning me this task was only a benefit/perk for the non-Black members of the team at the expense of me, the only Black analyst on the team. A benefit/perk, that like a Black plantation house slave, I would never have had the opportunity to enjoy. Let's also not forget that solely assigning me the task of taking the monthly meeting minutes was in conjunction with me having up to three presentations to make at these monthly meetings and the bigoted Defendant Khavin also solely assigning me the tasks to print, collate, staple and lug the presentation materials of the non-Black members of the team to these monthly meetings where, just as in the plantation era, these said non-Black members would be waiting "to be served".

With regards to Shillingford's emails of December 1, 2015 in her quest to garner material for her unlawful, retaliatory and pretextual argument against me, it makes me chuckle to read them (pages 29 – 30 on the CD).

"Ryan" whom Shillingford mentions in these emails is a PLOY. He is the said White employee that I wrote about in paragraph 69 of my Amended Complaint. The said employee who straight up refused to do essential tasks not racially discriminatory assigned unessential tasks which did not benefit the department or the company as a whole but only benefitted the non-Black employees on the team like what Defendant Khavin assigned and Defendant Shillingford enforced solely for me to do yet, he, Ryan, was promoted. As a matter of fact, please see email dated May 19, 2015 on page 40 of the CD entitled "FW: AM CRO Packet – "Key Initiatives" Text – Draft for Review". The decision to pass on this responsibility from Mohammad to me was temporarily "stet" due to my overwhelming amount of workload. However, when Mohammad left the company in July of 2015 and this task was passed over to Ryan to do, he flat out refused to do it throwing a tantrum shouting "I am not taking this on!" and I am the one who had to end up doing it.

So, here we have a White employee, Ryan, flat out refusing to do an essential task and what happens? The task is thrown on me, the Black employee, to do, case closed. But me, a Black employee, making fun of the fact, via email, that I am so overwhelmed with work yet is still being given additional tasks to do (when there are other employees with less work to do) and what happens to me? My email ends up in the "disrespectful, unprofessional, inappropriate" basket and I get put on written warning, etc. etc. etc. Even the blind could see the double standard here.

Ryan was the said employee who, in the weekly meeting where we all reported on what we have on "our plate" to do, reported that all that he had on his plate to do was to update his performance information for his year end review. He also confessed on January 6, 2016 that he had met with Defendant Khavin while she was on her "unexplained leave of absence". So, anything for him to rationalize Khavin's bigotry against me would make sense.

I heard Ryan when he went over to Shillingford's desk, after Shillingford had sent an email to me "reminding me" to do the racially discriminatory tasks, discreetly asking Shillingford "did she (as in Candice Lue) respond?" to the said email "reminding me" to do the racially discriminatory tasks. In other words, Shillingford was unprofessionally discussing my situation with him.

Ryan was the worst of the bunch to be organized and ready for the meeting as it relates to preparing and handing out copies of his presentation materials. As a matter of fact, I witnessed that Ryan was unprepared with his presentation materials for at least 3 monthly meetings, including my first two monthly meetings in the department where Khavin had to frustratingly stop the meeting and wait on Ryan to go and make copies of his presentation materials to hand out to the team. Furthermore, the only "organizing" that Ryan ever did as per Shillingford's said emails was to go around (as he has nothing to do) telling the other employees to print copies of their presentation materials for the Governance meeting (which includes putting the pages in order and stapling) then to give them to him for him to put in order of the Meeting Agenda ("collate") for him to take into the meeting (see email proof attached). This was also the case of the ONE other employee, that Shillingford referenced as "note that other analysts have been assisting with this task for the past few months", who "collated" the presentation materials according to the Meeting Agenda ONLY ONCE (see email proof attached). I saw Ryan at this other employee's desk in the "interest of team spirit" asking her to "collate". Ryan was a ploy concocted around the time the written warning was issued to me, September 24, 2015, to rationalize the unlawful employment racial discrimination and retaliation that was perpetrated against me.

As to the written warning, that Shillingford in her said email of December 1, 2015 needed directive as to "how to extend", where she stated: "Note, this (the task of being the team's house slave) falls under her (as in Candice Lue's) job responsibility: 'Updating and distributing daily Counterparty Reports", besides the obvious fact that this "written warning" was a fallacy, it is also

nonsensical in that how can a monthly responsibility, "to print all materials for our monthly team meeting and provide copies for each member" fall under a daily responsibility of "Updating and distributing daily Counterparty Reports"? Furthermore, at the time when Shillingford issued this "written warning", the responsibility of "Updating and distributing daily Counterparty Reports" was moved over to a non-Black analyst. So, since the responsibility of "Updating and distributing daily Counterparty Reports" was being done by a non-Black analyst, how is it that the said non-Black analyst was never asked/told "to print all materials for our monthly team meeting and provide copies for each member" since, according to Shillingford, "Note, this falls under [the] job responsibility: 'Updating and distributing daily Counterparty Reports'"? Also, this said job responsibility has been on all the analysts' and associates' job descriptions before I joined and after I joined the team yet, none of them, all non-Blacks, was ever given the task "to print all materials for our monthly team meeting and provide copies for each member" - The said racially discriminatory task that I took a stance against which led me to be put on the written warning.

I could go on and on with refuting Shillingford's claimed "inappropriate/unprofessional tone" emails and her own mendacious and disingenuous emails in her quest to garner material for her unlawful, retaliatory and pretextual argument against me but I will just let her defend the rest under sworn oath/penalty of perjury.

#### DOCUMENT REQUEST NO. 3

Proof that prior to I, Plaintiff, Candice Lue joining the Asset Management Counterparty Risk Group any of the non-Black analysts and/or associates was ever assigned/ordered to do the tasks that were racially discriminatory assigned to me.

## RESPONSE TO DEFENDANTS NOT PROVIDING DOCUMENTS FOR REQUEST NO. 3

The Defendants' response is that this document request is vague. But, what could be "vaguer" than the said Defendants' document request # 29 asking me for "Documents concerning

the allegations in the Amended Complaint that Dubowy's attendance at your mid-year performance review, as opposed to Khavin, was a ploy to unlawfully retaliate against you"? Yet, I responded to this and other "vague" document requests without objections or disclaimers.

However, the Defendants rightly stated that they "have no documents responsive to this request." But as for me, as the only Black analyst on the team and the designated 'house slave', reminiscent of the 1800s plantation style living, in the era of slavery when Blacks had to serve their masters and their masters' families, I have documents evidencing that I was solely assigned/ordered to do the tasks that were employment racially discriminatory.

### DOCUMENT REQUEST NO. 4

Timestamps of my daily entries and exits of the 270 Park Avenue, New York, NY 10017 location during my tenure in the Asset Management Counterparty Risk Group

### RESPONSE TO DEFENDANTS NOT PROVIDING DOCUMENTS FOR REQUEST NO. 4

The Defendants claim that this request "has no potential relevance to Plaintiff's claim...." but it actually does because as I said in paragraph 14 of my Amended Complaint regarding the employment racially discriminatory tasks of printing, collating, stapling and lugging of the presentation materials of all the non-Black members of the team being assigned solely to me, "It was not like I had more time on my hands than the non-Black analysts because, because of the overwhelming amount of work that my job entailed, for more than half of the month my average time to leave work was 8:00 to 8:30 pm (a few times after 9:00 pm) and for the rest of the time, there was a possibility, not a guarantee, that I would get to leave between 6:00 and 6:30 pm (extremely rare for 6:00 pm) when the average time for the whole month for the non-Black analysts and associates to leave work was between 5:00 and 5:30 pm with a 6:00 pm late evening."

The timestamps of my daily entries and exits of the 270 Park Avenue, New York, NY 10017 location during my tenure in the Asset Management Counterparty Risk Group would prove that this statement is true.

#### DOCUMENT REQUEST NO. 5

Timestamps of any analyst and/or associate of the Asset Management Counterparty Risk Group (other than the analyst that was hired ten months after I was that I wrote about in paragraph # 75 of my Complaint) that prove that any of these said employees worked longer hours than I, Plaintiff, Candice Lue did on a daily basis.

## RESPONSE TO DEFENDANTS NOT PROVIDING DOCUMENTS FOR REQUEST NO. 5

The Defendants claim that this request "has no potential relevance to Plaintiff's claim...." but it actually does pursuant to my response to "Request No. 4" above and because of my statement: "other than the analyst that was hired ten months after I was that I wrote about in paragraph # 75 of my Complaint".

This White analyst that I wrote about in paragraph # 75 of my Amended Complaint as "I was always at work working late hours along with" was never included as part of the rotation effective DECEMBER 23, 2015 (almost one year after it was solely assigned to me) and after my "perfected" Charge was served upon JPMorgan Chase by the Equal Employment Opportunity Commission (EEOC) - see Exhibit Y - Response to Defendants' First Request for Production of Documents, Request No. 46. Why? Because it would have been "unfair" (see how the word "fair" was emphasized by Shillingford in Exhibit Y), and rightly so, considering that he had to work such long hours and then be "expected" to do the printing, collating, stapling and lugging of the presentation materials of the other team members "when the average time for the whole month for the [other team members] to leave work was between 5:00 and 5:30 pm with a 6:00 pm late evening." However, with me being Black and having to work the said long hours as this White

analyst, it was different for me. The task of printing, collating, stapling and lugging of the

presentation materials of the [other team members], as in non-Black team members, was assigned

solely to me to do.

CLOSING REMARKS

The experience of being treated as a second class citizen while working at JPMorgan Chase

has rocked my dignity to its core. There is not a day that goes by whereby I am not haunted by the

way how I was treated, as a Black employee, working at JPMorgan Chase. It even makes me

sadder to know that there are other Black employees there who, for whatever reason, are not able to

take a stance, so, like a caged-bird, they just hum/sing.

And worst yet, to know that when legal action is brought against JPMorgan Chase & Co.

"the court" protects the company. No wonder why when I raised the issue of employment racial

discrimination against me to JPMorgan Chase & Co.'s managers and their HR department, my

complaint was either ignored, aided, abetted, enforced, shooed away and/or dismissed.

This should explain my so-called "unprofessional/inappropriate emails". I had to take an

assertive stance against racism and in addition to reporting the matter to the federal authority, I did

so via emails.

DATED: November 22, 2016

**CANDICE LUE** 

lice S.M. Lues

Address

City, State, Zip Code

## **Candice Lue**

November 22, 2016

United States District Court
of the Southern District of New York
Pro Se Intake Unit
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 200
New York, New York 10007

RE: Civil Action No.: 16 CV 3207 (AJN) (GWG) – Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" Dated November 16, 2016

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.

To Whom It May Concern:

Attached is a copy of my Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016 which I have sent to the Defendants' attorneys, Robert Whitman and Anshel Kaplan.

Please file this Response in the Court's docket.

Respectfully, Candice S.M. Lue

Candice Lue

Attachment: Copy of my Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016.

Certificate of Mailing

July 8, 2016

Robert S. Whitman Seyfarth Shaw LLP 620 Eighth Avenue New York, New York 10018

RE: Civil Action No.: 16 CV 3207 (AJN) (GWG) - Request for Official Reason with Proof for My January 6, 2016 Termination

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.

Mr. Whitman:

On behalf of your client, JPMorgan Chase & Co., please provide me with the official reason for which I was terminated on January 6, 2016 and importantly, proof of such reason.

Respectfully,

Candice S.M. Lue

Copy: Penny P. Domow, Assistant General Counsel

Certificate of Mailing



Writer's direct phone (212) 218-5629

Writer's e-mail rwhitman@seyfarth.com Seyfarth Shaw LLP 620 Eighth Avenue New York, New York 10018 (212) 218-5500 fax (212) 218-5526

www.seyfarth.com

July 14, 2016

### VIA FEDERAL EXPRESS

Candace Lue

Re:

Lue v. JPMorgan Chase & Co., et al.,

No. 16 CV 3207 (AJN) (GWG)

Dear Ms. Lue:

We are in receipt of your letter, dated July 8, 2016, requesting an "official reason with proof" for your termination. Please be advised that we will address any pre-trial discovery issues with the Court at the initial conference scheduled for July 19 at 3:00 PM. A copy of the Order for Conference Pursuant to Rule 16 is enclosed.

Further, it is not necessary for you to send copies of correspondence or other documents directly to any of the Defendants, including Penny Domow or others at Chase. All documents should be directed to us alone.

Finally, in order to facilitate communication with you during the course of this matter, please provide us with your email address and telephone number.

Very truly yours,

SEYFARTH SHAW LLP

/s/ Robert S. Whitman

Robert S. Whitman



#### Lue, Candice

From:

Lue Candice

Sent:

Monday, September 28, 2015 11:52 AM

To:

Shillingford, Fidelia

Subject:

RE: August 2015 - Top 20 Counterparties by Net Exposure - at Facility Level

Attachments:

Copy of Top 20 Counterparties by Ctpty Net Exposure (8-31-15).xlsx

My bad! It should have been shortest to longest (left to right). I did longest to shortest. I've re-done. Not a problem. See attached the corrected version - shortest to longest. If any facilities in this shortest to longest order need to be swapped, please let me know. Print area formatted.



Pivot - Grouped by Facility Chart - Grouped by Facility

Data Input Data

Best regards, Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY

From: Shillingford, Fidelia

Sent: Monday, September 28, 2015 11:06 AM

To: Lue, Candice

10017 | 8

Subject: RE: August 2015 - Top 20 Counterparties by Net Exposure - at Facility Level

#### Candice

- (1) I asked that you organize the facilities from shortest tenor to the left and longest tenor to the right why are Excess Cash and Securities Trading the last facilities in the table and Deposits account the first? Do you not understand the tenor for the products within the facilities? This is completely wrong and not usable – can you pls redo in the correct order. Let me know if you have any questions.
- (2) Lastly, when you prepare work like this for me, always ensure that it's formatted for printing.

#### Regards

Fidelia

From: Lue, Candice

Sent: Wednesday, September 23, 2015 7:58 PM

To: Shillingford, Fidelia

Subject: August 2015 - Top 20 Counterparties by Net Exposure - at Facility Level

Hi Fidelia.

Please see attached the Top 20 Net Exposure Analysis at facility level. I grouped exposures accordingly by facility as per CMS and tried to arrange the products in order by tenor on the tab with the chart. We can review this further tomorrow as necessary.

Please note that on the "Data Input Data" tab in this file with hard-coded exposure values from the August Data Input file, I changed Product (column A) "Derivatives" to Cleared OTC Derivatives and Bilateral Derivatives accordingly for more feasible groupings on the pivot tab (pulling in the sub-product classification field was creating too much additional manual work). The "Derivatives" Product Category remains as "Derivatives" in the main Data Input file with live formulas.

File is also saved here:

Pivot - Grouped by Facility Chart - Grouped by Facility Data Input Data

Best regards, Candice

Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY 10017 |

## Lue, Candice Ryan From: Wednesday, September 23, 2015 4:04 PM Sent: To: Cc: RE: Monthly CRG Governance Meeting - Procedures Subject: All, Please print your materials and provide them to me. I will be collating and bringing tomorrow. Best, Ryan Associate J.P. Morgan Asset Management From: Sent: Wednesday, September 23, 2015 4:00 PM CRG Subject: RE: Monthly CRG Governance Meeting - Procedures All, Please see attached CRG's latest Procedures. Regards, From: Lue, Candice Sent: Wednesday, September 23, 2015 3:16 PM CRG Subject: RE: Monthly CRG Governance Meeting - Exposure Report Please see attached August 2015 Monthly Exposure Report for tomorrow's meeting. Also, there were no true exceptions to report for the August 2015 Monthly Reconciliation Report. Best regards, Candice Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY = 1 10017 | 26

Sent: Tuesday, September 22, 2015 10:54 PM
To: CRG

Subject: Monthly CRG Governance Meeting

## Lue, Candice From: Wednesday, October 21, 2015 6:09 PM Sent: Lue. Candice To: RE: Monthly CRG Governance Meeting Subject: Hey Candice - Can you give me the printout for collating? Thanks! From: Lue, Candice Sent: Wednesday, October 21, 2015 5:58 PM To: CRG Subject: RE: Monthly CRG Governance Meeting Please see attached September 2015 Monthly Exposure and Reconciliation Reports for tomorrow's meeting. << File: 1 << File: Best regards, Candice Candice Lue | Asset Management | Counterparty Risk Group | J.P. Morgan | 270 Park Avenue, 9th Floor, New York, NY From: Sent: Wednesday, October 21, 2015 11:51 AM To: CRG Subject: RE: Monthly CRG Governance Meeting Hi team. Attached are the EMEA Limits Report and Canada Loan Limits Tracker for tomorrow's meeting. >> << File: Best regards, Analyst J.P. Morgan Asset Management Counterparty Risk Group

ww.jpmorgan.com/assetmanagement

From:

Sent: Tuesday, October 20, 2015 12:41 PM

To: CRG

Subject: RE: Monthly CRG Governance Meeting

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

<< File: \_\_\_\_\_\_>> << File: \_\_\_\_\_>>> << File: \_\_\_\_\_>>> << File: \_\_\_\_\_\_>>>

Best regards,

| Vice President | J.P. Morgan Asset Management | 270 Park Ave, 9th Floor, New York, NY 10017 | T:

From:

Sent: Tuesday, October 20, 2015 3:11 AM

To: CRG

Subject: Monthly CRG Governance Meeting

Hi team,

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

## Lue, Candice

From: Sent: To:	Wednesday, October 21, 2015 6:19 PM Lue, Candice
Subject:	RE: Monthly CRG Governance Meeting
Ok, I'll bring the rest then.	
From: Lue, Candice Sent: Wednesday, October	21, 2015 6:14 PM
Subject: RE: Monthly CRG	Governance Meeting
Hey (	
Don't worry about it. I'll take	e care of that for the Exposure and Reconciliation Reports and bring these to the meeting. ©
Best regards, Candice	
Candice Lue   Asset Manage 10017   🛣	gement   Counterparty Risk Group   J.P. Morgan   270 Park Avenue, 9th Floor, New York, NY
From: Sent: Wednesday, October To: Lue, Candice Subject: RE: Monthly CRG	
Hey Candice – Can you give	me the printout for collating?
Thanks!	
From: Lue, Candice Sent: Wednesday, October To: CRG Subject: RE: Monthly CRG	
Please see attached Septer	mber 2015 Monthly Exposure and Reconciliation Reports for tomorrow's meeting.
<< File:	>>> >>> >>> >>> >>> >>> >>> >>> >>> >>
Best regards, Candice	

Candice Lue   Asset Management   Counterparty Risk Group   J.P. Morgan   270 Park Avenue, 9th Floor, New York, NY
10017   🖀 🛑 🛒 🛒
From:
Sent: Wednesday, October 21, 2015 11:51 AM
To: CRG
Subject: RE: Monthly CRG Governance Meeting
Hi team,
in ceam,
Attached are the EMEA Limits Report and Canada Loan Limits Tracker for tomorrow's meeting.
Attached are the civical entits hepore and solutions and solutions are the civical entits hepore and solutions are the civical entits hepore and solutions are the civical entits hepore and solutions are the civical entits here.
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Best regards,
Analyst
J.P. Morgan Asset Management Counterparty Risk Group
www.jpmorgan.com/assetmanagement 270 Park Avenue Fi. 09
New York, NY 10017
From: Sent: Tuesday, October 20, 2015 12:41 PM
To: CRG
Subject: RE: Monthly CRG Governance Meeting
Attached are the RCC slides and most recent Policy & Procedures for this month's governance meeting.
Attached are the RCC sides and most recent Policy & Processies for this month a government meeting.
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Best regards,
Vice President   J.P. Morgan Asset Management   270 Park Ave, 9th Floor, New York, NY 10017   T:
Vice President   J.P. Morgan Asset Management   270 / all Mor, salt Mosty Not.
From:
Sent: Tuesday, October 20, 2015 3:11 AM
To: CRG Subject: Monthly CRG Governance Meeting
Sanitore Lightinh, CLO dovernance Licensia

Hi team,

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

# Pro Se Intake Unit UNITED STATES DISTRICT COURT

#### SOUTHERN DISTRICT OF NEW YORK

Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 200 New York, New York 10007

Ruby J. Krajick

CLERK OF COURT

## **MEMORANDUM**

Date: 12/2/2016

The attached document(s), which was received on 11/29/2016, is being returned to you for one or more of the following deficiencies. Please return this memorandum with the attached paper(s) to the Pro Se Office upon correction.

Please provide a Southern District Case Number.

[X] Other:

The court does not except Discovery documents except in connection with an application to the court. Discovery documents are between the Plaintiff & Defendant.

Any questions contact the Pro Se Intake Unit...

Sincerely,
PRO SE INTAKE UNIT

(212) 805-0175

## **Candice Lue**

November 22, 2016

United States District Court
of the Southern District of New York
Pro Se Intake Unit
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 200
New York, New York 10007

RE: Civil Action No.: 16 CV 3207 (AJN) (GWG) – Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" Dated November 16, 2016

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.

Candice S.M. Lue

To Whom It May Concern:

Attached is a copy of my Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016 which I have sent to the Defendants' attorneys, Robert Whitman and Anshel Kaplan.

Please file this Response in the Court's docket.

Respectfully,

Candice Lue

Attachment: Copy of my Response to "Defendants' Responses to Plaintiff's First Set of Document Requests" dated November 16, 2016.

Certificate of Mailing

SDNY RECEIVED

COLUMN 29 AMIL 25





United States District Court
of the Southern District of New York
Pro Se Intake Unit
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 200
New York, New York 10007





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