

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

CIVIL ACTION NO.: 19 CV 9784 (KPF) (SDA)

**CANDICE LUE, an individual,
Plaintiff**

v.

JPMORGAN CHASE & CO. a Delaware Corporation; ALEX KHAVIN, an individual; FIDELIA SHILLINGFORD, an individual; KIMBERLY DAUBER, an individual; BARUCH HOROWITZ, an individual; CHRIS LIASIS, an individual; MICHELLE SULLIVAN, an individual; inclusive,

Defendants

PLAINTIFF'S EXHIBITS

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EXHIBIT 1

**(2012 Performance Review which JPMorgan Chase & Co., et al are pretending does
not exist and which shows Defendant Michelle Sullivan as my manager
– Re: Page 6 - Am. Com.)**

Manager sections of this review are in 'display' status. Employee can view manager's comments or ratings.

Review Information	
Review Status:	Completed
Employee:	Lue,Candice S. m. (R089235)
Manager:	Sullivan,Michelle T. (V337433)
Additional Manager:	N/A
Review Cycle:	01-JAN-2012 -- 31-DEC-2012
Reporting Year:	2012
Job Title:	Client Service Specialist
Tenure Date:	20-AUG-2012

Finalize Year End Performance Review - Signature Section		
User	Signature	Date
Manager	Michelle Sullivan	08-JAN-2013
Employee	Candice Lue	08-JAN-2013

Objective #1	
Objective	Measures/Target Dates
To master the Confirmations process by finding ways to enhance efficiency, accuracy and turnaround time.	With my acquired knowledge in my continued on-the-job training/learning, I will be able to effectively organize my work and my time to bring these enhancements to fruition.
Employee Accomplishments	
I have been on the job for three months and so far I have been pretty much able to hold my own. I am able to fully execute my tasks by taking the initiative to investigate items and asking questions if necessary to get the job done in a competent manner.	
Manager Comments	
Candice is very diligent. She has picked up the confirmation process very quickly and has been a great contributor in the drafting team. She is very focused and completes her work on a timely basis. I expect that as Candice continues to learn the products and becomes more comfortable in the documentation role she will be able to contribute more effectively to creating efficiencies within our process.	

Objective #2	
Objective	Measures/Target Dates
To continue to meticulously review and analyze the trade confirmations for discrepancies that could slow productivity and turnaround time.	Be very conscientious in the execution of my daily tasks and continue to be detail oriented. I will also not hesitate to escalate issues that might need further attention to my manager for her review and assistance if necessary.
Employee Accomplishments	
This mindset has been integral to the efficiency and the productivity of the Confirmations Group.	
Manager Comments	
Candice is a very focused worker and I can always depend on her to action her items on time. She continues to grow as a drafter by asking her colleagues questions and it is evident she is becoming more comfortable with the products. She picked up the novation process very quickly and was very dependable when Tom was out of the office. Although novations can be very time consuming, Candice was able to manage this function along with her other tasks.	

Objective #3

Objective	Measures/Target Dates
Always try to understand the big picture and to work towards the common goal in the enhancement of the group's operation.	To be intellectually curious by asking questions that would be helpful for me to make a positive and more substantive contribution to the Confirmations process.
Employee Accomplishments	
By expressing interest in the different functions of the group and an attitude to understanding the big picture of the group's goal, I was able to jump in and effectively help with the processing of novations when my co-worker whose main job it is to handle/process novations was on vacation.	
Manager Comments	
Candice has a positive attitude and is a pleasure to work with. She is constantly taking on more responsibilities and helping out the team when needed. She often will do this on her own without having to be prompted by her manager.	

Development Plan
<i>There are no development plan goals for this employee.</i>
Manager's Comments

Career Plan	
Career Goal	Term
There are no career goals for this employee.	
Manager Comments	

Strengths & Opportunities
Employee Strength (Display) -- Lue, Candice (07-DEC-2012)
I have the ability to learn quickly and to communicate with individuals on all levels of the organization. I am also able to effectively prioritize my daily tasks which allows me to meet deadlines while still being able to make my contribution to the success of the team as a whole.
Employee Strength (Display) -- Lue, Candice (07-DEC-2012)
I do not hesitate to tackle challenging tasks for which I have little or no prior training. I use that as an opportunity to learn new functions and to enhance my skills for the betterment of the Confirmations Group and the organization as a whole.
Employee Opportunity (Display) -- Lue, Candice (07-DEC-2012)
As I grow in my role and continue to become acclimated with my functions, I would like to be seen as someone who has the initiative to do whatever it takes to get the job done. I am always looking for greater challenges which would be beneficial to the enhancement of my career at J.P. Morgan.
Manager Strength (Display) -- Sullivan, Michelle (31-DEC-2012)
Candice is very focused and produces quality work on a timely basis.
Manager Opportunity (Display) -- Sullivan, Michelle (31-DEC-2012)
I would like Candice to expand her product and ISDA documentation knowledge this year. This is the next step in progressing in her role as a drafter in commodities. We can identify ways to do this together.

Summary Comments
Employee Year End (Display) -- Lue, Candice (07-DEC-2012)
Overall, I think that I have had a successful three months working in Confirmations. I have been able to competently execute my tasks, not only as an individual but also as a team player and to gain the knowledge necessary to contribute to the realization of the group's goal.
The members of my team have been very helpful and in most cases have been willing to share their knowledge which helps with the betterment of my role as an Energy Confirmations Drafting Analyst.

Manager Year End (Display) -- Sullivan, Michelle (31-DEC-2012)

Candice has been a great addition to the team. She has picked up the drafting process very quickly and produces quality work. She has great focus and is very detail oriented which can be challenging in the current environment. Candice should continue down this path for 2013 and would benefit further by increasing both her product and ISDA documentation knowledge.

Discussion Tracking

Discussion	Employee Confirm	Manager Confirm
Objectives	N	N
Development/Career Plan	N	N
Jan, Feb, Mar (Quarterly Discussion)	N	N
Apr, May, Jun (Mid Year)	N	N
Jul, Aug, Sep (Quarterly Discussion)	N	N
Oct, Nov, Dec (Year End)	Y (02-JAN-2013)	Y (02-JAN-2013)

Attachments

Filename	Uploaded By	Source	Date
ICAP - TR email - Feedback from Broker.pdf	Lue, Candice	Summary	Thu Oct 25 12:47:25 EDT 2012

EXHIBIT 2

(Page 5 of my 2013 Performance Review showing that JPMorgan Chase maliciously used Defendant Chris Liasis' "*communication style*" comment to defame my character – Re: Page 7 - Am. Com.)

I will take heed and not escalate priority queries when I am not scheduled to do so unless a situation may arise where the query gets overlooked.

Manager Strength (Display) -- Sullivan, Michelle (02-JAN-2014)

Candice has an excellent work ethic and is a good team player. She takes her work seriously and always completes tasks on time and jumps in to assist where needed without being asked.

Manager Strength (Display) -- Sullivan, Michelle (02-JAN-2014)

Attention to details and responsiveness to internal and external queries.

Manager Strength (Display) -- Sullivan, Michelle (02-JAN-2014)

Ownership of BAU, Candice is always fully aware of the status of the BAU she owns and offers good transparency to the team and management with frequent updates.

Manager Opportunity (Display) -- Sullivan, Michelle (02-JAN-2014)

Candice is very good at following direction and processes that are fully documented. For Candice to continue to grow in her role she should look for ways to develop her analytic skills to identify issues and solutions for occurrences that happen outside of the normal situations.

Manager Opportunity (Display) -- Sullivan, Michelle (06-JAN-2014)

Candice would benefit from reacting to feedback in a more positive way with team members and management

Summary Comments

Employee Mid Year (Display) -- Lue, Candice (18-JUL-2013)

Currently, my main focus is on drafting confirms for Physical products across Power and Gas but Ive always been cognizant of my priorities as a team member whereby if help is needed on the drafting of confirms for Financial products or Client Service duties, I always analyze each tasks priority and shift my workload accordingly.

I am very eager to learn to effectively navigate the processes but having been on the job for less than one year some of that learning will come from a few errors and omissions both in execution of my tasks and in training. The good thing is that these errors and omissions are always noted by me and reoccurrence is either extremely minimal or none. Similarly, as I grow and continue to proactively learn on the job, initial occurrence of these few errors has not only continued to diminish but is at a minimal.

My communication style is for the most part very thorough but that is because I usually prefer to solve queries as efficiently as possible instead of through constant back and forth emails/phone calls. For instance, if I can be proactive in taking care of a traders or marketers queries/concerns in one email without the trader or marketer having to send back for additional information, Id always opt for that. I think that doing so helps with the enhancement of productivity not only for me but also for the trader or marketer and for J.P. Morgan Chase as a whole. Each day as I learn and grow, I am getting better aware of non-disclosure information as it relates to the regulatory environment and being mindful of releasing too much information.

My strategy for meeting and exceeding productivity goals is to not be insular in the execution of my work. I rarely ever have a cut off time for ending my work day but rather focus on completing all important tasks before leaving for the day. I also do prep work in preparation for the following business day to prevent any slow down in productivity. In my quest to further boost productivity, I do not have to be the team member scheduled to monitor emails for incoming queries in order to escalate a query (especially a priority request) that could otherwise be sitting unnoticed longer than usual to the respective person.

In terms of identifying weaknesses and gaps in the processes, I spent hours of my personal time (after work and on weekends) working on a query management tool (see attachments) which in my humble opinion, I think could enhance efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process. As detailed in the handout I gave to my team members during my presentation, this spreadsheet was carefully thought out to include every aspect of the noteworthy query request process. Except for the addition of a column for priority client, there have been no changes done to the spreadsheet since I first presented it to management.

Complaints about my emails being too thorough or me escalating priority queries when I am not scheduled to do so or my need to be less professional, do not do much in the enhancement of the Confirmations process as a whole. And maybe to my own detriment, but I tend to ignore these complaints and focus more on learning and growing in my position, the contribution that I can make to the Confirmations Team and by large to J.P. Morgan Chase as a whole.

My primary duties are always my main focus and it is because of this that I made the effort to create a spreadsheet model as a central data resource that I think could have enhanced my, and the teams as a whole, efficiency, accuracy, transparency, productivity and turnaround time of the Confirmations process.

EXHIBIT 3

(Emails showing that JPMorgan Chase and Co., et al's statement that: "*Baruch Horowitz, a Caucasian male and a Senior Associate (a higher rank than Lue's role of Analyst), was solely responsible for performing the Tasks*" is a LIE and that they cannot produce any email correspondence such as the ones I have produced to prove that just like me, Plaintiff, Candice Lue who is Black, Baruch Horowitz, "*a Caucasian male was solely responsible for performing the Tasks*" – Re: Pages 8, 9 & 10 - Am. Com.)

Lue, Candice

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

Candice-

Where are the meeting minutes?

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

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

My join date was November 10, 2014.
CL

Lue, Candice

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

Candice-

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

Alex

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

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

Hi Kenny

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

Regards

Fidelia Shillingford | VP, Counterparty Risk Management | **J.P. Morgan Asset Management**
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810

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

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

CL

Lue, Candice

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

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

Best,

Alex

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

CZ

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

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

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

Hi Alex,

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

Best regards,
Candice

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

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

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

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

Alex Khavin
Executive Director
J.P. Morgan Asset Management
alex.g.khavin@jpmorgan.com
270 Park Avenue, floor 9
Phone: 212-648-0172

Lue, Candice

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

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

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

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

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

Regards
Fidelia

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

From: Shillingford, Fidelia X
Sent: Thursday, May 28, 2015 10:57 AM

Lue, Candice

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

Discussion and Follow ups:

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



RE: CRG
Governance Me...

Regards
Fidelia

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

From: Shillingford, Fidelia X
Sent: Monday, July 20, 2015 9:12 AM

Nikhil was the Summer intern.

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

CL

Lue, Candice

From: Shillingford, Fidelia X
Sent: Tuesday, August 25, 2015 11:18 AM
To: Lue, Candice
Cc: Poz, Thomas I
Subject: RE: Monthly CRG Governance Meeting

Hi

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

**This was after the EEOC served JPMorgan Chase with the charge of my Employment Racial Discrimination and Retaliation* CL*

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

Regards
Fidelia

Eileen Kulda is the White administrative assistant who these duties were never assigned to.

Eileen Kulda was not even as much as asked to print for the group, the meeting agenda she sent out.

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

From: Kulda, Eileen **On Behalf Of** Khavin, Alex G

Sent: Tuesday, August 25, 2015 10:25 AM

To: Leung, Joyce L; Avetyan, Tatevik; Vroom, Ryan W; Shillingford, Fidelia X; Dauber, Kimberly S; Poz, Thomas I; Zambon, M Sol; Nguyen, Fiona N; Lue, Candice; Gorniak, Hubert; Dang Ngoc, Ali; Dorfman, Jon

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

Subject: Monthly CRG Governance Meeting

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

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

Agenda:

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

Audio conferencing details:

Name: Alexandra Khavin

International direct: +1 857 318 0900

US Toll free: 1 888 575 5762 (JPMC)

Chairperson passcode: 68517031 then #

Participant passcode: 15204032 then #

Lue, Candice

From: Shillingford, Fidelia X
Sent: Wednesday, October 21, 2015 11:51 AM
To: Lue, Candice
Subject: Monthly Governance Meeting

Hi Candice

Friendly reminder that our Monthly Governance meeting is scheduled for tomorrow morning; please ensure all materials are ready to go. Liaise with the Officers and Analyst regarding their materials.

Thanks

Regards
Fidelia

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

Nothing "Friendly" about this "reminder!"

CZ

Lue, Candice

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

Hello John,

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

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

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

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

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

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

Lue, Candice

From: Dauber, Kimberly S
Sent: Wednesday, February 04, 2015 2:03 PM
To: Lue, Candice; Shillingford, Fidelia X
Subject: RE: Minutes and Documents for Extended Team Meeting

Candice -

Every analyst and/or associate on this team has been the minute taker of our Extended meetings at some time during the last 2 years. I don't think this is a function that is specifically written out in job duties because it's an ad-hoc function. However, Alex would pick a different person each time during our meetings. Most recently, it was understood that the reporting analyst would handle it. I'm fine with including additional analysts to assist you with this.

Best regards,

Kimberly Dauber | Vice President | J.P. Morgan Asset Management | 270 Park Ave, 9th Floor, New York, NY 10017 | T: 212-270-1655 | kimberly.s.dauber@jpmorgan.com

From: Lue, Candice
Sent: Wednesday, February 04, 2015 1:55 PM
To: Shillingford, Fidelia X; Dauber, Kimberly S
Subject: RE: Minutes and Documents for Extended Team Meeting

Hi Fidelia,

Just to reiterate, as previously discussed, I have never considered these tasks to be my responsibility as I had confirmed such in the interview and on the job.

Best regards,
Candice

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

From: Shillingford, Fidelia X
Sent: Wednesday, February 04, 2015 1:38 PM
To: Dauber, Kimberly S
Cc: Lue, Candice
Subject: Minutes and Documents for Extended Team Meeting

Hi Kim

I have discussed with Alex and she is ok with the proposal that we continue to rotate the responsibility of document collection and minutes taking for our monthly governance meeting.

I suggest that we have a schedule so that each analyst is aware of who is responsible for which month. Can you please select at least two analysts who could assist Candice with this responsibility? Once confirmed, I will fill in the appropriate names for Analyst 1 and 2 and circulate.

Thank you.

Analyst	Month
Feb	Candice

Mar	Analyst 1
Apr	Analyst 2
May	Candice
Jun	Analyst 1
Jul	Analyst 2
Aug	Candice
Sep	Analyst 1
Oct	Analyst 2
Nov	Candice
Dec	Analyst 1

Regards

Fidelia Shillingford | VP, Counterparty Risk Management | **J.P. Morgan Asset Management**
 270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810

EXHIBIT 4

(Proof that JPMorgan Chase & Co. et al's statement that "*another [White] member of the group had to step in and print the materials in Lue's stead*" is false. This [White] member (and on a separate occasion, another non-Black employee) only put the printed materials given to them in order of the Governance Meeting agenda – "collate". Unlike what was demanded of me, the only Black analyst on the team, neither of these non-Black employees was required to do the actual printing, collating, stapling, etc. of all the said materials – Re: Pages 10 & 11 - Am. Com.)

Lue, Candice

From: Vroom, Ryan W
Sent: Wednesday, September 23, 2015 4:04 PM
To: Nguyen, Fiona N; JPM AM Global CRG
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

Lue, Candice

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 >>

Best regards,
Candice

EXHIBIT 5

(Proof that Kimberly Dauber, who is White, was slated to be my manager and it was only after the decision that I, the Black candidate, was chosen for the Credit Reporting Risk Analyst position that Khavin switched my manager from Kimberly Dauber to Fidelia Shillingford who is Black – Re: Pages 11, 12 & 13 - Am. Com.)

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

Lue, Candice

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;

Lue, 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

Lue, Candice

Subject: Risk Reporting Analyst Position
Location: Team Room #3 , 270 Park Avenue, 9th Floor
Start: Thu 10/30/2014 5:00 PM
End: Thu 10/30/2014 5:30 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Dauber, Kimberly S *
Required Attendees: Shillingford, Fidelia X; Lue, Candice



Reid, Jenna



Reid, Jenna - In a meeting
FORUM PERSONNEL INC

IM

Video

Share



Reid, Jenna



11:06 AM

- Hi Candice - Kim Dauber would like you to interview with her team tomorrow morning from 8:30-10am at the 270 Park Ave location. Please let me know if you will be available as she would like you to come in asap. Thanks!

Lue, Candice

11:08 AM

- Hi Jenna
- the 8:30 to 10 am time slot works. Thanks.

Reid, Jenna

11:09 AM

- Great, I'll send you a meeting invite shortly.

Lue, Candice

11:09 AM

- ok

Lue, Candice

11:24 AM

- Got 'em. Thanks!

Last message received on 10/30/2014 at 11:09 AM. *

A 😊

Lue, Candice

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

Start: Mon 11/3/2014 8:30 AM
End: Mon 11/3/2014 9:00 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Dauber, Kimberly S ~~*~~
Required Attendees: Khavin, Alex G; Lue, Candice

Home Insert Page Layout Formulas Data Review View SecureZIP PrintPRO

Clipboard Font Alignment Number Styles Cells Editing Click To Call

AM - Credit Reporting Risk Analyst

A	B	C	D	E	F	G	H	I
1	100	Division Level 1	Division Level 2	Division Level 3	Division Level 4	Requestion Number	Requestion Title	Approved (Open) Date
40	ASSET MANAGEMENT	ASSET MANAGEMENT	AM CENTER	AM MGMT & MGMT SUPPO	RISK	1400284006	AM - Credit Reporting Risk Analyst	8/15/2014

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O7843

J	K	L	M	N	O	P	Q	R	S	T
1	Corporate Title	Jobcode Grade	Country Name	State or Province	City	Recruiter SID	Recruiter Full Name	Hiring Manager SID	Hiring Manager Full Name	Referral Points Amt
40	501	United States	New York	New York	E453821	Rivera, Francisco	F360671	Daubert, Kimberly		0

 **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
vp

Thursday, November 06, 2014



Rivera, Francisco Z hi candice

9:15 AM



Lue, Candice hi Francisco

9:22 AM



Rivera, Francisco Z hi

9:22 AM



Lue, Candice Francisco

9:22 AM



Rivera, Francisco Z do you get overtime?

9:22 AM

fyi I work with Alex and Kim etcv *

I'm in HR

I see you are 401 and am working on an offer for you
my sid e453821

No mention of working with
Fidelia Shillingford.
CL



Lue, Candice ok

9:23 AM

yes I get overtime

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

LOOKING TO LOG IN?

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Job Description

AM - Credit Reporting Risk Analyst-140084006

Description

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

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

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

Job Responsibilities:

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

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

Qualifications

Qualifications and Skills:

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

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

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EXHIBIT 6

(JPMorgan Chase document # 000221 - Proof of manager change from Kimberly Dauber, who is White to Shillingford, who is Black on November 5, 2014, two days after I met with Alex Khavin and the day before I was officially offered the job Re: Page - 12 - Am. Com.)

AM - Credit Reporting Risk Analyst (140084006)

Status
Filled

Recruiter
Rivera, Francisco

Department
AM COUNTER PARTY

Status Details
Filled

Hiring Manager
Shillingford , Fidelia

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

Requisition Type
Professional

Hired Candidates
1 out of 1

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	By
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.

EXHIBIT 7

(“No manager gives an employee whose performance is on a downward trend the promotion of “*managerial experience*” and no employee goes to his/her manager to express his/her need for “*managerial experience*” when that employee’s performance is literally going down the tubes to the point where the manager to whom she is expressing her need for “*managerial experience*” sees it fit to put her on a DEVELOPMENT PLAN as a course of action” - Re: Page - 12 - Am. Com.)

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

EXHIBIT 8

(JPMorgan Chase document Nos. 001612, 001630 and 001933 and JPMorgan Chase document No. 000327 – Re: Page 14 - Am. Com.)

From: Knepper, Kathy
To: Dubowy, Helen
Sent: 12/10/2015 9:33:26 PM
Subject: RE: summary

In this email trail, HR legal representatives NOT my manager, Shillingford are discussing my termination. As Helen Dubowy's email time stamped 4:30 PM shows, Shillingford was not even aware of this communication. Proof that my termination was a LEGAL decision made in JPMC's favor. CL

I think we talked about you discussing the term recommendation with the head of AM Risk.

Please keep me posted. Thanks. Kathy

From: Dubowy, Helen
Sent: Thursday, December 10, 2015 4:30 PM
To: Knepper, Kathy
Subject: RE: summary

AM Risk is the department in which Defendant Shillingford and I, Plaintiff, Candice Lue worked. CL

I am just sending this to Nelli Childs (Head of HR for Firmwide risk). I want to get her support for term.

Unless you had a concern I likely would share it with the head of AM risk also (but would not go below that level).

Thank you for the updates. They look good.

From: Vernon, Terri
Sent: 10/6/2015 6:45:33 PM
To: Vernon, Terri ; Knepper, Kathy ; Padilla, Linda ; Dubowy, Helen
Subject: Candice Lue
Location: (888) 575-5762 PC: 67948733#
Start: Fri 10/9/2015 9:00:00 PM
End: Fri 10/9/2015 10:00:00 PM
Show Time As: Tentative

Recurrence: (none)
Meeting Status: Not yet responded

Required Attendees: Knepper, Kathy; Padilla, Linda; Dubowy, Helen

All,
We might not need the full hour, but I was lucky to find it just in case!
This meeting is to discuss next steps with Candice Lue and pre-planning for a possible termination.

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

Direct: Terri.Vernon@jpmchase.com / (714) 997-4377

These meetings were solely attended by JPMorgan Chase's HR LEGAL Representatives to "pre-plan" my termination. Notably absent is my Black manager, Defendant Fidelia Shillingford.

CL

From: Vernon, Terri
Sent: 10/7/2015 3:44:32 AM
To: Knepper, Kathy ; Padilla, Linda ; Dubowy, Helen
Subject: Candice Lue
Show Time As: Free

Recurrence: (none)
Required Attendees: Knepper, Kathy; Padilla, Linda; Dubowy, Helen

When: Friday, October 09, 2015 8:00 AM-8:30 AM (UTC-08:00) Pacific Time (US & Canada).

Where: (888) 575-5762 PC: 67948733#

Note: The GMT offset above does not reflect daylight saving time adjustments.

~~*~*~*~*~*~*~*

All,
Linda wasn't able to make the last appointment I scheduled. Hopefully this will be good for all.
This meeting is to discuss next steps with Candice Lue and pre-planning for a possible termination.

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

Direct: Terri.Vernon@jpmchase.com / (714) 997-4377

These meetings were solely attended by JPMorgan Chase's HR LEGAL Representatives to "pre-plan" my termination. Notably absent is my Black manager, Defendant Fidelia Shillingford.

CZ

Cetoute, Lela

From: Poz, Thomas I
Sent: Wednesday, January 06, 2016 2:13 PM
To: Vernon, Terri; Shillingford, Fidelia X
Cc: Dubowy, Helen
Subject: RE: Information

Terri,

I approve. However, on line four there is an extra "she."

Tom

From: Vernon, Terri
Sent: Wednesday, January 06, 2016 1:56 PM
To: Shillingford, Fidelia X; Poz, Thomas I
Cc: Dubowy, Helen
Subject: Information

Fidelia,

Please review the Request for termination document. There is a section that we need you to complete marked by the XXXXX.

**-Re: Page 14 - Am. Com. cl*

You can also print and hand out the "As you leave guide" and have for her when you communicate.

Please review the RFT form.

Helen, can you please sign?

Tom, can you please review the document and reply with your agreement?

Terri Vernon

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

Direct: Terri.Vernon@jpmchase.com / (714) 997-4377

EXHIBIT 9

(Proof that “*other analysts and associates did [not] have to ask for and obtain permission before working from home*” and that even when I asked in advance for permission to work from home, I was still denied that privilege and had to take the day off as a **vacation** day – Re: Pages 14 & 15 - Am. Com.)

Lue, Candice

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

Hi Fidelia,

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

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

Best regards,
Candice

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

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

From: Lue, Candice
Sent: Thursday, May 07, 2015 5:58 AM
To: JPM AM Global CRG
Subject: WFH

Hi Team,

Due to a family emergency, I have to work from home today. I can be reached via email and communicator. If urgent, you can call me at [REDACTED]

Best regards,
Candice

Lue, Candice

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

Hi all,


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

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

Lue, Candice

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

Hi all,

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

Fiona

Lue, Candice

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

Hi Kim

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

Kenny.

Lue, Candice

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

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

Regards,
Gaurav

Gaurav Kishore

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

Lue, Candice

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

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

Fidelia Shillingford

Lue, Candice

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

Hi Fidelia,

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

Hi Eileen,

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

Thanks and regards,
Candice

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

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

Hi Fidelia,

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

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

Easter is the holiest Christian holiday in my family. ☺

Best regards,
Candice

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

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

Thanks Candice for the heads-up.

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

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

Regards

Fidelia Shillingford | VP, Counterparty Risk Management | **J.P. Morgan Asset Management**
270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1810

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

Hi Fidelia/Eileen,

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

Thanks and regards,
Candice

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

EXHIBIT 10

(Common Law Conspiracy - Defendants JPMorgan Chase, Fidelia Shillingford, Alex Khavin, Kimberly Dauber and Baruch Horowitz, acting as individuals, combined, associated, agreed or acted in concert with each other to unlawfully make false statements under penalty of perjury to influence the outcome of my Employment Racial Discrimination and Retaliation lawsuit against them – Re: Page 16 - Am. Com.)

LEGEND FOR COLOR CODING

Yellow – “The Baruch Horowitz Lie” – Defendants - JPMorgan Chase, Shillingford, Khavin, Dauber and Horowitz (Pages 8, 9 & 10 - Am. Com.)

Pink - “The Manager Switch Lie” – Defendants - Khavin and Shillingford (Pages 11, 12, 13 & 14 - Am. Com.)

Green – “The Work from Home Lie” – Defendants - Shillingford and Horowitz (Pages 14 & 15 - Am. Com.)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
CANDICE LUE,

Plaintiff,

- against -

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

Defendants.
----- X

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

DECLARATION OF JOHN VEGA

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

1. I was employed as an Executive Director in the Employee Relations Department of JPMorgan Chase Bank, N.A., a wholly-owned bank subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of Defendants' motion for summary judgment in this action. This declaration is based on my personal knowledge, as well as my review of Chase business records.

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

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
CANDICE LUE,

Plaintiff,

- against -

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

Defendants.
----- X

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

DECLARATION OF FIDELIA SHILLINGFORD

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

1. I am employed as a Vice President in the Counterparty Risk Group ("CRG") of J.P. Morgan Investment Management Inc., a wholly-owned subsidiary of JPMorgan Asset Management Holdings Inc., which is a wholly-owned subsidiary of JPMorgan Chase Holdings LLC, which is a wholly-owned subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of Defendants' motion for summary judgment in this action. This declaration is based on my personal knowledge, as well as my review of Chase business records.

2. I am an African-American woman, and I supervised Candice Lue ("Plaintiff") while she was a member of the CRG from her hiring into that group in November 2014 until her termination in January 2016.

Manager "Switch"

3. In or about 2013, Alex Khavin, an Executive Director, became the head of the CRG. Several months later, Kim Dauber, a Vice President, joined the CRG. When Dauber joined, Khavin changed the reporting structure of the group such that all junior members of the CRG, *i.e.*, analysts and associates, would report to Dauber, while all senior members, *i.e.*, Vice Presidents and Executive Directors, would report to Khavin directly. Prior to that time, everyone in the CRG reported to Khavin directly.

4. In the months leading up to Plaintiff's hiring into CRG in November 2014, I expressed to Khavin that I wanted to gain managerial experience. Thus, when the CRG began looking to hire a Credit Reporting Risk Analyst ("Reporting Analyst"), Khavin told me that the person hired to fulfill the role would report to me, and not Dauber.

5. On or about October 30, 2014, I interviewed Plaintiff. During the interview I made clear to her that I would be the supervisor of the person hired for the role, not Dauber. Other members of the CRG who interviewed Plaintiff expressed the same.

6. The ultimate decision to hire Plaintiff was mine. A true and correct copy of Plaintiff's offer letter is annexed here to as Exhibit A.

7. The individual who replaced Plaintiff, a Caucasian, reports to me as well.*

See "NOTES" (Fidelia Shillingford) following.
CL

Job Description

8. Reporting Analysts and a Counterparty Credit Risk Analysts ("Credit Analysts") are two different positions and serve two different functions, notwithstanding their similar official job descriptions. First, the Reporting Analyst(s) reports to me, while the Credit Analysts report to Dauber. Second, the Reporting Analysts are responsible for reporting and operational functions of the CRG, while the Credit Analysts are responsible for analysis. To elaborate, Reporting Analysts prepare daily and monthly reports, including the "Monthly Counterparty Risk Exposure Report," "Limits Monitoring

Report,” and “Exception Monitoring.” In contrast, Credit Analysts are responsible for assessing risk and conducting ad hoc analyses on counterparties.

9. I informed Plaintiff that she was being hired as a Reporting Analyst.

Taking Minutes and Document Collection

10. Prior to Plaintiff’s arrival to the CRG, Baruch Horowitz, Plaintiff’s predecessor, was exclusively responsible for taking the minutes at, and collecting and distributing the materials for, the CRG’s monthly governance meeting (the “Tasks”).

11. In or about June 2014, Horowitz began a disability leave. In his absence, Khavin made the task of taking minutes temporarily rotational until Horowitz returned to work. In further recognition of Horowitz’s absence, each analyst was tasked with bringing their own materials to the monthly governance meeting and distributing them upon arrival. However, we found that this approach was inefficient because the participants were spending the first 15-20 minutes of each meeting collecting documents.

12. Horowitz did not return to work from his leave, and the status quo remained until a replacement Reporting Analyst could be hired and resume the Tasks. * ALSO see “NOTES” (Fidelia Shillingford) following. CZ

Work from Home

13. In the CRG, employees are permitted to work from home (“WFH”) at the discretion of their manager. WFH enables employees to work remotely on those occasions when they are available to fulfill their job responsibilities but are otherwise unable to come into the office.

14. Prior to working from home, employees must obtain supervisor approval. An employee cannot unilaterally decide to WFH.

Plaintiff’s Unsatisfactory Performance, Disrespect, and Insubordination

15. On or about January 26, 2015, Plaintiff complained that to me that Khavin was demeaning her by assigning her the Tasks, “as if she was the help, as if this is 1910.”

NOTES (Fidelia Shillingford)

- Statement #7 – Lesser credentials were required for the “Caucasian” who replaced me (see my job description in Exhibit 5 and the job descriptions following as proof). Note where for “qualifications” my job description clearly states: “Undergraduate degree with 1+ years of relevant work experience – strong academic performance with coursework in economics, statistics and finance”. This was also the qualification requirement of all the other analysts and associates who did not report to Shillingford. This qualification is missing from the “Caucasian’s” job description.
- Statement #12 – I had THREE (3) non-Black predecessors, none of whom was assigned the discriminatory tasks:
 1. Baruch Horowitz
 2. Kenneth Ng who was later moved over to the Credit Analysis side of the team and was replaced by Thomas Monaco.
 3. Thomas Monaco who left after only two months on the job causing Kenneth Ng to return to the role. In November of 2014, I replaced Kenneth Ng.

JPMorgan Chase & Co., et al’s intentional omission of this information is another example of “spoliation of evidence”.

Candice Lue

CL

JPMorgan

J.P. Morgan is a leading global financial services firm with assets of \$2.1 trillion and operations in more than 60 countries. The firm is a leader in [investment banking](#), financial services for consumers, small business and commercial banking, financial transaction processing, asset management and private equity. Information about J.P. Morgan is available at www.jpmorganchase.com.

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

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

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

Specific responsibilities include:

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

Qualifications

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

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

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

Job Risk

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

Organization ASSET MANAGEMENT

Schedule Full-time

Job Type Standard

Shift Day Job

Corporate Brand JPMorgan Chase & Co.

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Job Description

Asset Management, Global Investment Management - Counterparty Risk Reporting Analyst - NY-160069076

Job Description**JPMorgan**

J.P. Morgan is a leading global financial services firm with assets of \$2.1 trillion and operations in more than 60 countries. The firm is a leader in investment banking, financial services for consumers, small business and commercial banking, financial transaction processing, asset management and private equity. Information about J.P. Morgan is available at www.jpmorganchase.com.

Counterparty Risk Reporting Analyst

J.P. Morgan Asset Management, Risk Management is committed to being a world class leader in risk management; maintaining a system of strong controls, providing guidance and clear direction on key risk principles, proactively managing risk and achieving a consistent balance between our business goals and deployment of capital.

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

Specific responsibilities include:

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

Qualifications

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

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

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

Job Risk

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

Organization ASSET MANAGEMENT

Schedule Full-time

Job Type Standard





Shift Day Job

Corporate Brand JPMorgan Chase & Co.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
CANDICE LUE,

Plaintiff,

- against -

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

Defendants.
----- x

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

DECLARATION OF ALEX KHAVIN

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

1. I am employed as an Executive Director in the Special Credits Group of JPMorgan Chase Bank, N.A., a wholly-owned bank subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of Defendants' motion for summary judgment in this action. This declaration is based on my personal knowledge, as well as my review of Chase business records.

2. I was the second-level supervisor for Candice Lue ("Plaintiff") while she was a member of the Counterparty Risk Group ("CRG") from her hiring in November 2014 until I left the CRG in June 2015. *See "NOTES" (Alex Khavin) following. cL

3. Plaintiff's immediate supervisor from her hiring in November 2014 until her termination in January 2016 was Fidelia Shillingford, a Vice President.

Manager "Switch"

4. In or about April 2013, I became the head of the CRG. Several months later, Kim Dauber, a Vice President, joined the CRG. After Dauber joined, I changed the reporting structure of the group so that all junior members of the CRG, *i.e.*, analysts and associates, would report to Dauber, while all senior members, *i.e.*, Vice Presidents, would report to me directly. Prior to that time, everyone in the CRG reported to me directly.

5. In the months before Plaintiff's hiring into the CRG in November 2014, Shillingford and I had conversations about growing her managerial skills. When the CRG began looking to hire a Credit Reporting Risk Analyst ("Reporting Analyst"), I told her that the person hired to fulfill the role would report to her, and not Dauber.

6. I made this decision based on discussions with Shillingford and my immediate manager, Philippe Quix, a Managing Director, and communicated the decision to Shillingford. At the time, I did not know who would be hired for the Reporting Analyst position. I did not know Plaintiff at that time and was not aware of her candidacy. My decision to make Shillingford the manager was unrelated to the identity of the selected candidate.

7. Because all analysts and associates had previously reported to Dauber, the internal job posting for the position reflected Dauber as the hiring manager. This was a mistake by the HR hiring manager, as it was previously decided that Shillingford was going to be the one to whom the Reporting Analyst would report.

Document Collection and Distribution

8. The CRG monthly governance meeting ("Governance Meeting") is a meeting during which the CRG reviews trends and controls (e.g., limits, breaches, and exposures), notes any issues, and discusses follow-up from previous meetings.

9. The Governance Meeting is attended (physically and virtually) by many individuals in several locations, including New York, Hong Kong, and London. Due to the number of individuals who participate, meeting materials came from many different sources.

10. Because of this, when I joined CRG, I tasked Plaintiff's predecessor, Baruch Horowitz ("Horowitz"), a Caucasian male and a senior Associate, with preparing the materials for the Governance Meetings, including collecting meeting materials from individuals in various offices, and printing and bringing hard-copies into the meeting. These tasks were assigned to Horowitz alone.

11. As an Associate, Horowitz held a more senior title than that held by Plaintiff, an Analyst.

12. In June 2014, Horowitz began a disability leave. As a result, each member of the CRG tried to handle his tasks on their own, but we found that the first 10-20 minutes of each Governance Meeting were spent collecting, exchanging, and distributing the materials, and we lost valuable meeting time.

13. In addition, because some participants were joining the Governance Meeting from overseas locations, they were unable to receive some of the materials as they had not been distributed before the meeting.

14. Thus, when Plaintiff was hired, in an effort to make the Governance Meeting more streamlined and efficient, I asked her to collect, consolidate, and distribute the meeting materials, as Horowitz had done.

Taking Minutes

15. CRG analysts and associates take meeting notes or "minutes" at many meetings, including the CRG Governance Meetings,* Technology Initiatives Meetings, AM Risk People

* See "NOTES" (Alex Khavin) following.

CL

Council Meetings, and others.* At some of these meetings, the task of taking minutes was assigned on a rotational basis.

16. After I joined the CRG in 2013, I assigned Horowitz alone the task of taking minutes at the Governance Meeting. He carried out this responsibility until he went out on disability leave in or about June 2014.

17. After Horowitz left, I temporarily made the task of taking minutes at the Governance Meeting rotational among the Credit Analysts because, at the time, each of the Credit Analysts were very busy, and I thought a division of labor was appropriate.

18. Horowitz, however, never returned to work. Thus, the temporary rotation was in effect until Plaintiff was hired in November 2014.

19. *Throughout this six month period,* it remained my view that document collection and taking minutes ultimately remained the responsibility of the Reporting Analyst, the position for which Plaintiff was hired. *See "NOTES" (Alex Khavin) following. CL*

Plaintiff's Unsatisfactory Performance

20. During Plaintiff's first couple of Governance Meetings, I assigned her the tasks of taking minutes and document collection and distribution (the "Tasks"), as Horowitz had done before he left the company.

21. At the April 2015 Governance Meeting, in order to further streamline the document collection and distribution process as it had been while Horowitz handled the task, I asked that the group send to Plaintiff all meeting materials in advance of the May 2015 Governance Meeting so that Plaintiff could distribute them beforehand in order to save time distributing them at the meeting itself, as well to ensure these materials were made available to those individuals joining remotely. In response, Plaintiff got up and walked out of the meeting.

NOTES (Alex Khavin)

- Statement #2 – Defendant Khavin officially left the Counterparty Risk Group (CRG) the SAME DAY that I was fired, January 6, 2016 (see proof on next page). Within half an hour after this announcement, I was fired.
- Statement #15 – Not true. In my one year and two month tenure in the Counterparty Risk Group (CRG), the only meeting I knew of where the analysts and/or associates of this group were required to take meeting notes was for the Monthly Governance Meeting.
- Statement #19 – I had THREE (3) non-Black predecessors, none of whom was assigned the discriminatory tasks:
 1. Baruch Horowitz
 2. Kenneth Ng who was later moved over to the Credit Analysis side of the team and was replaced by Thomas Monaco.
 3. Thomas Monaco who left after only two months on the job causing Kenneth Ng to return to the role. In November of 2014, I replaced Kenneth Ng.

JPMorgan Chase & Co., et al's intentional omission of this information is another example of "spoliation of evidence".

Candice Lue



Lue, Candice

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

GLOBAL INVESTMENT MANAGEMENT

J.P.Morgan
Asset Management

Organization Announcement

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

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

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



Philippe Quix
Chief Risk Officer,
Global Investment Management

This message was sent to all AM Risk employees.

JPMC INTERNAL USE ONLY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CANDICE LUE,

Plaintiff,

- against -

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

Defendants.
-----X

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

DECLARATION OF KIMBERLY DAUBER

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

1. I am employed as a Vice President in the Counterparty Risk Group ("CRG") of J.P. Morgan Investment Management Inc., a wholly-owned subsidiary of JPMorgan Asset Management Holdings Inc., which is a wholly-owned subsidiary of JPMorgan Chase Holdings LLC, which is a wholly-owned subsidiary of JPMorgan Chase & Co. ("Chase"), a Defendant in the above-captioned action. I respectfully submit this declaration in support of Defendants' motion for summary judgment in this action. This declaration is based on my personal knowledge, as well as my review of Chase business records.

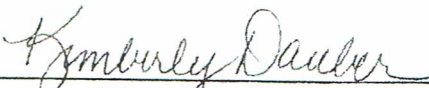
2. On February 4, 2015, I sent an e-mail to Candice Lue stating in pertinent part: "Every analyst and/or associate on this team has been the minute taker of our Extended meetings at some time during the last 2 years." A true and correct copy of such e-mail correspondence is annexed hereto as Exhibit A.

* 3. By "extended meetings," I was referring to non-governance meetings, such as our Technology Initiatives Meeting and Investment Risk Process meetings, at which the task of taking minutes was rotated among the analysts and associates.

4. I was not referring to the monthly governance meeting, the meeting for which Ms. Lue was assigned the exclusive responsibility to take minutes. Before Ms. Lue joined the CRG, that task was performed by Ms. Lue's predecessor, Baruch Horowitz. Mr. Horowitz was also exclusively responsible for collecting and distributing documents to the participants in advance of the meetings.

5. The only time these tasks were rotational was from June to November 2014, when Mr. Horowitz was on disability leave and after he left the company and his position had not yet been filled.

Dated: New York, New York
May 9, 2017



Kimberly Dauber

* Not true. The names "Extended Meeting" and "Monthly Governance Meeting" were used interchangeably by the Team. See the emails in Exhibit 3 and the asterisks on JPMorgan Chase document numbers 002366 and 002367 (that Kimberly Dauber referenced in Statement #2) following.

CZ

From: Dauber, Kimberly S
To: Lue, Candice; Shillingford, Fidelia X
Sent: 2/4/2015 7:02:31 PM
Subject: RE: Minutes and Documents for Extended Team Meeting ✱

Candice -

Every analyst and/or associate on this team has been the minute taker of our Extended meetings at some time during the last 2 years. I don't think this is a function that is specifically written out in job duties because it's an ad-hoc function. However, Alex would pick a different person each time during our meetings. Most recently, it was understood that the reporting analyst would handle it. I'm fine with including additional analysts to assist you with this.

Best regards,

Kimberly Dauber | Vice President | J.P. Morgan Asset Management | 270 Park Ave, 9th Floor, New York, NY 10017 | T: 212-270-1655 | kimberly.s.dauber@jpmorgan.com

From: Lue, Candice
Sent: Wednesday, February 04, 2015 1:55 PM
To: Shillingford, Fidelia X; Dauber, Kimberly S
Subject: RE: Minutes and Documents for Extended Team Meeting ✱

Hi Fidelia,

Just to reiterate, as previously discussed, I have never considered these tasks to be my responsibility as I had confirmed such in the interview and on the job.

Best regards,

Candice

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

From: Shillingford, Fidelia X
Sent: Wednesday, February 04, 2015 1:38 PM
To: Dauber, Kimberly S
Cc: Lue, Candice
Subject: Minutes and Documents for Extended Team Meeting *

Hi Kim

I have discussed with Alex and she is ok with the proposal that we continue to rotate the responsibility of document collection and minutes taking for our monthly governance meeting. *

I suggest that we have a schedule so that each analyst is aware of who is responsible for which month. Can you please select at least two analysts who could assist Candice with this responsibility? Once confirmed, I will fill in the appropriate names for Analyst 1 and 2 and circulate.

Thank you.

Analyst	Month
Feb	Candice
Mar	Analyst 1
Apr	Analyst 2
May	Candice
Jun	Analyst 1
Jul	Analyst 2
Aug	C andice
Sep	Analyst 1
Oct	Analyst 2
Nov	Candice
Dec	Analyst 1

Regards

Fidelia Shillingford | VP, Counterparty Risk Management | **J.P. Morgan Asset Management**

270 Park Avenue, 9th Floor, New York, NY 10017-2014 | T: 212 648 1816

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
CANDICE LUE,

Plaintiff,

- against -

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

Defendants.
----- X

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

**DECLARATION OF
BARUCH HOROWITZ**

BARUCH HOROWITZ, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury as follows:

1. I was employed by JPMorgan Chase Bank, N.A. ("Chase"), a subsidiary of JPMorgan Chase & Co., a Defendant in the above-captioned action. I know the facts testified to in this Declaration to be true based upon my own personal knowledge.
2. I am a Caucasian male.
3. I worked for Chase from approximately November 2005 to August 2014. From approximately December 2011 to August 2014, I was employed as an Associate in the Counterparty Risk Group ("CRG") of JPMorgan Asset Management, a business unit of Chase.
4. While employed as an Analyst in CRG, I had two supervisors: Jim Sexton ("Sexton") and, later, Alex Khavin ("Khavin"). Khavin joined the CRG at some point after I did.
5. Prior to Khavin joining the team, I was periodically directed by Jim Sexton to take minutes at the group's monthly CRG meeting and other meetings, and I did so. Once Khavin joined CRG, she also periodically directed me to take minutes at the group's monthly

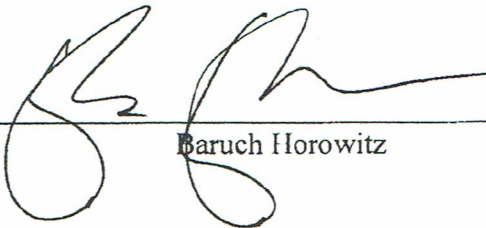
CRG meeting and other meetings. I did so. Subsequently, Khavin asked me to take the minutes on a "going-forward basis," and I did so for a period of time.

6. Additionally, Sexton and then Khavin directed me to prepare the materials for the monthly CRG meeting, including printing, organizing, sorting, collating, and stapling. I did so. Once I had completed these tasks, I typically e-mailed copies of the materials to everyone on the invite list of the monthly CRG meeting, including those attending remotely, and brought hard copies to the meeting to distribute to those attending in person. I am not aware that anyone else was assigned these tasks.

7. During my employment with Chase, I periodically worked from home. Prior to doing so, however, I contacted my group supervisor at the time for permission.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 28, 2017
Los Angeles, California


Baruch Horowitz