

## “John Vega’s ‘Investigation’”



With all due respect, excerpts of the drunken “investigation report” done by Defendant John Vega that were provided to me by Defendants, JPMorgan Chase & Co., et al’s attorneys during Discovery and the full said report attached to “Declaration of Helen Dubowy – Docket # 96” as “JPMorgan Chase 000101 – 000108 & 002095 - Exhibit B” in conjunction with Defendant John Vega’s display of impropriety as evidenced in Exhibit CC-1, explain why JPMorgan Chase & Co. (“JPMorgan Chase”) fired him (at least, I think Vega was fired).

Vega’s “investigation” of my Claim of Employment Racial Discrimination that I had brought against Khavin and Shillingford, which anyone of reasonable mind would assume was supposed to be neutral and fair, was not only “drunken” but as evidenced in Exhibit CC-1 and from my own first hand knowledge was biased, retaliatory and a total farce.

Among the thousands of duplicated copies of emails (just a mere fraction has been sent to the Court as “Exhibits”) I received from the Defendants, JPMorgan Chase & Co., et al attorneys’ office on March 21, 2017 were the following emails between Vega and the alleged perpetrators, Khavin and Shillingford during the time that Vega should have been “neutrally investigating” my claim of Employment Racial Discrimination against me, by the said alleged perpetrators, Khavin and Shillingford (Exhibit CC-1):

- An email showing that from my first correspondence with Defendant/“neutral investigator”, Vega in which he informed me that *“your matter has been raised to me for investigation”* (JPMorgan Chase 002285 – Exhibit CC-1), unbeknownst to me, he had been **blind copying** the alleged perpetrators, Khavin and Shillingford and continued to blind copy them on such subsequent emails. However, as the complaining party, I was never copied and/or blind copied on any email Vega sent to Khavin and/or Shillingford.
- Email trail dated July 8, 2015 – Unbeknownst to me, everything that Defendant/“neutral investigator”, Vega and I discussed was relayed to alleged perpetrator/Defendant Shillingford.

However, as the complaining party, Vega had never relayed to me what he discussed with alleged perpetrator/Defendant, Shillingford about the matter.

- Pursuant to email dated July 8, 2015, email from Shillingford dated July 17, 2015 and time stamped 7:03 AM confirms that Defendant/“neutral investigator”, Vega had been keeping alleged perpetrator/Defendant, Shillingford “*updated*” as per Shillingford’s request (email dated June 30, 2015 – JPMorgan Chase 001242).
- Email dated July 27, 2015 – Unbeknownst to me, Defendant/“neutral investigator”, Vega who is an attorney by profession along with other HR representatives, who are quite likely attorneys as well, were liaising with alleged perpetrator/Defendant Shillingford in concocting the fallacious, pretextual and retaliatory Performance Improvement Plan (“PIP”) that was issued to me on July 30, 2017. I respectfully refer the Court to the additional emails showing this “PIP concoction”<sup>3</sup> provided in Exhibits CC and CC-1.
- Email dated July 28, 2015 - Unbeknownst to me, alleged perpetrator/Defendant Shillingford was among the people informed by Defendant/“neutral investigator”, Vega that he would be discussing the “*results of [his] investigation*” with me on July 29, 2015<sup>4</sup> saying: “*I will keep everyone apprised of this*”<sup>5</sup>. Shillingford then forwarded this email to her acting manager at the time, Defendant Thomas Poz. However, as the complaining party, the only thing that Vega told me with regards to the “*results of [his] investigation*” with Shillingford and/or Khavin was, he had “*found “nothing discriminatory”*” and with the same intensity as alleged perpetrator/Defendant Khavin and in reminiscence of the 1800s plantation style living when slaves were ordered by force, he vehemently ordered me saying, “*when it comes time to get everything ready for the monthly meeting*, [printing 13 copies of each of the non-Black team

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<sup>3</sup> Among HR representatives whom I had never met and/or as much as had an email communication with, never even knew they existed (the only other HR personnel besides Vega whom I had email communication with was Terri Vernon).

<sup>4</sup> The day before my “impromptu” 2015 mid-year performance review.

<sup>5</sup> The July 29, 2015 “*results of [Vega’s] investigation*” consisted of all the fallacious and pretextual information, according to Vega, that Khavin and Shillingford gave him. These were the said fallacious and pretextual information that appeared on the “performance improvement plan” I was issued the very next day



member's presentation materials (one copy for each member of the team), collating, stapling and lugging of the said presentation materials to the monthly team meetings] *get it ready so as not to derail your career here* [JPMorgan Chase]". In my words, "turn a blind eye to the Employment Racial Discrimination against you and your financial career here at JPMorgan Chase, will be just fine".

- Email dated July 31, 2015 (two pages) – Unbeknownst to me, when I sent an email the day after my 2015 mid-year performance review, where I was issued the fallacious, pretextual and retaliatory performance improvement plan (PIP), to alleged perpetrator/Defendant Shillingford informing her of my illness, which I later found out is due to Somatisation/Somatoform and Psychosomatic Disorders (Exhibit ZZ), Shillingford forwarded my said email, in ridicule, to Defendant/"neutral investigator" Vega with the statement: "*As expected....*" Defendant/"neutral investigator" Vega then responded: "*I am not surprised....*" alleged perpetrator/Defendant Shillingford's response: "*I won't be surprise[d] if she takes disability*" (because this was what I was voluntarily informed and believe, and on that basis allege that Baruch Horowitz, my first predecessor, did due to overwork, stress and the unrealistic expectation for one person to do a job that realistically requires two people to do)<sup>6</sup>.
- On or about August 13, 2015 when I was standing at alleged perpetrator/Defendant Shillingford's desk and her Outlook Inbox was opened on her computer, I was surprised to see a "Thank You and Farewell" email from Defendant/"neutral investigator", Vega to alleged perpetrator/Defendant Shillingford considering that when I first met with Vega, he appeared to have never known of or about Khavin and Shillingford prior to me raising the claim of Employment Racial Discrimination against them. Yet, in no time, he, Vega was "friendlily" sending Shillingford, and possibly Khavin, his "Thank You and Farewell" email. However, it has now been revealed in the thousands of duplicated copies of emails that I received from the Defendants, JPMorgan Chase & Co., et al attorneys' office on March 21, 2017 that this

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<sup>6</sup>Am. Compl. ¶ 107; Khavin Dec., ¶ 12, 16; Dauber Dec., ¶ 5; Shillingford Dec., ¶ 11

“comfortable back and forth” between Defendant/“neutral investigator”, Vega and the alleged perpetrators/Defendants, Khavin and Shillingford had been going on from the time my Claim of Employment Racial Discrimination against me to JPMorgan Chase’s HR Department was “escalated” to Vega for him to “investigate”.

My Claim of Employment Racial Discrimination for which Vega was “investigating” was based on the fact that undesirable tasks that were assigned solely to me, the only Black analyst in the Counterparty Risk Group led by Khavin, that had never been assigned to any of the non-Black analysts and/or associates (including my non-Black predecessors) in the said group prior to me joining the group and/or after I joined the group, were racially discriminatory.

However, anyone of reasonable mind will notice in the emails I have provided in Exhibits CC and CC-1 that there is nothing about rectifying the issue pertaining to this unlawful act or the mention of even the possible violation of Title VII of the Civil Rights Act of 1964 - EEOC Compliance Manual Section 15 – Race and Color Discrimination – VII(B)(1) – WORK ASSIGNMENTS which states: *“Work assignments must be distributed in a nondiscriminatory manner. This means that race cannot be a factor in determining the amount of work a person receives, or in determining who gets the more, or less, desirable assignments.”*

It was all about concocting ways to unlawfully retaliate against me in their quest to protect the company from “litigation” - as Vega described himself in his LinkedIn profile summary: *“Trusted advisor and consultant to HR and business managers on diverse workplace issues with a proven track record of analyzing and resolving complex employment issues minimizing litigation risks”*.

Also, I respectfully ask that the Court take note of Exhibits CC and CC-1 whereby the ONLY tasks that Vega, et al are accusing me of refusing to do are the racially discriminatory tasks<sup>7</sup>

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<sup>7</sup> The task of the taking of the minutes for the Monthly Governance Meetings and the tasks of printing 13 copies of each of the non-Black team member’s presentation materials (one copy for each member of the team), collating, stapling and lugging of the said presentation materials to the monthly team meetings where the non-Black team members including the ones on my job level would be sitting around the conference room table waiting to “be served”.

that were off limits for the non-Black analysts and associates to do but were solely assigned to me, the only Black Analyst in the Counterparty Risk Group, to do – Bearing in mind that before I joined the said Counterparty Risk Group, the task of the taking of the minutes for the Monthly Governance Meetings, for example, was rotated among all the non-Black analysts and associates in the said group<sup>8</sup> and the tasks of the printing, etc. of all the team members presentation materials for the Monthly Governance Meeting never existed. There was also a White administrative assistant on the team to whom these tasks were never assigned even though those tasks would more likely fall into the administrative assistant job category. (I respectfully refer the Court to see more on the unfairness of these tasks being solely assigned to me in my “Affidavit in Opposition/Response to Declaration of Alex Khavin - docket # 92 – “Response to Statement #s 12, 13 & 14”.)

Anyone of reasonable mind will also notice that alleged perpetrator/Defendant Shillingford, who is Black and a servile employee, was coached into lying – “the Baruch Horowitz lie” (email dated July 24, 2015 – “Follow ups from our meeting”)<sup>9</sup> and was given step by step directives by the HR representatives in their quest to unlawfully retaliate against me for raising the issue of Employment Racial Discrimination. These step by step directives included Defendant Dubowy sending Shillingford the performance improvement plan (PIP) template on July 6, 2015 with the message: “*As discussed. Thanks*” (JPMorgan Chase 002992 - Exhibit CC-1) and the HR representatives trying to make it seem that Shillingford, who again is Black and not Khavin who is White was the main perpetrator of the claim of Employment Racial Discrimination that I reported to JPMorgan Chase’s HR department (Exhibit CC - JPMorgan Chase 001392 & 003342, ¶ 114 - Am. Compl., Exhibit F and Declaration of Fidelia Shillingford - Docket # 93).

In light of the foregoing and as is obvious in the above-referenced emails and other emails in Exhibit CC and Exhibit CC-1, Vega’s “investigation” was not only biased and a total farce but it

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<sup>8</sup> Khavin was cognizant of not making any of the non-Black analysts and/or associates feel demeaned by solely assigning any one of them the undesirable task of taking the minutes for the Monthly Governance Meeting.

<sup>9</sup> I respectfully refer the Court to see my Response to “the Baruch Horowitz lie” in my “Affidavit in Opposition/Response to Declaration of Baruch Horowitz – Docket # 99” and my “Affidavit in Response/Opposition to Defendants’ Statement of Undisputed Material Facts - Docket # 90 - Defendants’ Undisputed Material Fact # 18”.

was retaliatory<sup>10</sup> which is in violation of Title VII of the Civil Rights Act of 1964 - EEOC Compliance Manual Section 15 – Race and Color Discrimination – VII - C. RETALIATION which states: *“Employees have a right to be free from retaliation for their opposition to discrimination or their participation in an EEOC proceeding by filing a charge, testifying, assisting, or otherwise participating in any manner in an investigation, proceeding, or hearing under Title VII.(156)”*.

Also, drawing from Canon 3(A)(4) which states: *“A judge should accord to every person who has a legal interest in a proceeding, and that person’s lawyer, the full right to be heard according to law. Except as set out below, a judge should not initiate, permit, or consider ex parte communications or consider other communications concerning a pending or impending matter that are made outside the presence of the parties or their lawyers. If a judge receives an unauthorized ex parte communication bearing on the substance of a matter, the judge should promptly notify the parties of the subject matter of the communication and allow the parties an opportunity to respond, if requested”* Defendant Vega’s conduct, as is evidenced in his email correspondence with the alleged perpetrators, Khavin and Shillingford reflects impropriety and his investigation, a lack of integrity.

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<sup>10</sup> The ONLY tasks that I refused to do were the racially discriminatory tasks that were solely assigned to me, the only Black analyst in the Counterparty Risk Group – Tasks which were not even assigned to the White administrative assistant in the said group to do even though they would more likely fall into the administrative assistant job category.

# EXHIBIT CC-1

(Evidence in Support of Plaintiff's, Candice Lue's Affidavit in Opposition/Response to Declaration of Helen Dubowy and John Vega - Docket #s 96 and 98)

**From:**  
**To:** Lue, Candice  
**CC:** Vernon, Terri  
**BCC:** Dubowy, Helen; Khavin, Alex G; Shillingford, Fidelia X  
**Sent:**  
**Subject:** RE: Discussion with Management concerns

Unbeknownst to me Defendant/  
"neutral investigator," John Vega  
was sharing all my  
communication with him with  
the alleged perpetrators,  
Khavin and Shillingford via  
blind copy emails (Bcc).  
CL

Good Afternoon Candice:

Your matter has been raised to me for investigation. Please let me know your availability next week to discuss.

I look forward to hearing from you.

Thank you,  
John

**John R. Vega, JD, MS** | Executive Director | Corporate Employee Relations | **J.P. Morgan Chase & Co.** | \* 1 Chase Manhattan Plaza,  
Floor 34, New York, NY 10004 | ( T: 212-552-0338 | [8john.r.vega@chase.com](mailto:8john.r.vega@chase.com)

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**From:** Vernon, Terri  
**Sent:** Wednesday, June 17, 2015 4:57 PM  
**To:** Lue, Candice  
**Subject:** RE: Discussion with Management concerns

Candice,  
Your case has been referred to our Corporate Employee Relations team for further review. I will contact the individual who is now working on this and see if there is an update.

Thank you for your patience as we look to resolve this matter.

Terri Vernon  
Vice President, Human Resources Advice Direct  
(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (949) 651-6035

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**From:** Lue, Candice  
**Sent:** Wednesday, June 17, 2015 1:03 PM  
**To:** Vernon, Terri  
**Subject:** RE: Discussion with Management concerns

Hi Terri,

I just wanted to touch base with you regarding the status of our last meeting. I'd also like to know the status of my request for the removal of my current manager from whom I am sensing retaliation.

I will be on vacation starting this Friday, June 19 and will not be back in the office until Monday, June 29.

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](mailto:Candice.Lue@jpmorgan.com)

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**From:** Lue, Candice  
**Sent:** Tuesday, June 02, 2015 9:11 AM  
**To:** Vernon, Terri  
**Subject:** RE: Discussion with Management concerns

Hi Terri,

In pursuance to the below email, please also see attached.

**From:**  
**To:** Lue, Candice  
**CC:** Vernon, Terri  
**BCC:** Shillingford, Fidelia X Dubowy, Helen  
**Sent:**  
**Subject:** RE: Discussion with Management concerns

I am appalled that Defendant/"neutral investigator," John Vega was blind copying Defendant/alleged perpetrators Fidelia Shillingford on all the email correspondence I had with him even though I was not privy to email communications he was having with the Defendant/alleged perpetrator. CZ

Hello Candice:

I will be at 270 Park the majority of the day on Wednesday, July 8<sup>th</sup>. I have some availability in the afternoon, between 1-3pm and 4-5pm. Please let me know what works best for you and we can meet that day.

Thank you,  
John

**John R. Vega, JD, MS** | Executive Director | Corporate Employee Relations | **J.P. Morgan Chase & Co.** | \* One Chase Manhattan Plaza, Floor 34, New York, NY 10005 | ( T: 212-552-0338 | [8john.r.vega@chase.com](mailto:8john.r.vega@chase.com)

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**From:** Vega, John R.  
**Sent:** Tuesday, June 30, 2015 11:21 AM  
**To:** Lue, Candice  
**Cc:** Vernon, Terri  
**Subject:** RE: Discussion with Management concerns

Let me check my availability and I will get back to you shortly...

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**From:** Lue, Candice  
**Sent:** Tuesday, June 30, 2015 10:25 AM  
**To:** Vega, John R.  
**Cc:** Vernon, Terri  
**Subject:** RE: Discussion with Management concerns

Hello John,

Just touching base with you in regards to the below. Here is my availability. Please let me know if any of these time slots work for you.

Wednesday, July 1: 10 to 11:30am; 3 to 3:30pm  
Thursday, July 2: 10:30am to 12pm; 4 to 5pm  
Friday, July 3: 10am to 12:30pm  
Tuesday, July 7: 11:30am to 12:30pm; 2 to 3pm

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](mailto:Candice.Lue@jpmorgan.com)

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**From:** Lue, Candice  
**Sent:** Thursday, June 18, 2015 6:59 PM  
**To:** Vega, John R.  
**Cc:** Vernon, Terri  
**Subject:** RE: Discussion with Management concerns



**From:** Vega, John R.  
**To:** Shillingford, Fidelia X  
**Sent:** 6/30/2015 4:34:02 PM  
**Subject:** RE: Emails

Of course...

**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, June 30, 2015 11:32 AM  
**To:** Vega, John R.  
**Subject:** RE: Emails

Great; will you keep me updated on the outcome?

Regards  
Fidelia

**From:** Vega, John R.  
**Sent:** Tuesday, June 30, 2015 11:30 AM  
**To:** Shillingford, Fidelia X  
**Subject:** RE: Emails

I expect to complete my investigation prior to my going out on vacation July 9<sup>th</sup>.

**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, June 30, 2015 9:58 AM  
**To:** Vega, John R.  
**Subject:** RE: Emails

Hi

Have you schedule time to speak with Candice.

We did not deliver the mid-year because she was out on vacation and when she came back Alex went out. Also, I would prefer to have the investigation completed before I deliver it.

Regards  
Fidelia

How can anyone of reasonable mind see fair the "investigation" that Defendant John Vega did into my Employment Racial Discrimination claim against Defendants Alex Khavin and Fidelia Shillingford when behind my back, Vega and Shillingford are nonchalantly communicating about this said "investigation"? CZ



**From:** Vega, John R.  
**To:** Lue, Candice  
**BCC:** Shillingford, Fidelia X  
**Sent:** 7/8/2015 5:35:03 PM  
**Subject:** RE: Discussion of Employee Concerns

More blind copying of our email  
communication by Defendant/  
"neutral investigator," John Vega.  
DISGRACEFUL and BIAS.  
CL

Please meet me at the elevator bank on the 4th floor at 1pm.

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**From:** Lue, Candice  
**Sent:** Wednesday, July 08, 2015 11:19 AM  
**To:** Vega, John R.  
**Subject:** RE: Discussion of Employee Concerns

Hello John,

Just checking in to see if you were able to confirm a location.

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](mailto:Candice.Lue@jpmorgan.com)

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

**From:** Vega, John R.  
**Sent:** Sunday, July 05, 2015 2:28 PM  
**To:** Lue, Candice  
**Subject:** Discussion of Employee Concerns  
**When:** Wednesday, July 08, 2015 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** 270 Park, location - TBD

Candice –

I will let you know where we will be meeting on Wednesday morning.

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**From:** Vega, John R.  
**Sent:** 7/27/2015 3:40:02 AM  
**To:** Vega, John R. ; Vernon, Terri ; Dubowy, Helen  
**Subject:** Candice Lue  
**Start:** Tue 7/28/2015 6:00:00 PM  
**End:** Tue 7/28/2015 6:30:00 PM  
**Recurrence:** (none)  
**Meeting Status:** Accepted

**Required Attendees:** Vernon, Terri; Dubowy, Helen

**Dial in: 1-888-575-5762**  
**Participate Code: 97334454**  
**Host Code: 29640750**

Let's regroup on how to proceed going forward. I have spoken with Fidelia and am comfortable moving forward with the prepared mid-year and the PIP.

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Nothing about my Claim of employment racial discrimination. All about planning, concocting, regrouping, discussing, etc. on how to get rid of me which is against the law.  
CL

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**From:** Poz, Thomas I  
**To:** Shillingford, Fidelia X  
**Sent:** 7/28/2015 8:09:01 PM  
**Subject:** RE: Update

Thanks

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**From:** Shillingford, Fidelia X  
**Sent:** Tuesday, July 28, 2015 3:09 PM  
**To:** Poz, Thomas I  
**Subject:** Fw: Update

FYI

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**From:** Vega, John R.  
**Sent:** Tuesday, July 28, 2015 02:34 PM  
**To:** Dubowy, Helen; Vernon, Terri; Shillingford, Fidelia X  
**Subject:** Update

Hi there:

I just wanted to let all of you know that I have sent an invite to Candice for 2:30-3pm tomorrow to discuss the issues she has raised and the results of my investigation.

I will keep everyone apprised of this.

Thx,  
John

The Defendant/"neutral investigator," John Vega should not have been keeping the Defendant/alleged perpetrator, Fidelia Shillingford "apprised".

When I had this conference call with Vega, I had no idea that Shillingford knew that the time I was taking off was to have this call with Vega, as she pretended not to know.

Again, I just learned of what was going on behind my back after I got these emails from the Defendants' attorneys' office.

JPMC HR Representatives cannot be trusted. (Exhibit DDD)  
CL



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**From:** Shillingford, Fidelia X  
**To:** Vernon, Terri; Dubowy, Helen  
**CC:** Khavin, Alex G; Vega, John R.  
**Sent:** 7/17/2015 3:06:28 PM  
**Subject:** RE: PIP template

Ok, thanks.  
I will await further guidance from you.

Pleasant weekend to all!

Regards  
Fidelia

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**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:05 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G; Vega, John R.  
**Subject:** RE: PIP template

Much like the PIP, I would hold off on providing any feedback at this time.

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

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

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**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 7:03 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

No, when last I spoke with him he noted that she brought up other issues which he has to investigate.  
Can I proceed with the mid-year feedback?

Regards  
Fidelia

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**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:01 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Fidelia,  
My apologies, I thought John had reached out to you.  
Please hold off at this time with the PIP until further notice.

Terri Vernon  
Vice President, Human Resources Advice Direct  
(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (949) 651-6035

AS promised in email from  
Defendant/"neutral investigator"  
John Vega to Fidelia Shillingford  
dated June 30, 2015 (JPMC 001242),  
Fidelia Shillingford's email dated  
July 17, 2015 confirms that  
unbeknownst to me, Vega had  
been keeping Shillingford "updated."

CL

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

I won't be surprise if she takes disability

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

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

I am not surprised.....

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

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

As expected...

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

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

Good morning,

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

Best regards,  
Candice

Defendant/alleged perpetrator, Shillingford and Defendant/"neutral investigator", Vega ridiculing my illness. The mental, physical and emotional stress I was going through the day after my 2015 mid-year performance review where I was presented with the pretextual, fallacious and retaliatory performance improvement plan (PIP). CL

Please note that in 2014 Baruch Horowitz went out on disability due to stress, etc. (Am. Compl. # 107). CL

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

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I believe 7 out of 12.

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

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

How many days for this year has she taken?

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

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

As expected...

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

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

Good morning,

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

Best regards,  
Candice

Totally inappropriate and  
BIASED. The "investigator"  
of my racial discrimination  
claims should not be  
having this kind of  
communication with the  
alleged perpetrator. CZ

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

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

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

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

Did she come in today?

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

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

As expected...

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

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

Good morning,

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

Best regards,  
Candice



**From:** Vega, John R. <John.R.Vega@chase.com>  
**To:** Shillingford, Fidelia X <fidelia.x.shillingford@jpmorgan.com>  
**Sent:** 8/3/2015 6:41:00 PM  
**Subject:** RE: Sick Day

Act as if she signed it. I don't see any reason why you should not act accordingly.

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

**From:** Shillingford, Fidelia X  
**Sent:** Monday, August 03, 2015 1:40 PM  
**To:** Vega, John R.  
**Subject:** RE: Sick Day

Yep, that's what I am doing.  
Does she necessarily have to sign off on the PIP?

Regards  
Fidelia

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

**From:** Vega, John R.  
**Sent:** Monday, August 03, 2015 1:37 PM  
**To:** Shillingford, Fidelia X  
**Subject:** RE: Sick Day

Oh yeah, I saw and I am appalled by it. Just continue to manage the situation.

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

**From:** Shillingford, Fidelia X  
**Sent:** Monday, August 03, 2015 1:36 PM  
**To:** Vega, John R.  
**Subject:** RE: Sick Day

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

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

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

Did she come in today?

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

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

As expected...

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

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

Good morning,

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

Best regards,

Defendant/"neutral investigator" John Vega's Cozy conversation with alleged perpetrator/Defendant Fidelia Shillingford telling her to "Act as if [Candice Lue] signed [the fallacious, pretextual and retaliatory performance improvement plan (PIP)]" that was issued to me on July 30, 2015 which I did not sign. CL



Candice

---

**From:** Vernon, Terri  
**To:** Vega, John R.  
**CC:** Martins, Jack N; Sebastian, Nancy R  
**Sent:** 6/4/2015 3:29:34 PM  
**Subject:** FW: Discussion with Management concerns  
**Attachments:** Lack of Trust and Confidence AND Your Relationship with Michelle Sullivan; RE: Exposure Report; RE: Minutes and Documents for Extended Team Meeting; RE: Monthly CRG Governance Meeting; Re: Not Feeling Well; Re: Sick; RE: Tasks; RE: WFH; Re: WFH; Reporting Analyst Workload

John,

I opened a case for you under the name Fidelia Shillingford (O024978). She is the manager that Candice Liu feels treats her as "The Help" and is racially discriminating.

There is a history with Candice filing complaints against a previous manager as well. Nancy Sebastian investigated that case.

I have emails (many) from Candice that I can forward. Please let me know how I can be of assistance.

---

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

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

Obvious from Terri Vernon's email, my complaint of Employment Racial Discrimination was dead on arrival. CL

---

**From:** Vernon, Terri  
**Sent:** Monday, June 01, 2015 11:00 AM  
**To:** Vega, John R.; Padilla, Linda  
**Cc:** Martins, Jack N  
**Subject:** FW: Discussion with Management concerns

John,

I am forwarding this email to you for you to review. The HRBP asked that I reach out to the employee and schedule a meeting, which I did for tomorrow (Tuesday). I then received this email back from the employee stating that she feels she is a "victim of racial discrimination."

There is a history with this employee. Nancy Sebastian (HRAD) investigated another complaint regarding this employee and a previous manager when the employee was with CIB (2014).

Given this new allegation of racial discrimination, please let me know how you would like to proceed and how I can assist.

---

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---

**From:** Lue, Candice  
**Sent:** Friday, May 29, 2015 5:51 AM  
**To:** Vernon, Terri  
**Subject:** RE: Discussion with Management concerns

Hi Terri,

I have attached a series of emails for your review. Can you please read through the trails in preparation for the meeting on Tuesday?

Also, please be advised that I consider myself to be a victim of racial discrimination.

Looking forward to speaking with you.

**From:**  
**To:** Dubowy, Helen; Vega, John R.  
**Sent:**  
**Subject:** RE: update

My 2015 mid-year performance review was totally pretextual and retaliatory. Even the alleged perpetrators themselves knew it.

CZ

Either way, she will think it's retaliatory. I also think there are pro / cons with the business delivering the mid year and then John speaking with her

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

**From:** Dubowy, Helen  
**Sent:** Thursday, June 18, 2015 4:42 AM  
**To:** Vega, John R.; Vernon, Terri  
**Subject:** RE: update

Terri – do you agree? Should I advise Alex and Fidelia to complete the review in the next 2 days before Alex leaves? Any concern with the perception of retaliation?

**From:** Vega, John R.  
**Sent:** Thursday, June 18, 2015 7:39 AM  
**To:** Dubowy, Helen; Vernon, Terri  
**Subject:** RE: update  
**Importance:** High

My opposition to the Employment Racially Discriminatory tasks that were solely assigned to me, the only Black analyst in the Counterparty Risk Group, per John Vega's email, "is causing the issue here!" CZ

At this stage yes. I would prefer that she do it, but the employee will clearly say it's retaliatory, which we all know is not the case.

This employee's failure to do her job, or her unwillingness to do, is causing the issue here. She is the catalyst.

**From:** Dubowy, Helen  
**Sent:** Thursday, June 18, 2015 7:37 AM  
**To:** Vega, John R.; Vernon, Terri  
**Subject:** RE: update

Thanks John. Should I assume that Alex should not deliver the midyear review until the investigation is complete?

**From:** Vega, John R.  
**Sent:** Thursday, June 18, 2015 7:34 AM  
**To:** Dubowy, Helen; Vernon, Terri  
**Subject:** RE: update

Hi there:

More investigation is needed. I also see that Candice reached out to Terri yesterday and I will be reaching out to her today. Candice will be on vacation starting later today so it's not likely that I will speak with her prior to the start of her vacation. I shared that with Alex and Fidelia. I have spoken with Alex, Fidelia and Kim Dawber and will likely speak with one or two people before I speak with Candice.

Stay tuned.



**From:** Dubowy, Helen  
**Sent:** Thursday, June 18, 2015 6:57 AM  
**To:** Vega, John R.; Vernon, Terri  
**Subject:** RE: update

John – sorry I missed your call yesterday. It was hard to hear your message, so not sure I have a good update. Let's try and connect today. Or may be easier to send an email since I am in meetings most of the morning. I am anxious to understand if there is an outcome or more investigation needs to happen. Thank you.

---

**From:** Vega, John R.  
**Sent:** Tuesday, June 16, 2015 12:27 PM  
**To:** Vernon, Terri; Dubowy, Helen  
**Subject:** update  
**Importance:** High

Hi there:

Just wanted to let you know that I spoke with Alex today on the Lue matter and have a discussion scheduled with Fidelia tomorrow at 3:30. Afterwards, I will speak with Candice.

My meeting with her will be very impromptu, on purpose. Given what I hear, I will then schedule more time.

I'll keep you both posted.

Thx,  
John

---

Impromptu, on purpose.  
Defendant Vega was not  
conducting an investigation,  
he was conducting a  
setup  
CL

**From:** Vernon, Terri  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**CC:** Khavin, Alex G  
**Sent:** 7/8/2015 6:10:33 PM  
**Subject:** RE: PIP template

The performance improvement plan 'PIP' concoction-telling the "ploy"- Defendant Helen Dubowy (Am. Compl. #62) and the two alleged Perpetrators, Defendants, Alex Khavin and Fidelia Shillingford to "stay tuned for further direction"- "Corp ER is meeting with her [Plaintiff, Candice Lue] now".  
Note: I was meeting with

Hi,  
Corp ER is meeting with her now. Please stay tuned for further direction.

Terri Vernon  
Vice President, Human Resources Advice Direct  
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Direct: Terri.Vernon@jpmchase.com / (949) 651-6035

**From:** Shillingford, Fidelia X  
**Sent:** Monday, July 06, 2015 2:27 PM  
**To:** Dubowy, Helen; Vernon, Terri  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Defendant John Vega on July 8, 2015 but Helen Dubowy had already sent the PIP template from July 6, 2015.  
CL

Thanks Helen

Terri, Helen  
Alex is OOO and I am planning to deliver mid-year feedback to Candice once the investigation has been completed (expected to be completed this week). Please find attached a summary of mid-year feedback for your review. This will be delivered by me with Kimberly Dauber present.  
Based on the feedback and performance for mid-year, I am strongly considering placing Candice on a PIP. Terri, can you please review the PIP and let me know your thoughts. I intend to deliver the PIP separately, after the mid-year feedback.

Regards  
Fidelia

**From:** Dubowy, Helen  
**Sent:** Monday, July 06, 2015 10:01 AM  
**To:** Shillingford, Fidelia X  
**Subject:** PIP template

As discussed. Thanks.

My mid-year performance review and my claim of Employment Racial Discrimination are two separate and independent matters which legally should have NO BEARING on each other.

That is why the performance improvement plan on which I was placed is not only fallacious, pretextual and retaliatory but it is an obstruction of justice.  
CL

---

**From:** Dubowy, Helen  
**To:** Vega, John R.  
**CC:** Vernon, Terri (terri.vernon@jpmchase.com)  
**Sent:** 7/21/2015 11:34:00 AM  
**Subject:** RE: Lue

John – I totally agree. I sent a note to Terri with something similar yesterday. I would like to be able to take action asap on this. It's not fair to the management team to continue with the way it is.

---

**From:** Vega, John R.  
**Sent:** Tuesday, July 21, 2015 6:17 AM  
**To:** Dubowy, Helen  
**Subject:** Lue

Hi there:

I am of the opinion that what this employee is doing is bordering on insubordination and she is on the cusp of a WW. Do you agree?

Taking a stance against disparate treatment  
on the basis of my race is not insubordination  
and neither was it insubordination when  
Rosa Parks refused to move to the back  
of the bus.  
CL



---

**From:** Shillingford, Fidelia X  
**To:** Vernon, Terri; Dubowy, Helen  
**CC:** Khavin, Alex G; Vega, John R.  
**Sent:** 7/17/2015 3:06:28 PM  
**Subject:** RE: PIP template

Ok, thanks.  
I will await further guidance from you.

Pleasant weekend to all!

Regards  
Fidelia

---

**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:05 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G; Vega, John R.  
**Subject:** RE: PIP template

Much like the PIP, I would hold off on providing any feedback at this time.

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---

**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 7:03 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

No, when last I spoke with him he noted that she brought up other issues which he has to investigate.  
Can I proceed with the mid-year feedback?

Regards  
Fidelia

---

**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:01 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Fidelia,  
My apologies, I thought John had reached out to you.  
Please hold off at this time with the PIP until further notice.

Terri Vernon  
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PIP- Performance  
Improvement Plan -

Pre-planned, pre-arranged  
and premeditated. CL

**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 6:00 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template  
**Importance:** High

Hi Terri

Were you able to get in contact with John? Can you please advise how to proceed?  
I believe we should at least provide mid-year feedback to Candice and we can proceed with the PIP after the investigations have been completed.

Can you please give me a call to discuss?

Thank in advance

Regards  
Fidelia

**From:** Vernon, Terri  
**Sent:** Wednesday, July 08, 2015 1:11 PM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

My mid-year performance review and my claim of Employment Racial Discrimination are two separate and independent matters which legally should have NO BEARING on each other. That is why the performance improvement plan on which I was placed is not only fallacious, pretextual and retaliatory but it is an obstruction of justice. CL

Hi,  
Corp ER is meeting with her now. Please stay tuned for further direction.

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**From:** Shillingford, Fidelia X  
**Sent:** Monday, July 06, 2015 2:27 PM  
**To:** Dubowy, Helen; Vernon, Terri  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Thanks Helen

Terri, Helen  
Alex is OOO and I am planning to deliver mid-year feedback to Candice once the investigation has been completed (expected to be completed this week). Please find attached a summary of mid-year feedback for your review. This will be delivered by me with Kimberly Dauber present.  
Based on the feedback and performance for mid-year, I am strongly considering placing Candice on a PIP. Terri, can you please review the PIP and let me know your thoughts. I intend to deliver the PIP separately, after the mid-year feedback.

Regards  
Fidelia

**From:** Dubowy, Helen  
**Sent:** Monday, July 06, 2015 10:01 AM  
**To:** Shillingford, Fidelia X  
**Subject:** PIP template



As discussed. Thanks.

---

**From:** Vega, John R.  
**To:** Vernon, Terri  
**Sent:** 7/28/2015 7:10:50 PM  
**Subject:** RE: Meeting follow up

Read it and I am fine with it. Please feel free to send it to Helen and Fidelia.

---

**From:** Vernon, Terri  
**Sent:** Tuesday, July 28, 2015 2:09 PM  
**To:** Vega, John R.  
**Subject:** RE: Meeting follow up

I made some edits. Can you look at the part regarding her attitude, etc.?

Terri Vernon  
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**From:** Vega, John R.  
**Sent:** Tuesday, July 28, 2015 10:12 AM  
**To:** Dubowy, Helen; Vernon, Terri  
**Subject:** FW: Meeting follow up

FYI....

---

**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 24, 2015 12:29 PM  
**To:** Vega, John R.  
**Subject:** Meeting follow up

Follow ups from our meeting



Please find attached:

1. Who was response for taking minutes notes after Baruch left and before Candice's arrival?  
The responsibility was not officially re-assigned until Candice arrival. The practice was that Alex would ask for a volunteer or randomly pick someone.
2. My correspondence with Michelle Sullivan?  
She attached email, Sick Days. It was confirmed that she had 6 sick days to carry over in 2015.
3. Confirm how her increase in salary was established? Did she negotiate the increase?  
I spoke with Kim and she is not aware of any negotiations neither am I.
4. Provide midyear feedback and PIP  
See attached Candice Mid Year Review 2015 Feedback and PIP July
5. Confirm how long it took Zeeshan to compile the materials for the Governance meeting.  
Less than 1 hour

I will await your invite for follow up discussions with HR next week.

Regards  
Fidelia

I have never met Terri Vernon. I honestly did not know that Vernon had played such a big part in my retaliatory mid-year performance review and termination until I received these emails from the Defendants' attorneys' office. When I spoke with Terri via telephone, she pretended to be neutral. That is why she was not initially named as a Defendant.

CL

**From:** Shillingford, Fidelia X  
**To:** Dubowy, Helen  
**CC:** Vernon, Terri  
**Sent:** 7/30/2015 3:51:35 PM  
**Subject:** RE: Tomorrow  
**Attachments:** C Liu PIP July 2015 v2.doc

Again, Terri Vernon whom I had never met and who pretended to be "neutral" when I spoke to her on the phone "Reviewed and edited ACS follows" and Defendant Helen Dubowy whom I have never even had an email exchange with is now asked to do the same. CL

Terri reviewed and edited ad follows:

Candice joined the (name of team) team as a reporting analyst on (date) Her main responsibilities include:

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

Although Candice has been with the team for over 8 months, she has not taken on all tasks assigned to her and she is unable to deliver in the anticipated timeframe without errors. This is putting additional stress on the team as other team members are performing duties assigned to her. Additionally, per feedback from team members, Candice is not "approachable," "inflexible" and "not open to feedback, defensive."

However, I noted I am hesitant to include any responsibilities pertaining to credit given that she was not hired for credit but for reporting and this was clearly communicated and established during the interview and hiring process. As such, I recommend the following in regards to responsibilities:

Candice joined the (name of team) team as a reporting analyst on (date) Her main responsibilities include:

- 1) Help monitor, report and manage counterparty exposures
- 2) Help maintain credit administration systems and records
- 3) Updating and distributing daily Counterparty reports
- 4) Assist other team members with assignments, cover for associates as needed.

Although Candice has been with the team for over 8 months, she has not taken on all tasks assigned to her and she is unable to deliver in the anticipated timeframe without errors. This is putting additional stress on the team as other team members are performing duties assigned to her. Additionally, per feedback from team members, Candice is not "approachable," "inflexible" and "not open to feedback, defensive."

Please review and advise accordingly.

Regards  
Fidelia

**From:** Dubowy, Helen  
**Sent:** Thursday, July 30, 2015 10:04 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Vernon, Terri  
**Subject:** RE: Tomorrow



Did Terri see your final PIP and comments? If not, please send to her she can give the final sign off /

**From:** Shillingford, Fidelia X  
**Sent:** Thursday, July 30, 2015 10:00 AM  
**To:** Dubowy, Helen  
**Subject:** RE: Tomorrow

Ok, let me book a room on 9<sup>th</sup> floor (will let you know shortly)  
I will send Candice and invite for 12noon.



---

**From:** Dubowy, Helen  
**To:** Vega, John R.; Vernon, Terri  
**Sent:** 7/23/2015 12:04:08 PM  
**Subject:** Re: Chronology of Events of Racial Discrimination

Thank you.

I was maligned by JPMC HR  
Representatives for reporting  
to JPMC HR that I was being  
racially discriminated against.  
CZ

---

**From:** Vega, John R.  
**Sent:** Thursday, July 23, 2015 06:54 AM  
**To:** Dubowy, Helen; Vernon, Terri  
**Subject:** RE: Chronology of Events of Racial Discrimination

We already have a meeting scheduled for 5pm today which you and Terri have accepted on Tuesday.

I agree, this has gone on too long with respect to how this employee acts. And I am going to tell her that she is getting in the way of her own career. I've already discussed this with Linda yesterday.

---

**From:** Dubowy, Helen  
**Sent:** Thursday, July 23, 2015 6:51 AM  
**To:** Vega, John R.; Vernon, Terri  
**Subject:** Re: Chronology of Events of Racial Discrimination

As per what I wrote in my "Conclusion" of  
my Affidavit in Opposition/Response to  
Declaration of Helen Dubowy.  
CZ

John - thank you for addressing this. We need to bring this to a close asap. This has been going on for too long and all Terri and I have been able to tell the mgmt is to hold. I am happy to meet later today. Will you schedule time? I will adjust my calendar. Thank you.

---

**From:** Vega, John R.  
**Sent:** Thursday, July 23, 2015 06:46 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Subject:** FW: Chronology of Events of Racial Discrimination

Hi there:

This is the first of three emails that I will be forwarding to you which I received from Candice this week and their respective attachments. The next two will follow shortly.

Let's discuss later today.

Thx  
John

---

**From:** Lue, Candice  
**Sent:** Tuesday, July 21, 2015 5:46 AM  
**To:** Vega, John R.  
**Subject:** Chronology of Events of Racial Discrimination

Hello John,

As requested, please see below chronology of events relating to the racial discrimination issue raised and discussed.

**November 26, 2014**

In my first Governance Meeting, as customary, Alex asked, "who wants to take the minutes this time?" then immediately volunteered me to take it.

**December 22, 2014**

In my second Governance Meeting, Alex did not ask as customary, "who wants to take the minutes this time?" but instead in the

early stages of the meeting looked at me and said "that's a follow up" as if it is my and my alone duty to take the minutes which is contrary to what I was told and what I made sure to confirm in my interview as I was not interested in an analyst/administrative assistant position.

Then in this said meeting, in front of everyone, Alex humiliatingly assigned me the task of printing everyone's presentation materials going forward, an assignment that was never given to an analyst or associate before, an assignment that has no bearing whatsoever on my own required presentation and an assignment that is not even a required task for the administrative assistant on staff to do.

#### ***January 2015***

In the week of January's Governance Meeting, I started feeling uncomfortable and getting anxiety attacks as I kept thinking, "I hope she doesn't address me as if I am the help in the next Governance meeting. I hope she doesn't address me as if I am the help in the next Governance meeting."

#### ***January 20, 2015*** (day before Governance Meeting)

Alex sent me an email asking me if I'm collecting and printing out everyone's presentation materials for the Governance Meeting as she had requested. No other analyst or associate was ever sent such an email.

#### ***January 21, 2015***

I lugged everyone's presentation materials that I had printed, collated and stapled to the meeting.

Then just like in the previous month's Governance meeting, instead of what was customary during the previous two years before me joining the group (Alex asking "who wants to take the minutes this time?"), she just looked at me and asked "are you taking notes?" (the minutes). This was a task that for two years prior was rotated so that it would not seem to be the task of any one analyst or associate.

After this meeting, the disparate treatment became so obvious to me that I became overwhelmed with stress and anxiety which resulted in me developing nausea and exhaustion.

#### ***January 22, 2015 and January 23, 2015***

The nausea and exhaustion became worse and were compounded with headaches and pain in my trapezius muscle. I had to take these two days off as sick days.

#### ***January 26, 2015***

Due to protocol whereby I am not allowed to go directly to Alex, I initiated a meeting with Fidelia in which I raised the issue of Alex demeaning me in front of the team by treating me as if I am "the help".

#### ***January 30, 2015***

In a one on one meeting with Fidelia, since she did not get back to me in regards to the issue I raised in our 1/26/15 meeting, I raised the issue again. According to her, she has to go and confirm with Alex if [the taking minutes, printing, etc.] was my job, meaning that up till then she had not conveyed my concern to Alex.

#### ***February 4, 2015***

Fidelia sent an email to the credit analysts/associates' supervisor saying that Alex is okay with the continuation of rotating the responsibility of document collection and minutes taking for our Monthly Governance Meeting and asking that she assign two of her analysts to the rotation. Bearing in mind that document collection was never a part of the rotation.

#### ***February Governance Meeting***

I was away at a mandatory two week Asset Management Training Program and one of the assigned analysts took the minutes. However, he nor anyone else was asked/told to collect and print out everyone's presentation materials for the meeting as if, the "help" is out so you have to print, collate and staple your own presentation materials for yourself.

#### ***March Governance Meeting***

I stood my ground that I am not "the help" meaning that I did not send out an email to the team telling them to send their presentation materials for me to print etc, so everyone printed, collated, stapled and lugged their own presentation materials to the meeting. Also, per the newly re-installed rotation, one of the other assigned analysts took the minutes.

#### ***April 23, 2015***

Even though I did not take the minutes for March's Governance Meeting and whoever takes the minutes for the prior month's meeting would have been responsible for sending them out to the team before the current month's meeting, Alex sent me an email the morning of April's Governance Meeting asking me for the minutes. Again, as if taking the minutes is my and my alone job.



During April's Governance Meeting, a team member asked about a presentation material that had absolutely nothing to do with my presentation/reporting tasks and instead of addressing the individuals responsible, Alex immediately asked, "Did Candice send that out last night?" Again, as if I am the team's help.

Soon after, she directed the team that to make things easier for everyone, instead of everyone going through their emails searching for presentation materials sent to the team, going forward, all presentation materials should be sent to me and I should do the searching then open each email sent, pull the attachments, put all the attachments together in one email then send this email to the team. So it is hard enough for everyone to search through their emails for the sent documents but for me, I must not only search through my emails for them, I must open each email sent, pull the attachments and put all those attachments together in one email to make it easier for everyone else. So what will become easier for everyone else would become three times harder for me.

At that point, I became so frustrated, I just sighed and quietly walked out of the meeting. I returned 20 minutes later.

After the Governance Meeting, I requested a meeting with Fidelia to again raise the issue of me being treated as if I am the team's help by Alex.

#### **April 24, 2015**

I sent the attached email to Fidelia.

Later that day, I had a meeting with Alex initiated by her as she wanted to know why I walked out of the Governance Meeting the previous day. I proceeded to tell her that with all due respect, I feel as if I am being demeaned by her. I feel as if she has been treating me as if I am the "help". Her response was condescending, unapologetic and unrepentant.

#### **May 27, 2015**

Based on Alex's directive at April's Governance Meeting, I received the first presentation material.

Knowing in my heart that this is not right and that I am being treated as if I am the team's help, I sent out the second attached email. Also see Alex's response in the said attachment.

Later that day, I got a meeting invite for 6/2/15 from Terri Vernon in HR to "discuss concerns regarding my manager and job responsibilities."

#### **June Governance Meeting**

I was on vacation when this Governance Meeting took place so as usual, in my absence, no other analyst or associate was asked/told to do the printing, etc. of everyone's presentation materials. As again, this will never be their job, just mine. However, my manager, a vice president, the only other Black employee on the team had to take on the role (see her email trail attached). As per the said email, she did enlist the help of the intern who like most other interns is prepared to assist with these types of tasks when needed as they are aware that it comes with the territory. But again, no other analyst or associate was asked/told to do this lower level task.

#### **July 20, 2015**

In a one on one meeting with Fidelia, for the first time, she took ownership of assigning the task to me in addition to reiterating what Alex contends that the printing of everyone's presentation materials is my job and she expects me to collect everyone's material and do the printing, etc, for the July Governance Meeting on July 23. After the meeting, she followed up via the email attached and suggested that I enlist the help of the intern as she had done for last month's meeting.

My question for her is this, where was she during the two years prior to me joining the team to assign this demeaning, lower level task that has nothing to do with Reporting or the Reporting related presentation for the Governance Meeting to my three non-Black predecessors? She was not even given the opportunity to be their manager much less the opportunity to dish out this demeaning, lower level task to them. This is one of the reasons why I have said under separate covers that I have a lack of trust and confidence in her as I consider her to be the enabler, the facilitator and the coordinator of the second class treatment that has been meted out to me. And, because she is Black like I am does not make this treatment right. Frankly, I think it makes it even more wrong.

In closing, please be advised that there were other instances of disparate treatment and verbal meetings with Fidelia that are not included in this chronological list as either they are second class treatment of a different nature or I do not remember the dates. Also, it was not until 1/21/15 (the day of January's Governance Meeting) that I felt in good faith that I am being racially discriminated against.

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](mailto:Candice.Lue@jpmorgan.com)



---

**From:** Dubowy, Helen  
**To:** Vernon, Terri  
**Sent:** 7/20/2015 11:40:40 PM  
**Subject:** Fw: PIP template  
**Attachments:** [Untitled].pdf

We have to figure out what to do here. This kind of behavior is not appropriate. Anyway to get John to expedite the rest of the investigation?

---

**From:** Shillingford, Fidelia X  
**Sent:** Monday, July 20, 2015 05:56 PM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G; Vega, John R.; Shillingford, Fidelia X  
**Subject:** RE: PIP template

Helen et al

I wanted to update you on a recent conversation with Candice during our scheduled one-on-one (meeting to discuss workload for the last two weeks, upcoming two weeks and any other tasks/issues).

- I asked Candice to include in her tasks for the upcoming two weeks, the responsibility for prepping documents and taking notes for the Governance meeting. She has refused.

- Candice also stated and I quote, "last week, you bullied me" in regards to "when will I have the exposure report completed." I explained to Candice that this role has deadlines and me asking her for the report is BAU – I am trying to manage management deadlines.

Regards  
Fidelia

---

**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:05 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G; Vega, John R.  
**Subject:** RE: PIP template

Deadlines for Shillingford were based on HER convenience as the second reviewer of my reports, not the CRG's deadline. Because Shillingford "had" Dubowy, Vega, etc. as the "wind beneath her wings", she bullied and went on. (Am Compl. #20). The "tasks that Shillingford" asked "me" to do are tasks she had never asked any of the non-Black analysts/ associates ~~one~~ even the white administrative assistant to do.

Much like the PIP, I would hold off on providing any feedback at this time.

Terri Vernon  
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(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (949) 651-6035

---

**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 7:03 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

No, when last I spoke with him he noted that she brought up other issues which he has to investigate. Can I proceed with the mid-year feedback?

Regards  
Fidelia

---

**From:** Vernon, Terri  
**Sent:** Friday, July 17, 2015 10:01 AM  
**To:** Shillingford, Fidelia X; Dubowy, Helen



**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Fidelia,  
My apologies, I thought John had reached out to you.  
Please hold off at this time with the PIP until further notice.

Terri Vernon  
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(888) 703-5555 / [HR.Advice.Direct@jpmchase.com](mailto:HR.Advice.Direct@jpmchase.com)

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

---

**From:** Shillingford, Fidelia X  
**Sent:** Friday, July 17, 2015 6:00 AM  
**To:** Vernon, Terri; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template  
**Importance:** High

Hi Terri

Were you able to get in contact with John? Can you please advise how to proceed?  
I believe we should at least provide mid-year feedback to Candice and we can proceed with the PIP after the investigations have been completed.

Can you please give me a call to discuss?

Thank in advance

Regards  
Fidelia

---

**From:** Vernon, Terri  
**Sent:** Wednesday, July 08, 2015 1:11 PM  
**To:** Shillingford, Fidelia X; Dubowy, Helen  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Hi,  
Corp ER is meeting with her now. Please stay tuned for further direction.

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

---

**From:** Shillingford, Fidelia X  
**Sent:** Monday, July 06, 2015 2:27 PM  
**To:** Dubowy, Helen; Vernon, Terri  
**Cc:** Khavin, Alex G  
**Subject:** RE: PIP template

Thanks Helen

Terri, Helen  
Alex is OOO and I am planning to deliver mid-year feedback to Candice once the investigation has been completed (expected to be completed this week). Please find attached a summary of mid-year feedback for your review. This will be delivered by me with Kimberly Dauber present.

Based on the feedback and performance for mid-year, I am strongly considering placing Candice on a PIP. Terri, can you please review the PIP and let me know your thoughts. I intend to deliver the PIP separately, after the mid-year feedback.

Regards  
Fidelia

---

**From:** Dubowy, Helen  
**Sent:** Monday, July 06, 2015 10:01 AM  
**To:** Shillingford, Fidelia X  
**Subject:** PIP template

As discussed. Thanks.

Defendant Helen Dubowy  
Sending the Performance  
improvement plan (PIP)  
template to my service  
manager, Defendant Fidelia  
Shillingford with the  
message "As discussed".  
With all due respect, enough  
said.  
CL

**From:** Vernon, Terri  
**To:** Dubowy, Helen; Shillingford, Fidelia X  
**Sent:** 7/29/2015 3:44:08 PM  
**Subject:** RE: Tomorrow  
**Attachments:** C Liu PIP July 2015.doc

JPMC's HR Representatives  
Whom I have never met/worked  
with REVIEWING/MAKING EDITS/  
APPROVING EDITS of the  
retaliatory, pretextual and  
fallacious performance  
improvement plan (PIP) I  
was placed on. (Exhibit C).  
CZ

Helen,  
I made some edits to the PIP. John has reviewed and approved the edits.

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---

**From:** Dubowy, Helen  
**Sent:** Wednesday, July 29, 2015 7:33 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Vernon, Terri  
**Subject:** RE: Tomorrow

Ok, thanks. I will get back to you to confirm later today or tomorrow morning.

---

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, July 29, 2015 9:10 AM  
**To:** Dubowy, Helen  
**Subject:** Tomorrow

Hi

I am free between 11:30-1:30 tomorrow, so any time period between would work for me.  
Will you be coming down to the 9<sup>th</sup> floor? I could reserve Alex's office.

Regards  
Fidelia



**From:** Dubowy, Helen  
**To:** Shillingford, Fidelia X  
**CC:** Vernon, Terri  
**Sent:** 7/30/2015 7:27:25 PM  
**Subject:** RE: Follow up

Prior to Defendant Helen Dubowy attending my 2015 mid-year performance review, I had never even as much as had an email correspondence with her yet she is making "changes" on the performance improvement plan on which I was placed on July 30, 2015. Further proof that this said PIP was fallacious, Pretextual and retaliatory (Second Cause of Action- Am. Compl.)

See my small changes below on the summary performance review. (I would change the PIP to reflect the same wording). I would add to the PIP form the date of the mid-year and put final review as Sept 30<sup>th</sup>. You don't need to mention the 60 days since you'll have Sept 30<sup>th</sup> as the final review date. When you meet with her you can talk about the 60 day time frame for improvement. CL

I would suggest when sending her the PDF PIP you can say:

*Attached is the Performance Improvement Plan we discussed. We will meet on a regular basis to discuss your progress on these areas.*

Terri -- can you please confirm you agree with the above before Fidelia proceeds. Thanks.

**From:** Shillingford, Fidelia X  
**Sent:** Thursday, July 30, 2015 1:58 PM  
**To:** Dubowy, Helen  
**Cc:** Vernon, Terri  
**Subject:** Follow up

Hi Helen

As discussed, please see below summary comments which I will add to Candice's PMC. Also, we did not communicate to Candice the duration of the PIP. Should I highlight this to her when I email her the soft copy? We agreed it would be a two months PIP after which are overall performance would be re-evaluated.

During our mid-year dialogue, I discussed with Candice her strengths and areas of improvement. The following strengths were highlighted: (i) Candice is adept at following procedures (ii) She proactively follows up on key issues and (iii) Candice is diligent at identifying course work to extend her knowledge. The areas of improvement which were discussed included (i) The need for Candice to perform job responsibilities asked: (ii) Take full responsibility for the tasks assigned, particularly the exposure report and (iii) Candice needs to improve her communication specifically in regards to tone and aggressiveness (attitude/professionalism).

Candice will need to address her development areas in order for her to meet expectations by year end. Candice has been placed on a PIP to address her areas of improvement. We will be meeting regularly to discuss her progress.

Regards  
Fidelia

Why would my manager need someone from HR to tell her what to put as the "Summary comments on my performance review?"

CL

---

**From:** Vernon, Terri  
**To:** Dubowy, Helen; Shillingford, Fidelia X  
**Sent:** 7/30/2015 7:58:15 PM  
**Subject:** RE: Follow up

I am fine with the wording per your suggestion.

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

---

**From:** Dubowy, Helen  
**Sent:** Thursday, July 30, 2015 11:27 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Vernon, Terri  
**Subject:** RE: Follow up

See my small changes below on the summary performance review. (I would change the PIP to reflect the same wording). I would add to the PIP form the date of the mid-year and put final review as Sept 30<sup>th</sup>. You don't need to mention the 60 days since you'll have Sept 30<sup>th</sup> as the final review date. When you meet with her you can talk about the 60 day time frame for improvement.

I would suggest when sending her the PDF PIP you can say:

*Attached is the Performance Improvement Plan we discussed. We will meet on a regular basis to discuss your progress on these areas.*

Terri – can you please confirm you agree with the above before Fidelia proceeds. Thanks.

---

**From:** Shillingford, Fidelia X  
**Sent:** Thursday, July 30, 2015 1:58 PM  
**To:** Dubowy, Helen  
**Cc:** Vernon, Terri  
**Subject:** Follow up

Hi Helen

As discussed, please see below summary comments which I will add to Candice's PMC.  
Also, we did not communicate to Candice the duration of the PIP. Should I highlight this to her when I email her the soft copy? We agreed it would be a two months PIP after which her overall performance would be re-evaluated.

During our mid-year dialogue, I discussed with Candice her strengths and areas of improvement. The following strengths were highlighted: (i) Candice is adept at following procedures (ii) She proactively follows up on key issues and (iii) Candice is diligent at identifying course work to extend her knowledge. The areas of improvement which were discussed included (i) The need for Candice to perform job responsibilities asked; (ii) Take full responsibility for the tasks assigned, particularly the exposure report and (iii) Candice needs to improve her communication specifically in regards to tone and aggressiveness (attitude/professionalism).

Candice will need to address her development areas in order for her to meet expectations by year end. Candice has been placed on a PIP to address her areas of improvement. We will be meeting regularly to discuss her progress.

Regards  
Fidelia



**From:** Shillingford, Fidelia X  
**To:** Dubowy, Helen  
**CC:** Vernon, Terri; Poz, Thomas I  
**Sent:** 8/27/2015 3:48:26 PM  
**Subject:** RE: Monthly CRG Governance Meeting

Retaliating against an  
employee for opposing  
Employment Racial  
Discrimination is against  
the law- EEOC Compliance  
Manual Section 15-Race  
and Color Discrimination-  
VII-C-Retaliation. CZ

Done -- scheduled for 8/31 @ 1pm.

Thanks

Regards  
Fidelia

---

**From:** Dubowy, Helen  
**Sent:** Thursday, August 27, 2015 10:12 AM  
**To:** Shillingford, Fidelia X  
**Cc:** Vernon, Terri; Poz, Thomas I  
**Subject:** Re: Monthly CRG Governance Meeting

Fidelia, I will let Terri advise on next steps. Why don't you schedule time on her calendar as soon as possible. Thank you.

---

**From:** Shillingford, Fidelia X  
**Sent:** Thursday, August 27, 2015 10:04 AM  
**To:** Dubowy, Helen  
**Cc:** Vernon, Terri; Poz, Thomas I; Shillingford, Fidelia X  
**Subject:** FW: Monthly CRG Governance Meeting

Hi Helen

Please see below.

Candice has once again refused to perform tasks requested (see yellow highlighted text).

What are the next steps here?

Regards

Fidelia

---

**From:** Shillingford, Fidelia X  
**Sent:** Wednesday, August 26, 2015 4:25 PM  
**To:** Poz, Thomas I  
**Subject:** FW: Monthly CRG Governance Meeting

Hi


Please be advised that Candice has once again refused to perform this task.

I had a quick meeting with her on a separate topic but I mentioned to her that I have saved all my documents in the shared folder for the governance meeting and asked if she has reached out to the

other team members for their information.

*peaceful defiance CZ*  
She gave me blank stare with no response; to which my response was, "We had a conversation during your mid-year review where I highlighted certain areas that needs to be improved. This is one of the areas – refusing to perform your duties. This is unacceptable."

She replied, "She has no further comments."

If tomorrow, she has not completed the required  ask, I will inform HR and seek guidance on the next steps.

Regards

Fidelia


---

**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

*Defendant Fidelia Shillingford's email dated August 25, 2015 proves that the task of taking the Monthly Governance Meeting minutes was never exclusively assigned to any one of the non-Black analysts and/or associates. CZ*

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

*Eileen Kulda is the white administrative assistant who does not even as much as prints the agenda she sends out to the team. I, the Black one, was supposed to make 13 copies of it (one for each team member). CZ*

---

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

---

I believe 7 out of 12.

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

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

How many days for this year has she taken?

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

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

As expected...

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

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

Good morning,

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

Best regards,  
Candice

Totally inappropriate and  
BIASED. The "investigator"  
of my racial discrimination  
claims should not be  
having this kind of  
communication with the  
alleged perpetrator. CZ



---

**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](mailto:HR.Advice.Direct@jpmchase.com)  
Direct: [Terri.Vernon@jpmchase.com](mailto:Terri.Vernon@jpmchase.com) / (714) 997-4377



# Redacted

**From:** Padilla, Linda  
**Sent:** Friday, October 23, 2015 8:37 AM  
**To:** Vernon, Terri; Knepper, Kathy; Domow, Penny P  
**Cc:** Dubowy, Helen  
**Subject:** RE: Monthly Governance Meeting - Candice Lue case



I honk it's time to move forward.

**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

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:** Knepper, Kathy  
**Sent:** Thursday, December 10, 2015 4:27 PM  
**To:** Dubowy, Helen  
**Subject:** RE: summary

Who is this summary being sent to? Please see my corrections/comments in red below.

Note that although there is no 2014 performance rating in Profile, the 2014 performance review had a rating of "Low Meets Expectations" (see attached). My understanding is because the performance review was never finalized (Candice did not sign the review), the rating did not get uploaded into our systems. I think you can say she received a M- for performance year 2014.

---

**From:** Dubowy, Helen  
**Sent:** Thursday, December 10, 2015 3:44 PM  
**To:** Knepper, Kathy  
**Subject:** summary

Anything you would add to this summary? Feel free to modify if I don't have it correct. Thanks.

-----  
DOH – 8/20/2012  
Transferred from CIB to AM 11/16/2014  
2012 YE rating – "Too New to Rate"  
2013 YE rating – M  
No rating entered for 2014 – interview notes state previous manager Michelle Sullivan said "trending towards a M-"  
(see my comments above)  
2015 – Midyear M- (trending)  
2015 – M-

PIP issued – July 30<sup>th</sup>, 2015