



NEW YORK STATE  
DEPARTMENT of  
FINANCIAL SERVICES

Andrew M. Cuomo  
Governor

Benjamin M. Lawsky  
Superintendent

March 28, 2014

Pam Martens  
Wall Street on Parade

[REDACTED]  
[REDACTED]  
[REDACTED]

Re: Foil Request # 14-039: Documents Pertaining to Bank Owned Life Insurance (BOLI) Held by JPMorgan Chase.

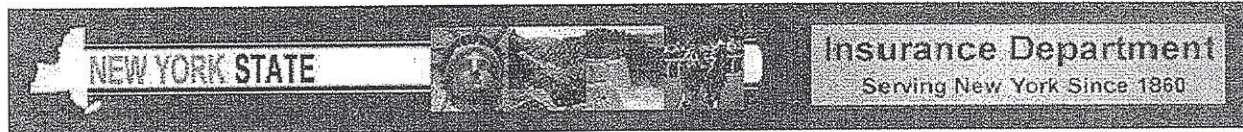
This is in response to your above-referenced request for information made to New York State Department of Financial Services ("the Department") under New York's Freedom of Information Law (New York Public Officers Law ("POL") §87). As to the records you requested, please be advised that:

- The Department is providing all of the records with redactions or deletions.
- The Department does not have any of the records.
- The Department is not providing the records in its possession which are responsive to your request for the reason(s) indicated below.
- The Department is providing only certain records. Please note, records were redacted and/or deleted for the reason(s) indicated below.
  - 1. Exempt from disclosure by State or Federal statute POL 87(2) (a)
    - a.  Examination/Investigatory material exempt under BL 36(10)
    - b.  Other
  - 2. Unwarranted invasion of personal privacy POL 87(2) (b)
  - 3. Impairment of contract awards negotiations POL 87(2) (c)
  - 4. Trade secrets or submitted to an agency by, or derived from information obtained by, a commercial enterprise, which if disclosed would cause substantial injury to the competitive position of the enterprise POL 87(2) (d)
  - 5. Compiled for law enforcement purposes which, if disclosed, would cause one or more of the harms POL 87(2) (e) (i)-(iv)
  - 6. Endanger life or safety POL 87(2) (f)
  - 7. Inter-agency/intra-agency materials which are not described in POL 87(2) (g) (i)-(iv)

Any decision of the Department not to disclose records based on the section(s) of law specified above may be appealed to the Deputy Superintendent and Counsel, in writing, within 30 days pursuant to New York Public Officers Law § 89. If you have any questions, please contact Harold Frye, Administrative Assistant, at (212) 709-1656 or by fax at (212) 709-1655.

Sincerely,

Christine R. Cardi, Assistant Counsel



**Application for Records Under Freedom of Information Law ("FOIL")**

Instructions

|                                |                       |
|--------------------------------|-----------------------|
| FIRST                          | Pam                   |
| LAST                           | Martens               |
| BUSINESS NAME                  | Wall Street On Parade |
| STREET                         | [REDACTED]            |
| CITY                           | [REDACTED]            |
| STATE                          | [REDACTED]            |
| ZIP CODE                       | [REDACTED]            |
| DAYTIME PHONE # (xxx-xxx-xxxx) | [REDACTED]            |
| EMAIL                          | [REDACTED]            |

**I HEREBY APPLY TO RECEIVE COPIES OF RECORDS.**  Yes

*If these records are not available by the method you have chosen you will be contacted to determine alternative. Duplication costs for records are outlined on our webpage.*

COPIES OF THESE RECORDS SHOULD BE DELIVERED TO ME BY:  Email

**I HEREBY APPLY FOR AN APPOINTMENT TO INSPECT RECORDS AT THE OFFICES OF THE NEW YORK STATE INSURANCE DEPARTMENT.**  Yes

CONTACT ME WITH A TIME TO INSPECT THESE RECORDS BY: [REDACTED]

|                           |   |
|---------------------------|---|
| <b>Record Description</b> | <p>All emails, correspondence, documents of any kind pertaining to Bank Owned Life Insurance (BOLI) held by JPMorgan Chase or its affiliates, divisions or subsidiaries on the life of its current or former employees.</p> <p>This request covers the years 2008 through March 21, 2014.</p> |
|---------------------------|---|

**CHECK BUSINESS UNIT(S) KNOWN OR ASSUMED TO HAVE THE RECORDS (if known):**

|  |  |  |
|--|--|--|
| <input type="checkbox"/> Administration          | <input type="checkbox"/> Office Of General Counsel           | <input type="checkbox"/> Property                        |
| <input type="checkbox"/> Market Examinations     | <input type="checkbox"/> Health                              | <input type="checkbox"/> Public Information Office       |
| <input type="checkbox"/> Consumer Assistance     | <input type="checkbox"/> Office Services and Facilities Mgmt | <input type="checkbox"/> Information Technology Services |
| <input type="checkbox"/> Executive               | <input type="checkbox"/> Human Resources                     | <input type="checkbox"/> Revenue and Billing             |
| <input type="checkbox"/> Procurement and Budget  | <input checked="" type="checkbox"/> Life                     | <input type="checkbox"/> Internal Audit                  |
| <input type="checkbox"/> Criminal Investigations | <input type="checkbox"/> Licensing                           |  |

**REQUESTED OFFICE FOR HANDLING:**  Albany