

# EXHIBIT 1

UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:21-cv-09326

SHAQUALA WILLIAMS,	:	VIRTUAL
	:	DEPOSITION OF:
Plaintiff,	:	
	:	SHAQUALA WILLIAMS
vs.	:	
	:	
JPMORGAN CHASE & CO.,	:	
	:	
Defendant.	:	
-----	:	X

TRANSCRIPT of virtual deposition taken by and before ROBYN PULZONE, a Certified Court Reporter of the State of New Jersey, in New Jersey on Tuesday, April 12, 2022 commencing at 10:03 A.M., pursuant to Notice.

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1 I N D E X  
 2 WITNESS DIRECT CROSS REDIRECT RECROSS  
 3 SHAQUALA WILLIAMS  
 4 BY: Mr. Linthorst 7  
 Mr. Iadevaia 218  
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1 THE VIDEOGRAPHER: Good morning.  
2 We're now on the record. This begins Videotape  
3 No. 1 in the deposition of Shaquala Williams in  
4 the matter of Shaquala Williams versus JPMorgan  
5 Chase Bank in the U.S. District Court Southern  
6 District of New York, Case 1:21-CV-09326.

7 Today is April 12th, 2022, and the  
8 time is 10:03 a.m.. This deposition is being  
9 taken via Zoom video conference at the request of  
10 Morgan, Lewis & Bockius, LLP.

11 The videographer is James Viola of  
12 Magna Legal Services and the court reporter is  
13 Robyn Pulzone.

14 Will counsel and all parties  
15 present please state your appearances and whom  
16 they represent?

17 MR. LINTHORST: Go ahead, Jeremiah.

18 MR. IADEVAIA: It's Jeremiah  
19 Iadevaia, Kathleen Riley and Brandon White of  
20 Vladeck, Raskin & Clark on behalf of the  
21 plaintiff, Shaquala Williams. Good morning,  
22 everyone.

23 MR. LINTHORST: Good morning. This  
24 is Tom Linthorst with Morgan Lewis on behalf of  
25 the defendant.

1 S H A Q U A L A W I L L I A M S, is sworn.

2

3 MR. IADEVAIA: Can we use a  
4 business address or my firm's address? Does it  
5 need to be a home address?

6 THE REPORTER: Whatever you prefer.

7 MR. IADEVAIA: Sure. I'll give my  
8 firm address. It's 565 Fifth Avenue, 9th Floor,  
9 New York, New York 10017.

10 THE REPORTER: Thank you.

11

12 DIRECT EXAMINATION BY MR. LINTHORST:

13 Q. Good morning, Ms. Williams.

14 A. Good morning.

15 Q. My name is Tom Linthorst. I am an  
16 attorney with the law firm of Morgan Lewis and we  
17 represent the defendant, JPMorgan Chase, in the  
18 lawsuit that you have brought against it. We're  
19 here today to take your deposition as the  
20 plaintiff in the action.

21 Have you ever had your deposition  
22 taken before?

23 A. No.

24 Q. Have you ever taken or defended a  
25 deposition as an attorney?



1 A. No.

2 Q. So let's just go over a couple of  
3 the ground rules to make sure we're all on the  
4 same page. The first and most important is that  
5 you've been placed under oath and you've sworn to  
6 tell the truth.

7 Do you understand that?

8 A. Yes.

9 Q. And even though we're in the  
10 relatively informal confines of a Zoom deposition,  
11 the oath that you've taken carries with it the  
12 same penalties of perjury as if you were on the  
13 witness stand at the federal courthouse.

14 Do you understand that?

15 A. Yes.

16 Q. The court reporter is taking down  
17 everything that's being said on the record and  
18 what that means is only one person can speak at a  
19 time. And that's even more important in the  
20 virtual environment because there can be kind of a  
21 delay and/or the sound won't translate when more  
22 than one person is speaking at a time. So I would  
23 ask that you try to wait until I get my complete  
24 question out before starting your answer. And the  
25 other thing is, the court reporter can only take

1 down verbal responses, yeses or nos, not nods of  
2 the head or uh-huhs or ah-hahs.

3 We can take a break at any time, I  
4 would just ask that if there's a question pending,  
5 you answer the question before we take a break.

6 If you don't understand a question,  
7 please let me know and I will try to rephrase it  
8 so that you understand it. If you answer the  
9 question, we will assume and the record will  
10 reflect that you understood the question and  
11 answered it to the best of your ability.

12 Do you understand that?

13 A. Yes.

14 Q. Are you currently under the  
15 influence of any medication or substance that  
16 would impair your ability to testify truthfully,  
17 completely and accurately here today?

18 A. No.

19 Q. Is there any other reason you would  
20 not be able to testify truthfully, completely and  
21 accurately here today?

22 A. No.

23 Q. And where are you located for  
24 today's deposition?

25 A. At my home.

1 Q. And in what city is that?

2 A. Atlantic Highlands.

3 Q. Is anyone present with you in the  
4 room?

5 A. No.

6 Q. If that changes at any point in the  
7 deposition, will you let us know?

8 A. Yes.

9 Q. And do you have any notes or other  
10 documents in front of you?

11 A. No.

12 Q. And if that changes at any point  
13 today, will you let us know?

14 A. Yes.

15 Q. Did you do anything to prepare for  
16 your deposition today?

17 A. Yes.

18 Q. What did you do?

19 A. I met with my lawyers.

20 Q. And when did you meet with them to  
21 prepare for your deposition?

22 A. On Saturday.

23 Q. And was that in person or some  
24 other means?

25 A. By video.

1 Q. And who was present during the  
2 meeting?

3 A. Jeremiah, Kate and Brandon.

4 Q. Anybody else?

5 A. No.

6 Q. And how long was the meeting?

7 A. About two hours.

8 Q. Did you have any other meetings to  
9 prepare for your deposition?

10 A. Yes.

11 Q. And when were those?

12 A. That was in March when we thought  
13 my deposition was going to be in April. I spent  
14 an hour with Kate -- or Kathleen Riley.

15 Q. Any other meetings to prepare for  
16 your deposition?

17 A. No.

18 Q. Did you review any documents to  
19 prepare for your deposition?

20 A. Yes.

21 Q. And what documents did you review?

22 A. My complaint, some e-mails. I  
23 think that's it, yeah.

24 Q. The complaint you reference, are  
25 you referring to the Southern District of New York

1 complaint?

2 A. Yes.

3 Q. And about how many e-mails did you  
4 review?

5 A. Maybe 10. Maybe 10.

6 Q. And to your knowledge, have all of  
7 those documents been produced in the litigation?

8 A. Yes, they all had Bates stamps.

9 Q. In responding to discovery in this  
10 case, have you conducted a search for all  
11 documents that relate to JPMorgan Chase?

12 A. Yes.

13 Q. And have you provided your counsel  
14 with all documents that relate to JPMorgan Chase?

15 A. Yes.

16 Q. What is your date of birth?

17 A. August 3rd. Do you need the year?

18 Q. Yes, please.

19 A. 1983.

20 Q. Are you married?

21 A. No.

22 Q. Have you ever been married?

23 A. No.

24 Q. Do you have any children?

25 A. No. Well, human children, no, not

1 human children.

2 Q. Pet children?

3 A. Yes, I have a -- I have a cat.

4 Q. Do you own your residence?

5 A. Yes.

6 Q. Do you own any other real estate?

7 A. Yes.

8 Q. And what is that?

9 A. It's a home I bought with my  
10 sister.

11 Q. And where is that?

12 A. Florida.

13 Q. What part of Florida?

14 A. Orlando.

15 Q. And when did you buy that?

16 A. Last year.

17 Q. 2021?

18 A. I believe so, yes.

19 Q. And for what purpose did you buy  
20 that?

21 A. It was going to be our family home.

22 Q. Okay. So to use it rather than to  
23 rent it?

24 A. That's correct.

25 Q. Any other real estate?

1 A. No.

2 Q. Have you ever been a party to any  
3 litigation besides this action and any other  
4 action you brought against JPMorgan Chase?

5 A. No.

6 Q. Have you ever filed for bankruptcy?

7 A. No.

8 Q. Have you ever filed any  
9 administrative complaints or charges other than  
10 those filed against JPMorgan Chase?

11 A. No.

12 Q. Have you ever been arrested?

13 A. No.

14 Q. Ever been charged with any criminal  
15 offense?

16 A. No.

17 Q. Ever been convicted of any crime?

18 A. No.

19 MR. LINTHORST: Let's mark this as  
20 Defendant's Exhibit 1, which is a document Bates  
21 labeled JPMC 2084 through 2215.

22

23 (Whereupon Document with Bates Nos.  
24 JPMC 2084 to JPMC 2215 was received and marked D-1  
25 for identification.)

1

2 Q. Did you complete an electronic  
3 application for your job with JPMorgan Chase?

4 A. Yes.

5 Q. And did you apply for the job of  
6 Global Compliance Anticorruption  
7 Compliance-Compliance Manager, Vice President?

8 A. Yes.

9 Q. And was the hiring manager Garrett  
10 Ross?

11 A. Yes.

12 Q. And did you submit a resume with  
13 your application?

14 A. Yes.

15 Q. Just scrolling down through a few  
16 of the pages, it looks like there's some work  
17 experience provided, education provided, answering  
18 some questions?

19 A. May I make this a bit smaller,  
20 please, on my screen because the scrolling is  
21 making me a little dizzy? Is that okay?

22 Okay.

23 Q. Does this appear to be a copy of  
24 your electronic application to JPMorgan Chase?

25 MR. IADEVAIA: I'm going to ask



1 that the witness be allowed to look at the  
2 document. I mean, it's a 132-page document, so.

3 Q. Yeah, I'll just represent that the  
4 pages I've scrolled through through JPMC 2092  
5 appear to be all of the application information,  
6 and then starting on 2093 is some history of  
7 system hits for the application. And then  
8 starting on 2106 appears to be information  
9 relating to other applications made to JPMorgan  
10 Chase.

11 But from what you've seen in the  
12 pages that I scrolled up above, does this appear  
13 to be your electronic application to JPMorgan  
14 Chase?

15 A. I don't know. I've never seen --  
16 seen it in this format.

17 Q. Well, let's go to the bottom.  
18 Showing you the pages that are JPMC 2213 through  
19 2215, does this appear to be a resume that you  
20 prepared?

21 A. Yes.

22 Q. And I take it that you would have  
23 submitted an original resume with your application  
24 to JPMorgan Chase?

25 A. Yes, through their system.

1 Q. And presumably this is not that  
2 resume since it has Chase employment on it. Did  
3 you update your resume in the Chase system as you  
4 applied for other roles at Chase?

5 A. That's likely, yes.

6 Q. So on Page JPMC 2087 it reflects  
7 work experience as -- at Morgan Stanley from  
8 February 2017 to July 2018 as a vice president.  
9 Is that accurate?

10 A. That's right.

11 Q. And what was your role at Morgan  
12 Stanley?

13 A. Beyond the vice president title?

14 Q. Yeah.

15 A. I was a global financial crimes  
16 policy procedure and training.

17 Q. And who was your direct supervisor?

18 A. Lauren Rasmus.

19 Q. How do you spell that last name?

20 A. R-a-s-m-u-s, I think. R-a-s-m-u-s,  
21 I think.

22 Q. And were you engaged in the role of  
23 an attorney at Morgan Stanley?

24 A. No, I was in compliance.

25 Q. And how did your employment with

1 Morgan Stanley come to an end?

2 A. I found another role with JPMorgan.

3 Q. And did you leave voluntarily from  
4 Morgan Stanley?

5 A. Yes.

6 Q. Did you have an offer from JPMorgan  
7 Chase at the time you left Morgan Stanley?

8 A. Yes.

9 Q. Were you ever disciplined at Morgan  
10 Stanley?

11 A. No.

12 Q. Were you ever advised that your  
13 employment would be terminated?

14 A. No. I was advised that my job  
15 would be moving to Baltimore and I could either  
16 move there or find a different job.

17 Q. You chose to find a different job?

18 A. To stay in New York, yes.

19 Q. And were you offered a separation  
20 package?

21 A. I would have been. I would have  
22 had a separation package if I hadn't found another  
23 role.

24 Q. I see. So you left to take the job  
25 with JPMorgan Chase before you could accept a

1 separation package?

2 A. That's correct.

3 Q. And this indicates that prior to  
4 Morgan Stanley, you worked at HSBC Middle East  
5 from October 2014 to September 2016. Does that  
6 accurately reflect your HSBC employment?

7 A. That's correct.

8 Q. And did you hold the role of senior  
9 manager Anti-Bribery and Corruption?

10 A. That's correct.

11 Q. And how did your employment with  
12 HSBC come to an end?

13 A. I needed to come back to the U.S.  
14 for some family health issues. They offered me a  
15 role closer to the U.S. which I explored, but the  
16 closest they could get me was Mexico and it  
17 just -- it didn't work out, the transfer didn't  
18 work out.

19 Q. And where were you employed with  
20 HSBC?

21 A. Dubai in the United Arab Emirates.

22 Q. And did you leave HSBC voluntarily?

23 A. Yes.

24 Q. And who was your direct supervisor  
25 at HSBC?

1 A. Simon Lee.

2 Q. Sorry, can you say that again?

3 A. Simon Lee.

4 Q. And were you engaged by HSBC as a  
5 lawyer?

6 A. No, it was just compliance.

7 Q. And prior to HSBC, were you  
8 employed by Deloitte?

9 A. Yes.

10 Q. And were you employed from  
11 September 2013 to September 2014?

12 A. Yes.

13 Q. Were you employed as a senior  
14 consultant?

15 A. Yes, yes.

16 Q. And what did you do for Deloitte?

17 A. I was on different projects to help  
18 financial institutions, I guess, with additional  
19 staffing or dealing with deferred prosecution  
20 agreements or other sort of government problems  
21 and also help them improve their programs based on  
22 whatever commitments they'd made to those  
23 regulators.

24 Q. And were you engaged by Deloitte as  
25 a lawyer?

1 A. No.

2 Q. And how -- and where were you  
3 employed by Deloitte?

4 A. My home base was Philadelphia.

5 Q. And how did your employment at  
6 Deloitte come to an end?

7 A. I was -- I was poached by an old  
8 colleague from Goldman to go to HSBC.

9 Q. And who was that colleague?

10 A. Lillian Chang.

11 Q. Who was your direct supervisor at  
12 Deloitte?

13 A. We didn't have direct supervisors  
14 there, it kind of worked a bit different; you had  
15 a mentor and then whenever you were on a project,  
16 you reported to whichever partner was running that  
17 project. Then you also were constantly checking  
18 in with your mentor. It's kind of like the  
19 concept of having a guidance counselor like in  
20 high school or something like that. So I can give  
21 you their mentor?

22 Q. Sure, please.

23 A. Janice Durisin.

24 Q. How do you spell the last name?

25 A. D-u-r-i-s-i-n. That might be

1 wrong, but it's close.

2 Q. And so I take it you left Deloitte  
3 voluntarily?

4 A. Yes.

5 Q. And you left to join HSBC?

6 A. That's right.

7 Q. And you had an offer to join HSBC  
8 at the time you left Deloitte?

9 A. That's right.

10 Q. And prior to Deloitte you worked at  
11 Goldman?

12 A. That's correct.

13 Q. You worked there from March 2010 to  
14 August 2013?

15 A. That's right.

16 Q. And you held a title of associate?

17 A. That's right.

18 Q. And what did you do for Goldman?

19 A. I was primarily -- well, there are  
20 two roles; one is when I first started in New York  
21 and I'll describe that first. So I was in the New  
22 York office in the Transaction Surveillance Group  
23 where we would do investigations on just any sort  
24 of suspicious transactions that came up or through  
25 a monitoring tool that would alert us and then we

1 would kind of handle those alerts like a -- you  
2 know, like a case and investigate it to see  
3 whether a suspicious activity report or a  
4 suspicious transaction report was required. I  
5 also was the liaison for the Asia Pacific region.  
6 Because of the time zone difference, they didn't  
7 have a lot of overlap with the main headquarters  
8 crew, so I was the most junior on the team so I  
9 had to do the grunt work and stay up for those  
10 calls from 9:00 to 11:00 p.m. and make sure  
11 everyone was in line, in lock step with each  
12 other, keep up to date with the regulatory -- you  
13 know, issues and news, help with audit requests.  
14 Sometimes there would be subpoenas that comes  
15 in -- that come in or freeze orders that come in.  
16 We would deal with that. We would investigate  
17 employee behavior as well as it related to  
18 potential money laundering, sanctions or other  
19 predicate offenses including corruption.

20 Q. And was there another component to  
21 your Gold -- to your Goldman employment?

22 A. Yes. So then after a certain  
23 period of time -- I think after a year -- they,  
24 Goldman, decided to open up a satellite office in  
25 Salt Lake City where they wanted the -- to build a



1 team in a lower cost location, and I raised my  
2 hand and they thought I was capable and ready to  
3 perform that task and build a team and start up a  
4 group there. And while I was there I also, on top  
5 of those responsibilities, took on the customer  
6 work under the anti-money laundering group as well  
7 as some market surveillance work, primarily  
8 dealing with the issue of the failure to locate  
9 under Regulation M. There are some other  
10 securities matters that came up as well, but I  
11 can't remember them now. But I do remember the  
12 Reg Ms were the regular workflow. I hired six  
13 people and had a couple of interns and -- you  
14 know, the people that I hired are now running the  
15 office, so I'm very, very proud of them.

16 Q. Who was -- who was or were your  
17 direct supervisors at Goldman?

18 A. Michael Wassell, W-a-s-s-e-l-l, and  
19 then when I was in Salt Lake I had a dotted line  
20 to Matthew Moore who was the MD of the Salt Lake  
21 office who was also a New York transplant.

22 Q. And did you work with Lillian  
23 Chang?

24 A. I continued -- so all the work I  
25 was doing before I continued to do so, so

1 Lillian -- liaison, now that I was even closer to  
2 her at times.

3 I also worked with the Europe team  
4 and the Latin American team whenever they needed  
5 assistance on a case going together as well.

6 Q. And were you engaged by Goldman as  
7 a lawyer?

8 A. Nope, I was a compliance officer.

9 Q. And how did your employment with  
10 Goldman come to an end?

11 A. I found another opportunity with  
12 Deloitte.

13 Q. And so your employment ended  
14 voluntarily?

15 A. Yes.

16 Q. And did you have an offer from  
17 Deloitte at the time that you left Goldman?

18 A. Yes.

19 Q. And why did you choose to leave  
20 Goldman for Deloitte?

21 A. I got to see more issues than what  
22 I was seeing at Goldman.

23 Q. And prior to Goldman, you worked at  
24 Bank of New York Mellon?

25 A. That's correct.

1 Q. And you worked there from September  
2 2008 to March 2010?

3 A. That's correct.

4 Q. And you were a KYC and OFAC  
5 specialist?

6 A. Yes.

7 Q. What does OFAC stand for?

8 A. The Office of Foreign Assets  
9 Controls.

10 Q. And KYC stands for another  
11 customer?

12 A. That's correct.

13 Q. And were you engaged by Bank of New  
14 York Mellon as a lawyer?

15 A. No.

16 Q. And what did you do for them?

17 A. I assisted with clients'  
18 on-boarding, so that's what the KYC part of it is,  
19 and, you know, doing background checks on those  
20 potential clients. And then, once they come on  
21 board, continuing those background checks. Those  
22 background checks also included OFAC screening.

23 Q. And who was your direct supervisor  
24 at Bank of New York Mellon?

25 A. Well, there were two, it was --

1 they were co-heads, one was Abby Lisbon and the  
2 other was Melissa -- oh, I don't remember her last  
3 name. We just called her Melissa. I think she  
4 had a -- I think she had a long last name, so  
5 everyone just called her Melissa and didn't know  
6 her last name.

7 Q. And why did you -- how did your  
8 employment with Bank of New York Mellon come to an  
9 end?

10 A. I received an opportunity from  
11 Goldman Sachs.

12 Q. And so you left Bank of New York  
13 Mellon voluntarily?

14 A. Yes.

15 Q. And you had an offer from Goldman  
16 Sachs at the time you left Bank of New York  
17 Mellon?

18 A. Yes.

19 Q. Have you ever been employed as a  
20 lawyer?

21 A. No.

22 Q. And you got your law degree from  
23 Brooklyn Law School?

24 A. Yes.

25 Q. In what year?

1 A. 2008.

2 Q. And a Bachelor's Degree in Criminal  
3 Justice and Political Science from SUNY Albany?

4 A. Yes.

5 Q. And you graduated May 2005?

6 A. Yes.

7 Q. And were you an intern during law  
8 school with the New York Attorney General's  
9 office?

10 A. Yes.

11 Q. And in what section were you an  
12 intern?

13 A. Investor Protection Bureau.

14 MR. LINTHORST: Can we go ahead and  
15 take a break? I have an alarm going off here that  
16 I just want to take a look at.

17 THE VIDEOGRAPHER: Sure. The time  
18 is 10:38 a.m.. We are going off the record.

19

20 (Whereupon there was a brief  
21 recess.)

22

23 THE VIDEOGRAPHER: The time is  
24 10:50 a.m.. We are on the record.

25 BY MR. LINTHORST:

1 Q. Ms. Williams, have you ever been  
2 involuntarily terminated from employment?

3 A. No.

4 MR. IADEVAIA: Objection. I mean,  
5 you've already answered, but objection.

6 Q. When you applied to JPMorgan Chase,  
7 did you interview with Garrett Ross?

8 A. Yes.

9 Q. And did you interview with Tim  
10 Bridgeford?

11 A. Yes.

12 MR. LINTHORST: We'll mark this as  
13 Defendant's Exhibit 2, Plaintiff's 572 to 573.

14

15 (Whereupon Document with Bates Nos.  
16 Pl. 572 to Pl. 573 was received and marked D-2 for  
17 identification.)

18

19 Q. I'm going to, at the request of  
20 Jeremiah, I think give you control to scroll up  
21 and down.

22 A. Okay. I think I'm doing it.

23 MR. IADEVAIA: Thank you.

24 Q. And does this appear to be a resume  
25 that you prepared for yourself?

1 A. It appears to be.

2 Q. And at the time you prepared it,  
3 did you believe all of the information to be  
4 accurate?

5 A. Yes.

6 Q. And if you just go to the top of  
7 Page 1, would you agree that this was prepared  
8 sometime after the termination of your employment  
9 at JPMorgan Chase?

10 A. Yes, based on the November. I'm  
11 scrolling too far. Sorry.

12 Q. And do you know when it was  
13 prepared?

14 A. No, I can't tell.

15 MR. LINTHORST: And we'll mark this  
16 as Defendant's Exhibit 3, which is Bates No. JPMC  
17 2231 through 2243.

18

19 (Whereupon Document with Bates Nos.  
20 JPMC 2231 to JPMC 2243 was received and marked D-3  
21 for identification.)

22

23 Q. And I will give you control, but  
24 the question will be, does this appear to be an  
25 accurate copy of your offer letter to join

1 JPMorgan Chase?

2 A. I don't appear to have control  
3 anymore.

4 It's working now.

5 This looks like it, yes.

6 Q. And if you'll just go up to the  
7 first page of the letter, second page of the  
8 exhibit.

9 A. Okay.

10 Q. Let me just take back control.

11 Did you receive this on or about  
12 June 22nd, 2018?

13 A. I believe so, yes.

14 Q. And does this accurately reflect  
15 the position you were offered?

16 A. Can you make it larger?

17 Q. Yeah.

18 A. Yes.

19 Q. And it says you're expected to  
20 start July 30, 2018. Is that the date you  
21 started?

22 A. Yes.

23 Q. And you reported to Garrett Ross?

24 A. Yes.

25 Q. And your annual base salary was



1 145,000?

2 A. That's right.

3 Q. And you were eligible for incentive  
4 compensation for 2018 with a target of 25,000?

5 A. That's right.

6 Q. And did you understand that your  
7 employment was "at-will"?

8 A. Yes, during and after the  
9 introductory period, yes.

10 Q. And "at-will" was defined, as we  
11 see here in this paragraph called Introductory  
12 Period an "at-will" employment?

13 A. Yes.

14 Q. And at the time that you were  
15 hired, what was Garrett Ross' title?

16 A. Vice president.

17 Q. Did he have a functional title as  
18 well?

19 A. Not technically. According to the  
20 assignments, PowerPoint, he was the point person  
21 for TPI for -- not for every candidate, but TPI,  
22 investigations and transactions when I first  
23 joined, so on the 30th of July.

24 Q. And at any point during your  
25 employment at JPMorgan Chase, did you have any

1 direct reports?

2 A. No.

3 Q. And at the time that you joined  
4 JPMorgan Chase, how many direct reports did  
5 Mr. Ross have?

6 A. At the time, when I joined?

7 Q. Yeah.

8 A. One.

9 Q. And that was you?

10 A. That was me, yes.

11 Q. And did he ever have additional  
12 direct reports at any time when you reported to  
13 him?

14 A. Yes.

15 Q. And who were the other direct  
16 reports?

17 A. (Inaudible).

18 THE REPORTER: I'm sorry, who was  
19 that?

20 A. Puneet Singh.

21 Q. Can you spell that, please?

22 A. S-i-n-g-h.

23 MR. LINTHORST: And Puneet is  
24 P-u-n-e-e-t.

25 Q. And what was his position?

1 A. Associate.

2 Q. And when was he hired?

3 A. Around November or December 2018.

4 Q. At the time you were hired, were  
5 you the most junior person working in TPI?

6 A. I'm sorry, can you repeat that?

7 Q. At the time you were hired at  
8 JPMorgan Chase, were you the most junior person  
9 working in TPI at the time?

10 A. So from the period before Puneet  
11 joined?

12 Q. Correct.

13 A. Yes, that's correct.

14 Q. And associate is a more junior  
15 title than vice president?

16 A. That's correct.

17 Q. Is that considered one level below?

18 A. I don't know. It depends. Some  
19 people were AVPs, assistant vice presidents, so I  
20 don't know if that department used the AVP title  
21 as another step between.

22 Q. And during the time that you  
23 reported to Mr. Ross, who did he report to?

24 A. Tim Bridgeford.

25 Q. And what was his title?

1 A. Global head of anti-corruption and  
2 global head of antitrust compliance.

3 Q. And who did he report to?

4 A. He reported to Jennifer  
5 Boyle-Devine.

6 Q. And what was her title during that  
7 time?

8 A. Deputy head of employee compliance.

9 Q. And who did she report to during  
10 the time that you reported to Mr. Ross?

11 A. Cathy Duffy.

12 Q. What was her title during that  
13 time?

14 A. Head of CB compliance and corporate  
15 executive or head of employee compliance.

16 Q. The first part, you said head of CB  
17 compliance?

18 A. Yeah, C-B, Charlie Bravo, and it  
19 stands for commercial banking.

20 Q. And who did she report to during  
21 the time you reported to Mr. Ross?

22 A. Craig Pern.

23 Q. P-e-r-n?

24 A. P-e-r-n.

25 Q. And what was his title at that

1 time?

2 A. Chief compliance officer.

3 Q. Who did he report to during that  
4 time?

5 A. Ashley Bacon.

6 Q. B-a-c-o-n?

7 A. B-a-c-o-n.

8 Q. And what was her title during that  
9 time?

10 A. It's a male, he -- he was the chief  
11 risk officer.

12 Q. And who did he report to during  
13 that time?

14 A. Jamie Dimon.

15 Q. CEO?

16 A. CEO.

17 Q. Around the time you were hired, did  
18 you receive training on JPMorgan Chase's code of  
19 conduct?

20 A. Yes.

21 Q. And what was the code of conduct?

22 A. It was a document prepared by the  
23 code of conduct compliance team, which was also in  
24 employee compliance and reported to Jennifer  
25 Boyle-Devine, and they prepared that document, as

1 well as training, to assist employees with  
2 understanding the expectations of JPMorgan  
3 employees.

4 Q. And did you understand, throughout  
5 your employment at JPMorgan Chase, that the code  
6 of conduct included an anti-retaliation policy for  
7 those who reported concerns?

8 A. Yes.

9 MR. LINTHORST: Let's mark this as  
10 Defendant's 4, which is Bates No. JPMC 2390 to  
11 2391.

12  
13 (Whereupon Document with Bates Nos.  
14 JPMC 2390 to JPMC 2391 was received and marked D-4  
15 for identification.)

16  
17 Q. I will turn it over to you. I will  
18 represent to you, you've probably never seen this  
19 at least in this form prior to this case, but this  
20 is a report from the system which purports to  
21 reflect training that you received during your  
22 employment. And I will just ask you to look it  
23 over and see if it generally looks like a  
24 transcript of the training you received.

25 A. There are some entries from 2014 in

1       there, but it looks like the -- like these are the  
2       mandatory courses that we would take through --  
3       through the online system. It doesn't include all  
4       the courses that we would have taken there.

5               Q.       What other kinds of courses would  
6       you have taken?

7               A.       Well, there are awareness sessions  
8       that are not provided through this system; so, for  
9       example, I delivered awareness sessions and  
10       trained a third-party oversight group on  
11       third-party intermediaries, so that's a training  
12       that I would have delivered. They're regular -- I  
13       don't know if they were monthly, maybe every other  
14       month -- ACCO calls, anti-corruption compliance  
15       officer calls, where there would be training  
16       provided by GACC to anti-corruption compliance  
17       officers. And there were also continuing legal  
18       educations that the legal department would put on  
19       and anyone who's a lawyer, whether in legal or  
20       not, could take those and I would typically take  
21       those that were relevant to my -- to my work or  
22       something that I was just interested in. So those  
23       are just a few examples.

24               Q.       Are you -- are you licensed by any  
25       bar?

1           A.     The New York State Bar and the New  
2     Jersey State Bar.

3           Q.     And for what period have you been  
4     licensed by the New York State Bar?

5           A.     From 2009 until present.

6           Q.     Have you ever received any  
7     discipline from The Bar?

8           A.     No.

9           Q.     And you're a member in good  
10    standing today?

11          A.     Yes.

12          Q.     And for what period of time have  
13    you been admitted to the New Jersey State Bar?

14          A.     Since last September, so September  
15    2021.

16          Q.     And have you ever been disciplined  
17    by the New Jersey State Bar?

18          A.     No.

19          Q.     And you're a member in good  
20    standing today?

21          A.     Yes.

22          Q.     And have you ever been admitted to  
23    The Bar of any other states or courts?

24          A.     No.

25          Q.     So looking at the second page of



1 Exhibit 4, four items down, it says, "Code of  
2 conduct for new hires completed August 2nd, 2018."

3 Does that appear to be or reflect  
4 the code of conduct training you received at the  
5 time of your hire?

6 A. I think so, yes.

7 Q. And did you understand all JPMorgan  
8 Chase employees to be trained on the code of  
9 conduct at the time of hire?

10 A. Yes, it was a global mandatory  
11 training, yes, my understanding.

12 Q. And this reflects that you  
13 completed code of conduct training again on  
14 September 13, 2019. Did you take and complete the  
15 training again around that date?

16 A. Yes.

17 Q. And did you understand it to be a  
18 global mandatory training to take code of conduct  
19 training approximately every year?

20 A. Yes.

21

22 (Whereupon Document with Bates No.  
23 JPMC 1944 was received and marked D-5 for  
24 identification.)

25

1 Q. We'll mark this as Defendant's 5,  
2 which is a one-page document, JPMC 1944, and the  
3 question will be, does this appear to be an  
4 affirmation that you completed on or about  
5 September 18, 2019?

6 And you have control of it now.

7 A. Oh, I do? Okay.

8 I believe this would have  
9 accompanied the training course, yes.

10 Q. And so did you understand that all  
11 JPMorgan Chase employees had to complete this  
12 affirmation upon completing their annual code of  
13 conduct training?

14 A. In 2019, yes.

15 Q. Was that true in 2018?

16 A. I don't know.

17 MR. LINTHORST: We'll mark this as  
18 Defendant's 6, Plaintiff's -- Bates No.  
19 Plaintiff's 1342 to 1359.

20

21 (Whereupon Document with Bates Nos.  
22 Pl. 1342 to Pl. 1359 was received and marked D-6  
23 for identification.)

24

25 Q. I will share the screen and -- I

1 mean, I will turn over control. And the question  
2 will be, does this appear to be a document that  
3 you sent to Mia Korot and Rory O'Connor on April  
4 10, 2019?

5 A. So we're just focusing on the one  
6 from the 10th?

7 Q. Well, is it one document that you  
8 sent to Mia Korot and Rory O'Connor?

9 A. It's several e-mails sending them  
10 multiple documents.

11 Q. Okay. And did you prepare this  
12 e-mail to them?

13 A. Yes.

14 Q. And at the time that you did so,  
15 did you believe it to be accurate?

16 A. I did.

17 Q. So scrolling down, looking at the  
18 content starting on Plaintiff's 1346, was this  
19 background that you were providing to Mia and  
20 Rory?

21 A. That's right.

22 Q. And on 1347 it reflects on August  
23 27, 2018 you sent a message to chat with Tim  
24 Bridgeford. Is that accurate?

25 A. Yes.

1 Q. And that was within a month of your  
2 starting at JPMorgan Chase?

3 A. Yes.

4 Q. And what was the issue relating to  
5 a transition of a former employee?

6 A. So when I joined there was a high  
7 turnover; I think about eight people resigned  
8 within the -- within the month, and a lot of folks  
9 were concerned, and then there was one employee in  
10 particular, Katrina, who was the governance  
11 person. She was supposed to -- or Tim had  
12 e-mailed her and asked her to transition work to  
13 me and also transition work to Jeanette O'Rourke  
14 and she was very difficult.

15 Q. Okay. And what was the issue with  
16 reassignment of one of Jeanette's responsibilities  
17 to you?

18 A. I'm sorry, the question was what is  
19 the issue with it?

20 Q. Yeah.

21 A. So Jeanette -- or I guess Tim  
22 assigned Jeanette a kind of a pre-audit assignment  
23 is what it was called, to take a look at the TPI  
24 program or all of the programs, just to see how we  
25 would fare against the audit because she had a

1 background of being in audit and also as a CFA,  
2 and she'd been through a number of audits after  
3 being in the sanctions department, and so she kind  
4 of carved out one of those assignments and gave it  
5 to me because she, along with, you know, me and  
6 Garrett Ross, all believed that I was also doing  
7 an assessment of the TPI program and so that I  
8 should just do that and then she can focus on the  
9 other stuff. The issue was that, you know, she  
10 didn't tell Tim, who had assigned her that work,  
11 that he -- that she was reassigning that to me,  
12 and that, from my perspective, I'd asked Jeanette,  
13 I said, sure I'd be happy to do that, that makes  
14 sense as long as I'm able to present it and get  
15 credit for my work. And she didn't agree to that  
16 part, and so I said, I don't feel comfortable with  
17 kind of working in secret. And then I told Tim  
18 about it and Tim seemed to be unaware that  
19 Jeanette had reassigned her responsibility to me.

20 Q. And on or about September 4, 2018,  
21 did you have a meeting with Jennifer Boyle-Devine?

22 A. Yes, showed up for a scheduled  
23 one-on-one with -- one-on-ones with remaining team  
24 members after the slew of resignations just to  
25 kind of figure out what was going on with the team

1 and why, you know, so many resignations were  
2 happening and I guess kind of maybe boost morale a  
3 bit by talking to us. So that was the meeting  
4 with Jennifer.

5 Q. And was that after five people  
6 resigned since you started?

7 A. Yeah, that was five in a month.

8  
9 (Whereupon Document with Bates Nos.  
10 JPMC 1701 to JPMC 1702 was received and marked D-7  
11 for identification.)

12  
13 MR. LINTHORST: Let's mark this,  
14 that will be Defendant's 7.

15 Q. I'll get a Bates number for this,  
16 but this is Exhibit L to JPMorgan Chase's position  
17 statement to OSHA. And I will give you control,  
18 and the question will be, does this appear to be  
19 an accurate copy of an instant message exchange  
20 that you had with Garrett Ross on September 13,  
21 2018?

22 A. The time seems strange; so like at  
23 the bottom, like it has 11:17 a.m. and then it  
24 goes to 10:50 a.m. after it. Maybe these are out  
25 of order -- time order, but it looks like an

1 instant message conversation.

2 Q. Here, at 9:54 a.m., you indicate  
3 also you're good with Ilya, he is pushing the  
4 screening question forward with sanctions and will  
5 loop us in if they have questions.

6 Who is Ilya?

7 A. Ilya Shulman was the sanctions  
8 legal contact that Garrett and Tim directed me to.

9 Q. And then Garrett asked what is he  
10 pushing forward and you indicated whether they  
11 wanted to add iComply to the sanctions screening  
12 feed.

13 What did that -- can you just  
14 describe that issue?

15 A. So iComply -- I guess we had a  
16 meeting with myself, Jeanette, Garrett Ross and  
17 Tim Bridgeford before this conversation where we  
18 were talking about sanctioned issues or sanctions  
19 and A&L screening where that we thought the TPI  
20 profiles were not -- were not being looped in  
21 there and there's a -- there's a perceived gap in  
22 that.

23 Another issue that I found was that  
24 there were comprehensively -- or there was one  
25 comprehensively sanctioned country that was

1 available for selection in the iComply system that  
2 needed to be removed. So there were two things  
3 that I was talking to Ilya about, but with regard  
4 to the connecting the iComply to the sanctions  
5 feed is it would have screened the TPI entity  
6 names, any beneficial owners that we collected for  
7 those TPI entities, and any managers, key  
8 managers, that we had collected, again to perform  
9 due diligence on TPIs, as well as if the TPI is an  
10 individual, they would have been done through  
11 those screenings where, at that point, it seems  
12 like none was happening.

13 Q. And did Garrett ask you how would  
14 they even do that at iComply? And did you  
15 respond, "not my problem"?

16 A. Yes.

17 Q. What is iComply?

18 A. So iComply is the system that  
19 houses the risk profiles for a number of employee  
20 compliance work flows, and so from a TPI  
21 perspective -- should I keep talking?

22 MR. IADEVAIA: Yeah, sorry, I  
23 coughed.

24 THE WITNESS: Oh, okay.

25 MR. IADEVAIA: I'll mute.



1           A.       So from a TPI perspective it would  
2       house the due diligence profiles for the TPIs and  
3       the solution to that was to add iComply to the  
4       sanction screening feed.

5           Q.       And did Garrett say, as indicated  
6       here at 10:41, that is not a sufficient answer --  
7       oh, I'm sorry, above that -- did you say to  
8       Garrett, "They should be able to communicate their  
9       system needs to tech, I'll let Tim have that  
10      battle"?

11          A.       So yeah, so that's after I provided  
12      a solution. Yes, okay, I see it at the bottom.  
13      Um-hum.

14          Q.       What was the battle that you were  
15      suggesting Tim have?

16          A.       So if there was a debate with  
17      sanctions over whether to sanction screen, you  
18      know, relevant parties, then that -- they -- then  
19      they're going to have that discussion. I don't --  
20      I didn't conceive of a way that the sanctions  
21      person would be adverse to screening individuals  
22      for sanctions issues, and it's also the level of  
23      risk that a sanctions violation poses to the bank.  
24      And I would tell this to folks, like that's a --  
25      that's a shut-down-the-bank kind of a problem,

1 it's an immediate; once we know that something is  
2 going wrong, we need to say something.

3 And this was also part of the  
4 annual economic sanctions training that we  
5 received at JPMorgan, where they were expecting  
6 people to, you know, see something, say something  
7 and speak up.

8 Q. Why did you think at this time it  
9 would be a battle between Tim and tech or the head  
10 of sanctions?

11 A. Based on Garrett's --

12 MR. IADEVAIA: Hold on, hold on,  
13 Quala. I'm just going to object to the form. You  
14 can answer.

15 THE WITNESS: Sure.

16 A. So based on Garrett's response at  
17 10:41, he's saying that that process -- that  
18 becomes process that we have to manage, which  
19 means he's -- he's not concerned that we may be  
20 violating sanctions law, he's more concerned about  
21 who's going to do the work, and if that's the  
22 battle that needs to be had, then that -- that  
23 needs to happen, someone has -- we have to -- we  
24 can't skip screening individuals for potential  
25 sanctions exposure, it's too high of a risk for

1 the bank to ignore for staffing problems.

2 Q. And there was a sanctions group  
3 with that responsibility, right?

4 A. Right, and that sanctions group  
5 provided the annual training that I talked about  
6 and instructed employees to raise their hands if  
7 they see something, because as a sister compliance  
8 group, we understand we don't really see  
9 everything, so we need -- we need everyone's help.  
10 And they sat on the floor with us, it was very  
11 easy for us to just walk over and say hey, guys,  
12 we think we see something, what do you think? And  
13 if the worst case scenario is we find something  
14 and we don't have the staff to manage it, then we  
15 could put in a case for temporary resources to get  
16 through it, but it's just, again, too high of a  
17 risk to ignore potential sanctions violations,  
18 because sanctions violations are not only on  
19 countries, they're on individuals that, you know,  
20 you can't always have off the top of your head.

21 Q. And did the sanctions group also  
22 have responsibility for sanction screening for  
23 third-party intermediaries?

24 A. So the sanctions department, as  
25 they communicated to us in later communications,

1 is they have a policy and their policy, they  
2 instruct people to -- people meaning other  
3 departments -- to follow their policy, and if it  
4 came to, you know, who's ultimately doing the  
5 screening, I'm not sure if, based on the  
6 conversations we had with the sanctions  
7 department, they -- then their response was more,  
8 you know, you department, the department that  
9 found something, you are responsible for -- for  
10 the risk that you just uncovered. They weren't --  
11 they were more advisory, let's say, than doing the  
12 screening work.

13 Q. And looking at the top of the  
14 second page, indicated at 10:42, did you tell  
15 Garrett that if it's a sanctions issue then they  
16 need to support it?

17 A. And that was my understanding of  
18 the team meeting. That's correct.

19 Q. And so this was screening work that  
20 the sanctions group needed to do?

21 A. If -- so if I'm talking about my  
22 understanding from a team meeting, that must be  
23 the meeting that I was referring to earlier when  
24 we were talking with Bridgeford, in that meeting  
25 he didn't say -- let's see if I remember that

1 meeting. Yeah, so I think Tim's expectation would  
2 have been that they were going to support it in  
3 some way.

4 MR. LINTHORST: Shall we take a  
5 short bio break?

6 THE VIDEOGRAPHER: Sure. The time  
7 is 11:36 a.m.. We're going off the record.

8  
9 (Whereupon there was a brief  
10 recess.)

11  
12 THE VIDEOGRAPHER: The time is  
13 11:47 a.m.. We are on the record.

14 BY MR. LINTHORST:

15 Q. Let's go back and look at your  
16 April 9, 2019 document to Mia Korot, and we're  
17 just looking at Plaintiff's 1348 for a Bates  
18 number. And at the top of the page it indicates  
19 Behavior Example 1. And does this relate to the  
20 sanctions issues that we just discussed?

21 And you're on mute.

22 A. Sorry about that. Point No. 3,  
23 right?

24 Q. Yes.

25 A. Yes.

1 Q. And did you have a second meeting  
2 with Tim Bridgeford shortly after September 19th,  
3 2018?

4 A. Yes.

5 MR. IADEVAIA: Objection. You can  
6 answer.

7 Q. And on September 21st, 2018, did  
8 you have a communication with Garrett Ross in  
9 which he said he would endeavor to be more  
10 patient?

11 A. Yes.

12 Q. And then at the top of Plaintiff's  
13 1350 it reflects a third escalation to Tim.

14 Did you have a third meeting with  
15 Tim Bridgeford on October 1st, 2018?

16 A. Yes.

17 Q. And on October 2nd, 2018, did you  
18 have a catch-up meeting with Garrett Ross that  
19 went well?

20 A. October 2nd is that?

21 Q. Yeah.

22 A. Yes.

23 Q. Did you e-mail Tim to hold off on  
24 the HR escalation based on your conversation with  
25 Garrett on October 2nd?

1           A.     It was based on both Tim's -- Tim  
2     saying that an escalation to HR will not be looked  
3     upon favorably and Garrett's response that he  
4     seemed to want to try to be better.

5           Q.     And did you have a fourth meeting  
6     with Tim Bridgeford on October 26th, 2018?

7           A.     Yes.

8  
9                     (Whereupon Document with Bates No.  
10    JPMC 1717 was received and marked D-8 for  
11    identification.)

12

13           Q.     Let's mark this as Defendant's 8.  
14    Can you see your e-mail of November 1st on the  
15    screen?

16           A.     Yes.

17           Q.     This is Exhibit Q to the OSHA  
18    position statement. We'll provide a Bates  
19    numbered version for the exhibit.

20                     Just giving you control, does this  
21    appear to be -- I'll start with an e-mail exchange  
22    you had with Tim Bridgeford and then an e-mail you  
23    sent to yourself on November 1st, 2018?

24           A.     It starts with an e-mail from an HR  
25    system, then they're e-mails between Tim and I.

1 Q. And then an e-mail from you to  
2 yourself?

3 A. That's right.

4 Q. And why did you send an e-mail to  
5 yourself?

6 A. To document the conversation that  
7 I'd had with Tim.

8 Q. And why did you do that through an  
9 e-mail to yourself?

10 A. It was the best way to document the  
11 conversation that I thought -- yeah, it was the  
12 best way to document the conversation with Tim.

13 Q. Did you think there was anything  
14 inappropriate about documenting it with an e-mail  
15 to yourself?

16 A. No.

17 Q. Going back to your April 9th  
18 submission, in your third escalation to Tim on  
19 October 1st, did you propose not to report to  
20 Garrett anymore?

21 A. Is that in the e-mail?

22 Q. It's in the attachment. Do you  
23 recall whether you proposed that in this  
24 escalation?

25 A. I proposed it at some point. I



1 don't know without reviewing the documents.

2 Q. And going back to your April 9th  
3 submission at Plaintiff's 1351, did you have a  
4 fifth meeting with Tim Bridgeford on November 9th?

5 A. Yes.

6 Q. And then, as reflected on 1353, you  
7 have a second meeting with Jennifer Boyle-Devine?

8 A. Yes.

9 Q. Now, you say you -- on November 9,  
10 you met with a mentor and explained what was  
11 happening. Who's the mentor?

12 A. Elizabeth Barbosa. She's the head  
13 of code of conduct.

14 Q. And you spoke briefly with Jennifer  
15 on November 13 and had a further meeting with her  
16 the following day on the 14th?

17 A. That's right. So Elizabeth Barbosa  
18 reports to Jennifer Boyle-Devine and she asked me  
19 if it would be okay if she raised this to  
20 Jennifer, and then I received this reply from  
21 Jennifer.

22 Q. And you reported that the team was  
23 frustrated by the lack of early dismissals on  
24 holiday weekends?

25 MR. IADEVAIA: Objection. You can

1 answer.

2 A. Yes.

3 Q. And that a number of team members,  
4 including Garrett, left early without an early  
5 dismissal note?

6 A. That's right.

7 Q. Why did you think that was  
8 important to raise to Jennifer?

9 A. It was an example of the core  
10 morale that I saw and experienced and this kind of  
11 goes back to my first conversation with Jennifer  
12 where she was sending catch-ups with everyone who  
13 was left after all the resignations and just  
14 trying to give a morale boost. And this was, you  
15 know, kind of furthering that discussion as well  
16 as what Elizabeth Barbosa told her on my behalf.  
17 And I remember Jennifer coming through the floor  
18 that day and making a point to greet everyone who  
19 was still there in their seats to, you know, say  
20 thank you for still being here kind of thing, and  
21 I wanted to let her know why that was, the morale  
22 was low, and maybe this could be something that  
23 could cheer people up a bit, give them the early  
24 dismissal or something.

25 Q. Going back to your fourth

1 escalation with Tim on 1350 and 51, you say here  
2 in the fourth bullet down, most of your day is  
3 spent on TPI identifying program issues and  
4 remediation efforts. "I would like to add those  
5 efforts to the monthly program plan and my review,  
6 but I'm -- but I am afraid that I will not be able  
7 to based on my experience with Garrett, Alicia and  
8 other team members as Tim and I discussed in  
9 previous meetings."

10 When you say the monthly program  
11 plan, what are you referring to?

12 A. So there were a number of different  
13 group calls that the GACC team had and sometimes  
14 they were combined anti-corruption and antitrust  
15 calls, but for -- one type was called all-hands  
16 and another type was called a program update and  
17 that was the meeting that I was referring to.

18 Q. Which one, the all-hands?

19 A. It says monthly program plan, so  
20 that would have been the program update.

21 Q. And who participated in the program  
22 update?

23 A. I believe it was both GACC and  
24 antitrust that were in there and the entire New  
25 York team, everyone that was sitting in New York

1 in GACC, the international or, you know, the  
2 non-U.S. leads, at least the global heads were  
3 there at the program update, and then a few of the  
4 key anti-corruption compliance officers. So CB or  
5 commercial banking and CIB investment banking were  
6 key for us and they were -- Rich Berger was the  
7 CIB person and he was usually invited when other  
8 ACCOs weren't.

9 Q. And were these meetings an hour?

10 A. I would -- I would say so, yes.

11 Q. What were opportunities and  
12 enhancements meetings?

13 A. So those were the meetings that Tim  
14 asked me to put together to present the TPI issues  
15 that -- that they didn't want on either the  
16 all-hands or the program update, so it was a side  
17 meeting just for TPI.

18 Q. And when did he ask you to commence  
19 those meetings?

20 A. After our conversation on November  
21 9th.

22 Q. And who would attend those  
23 meetings?

24 A. The regular attendees were myself,  
25 Garrett Ross, Tim Bridgeford, Alicia Avelo. So

1 those were the regular attendees and then  
2 sometimes other folks joined; Pam Meyer who was  
3 our program -- no, our project manager for  
4 technology, our legal team, Mailys Abos and  
5 Montgomery Anguil would join, but Mailys Abos was  
6 on maternity leave until January, so she didn't  
7 join until then, and that's it.

8 Q. Can you spell Alicia's last name?

9 A. A-v-e-l-o.

10 Q. And what was her role?

11 A. She was the head of the governance  
12 workstream within GACC and antitrust.

13 Q. And who did she report to?

14 A. Tim Bridgeford.

15 Q. And how long were the opportunities  
16 and enhancements meetings?

17 A. You mean the length of time or how  
18 many meetings did we have?

19 Q. Well, let's start with the length  
20 of time. Were these an hour meeting typically?

21 A. They were one-hour meetings, yes.

22 Q. And for what period of time and how  
23 frequently did you hold those?

24 A. They started out as a monthly and  
25 then until January, when Tim asked for greater

1 frequency, he wanted them every two weeks and  
2 then, because we started uncovering more and we  
3 had more to talk about. And then Tim was fired  
4 and then we had one more in April after Tim was  
5 fired with Melissa Laferriere kind of replacing  
6 Tim, and then we stopped those meetings.

7 Q. And why did you stop the meetings?

8 A. Melissa asked me to.

9 Q. And other than you presenting any  
10 issues that you had or found with the TPI program,  
11 was there any other presenters or purposes of the  
12 meetings?

13 A. For the attendees, so anyone who  
14 was attending had an action point to give an  
15 update on, you know, what they found out or, you  
16 know, on whatever the next steps were on or what  
17 their project was.

18 Q. And were you ever unable to raise  
19 any issue that you wanted at the opportunities and  
20 enhancement meeting?

21 A. No.

22 Q. Looking at the fifth bullet, were  
23 you concerned that if you were not able to add the  
24 issues and remediation efforts to your performance  
25 review, it would make it difficult to justify

1 receiving your bonus or a promotion?

2 A. That's correct.

3 Q. Did your responsibilities change at  
4 all during your employment?

5 A. Yes.

6 Q. How so?

7 A. So when I interviewed with  
8 JPMorgan, so with, let's say, Garrett, Tim, Mailys  
9 and then a couple of other folks, I was told that  
10 I would -- the volume of the program is definitely  
11 in the TPI world and they need help there, so that  
12 would be a primary responsibility, and then I  
13 would also do whatever Garrett did and -- because  
14 he had no backup, and Tim would say, you know, if  
15 he was hit by a bus tomorrow, you know, we  
16 wouldn't know what to do, so he needs someone to  
17 back him up and he could actually go on vacations,  
18 too. And so that was -- and when I joined that's  
19 what happened, I received a bunch of printed  
20 policies and other documents on my desk with those  
21 -- with all of those workloads I had to read and  
22 get familiar with. Garrett, you know, had me on  
23 all of the workload that I was anticipating and  
24 then one more came after I joined, the referred  
25 candidates monitoring. And then as time

1 progressed I was only doing TPI.

2 Q. And you continued only doing TPI  
3 until the end of your employment at JPMorgan  
4 Chase?

5 A. Oh, no, until Melissa Laferriere --  
6 until Melissa Laferriere took over for Tim  
7 Bridgeford and then I was the TPI lead and then  
8 she gave me transactions. Well, first she -- she  
9 was going to assign me some governance labeling,  
10 like a GDPR, so this is kind of, I think it's the  
11 UK document retention sort of thing project that  
12 was happening, and then it was taken away. I  
13 don't know why. And then I ended up with  
14 transactions on top of TPIs.

15 Q. Did you receive an annual  
16 performance review for 2018?

17 A. Yes.

18 Q. And that would have been completed  
19 by Garrett Ross?

20 A. Yes.

21

22 (Whereupon Document with Bates Nos.  
23 Pl. 1384 to Pl. 1386 was received and marked D-9  
24 for identification.)

25



1 Q. Let's mark this as Defendant's  
2 Exhibit 9, Plaintiff's 1384 to 1386. I'm giving  
3 you control and the question will be, does this  
4 appear to be a copy of the annual -- 2018 annual  
5 review that you received initially?

6 A. That I received initially from  
7 Ross?

8 Q. Yeah.

9 A. I know it was edited a couple of  
10 times, once by Ross and again by Aaron Smith. I  
11 don't know which version this is. It appears to  
12 be the format of the 2018 performance review, I  
13 just don't know whether it's the -- also the  
14 edited version.

15 Q. And was the process that you  
16 completed some self-assessments?

17 A. Yes.

18 Q. And then your manager provided his  
19 comments?

20 A. Yes.

21 Q. And then did you meet with Garrett  
22 to go over the review?

23 A. Yes.

24 Q. And do you recall when you put in  
25 your self-assessments?

1 A. It would have been -- it would have  
2 been in November when Bridgeford was asking me to  
3 do it.

4 Q. And do you recall about when you  
5 met with Garrett Ross to go through the review?

6 A. The first week of January or  
7 whenever we came back from New Year's.

8 Q. And would that be the first time  
9 you saw his comments?

10 A. Yes.

11 Q. And did you indicate on the first  
12 page here under the self-assessment in the second  
13 program that you produced a TPI project plan that  
14 lists potential program gaps and execution  
15 deficiencies as well as remediation and  
16 enhancement suggestions?

17 A. That's right.

18 Q. And so were you able in the review  
19 to essentially make your work in those areas  
20 visible?

21 MR. IADEVAIA: Objection. You can  
22 answer.

23 A. Yes, based on HR's instructions.

24 Q. Did you receive a bonus for 2018?

25 A. I did.

1 Q. And do you recall how much that  
2 was?

3 A. I don't remember the exact amount.

4 Q. I think we saw you had a target of  
5 25,000. You don't remember if it was that amount  
6 or more or less?

7 A. I think I received what I was --  
8 yeah, I think I received my target.

9 Q. And did you disagree with the 2018  
10 performance review in any respect?

11 A. I did.

12 Q. Going back to your April 9  
13 submission at Plaintiff's 1354, Item No. 18, did  
14 you have an additional meeting with Jennifer  
15 Boyle-Devine on January 18, 2019?

16 A. Yes. Yes, yes we managed to meet  
17 in January.

18 Q. And did you tell her that you  
19 intended to challenge your annual review?

20 A. Yes.

21 Q. And did you tell her that you would  
22 like to apply for early transfer opportunities?

23 A. Yes.

24 Q. And did she inform you a week later  
25 that she had granted your request to apply for

1 early transfer opportunities?

2 A. Yes.

3 Q. And did you normally have to be in  
4 your role for a year before seeking to transfer?

5 A. Yes.

6 Q. And so did she grant you an  
7 exception to that rule to allow you to apply for  
8 other roles within JPMorgan Chase?

9 A. Yes.

10 Q. And did you start to do that around  
11 January 2019?

12 A. Yes.

13 Q. And did you continue to apply for  
14 other roles within JPMorgan Chase for the rest of  
15 your employment with Chase?

16 A. Yes.

17 Q. By my count it looks like you  
18 applied for over 30 other roles at JPMorgan Chase.  
19 Does that sound right?

20 A. I don't know, but it's possible.

21 Q. I take it it's fair to say that you  
22 applied for a lot of other roles?

23 A. That's fair.

24

25 (Whereupon Document with Bates Nos.

1 Pl. 1398 to Pl. 1401 was received and marked D-10  
2 for identification.)

3

4 Q. Let's mark this Defendant's 10,  
5 which is Plaintiff's 1398 through 1401, and I'll  
6 give you control. The question will be, does this  
7 reflect an e-mail exchange that you had with Aimee  
8 Daldrin?

9 A. Yes.

10 Q. And at the bottom there at 1401,  
11 did she communicate a revision to the review to  
12 insert the words "to me" as reflected on 1401?

13 A. The question is did she write that?

14 Q. Yeah.

15 A. Yes.

16 Q. So going back to your April 9  
17 submission, it looks like, at Plaintiff's 1345,  
18 there's a calendar entry for a meeting between you  
19 and Mia Korot and Rory O'Connor for April 9th. Do  
20 you see that?

21 A. That's correct.

22 Q. And Mia had sent that out on April  
23 4th?

24 A. That's correct.

25 Q. And who's Rory O'Connor?

1           A.     He's the head of physical security  
2     at that location.

3           Q.     And just how did we go from you,  
4     your e-mail exchange with Aimee Daldrin in March  
5     that you continued to have disputes about your  
6     2018 review, to Mia sending out an invite on April  
7     4 for a meeting on April 9?

8           A.     So there were two HR specialists  
9     investigating two different things starting in  
10    January; there's Aimee Daldrin and there was  
11    Amanda Brown and each were investigating -- one  
12    was investigating manhood practices, another was  
13    doing the performance evaluation challenge. And I  
14    think at some point through their reviews, it was  
15    escalated to Aaron Smith that's at ER, a higher  
16    level, that whatever they had uncovered or found  
17    required a higher level of review, and so it ended  
18    up going to Aaron Smith. I spoke with Aaron Smith  
19    and then a couple -- a couple of her colleagues as  
20    well. Cecilia may be one of them. I can't  
21    remember their names. I explained what was  
22    happening to them and then they escalated it to a  
23    higher level, being Mia, and because there was a  
24    physical security concern expressed, I think Rory  
25    O'Connor became involved, so that's how it just

1 continued to escalate further.

2 Q. And what was the physical security  
3 concern expressed?

4 A. Garrett Ross was -- I communicated  
5 that Garrett Ross' -- had a temper issue, was a  
6 hot head and would physically intimidate me by  
7 coming over to my desk, yelling at me, standing  
8 over me as a means of physical intimidation in  
9 order to stop escalating the concerns that I had.

10 Q. Did you have your own office?

11 A. No, we were all in out -- outside  
12 cubicles.

13 Q. And who was sitting around you?

14 A. Jeanette O'Rourke.

15 Q. Anybody else?

16 A. Garrett Ross.

17 Q. Anybody else?

18 A. There was an empty seat that was  
19 Allie Frank's seat.

20 Q. Allie Frank?

21 A. But she never worked from the  
22 office, she worked from home so it was an empty  
23 seat. So that's who was -- oh, and immediately in  
24 front of me -- was it James Economou? James  
25 Economou was not directly next to me, but over the

1 cubicle line.

2 Q. How about Puneet Singh?

3 A. Yes, later. So in December his  
4 seat was next to -- oh, no, it wasn't James, it  
5 was -- that was Andrew Norris and then Puneet sat  
6 next to Andrew Norris and then Jeanette and I --  
7 Jeanette, myself, Allie Franks' seat were all on  
8 the other side.

9 Q. And when did Mr. Ross stand over  
10 you and yell at you?

11 A. During the sanctions issue. Also  
12 he yelled about me -- at me about the  
13 communication that had to go out to the  
14 third-party oversight office. He also would stand  
15 over me when audit came to -- and they wanted to  
16 watch me perform a task, he would stand right over  
17 me and make sure that I was, you know, not telling  
18 them more than he wanted me to tell them. So  
19 that's the physical intimidation that I'd  
20 experienced from him.

21 Q. So when he -- when did he yell at  
22 you about the communication that had to go out to  
23 the third-party oversight office?

24 A. It would have been  
25 September/October time.



1 Q. Was he standing over you for that?

2 A. Yes.

3 Q. And how many times was audit  
4 observing you performing a task?

5 A. Once.

6 Q. And when was that?

7 A. October 2018, around there.

8 Q. And I take it those in the area  
9 could see and hear him standing over you and  
10 yelling at you?

11 A. Yes. And he -- his desk was on the  
12 other side, so normally if he just wanted to  
13 say -- like it was like diagonally across from  
14 him, that's how it was -- so normally if he just  
15 had something in a normal tone to say, didn't want  
16 to be intimidating, he would just stand up and I  
17 would see him, then I would stand up and we would  
18 have a conversation, but when he was really upset  
19 or angry, he would come over and do that. And it  
20 was something that Jeanette also noticed, and she  
21 would look at me when it would happen and see if I  
22 was okay.

23 Q. So looking again at your April 9  
24 submission to Mia and Rory, you indicate on 1346  
25 and 1347, "I'm escalating these concerns through

1 HR to achieve the following," and then you have a  
2 list of bullets there. Do you see those?

3 A. Um-hum. Yes.

4 Q. And one of the bullets at the top  
5 of 1347 was, you were asking for a corrected  
6 annual review?

7 A. That's correct.

8 Q. And two levels -- two bullets below  
9 that you were asking to have evaluated whether  
10 your performance qualified for you to be on the  
11 promotion track for this year?

12 A. That's correct.

13 Q. And second bullet from the bottom  
14 you requested the ability to work from a different  
15 location for part of the week?

16 A. That's right.

17 Q. What location were you requesting  
18 to work from?

19 A. Whatever was available in Manhattan  
20 where I could sit. I know that Cathy and some  
21 other compliance personnel sat in midtown and they  
22 were -- they were -- there was a floor dedicated  
23 to compliance teams in midtown. So one of the  
24 problems with Garrett and his physical  
25 intimidation is, was Bridgeford CA, and when I

1 first complained to Bridgeford about Garrett's  
2 behavior and that came from a meeting that we all  
3 had and Bridgeford said that he noticed, you know,  
4 Garrett's behavior was inappropriate and he would  
5 talk to him and he told him, you know, there's no  
6 one out on the floor to watch what's going on  
7 there because Tim's office was all the way across  
8 the floor and he was in an enclosed office, so he  
9 didn't see what was going on. And so that was the  
10 problem with the whole setup.

11 Q. And did you work from a different  
12 location for part of the week?

13 A. No.

14 Q. You indicate "heavily supervise  
15 Garrett's practices in his new role" as the last  
16 bullet for why you were escalating these issues.

17 What was his new role as of this  
18 time?

19 A. The referred candidates monitoring  
20 person.

21 Q. And did you continue to report to  
22 him in this new role?

23 A. Yes, this was before the  
24 performance evaluation. The referred candidates  
25 came in October -- maybe September, October.

1 Q. You reported to Garrett Ross until  
2 September or October of 2019?

3 MR. IADEVAIA: Objection. You can  
4 answer.

5 A. I'm talking about September,  
6 October of 2018. So when this was written,  
7 Garrett Ross hadn't been transferred and wasn't  
8 fired yet. This was still before all the  
9 transitioning happened.

10 Q. So the new role you're referring to  
11 is referred candidates?

12 A. Referred candidates monitoring,  
13 yes.

14 Q. And when was Tim Bridgeford  
15 separated?

16 A. April 2019.

17 Q. And is that also when you ceased  
18 reporting to Garrett Ross?

19 A. Yes.

20 Q. And what were you told at that time  
21 about why you were ceasing reporting to Garrett  
22 Ross?

23 A. By who?

24 Q. By anybody.

25 A. So I had a meeting with Melissa

1 Laferriere and she told me that the department's  
2 being shuffled around or they're redistributing  
3 responsibilities and now I'll be reporting to her.  
4 She didn't give any background on why Ross had  
5 moved.

6 Q. And when was this meeting?

7 A. April. I had just come back from  
8 vacation, so I was a bit late knowing everything.  
9 So it was maybe mid April.

10 Q. And how did you learn that Tim  
11 Bridgeford was no longer employed?

12 A. Also from Melissa during that  
13 meeting.

14 Q. And what did she say?

15 A. That Tim Bridgeford is no longer  
16 working with the firm and to -- and again, I would  
17 be reporting directly to her.

18 Q. And what were you told about  
19 Garrett's new role relating to referred candidates  
20 in September or October 2018?

21 MR. IADEVAIA: Objection. You can  
22 answer.

23 A. What was I told about his new role?

24 Q. Yeah.

25 A. So Garrett and Jeanette O'Rourke

1 had a meeting with me where they said that they  
2 needed to -- or the FED needed them to create a  
3 monitoring exercise for the other referred  
4 candidates workstream, and that Garrett and  
5 Jeanette would be tackling it together, and this  
6 is because -- and it was kind of frantic a bit  
7 because of the high turnover, the people that  
8 left, I think one of -- at least one of them was  
9 in charge of this previously and it kind of --  
10 kind of dropped and that they had to create a  
11 monitoring framework -- or procedure that they  
12 ended up calling a framework to assist with  
13 mitigating the risk of referred candidate hiring.

14 Q. Okay. Were you told anything else  
15 about that new role for Garrett?

16 MR. IADEVAIA: Objection. You can  
17 answer.

18 A. That's -- that's all I was told  
19 what was happening.

20 Q. And so, as of that time, were you  
21 the only one working on TPI?

22 A. No.

23 Q. Who else was working on TPI?

24 A. Garrett.

25 Q. How about -- and after that, Puneet

1 Singh?

2 A. After -- yeah, when Puneet joined,  
3 he was working on it.

4 Q. Was there ever a time you were told  
5 Garrett would not be working on TPI?

6 A. Yes.

7 Q. When was that?

8 A. When Melissa Laferriere took over.

9 Q. And who told you that he would not  
10 be working on TPI?

11 A. Melissa Laferriere as well as --

12 Q. Go ahead.

13 A. -- as well as Mia Korot and Aaron  
14 Smith.

15 Q. And when did Melissa tell you that?

16 A. When I returned from vacation and  
17 we had a meeting about it.

18 Q. In April 2019?

19 A. April, that's right.

20 Q. And when did Mia and Aaron tell you  
21 that?

22 A. After my meeting with Melissa.

23 Q. In April?

24 A. In April.

25 Q. And what did Mia and Aaron tell you

1 about that?

2 A. So Mia and Aaron told me that Tim  
3 had been fired based on my complaints and that  
4 Garrett had also been moved from TPI, also based  
5 on my complaints, and that, you know, now you'll  
6 be reporting to Melissa and that they're going to  
7 keep looking into the issues that I -- that I  
8 raised. And I asked them if Melissa's aware and  
9 they said, yes. And that's what I remember from  
10 the conversation.

11 Q. And when in April was this  
12 conversation with Mia and Aaron?

13 A. I don't remember. I'd have to look  
14 at the e-mails or my calendar.

15 Q. Do you recall when you were on  
16 vacation?

17 A. It was the end -- end of March,  
18 early April 2019.

19 Q. So you met with Mia and Rory on  
20 April 9. Was your meeting with Melissa before or  
21 after that date?

22 A. It was probably before.

23 Q. And how long after your meeting  
24 with Mia and Rory was your meeting with Mia and  
25 Aaron that you've just recounted?



1           A.     It would have been after that. I  
2     thought Mia -- I think Aaron was on that call --  
3     may have been on that call.

4           Q.     Which call?

5           A.     With Mia and Rory, because I  
6     remember being in -- that was the only time I ever  
7     spoke with Mia and Rory in her office, Mia's  
8     office, and Aaron was on the phone, so I think  
9     Aaron was on that meeting.

10          Q.     Is that when they informed you  
11     about Bridgeford and Garrett?

12          A.     Yes. And that my seat would be  
13     moving as well.

14          Q.     And what did they say about your  
15     seat moving?

16          A.     That I would be moved to the other  
17     side of the floor with other GACC team members  
18     that were on that part of the floor.

19          Q.     And did they explain why your seat  
20     would be moving?

21          A.     Due to my complaints about physical  
22     security with Garrett.

23          Q.     And did you welcome that change?

24          A.     Yes.

25          Q.     And so Mia and Aaron are going to

1 investigate the issues as you've related them in  
2 your April 9th submission, but at the outset of  
3 that, on April 9th, they told you Bridgeford had  
4 already been fired and Garrett had already been  
5 moved?

6 MR. IADEVAIA: Objection. You can  
7 answer.

8 A. Yeah, there may have been -- there  
9 was another meeting with ER before. I think it's  
10 not the -- I think -- what's her name? Mia was  
11 kind of new. So if I had access to my calendar  
12 and the other e-mails back and forth, I'd be able  
13 to piece it together more clearly.

14 Q. Well, what would show you that?

15 A. What would show me the sequence of  
16 meetings?

17 Q. Yeah.

18 A. My calendar.

19 Q. Did they say anything about why  
20 Garrett Ross wasn't fired?

21 A. No. I didn't ask them.

22 Q. Do you have any understanding as to  
23 whether someone's who's fired for misconduct at  
24 JPMorgan Chase was offered severance?

25 A. No.

1 Q. I'm sorry?

2 A. No.

3 Q. Did you have any understanding as  
4 to who made the decision to fire Tim and move  
5 Garrett as a result of your complaints?

6 A. Did I have an idea is your  
7 question?

8 Q. Well, were you told?

9 A. No.

10 Q. And who would you expect?

11 A. His managers.

12 Q. Which would be Jennifer  
13 Boyle-Devine and Cathy Duffy?

14 A. Yes. And perhaps Craig Pern.

15 MR. LINTHORST: Shall we take a  
16 break for lunch?

17 MR. IADEVAIA: Sure.

18 THE VIDEOGRAPHER: The time is  
19 12:50 p.m.. We are going off the record.

20

21 (Whereupon there was a luncheon  
22 recess.)

23

24 THE VIDEOGRAPHER: The time is 1:37  
25 p.m.. We are on the record.

1 BY MR. LINTHORST:

2 Q. Good afternoon, Ms. Williams.

3 A. Good afternoon. Sorry, I was on  
4 mute.

5 Q. Now, when Puneet Singh was hired  
6 into the group, did you tell him that he should  
7 look for another job?

8 A. No, he -- he told me that he was  
9 continuing to interview with MacKenzie and that he  
10 was shocked about what was going on and we were  
11 probably likely going to lose him, and so I -- I  
12 guess I brought him around and introduced him to  
13 people. I introduced him to Jennifer Boyle-Devine  
14 and tried to get him to stay.

15 Q. This was in December of 2018?

16 A. December -- yeah, December through  
17 January I think, I was kind of trying to introduce  
18 him to more people and brought him into Jennifer's  
19 office to introduce him because I was also on  
20 the -- Jennifer, after -- after I told her about  
21 what was going on, I had some ideas about, you  
22 know, retention, Jennifer put me on a retention  
23 committee and I was helping out there and it would  
24 be pretty embarrassing if I was on that committee  
25 and couldn't retain Puneet, so, you know, did what

1 I could.

2 Q. And when did Jennifer Boyle-Devine  
3 put you on a retention committee?

4 A. Probably in November and we were  
5 doing -- when we met in November we talked about  
6 both what was going on in the department and how  
7 we can help retain people because -- well, there  
8 were a lot of layoffs going on on top of, you  
9 know, just people resigning. And then the low  
10 morale was another kind of topic that we were  
11 talking about and -- you know.

12 Q. And who else was on this committee?

13 A. It was other people in employee  
14 compliance that were on the floor. I don't  
15 remember all of them. I think Greg Powell was on  
16 it, he's our control officer for employee  
17 compliance and CBE; well, pretty much whatever  
18 Cathy Duffy covered, he was the employee  
19 compliance control officer for it. And I think --  
20 yeah, a few other people from different  
21 disciplines within employee compliance and we were  
22 kind of doing our best to retain people.

23 Q. For what period of time were you on  
24 this committee?

25 A. I think throughout my tenure. I

1 don't remember being taken off the committee. I  
2 don't think there were any meetings after a  
3 certain point, but I can't remember.

4 Q. Was anyone sort of the chair or  
5 leader of the committee?

6 A. Jennifer Boyle-Devine.

7 Q. Did you tell Puneet Singh around  
8 December 2018 that TPI had a bad reputation?

9 A. No, no.

10 Q. Can you think of any reason why he  
11 might allege that you had told him around this  
12 time that you should look for another job because  
13 TPI had a bad reputation?

14 MR. IADEVAIA: Objection. You can  
15 answer.

16 A. I hadn't told him that, so I  
17 don't -- I don't know why he would think that.

18 Q. Do you contend that in late January  
19 2019 you learned that Bridgeford and Ross were  
20 excluding you from meetings concerning the TPI  
21 program?

22 A. In late 2018?

23 Q. In late January 2019.

24 A. Oh. Yes, yes.

25 Q. And what meetings do you contend

1 that Bridgeford or Ross excluded you from?

2 A. So these were meetings related to  
3 the TPI workstream and the impact on it, so they  
4 were audit meetings, they had their own catchups  
5 about the TPI workflows that I wasn't part of.

6 Q. You're talking about meetings  
7 between Garrett Ross and Tim Bridgeford?

8 A. Right, and then Ross would then  
9 relay some information to me or -- and then I'd  
10 kind of be confused about it, but.

11 Q. Is there anything inappropriate  
12 about Ross meeting with his direct supervisor  
13 about work?

14 MR. IADEVAIA: Objection. You can  
15 answer.

16 A. No, but when it came to something  
17 that I should have been or was told that I was  
18 going to be involved in, it seemed odd, especially  
19 with the TPI -- the special TPI meeting that was  
20 going on, that was the kind of umbrella for  
21 documenting information, so everyone had access to  
22 the issues log that was a spreadsheet. It was on  
23 the shared drive and everyone else that had access  
24 to the PowerPoint slide -- slides and could  
25 contribute to it in any way, so it seemed strange

1 that there were follow-up meetings going on with  
2 the stake holders that -- that were decided in the  
3 meeting that I was going to be part of.

4 Q. The TPI specific meeting --  
5 meetings that you were just speaking about and the  
6 related issues log in PowerPoint, is that the  
7 opportunities and enhancements meetings?

8 A. Yes, it became -- it became the  
9 opportunities and enhancements meetings, yeah.

10 Q. And what was the issues log?

11 A. So it was a spreadsheet that log --  
12 I guess originally it was called the opportunities  
13 and enhancements log to match the name of that  
14 meeting and it was a running, I would say, project  
15 plan where there were the gaps, issues,  
16 enhancements, remediations, proposals, all kind of  
17 documented in that spreadsheet along with the  
18 supporting documents, like an e-mail or a policy  
19 or other sorts of notes that were attached in  
20 there that would help keep track of how we were  
21 doing it and how these different issues were  
22 prioritized.

23 Q. And who had access to the issues  
24 log?

25 A. The entire department, the GACC



1 Department had access to the share -- shared drive  
2 and the share point and anyone in the group could  
3 have accessed it.

4 Q. And who could contribute and add  
5 issues to the log?

6 A. Anyone who had access to our --  
7 the GACC shared point drive.

8 Q. And that included you?

9 A. That included me, yes.

10 Q. And did you add issues to the log?

11 A. Yes.

12 Q. And what were the PowerPoint  
13 slides?

14 A. So they were the -- refreshed every  
15 -- every meeting to show the high level points for  
16 each vertical or I guess workstream within the  
17 issues meeting. So that's pretty much what we  
18 would go through in depth and then -- in the  
19 meeting and then would have the Excel spreadsheet  
20 as support for it, for the PowerPoint slide, and  
21 it would show, you know, all the line items of  
22 what needed to be done for each vertical.

23 Q. What were the audit meetings you  
24 referred to that you claim you were excluded from?

25 A. So there were meetings with audit

1 regarding how the TPI program operated, what --  
2 and then there were scoping meetings in order to  
3 determine what the audit team would audit from the  
4 TPI program as well as other parts of the GACC  
5 program. It would -- there were also conclusions  
6 to those; once the audit was over, there would be  
7 audit meetings regarding the conclusions of those  
8 -- of audit's findings and it would not be, you  
9 know, limited to TPI. So if I were still working  
10 in investigations or transactions or even that  
11 referred candidates workflow, it would have been  
12 part of that -- that meeting as well.

13 Q. And how many audits occurred during  
14 your employment with JPMorgan Chase?

15 A. Audits of?

16 Q. Related to TPI.

17 A. There were two audits of GACC and  
18 they were annual, so they were every -- they were  
19 both in October of 2018 and October of 2019.

20 Q. Were you included in any of the  
21 meetings for October 2018?

22 A. Just the one where Garrett stood  
23 over my desk as a way of intimidating me from  
24 escalating the, you know, compliance concerns,  
25 potential legal issues.

1 Q. And were you included in the audit  
2 meetings for 2019?

3 A. No, I was not. I was included in  
4 the prep meetings which was different.

5 Q. So what makes you think you were  
6 excluded from the meetings in October 2018?

7 A. So I was told that I was going to  
8 be helping on those meetings.

9 Q. Who told you?

10 A. Ross. And then Jeanette O'Rourke,  
11 who was part of those meetings, would ask me, why  
12 aren't you in these? You need to -- like a lot of  
13 these issues are kind of related to what you're  
14 doing. So the only reason I actually knew about  
15 them was because other people had mentioned that  
16 they thought I was going to be in it and I wasn't.

17 Q. And Garrett Ross told you you were  
18 going to be helping with those meetings?

19 A. Yes. So part of my job function,  
20 when I was interviewed as well as after I was  
21 hired, was to, among other thing, assess the TPI  
22 program, give business as usual support and part  
23 of business as usual is dealing with audit or  
24 regulatory -- excuse me -- or regulatory requests.

25 Q. Other than the audit meetings and

1 meetings that Garrett Ross and Tim Bridgeford had  
2 themselves to discuss TPI issues, any other  
3 meetings that you contend Bridgeford or Ross  
4 excluded you from?

5 A. So there were meetings related to  
6 TPI profiles, so one in particular was the one  
7 with Tony Blair and I was the person that was  
8 helping to, you know, perform the due diligence,  
9 and while I was performing the due diligence, I  
10 later learned that there were other meetings and  
11 conversations about what was going on and it would  
12 have been helpful for me to know while I was  
13 conducting that activity.

14 Q. Anything else? Any other meetings  
15 that you contend Bridgeford or Ross would have  
16 excluded you from?

17 A. Well, those are the examples I can  
18 name off the top of my head, but if I have  
19 additional documents I could refresh my memory.

20 Q. What documents would refresh your  
21 memory?

22 A. My e-mails.

23 Q. Why, would you have sent yourself  
24 an e-mail about meetings you were excluded from?

25 A. Perhaps, or I would send them to

1 HR, ER. Other personnel may have sent me not only  
2 e-mails, but communicator messages letting me know  
3 that there was a meeting happening and why am I  
4 not in it.

5 Q. After you no longer reported to  
6 Garrett Ross, did he do anything to you that you  
7 thought was improper?

8 A. So after he was removed?

9 Q. Yes.

10 A. Let's say in April 2019 is what  
11 we're talking about?

12 Q. That's correct.

13 A. I had -- not that I was aware of  
14 because I had no contact with him after he was  
15 moved.

16 Q. Are you aware of anything now?

17 A. I am.

18 Q. And what is that?

19 A. That he continued to be involved in  
20 TPI matters after I was told that he wouldn't be.

21 Q. And how -- how did that affect you,  
22 if at all?

23 A. I -- I was -- I felt that I was  
24 excluded from these sessions and it impacted my  
25 career in terms of, you know, what I was able to

1 do and achieve, what I could note on my  
2 performance evaluation, the exposure that I could  
3 have to senior management.

4 Q. What exposure did you not get with  
5 senior management as a result of any work that  
6 Garrett Ross did relating to TPI after he was  
7 removed as your supervisor?

8 A. So he would have been involved in  
9 meetings with senior personnel or in audit or in  
10 monitoring and testing or related to a regulatory  
11 filing. Those are just some examples which would  
12 give me more experience, and with that experience  
13 I can show that, you know, on an evaluation, you  
14 know, list out all of the work that I've done. If  
15 I can't list that out and show, have -- you know,  
16 examples ready to show as to why I, you know, had  
17 done a good job over the year, it harms my ability  
18 to get a promotion or a raise.

19 Q. Well, you filled your time with  
20 other work, right?

21 A. What do you mean?

22 Q. I mean, you continued to handle  
23 your responsibilities and perform the work that  
24 was assigned to you?

25 A. I did.

1 Q. Do you have any understanding as to  
2 why he continued to handle certain TPI work?

3 A. At what point in time are you  
4 talking about?

5 Q. At any point after he was removed  
6 as your supervisor.

7 A. Do I have an understanding of why?  
8 I -- I have no idea why. I thought -- what I was  
9 told is that he wasn't going to be involved  
10 anymore, so I didn't understand why that was still  
11 happening.

12 Q. Did you think Tim Bridgeford should  
13 have been fired based on your complaints?

14 A. I don't know.

15 Q. Well, did you think what he did was  
16 terminal -- justify termination of employment?

17 A. I'm not HR or his managers, so I  
18 can't make that determination.

19 Q. Well, we saw in your April 9  
20 submission to Mia and Rory that you outlined  
21 certain things that you wanted them to do. I  
22 didn't see on there fire Tim Bridgeford. Is that  
23 something you were looking for?

24 A. That's not -- termination is not  
25 something that I feel that is my -- you know,

1 something that I believe that I should be able to  
2 comment on or -- because I'm not that person's  
3 manager and that's probably why I didn't say  
4 anything like that in there.

5 Q. Well, if another employee engages  
6 in misconduct towards you, wouldn't you have a  
7 view as to whether they should continue to be  
8 employed by JPMorgan Chase?

9 MR. IADEVAIA: Objection. You can  
10 answer.

11 A. I think that determination is made  
12 based on JPMorgan's policies and procedures out of  
13 HR. I can't -- I'm not an expert at that, so all  
14 I can do is give my experience and what -- what I  
15 no longer wanted to happen, promote the  
16 professional route as well as, you know, the legal  
17 route. I just didn't think there was legal or  
18 ethical practices that just weren't being followed  
19 by these folks.

20 Q. You also did not list there in your  
21 April 9 submission to have Garrett Ross removed as  
22 your supervisor. Is that not something you were  
23 looking for?

24 A. That's again something that HR and  
25 the managers will need to determine, because



1 something like that requires like a head count and  
2 money examination, which is more of an HR kind of  
3 an art. For me it's a -- what I can do in my role  
4 as a risk person in financial crimes is to show  
5 what the risk of these folks are bringing to the  
6 bank is and how they're harming the bank's chances  
7 of complying with regulations and exposing the  
8 bank to not only risk, but actual prosecution.  
9 And then the HR teams and the managers can make  
10 that decision. My job was to raise my hand and  
11 say something.

12 Q. And after you raised your hand and  
13 said something and you were advised that Tim  
14 Bridgeford was fired and Garrett Ross was removed  
15 as your supervisor as a result of your complaints,  
16 did you feel that your complaints were taken  
17 seriously?

18 A. Well, there was an inconsistent  
19 communication of that. So I had a communication  
20 from Melissa Laferriere and then later Frank Pern  
21 came down to the office and talked to the group  
22 and said that they were just going in a new  
23 direction. And then Mia and Aaron tell me  
24 something different, that it was based on my  
25 escalation. So not -- I'm not sure which one is

1 exactly true, I tend to believe maybe it's a mix  
2 of both. I don't quite know, but if it is -- if  
3 they did fire Tim based on my escalations, then  
4 that meant it was somewhat taken seriously.

5 Q. Well, if he was fired because of  
6 your complaints, would you expect Frank Pern to  
7 come down and tell the group that he was fired  
8 because of complaints by Ms. Williams?

9 MR. IADEVAIA: Objection. You can  
10 answer.

11 A. I would expect Frank Pern to tell  
12 the truth to his employees, so if he felt that  
13 being dishonest with his employees was an  
14 effective way to communicate at that time, then  
15 that's up to him. I can't think what Frank Pern  
16 must have thought.

17 Q. After Melissa was appointed co-head  
18 of GACC, did you have an initial meeting with her?

19 A. I did over the phone, yes.

20 Q. And did you tell her that you were  
21 unhappy and wanted to transfer out of TPI?

22 A. I don't think I talked to her about  
23 that in my initial meeting with her, no.

24 Q. Did you talk to her about that at  
25 another meeting?

1 A. I think so.

2 Q. And when was that?

3 A. Sometime later. I remember talking  
4 to her, I sent her my resume so she had an  
5 understanding of my background and how I could  
6 help or fit in with the group and that I was --  
7 and I was transparent with her about, you know,  
8 looking for other opportunities as Jennifer  
9 Boyle-Devine gave me an exception to apply  
10 elsewhere.

11 Q. Did you tell her that the TPI group  
12 was a disaster?

13 A. No, I told her that the TPI group  
14 was messy. Disaster was typically a word that  
15 Melissa would use to describe Brad Carso, which I  
16 thought was inappropriate.

17 Q. Tell her that TPI had a bad  
18 reputation?

19 A. No.

20 Q. Did Melissa hold a team-wide call  
21 on or about June 21st, 2019 to discuss work  
22 allocation?

23 A. I don't remember the exact date,  
24 but I know we talked about -- we talked about  
25 workflow allocations several times since she

1 transferred over from like April through when  
2 Andrew quit.

3 Q. And did you indicate -- prior to a  
4 call on work allocation, did you indicate to  
5 Melissa that you don't need to attend and you'll  
6 just go along with what's decided?

7 A. I don't think that I -- I don't  
8 remember -- yeah, I don't remember saying that. I  
9 remember saying that I -- I'm flexible, I'm  
10 agnostic, but she would -- she sent me a  
11 communicator message where she asked me, when you  
12 say you're willing to, you know, do whatever, you  
13 mean you're agnostic in terms of assignments,  
14 right? And I said, yes, I'm agnostic to it, so  
15 everyone -- again, we were all transparent about I  
16 was looking for other opportunities and so it just  
17 made sense for me to just take whatever folks  
18 wanted me to do.

19 Q. Did you indicate you did not want  
20 to continue leading technology builds for TPI and  
21 rather that was done by Singh and Norris?

22 A. I don't remember the technology  
23 builds conversation.

24 Q. Did you indicate to her that you  
25 were no longer interested in enhancement projects

1 because that was an unwanted baby?

2 A. When you say enhancements projects,  
3 are you talking about the issues, TPI's issues?

4 Q. Yeah.

5 A. No, I don't remember saying that.

6 Q. Does enhancement -- is there any  
7 other understanding of enhancements projects than  
8 what you were working on?

9 A. Right, so the meeting that was the  
10 opportunities and enhancements projects was under  
11 Tim Bridgeford and only lasted from November until  
12 Melissa joined us until -- I think April was the  
13 last one and then going forward from April it  
14 became something different.

15 Q. What did it become?

16 A. So one was the TPI -- I forgot what  
17 they had me call this. There was a project  
18 proposal and then it became a working group and  
19 then it also split off into an issues log review,  
20 so it became different things over time.

21 Q. And this was a continuation in  
22 different forms of the opportunities and  
23 enhancements process?

24 A. No. So the opportunities and  
25 enhancements meetings were more about going

1 through these issues and prioritizing them and  
2 then figuring out what their priorities are going  
3 to be for a plan going forward, and Tim put, I  
4 think, a Q2 deadline on it, so to have a plan in  
5 place on what we were going to do for each one.  
6 The opportunities and enhancements log then kind  
7 of -- we had one more meeting in April and then it  
8 stopped, and then when Melissa took over it became  
9 a merger of the Europe teams, unidentified TPI  
10 project as well as the certain items within the  
11 opportunities and enhancements log, that  
12 spreadsheet that I was talking about before. So  
13 it wasn't all inclusive, it was just certain ones.

14

15 (Whereupon Document with Bates Nos.  
16 Pl. 978 to Pl. 980 was received and marked D-11  
17 for identification.)

18

19 Q. Let's mark this as D-11. D-11 is  
20 an e-mail exchange, Plaintiff's 978 through 980,  
21 and I'll give you control. And does this appear  
22 to be e-mail exchange between you and Melissa on  
23 about June 28th, 2019?

24 A. Okay. Yeah.

25 Q. All right. So let's just start at

1 the bottom. This is the first e-mail on June 13  
2 from you to Melissa. And what is this e-mail?

3 A. Me sending Melissa my priorities.

4 Q. And what was the TPI program  
5 remediation and enhancement project?

6 A. So this is the project plan that  
7 she had asked us to put together. So that's where  
8 she asked us for our top five -- or for me to  
9 identify top five from that issues log and make it  
10 into a project plan.

11 Q. And then she responds, on the next  
12 one up, on June 14 and requests that you make a  
13 couple of changes before you sit down together.  
14 Is that right?

15 A. That's right.

16 Q. Did she ask that you add the DDR  
17 project since you did a significant amount of work  
18 on it and she wanted to make sure you got credit  
19 for it?

20 A. Right, that's the quick name check  
21 screening project, yes.

22 Q. That's the screening project that  
23 we talked about from September 2018 where you  
24 spoke to Ilya about?

25 A. No. So this is the TPI program

1 transitioned from using -- had to do due diligence  
2 on TPIs, and one way to do that due diligence is a  
3 background check, and those background checks were  
4 performed by Thomson Reuters. They became too  
5 expensive my understanding is and the reports were  
6 sometimes strange, and so it was a decision to  
7 transition to the intern -- the free internal  
8 resource called quick name checks. And so that's  
9 what she's talking about here in terms of me  
10 writing the -- or updating the procedures to  
11 reflect what people need to do in order to perform  
12 the quick name check because it was a different  
13 process under Reuters and I had -- and this is an  
14 example of actually one of those projects where  
15 Ross was still involved and I was excluded,  
16 because they were working out this -- the -- what  
17 options to choose in this screening and they, you  
18 know, decided to only use negative media searches  
19 instead of, you know, the other available options  
20 for sanctions and AML screenings.

21 Q. Did you appreciate her suggestion  
22 that you add this to your priorities so that you  
23 would get credit?

24 A. Yes.

25 Q. In the fourth bullet, she says, "I



1 think you can remove priority two, in my view,  
2 that is more BAU and I want your priorities to  
3 focus on projects and other non-BAU items."

4 Do you see that?

5 A. Yes.

6 Q. And is BAU business-as-usual?

7 A. That's my understanding.

8 Q. And is there anything wrong with  
9 that suggestion?

10 A. What was bullet two again?

11 Q. This is bullet four?

12 A. This is referring to --

13 Q. Oh, priority two. Sorry, you have  
14 control, but priority two is Management and  
15 Execution.

16 A. Okay. Yes. So my concern with  
17 that is I -- with that was that it didn't -- it's  
18 removing an item that I thought was important for  
19 my -- to reflect on my work.

20 Q. Did you have any reason to think  
21 she suggested it be removed for any reason other  
22 than what she indicated here?

23 A. Other than she doesn't want to see  
24 BAU items in priorities? Is that --

25 Q. Right.

1           A.     Yeah, I believe that's what she  
2     thought.

3           Q.     And in the last bullet, she  
4     indicates that she'd like you to think about one  
5     leadership or teamwork priority that you could add  
6     and an example might be expanding internal network  
7     and visibility with senior management.

8                     Did you think she was interested in  
9     seeing you getting greater visibility with senior  
10    management?

11          A.     It appears so, yes.

12          Q.     And then you -- looks like you sent  
13    her some updated priorities and she sent you some  
14    more feedback. Looks like this e-mail on June  
15    28th is after a meeting between the two of you on  
16    the priorities?

17          A.     Yes.

18          Q.     And then in the third bullet she  
19    says she would like for you to continue to be the  
20    GACC lead on the TPI enhancements project and  
21    indicates you have a good eye for spotting  
22    potential issues and she wants you to utilize your  
23    skill set as long as you choose to stay with the  
24    group.

25                     Do you see that?

1 A. Yes.

2 Q. And what does that relate to, the  
3 TPI enhancements project?

4 A. That's the same project I described  
5 before, the high-level five priorities project.

6 Q. And did you think from this that  
7 she appreciated your spotting potential issues  
8 with the TPI program?

9 MR. IADEVAIA: Objection. You can  
10 answer.

11 A. I don't know if she appreciated it,  
12 it looked like she recognized that I'm good at it.

13 Q. Well, she asked you to continue to  
14 utilize that skill. Wouldn't you conclude that  
15 she appreciated it?

16 MR. IADEVAIA: Objection. You can  
17 answer.

18 A. Again, I don't think it means that  
19 she appreciated it. It looks like she -- she  
20 wanted me to continue to do it.

21 Q. And had you expressed an interest  
22 in governance related work?

23 A. Yes. This was -- there was a  
24 project that she -- was sent to me. I did mention  
25 it earlier about GDPR tagging that was taken away

1 and I think I may have asked her about it and why  
2 it was -- why I'm no longer on that. And then --  
3 yeah, I think maybe she's replacing it with --  
4 attempting to replace it with something else.

5 Q. And did you appreciate her  
6 indication that she would look for ways to expand  
7 the scope of your work in this space?

8 A. I see that she's saying that she's  
9 looking to do it.

10 Q. And when you saw that, did you  
11 appreciate that?

12 A. I don't know if it's something to  
13 appreciate, I just recognized what she wrote and  
14 waited for her to give me more details when the  
15 time comes.

16 Q. At some point, were you advised as  
17 to the conclusion of the investigation conducted  
18 by Mia Korot and Aaron Smith?

19 A. I'm sorry, can you repeat that?

20 Q. At some point, were you advised  
21 about the conclusion of the investigation  
22 conducted by Mia Korot and Aaron Smith?

23 A. Yes.

24 Q. And when was that?

25 A. Early June.

1 Q. 2019?

2 A. Yes.

3 Q. And how were you advised, was that  
4 a meeting?

5 A. It was a call with Korot and Smith.

6 Q. And what did they tell you?

7 A. That the investigation had  
8 concluded and, you know, thank me for sending them  
9 materials and they determined that the issues that  
10 I had raised and, you know, concerns related to  
11 illegal conduct or management decisions and that  
12 -- what else? That's all I can remember off the  
13 top of my head.

14 Q. Did they tell you that the  
15 personnel changes should have resolved many of  
16 your concerns?

17 A. I don't remember that.

18 Q. Did they indicate whether any of  
19 your concerns were substantiated?

20 A. I don't remember. There may be a  
21 document that could help refresh my memory.

22 Q. What document's that?

23 A. An e-mail.

24 Q. What is the e-mail?

25 A. An e-mail that I may have written

1 to myself summarizing the discussion.

2 Q. Okay. But as you sit here now, you  
3 don't recall whether they found merit in any of  
4 your allegations?

5 A. It seems that what they were  
6 communicating is that they were -- the resolution  
7 which was based on an unmanagement decision, so  
8 there was no indication that it didn't have merit,  
9 it's just that the conclusion or the decisions  
10 were made were at the managers' discretions. So  
11 it's possible that, you know, that -- that they're  
12 allowing managers to decide to engage in illegal  
13 conduct if it fits within their risk profile.

14 Q. Well, does any manager at JPMorgan  
15 Chase have a risk profile that includes illegal  
16 conduct?

17 A. Are you asking me about right now  
18 or when -- when I was there?

19 Q. I'm asking you about when you were  
20 there.

21 A. When I was there. From what I  
22 observed, yes, there were -- there were managers  
23 that engaged in illegal conduct.

24 Q. What do you mean by a manager's  
25 risk profile?

1           A.       So in -- in compliance there's a  
2       thing called a risk acceptance, where it's  
3       essentially a cost benefit analysis in terms of,  
4       you know, if I do X, what's the worst that can  
5       happen, and if it's not bad, then I'll -- then  
6       I'll risk accept it and then do it. Because the  
7       worst that could happen, I can take it. It's just  
8       a problem with when you're dealing with illegal  
9       conduct is -- and specifically in compliance, is  
10      rule zero, is you can't do a cost benefit analysis  
11      on illegal conduct, meaning if -- even if the fine  
12      is \$1,000 and, you know, the bank can definitely  
13      pay it, it's still -- it's still illegal, you  
14      can't -- you shouldn't be doing it. So if they  
15      have kind of -- what I meant by risk profile is  
16      they -- if they have a profile of conducting such  
17      risk analyses or risk benefit analyses on illegal  
18      activity, then it's a poor way to do compliance.

19           Q.       So did you understand that when you  
20      were told that the issues were managers'  
21      discretion, that it was -- it was appropriate for  
22      them to have taken the action?

23           A.       No, those were very careful words  
24      it seemed, in my opinion, from Korot and Smith.  
25      It seemed that -- that they were hedging a bit

1 with that language. It seemed that it was kind of  
2 leaving it open to well, that they can make a risk  
3 decision or again, a cost benefit analysis on  
4 whether to engage in illegal behavior.

5 Q. Did they say we made a mistake by  
6 firing Bridgeford before we even conducted the  
7 investigation since we determined it was a  
8 management decision?

9 MR. IADEVAIA: Objection. You can  
10 answer.

11 A. No, they didn't say that.

12 Q. Did you ever become aware, during  
13 your employment at JPMorgan Chase, of Puneet Singh  
14 making any complaints about you?

15 A. No.

16 Q. Do you know -- are you aware of  
17 that now?

18 A. I am.

19 Q. Do you know why he would make a  
20 complaint about you?

21 A. I know that I was escalating  
22 concerns about him for his work and that he was  
23 concerned about those escalations, so it may have  
24 been done in retaliation as well.

25 Q. What concerns about his work were



1 you escalating?

2 A. So I'll give examples that I have  
3 at the top of my head is, he would -- he would  
4 change or update policy documents or desk manuals,  
5 their procedures really, but they're called desk  
6 manuals, without approval, and I received a  
7 request from the Europe team that they had to, you  
8 know, produce them to the FCA, and then I was kind  
9 of stuck with that.

10 Another example is also related to  
11 document controls; he retired a document that we  
12 needed to show that a certain group had an  
13 exception or an exemption, also again without  
14 approval, and it was needed for an audit request,  
15 so I couldn't use it until Melissa was able to  
16 un-retire it.

17 What else? There's also something,  
18 a TPI monitoring exercise where there was just  
19 month after month they were ignoring these entries  
20 without any notes on it and then when it  
21 transferred to me after Andrew quit, I, you know,  
22 made it a point of taking ownership and trying to  
23 figure out what each one of these entries were and  
24 then it reflected poorly on Singh and Norris  
25 because they were essentially just rubber stamping

1 this exercise that was a regulatory commitment as  
2 well.

3 So each one of those had an impact  
4 on books and records, internal controls,  
5 regulatory commitment, regulatory requests which  
6 he was quite sensitive to, understandably so.  
7 It's embarrassing, but he was an associate so, to  
8 me, you know, he could recover from it.

9 Q. What do you mean that he could  
10 recover from it?

11 A. I don't -- the expectations aren't  
12 as high on an associate as they are for higher  
13 level employees; you know, like junior level folks  
14 make mistakes, everyone's human. It's just I was  
15 kind of -- my hand was forced there on these. And  
16 then when I went to Melissa, I tried to handle  
17 them privately with her and then she then, you  
18 know, preferred that we did it in the group  
19 meeting which also put the spotlight on Puneet as  
20 making a bad mistake.

21 Q. Do you have a midyear check-in with  
22 Melissa on or about August 28, 2019?

23 A. Yes.

24 Q. Midyear check-in, is that a  
25 performance discussion?

1           A.     I believe so. It was the first one  
2     I'd ever had there, so I believe that's what it's  
3     meant to do.

4           Q.     And there's, I take it, no formal  
5     documented midyear review the way there is for the  
6     annual review?

7           A.     I don't know. I don't remember. I  
8     think a lot of those were at the managers'  
9     discretion. I remember a couple of people on the  
10    floor talking about doing a document and that's  
11    what was confusing to me, so when I went in to  
12    mine with Melissa I was a bit -- the first thing I  
13    asked her was, I've never done this before, how do  
14    you usually do it? Because some had documents and  
15    some didn't, it was up to the manager.

16          Q.     During the midyear check-in, did  
17    she provide feedback to you that the tone you used  
18    with other team members and the way you treat  
19    others is problematic?

20          A.     No.

21          Q.     Did she -- did you discuss with her  
22    the fact -- (Inaudible).

23                   THE REPORTER: I'm sorry, I need  
24    that question again. You broke up on me. I'm  
25    sorry.

1 MR. LINTHORST: Just the question I  
2 was in the middle of after the answer?

3 THE REPORTER: Yes.

4 "Did you discuss with her the  
5 fact" -- and then I lost you.

6 Q. -- that you often engaged in the  
7 types of behaviors towards others that you had  
8 complained about when directed at you?

9 A. No.

10 Q. Did you discuss emotional  
11 intelligence and the fact that you needed to be  
12 more mindful in your interactions with others?

13 A. No.

14 Q. Did you discuss the importance of  
15 collaboration and the ability to work together as  
16 a team?

17 A. No.

18

19 (Whereupon Document with Bates Nos.  
20 Pl. 912 to Pl. 922 was received and marked D-12  
21 for identification.)

22

23 Q. Let's mark this as D-12. D-12 is  
24 Plaintiff's 912 through 922 and it starts with a  
25 meeting invite at the bottom for August 28, 2019

1 for you and Melissa.

2 Does that appear to you to be the  
3 midyear check-in?

4 A. It looks like a weekly meeting.

5 Q. And was your midyear check-in  
6 during your weekly meeting?

7 A. Maybe.

8 Q. And you had another meeting on/or  
9 about September 6?

10 A. Yeah, a weekly meeting, yeah.

11 Q. And then she sends you an e-mail  
12 and there's an exchange back and forth and  
13 ultimately an e-mail from her to Frank Pern and an  
14 e-mail from her to herself.

15 As it relates to the e-mails  
16 between you and Melissa, my only question is, do  
17 these appear to be correct copies of e-mail  
18 exchanges you had with Melissa?

19 MR. IADEVAIA: I'm just going to  
20 raise, I guess, a question or a concern. I can't  
21 tell, are you saying this is all one document,  
22 because there's multiple documents put into one  
23 exhibit?

24 MR. LINTHORST: It appears to me  
25 that the e-mail exchange is one document. I don't

1 know whether the -- maybe the meetings are  
2 separate.

3 MR. IADEVAIA: Okay.

4 Q. As to the e-mail starting on  
5 September 9th from Melissa to you up through the  
6 meeting from you to Melissa on September 13th that  
7 we see on Plaintiff's 913, do these appear to be  
8 e-mail exchanges that you had with her on those  
9 dates?

10 A. No. So -- do I have control of the  
11 document?

12 Q. You do.

13 A. Okay. It's strange that it's in  
14 purple, but I'm going to scroll up here just to  
15 see. Okay. So that's an e-mail on September 23rd  
16 from Melissa to herself, and then an e-mail on  
17 September 13th, so 10 days earlier, from Melissa  
18 to Frank Pern, Jennifer Boyle-Devine and Cathy  
19 Duffy. And then -- okay, and then the last one --  
20 yeah, the purple -- it seems like she's edited  
21 this document.

22 Q. With what's in purple?

23 A. At least what's in purple. I'm not  
24 sure what else she may have edited.

25 Q. Do you contend that Melissa ever

1 excluded you from any meetings?

2 A. Yes.

3 Q. And which meetings?

4 A. The ones that I am aware of or that  
5 was a topic of discussion during this time, so I  
6 remember the performance evaluation meeting  
7 happened, it was very short. We talked about --  
8 I asked her what I should be doing. She said no,  
9 it's up to you, what do you want to do? I told  
10 her I'd like to take that emotional intelligence  
11 course, the second level of it, I enjoyed it. It  
12 was a group course that she assigned to the whole  
13 team, and then I asked her if she had any feedback  
14 for me. She said, no. I asked what -- is there  
15 anything else I should be doing? She said, no.  
16 And then I asked her about -- oh, no, she asked me  
17 about my job prospects, if -- have I found  
18 anything and is there anything she could do to  
19 help with that. No. And then I said okay, well,  
20 I guess is that it? And then we concluded that  
21 conversation, the performance evaluation or the  
22 midyear check-in. And then we moved on to  
23 different topics. I said okay, now that that's  
24 over I want to talk to you about this meeting that  
25 we -- that you guys had. It looks like, you know,

1 Chris Punke told me about this meeting where all  
2 the other team leads are there and I'm not, and  
3 that's when, you know, we had the conversation  
4 about that and she said, you know, that she didn't  
5 feel the need to invite me to that meeting because  
6 she already knows what's going on with TPI, but  
7 the other leads she needs to understand what's  
8 happening with them and that's why they're there  
9 and I'm not. And then I said, well, I feel like  
10 I'm being excluded again and kind of went from  
11 there and then we concluded the meeting after we  
12 had additional kind of back and forth. It was a  
13 very short meeting and then we had this -- I guess  
14 an unedited version of this e-mail trail that you  
15 showed where I kind of more fully described what I  
16 remember happening in both the August 28th and the  
17 September 6th meetings.

18 Q. As to the meeting where she told  
19 you that she didn't think you needed to be there  
20 because she already knows what's going on with  
21 TPI, did you have any reason to doubt her  
22 explanation for why you weren't at the meeting?

23 A. Yes, because it's also about  
24 exposure, and if I'm not being treated the same  
25 way, you know, different -- why I'm being treated



1 differently than other team leads, I didn't  
2 understand it, I thought, you know, we got past  
3 excluding me from things.

4

5 (Whereupon Document with Bates Nos.  
6 Pl. 962 to Pl. 966 was received and marked D-13  
7 for identification.)

8

9 Q. Let's mark this as D-13, which is  
10 Plaintiff's 962 to 966. I'll give you the  
11 control. Can you tell us what this document is?

12 A. It appears to be some examples that  
13 I -- I sent to Ruggieri and then later Batterman.

14 Q. Who's Ruggieri?

15 A. Rosemary Ruggieri, an ER  
16 investigator.

17 Q. R-u-g-g-i-e-r-i?

18 A. I'll trust your spelling.

19 Q. And John Batterman?

20 A. B-a-t-t-e-r-m-a-n.

21 Q. And who's Batterman?

22 A. He's a -- I think he just joined  
23 the GIRE investigations team. That's the -- I  
24 can't remember what GIRE stands for, I just know  
25 they work with the GACC team on the investigations

1 workstream and they also would do internal  
2 whistleblower investigation.

3 Q. I'm sorry, did you say you don't  
4 know what GIRE stands for?

5 A. No, I don't remember what the  
6 acronym stands for.

7 Q. But it's G-I-R-E?

8 A. G-I-R-E.

9 Q. And did Ruggieri and Batterman then  
10 conduct an investigation into your allegations?

11 A. Well, first it was Ruggieri and  
12 then it got escalated to Batterman and they both,  
13 yeah, conducted an investigation together.

14 Q. And did you have a two-hour meeting  
15 with the two of them on or about October 7, 2019?

16 A. Around there.

17 Q. Looking at the first page of this  
18 document, at 962 there's a reference to priorities  
19 discussions, and in the third line you said, "I  
20 was also concerned with being told to remove items  
21 that I accomplished which is similar to what my  
22 prior managers did."

23 Does that refer to the priorities  
24 exchange that we reviewed before?

25 A. Yes.

1 Q. And your concern was being told to  
2 remove the items where Melissa thought they were  
3 more BAU?

4 A. I'm not sure what -- maybe the  
5 attachment in there will show that, but I'm --  
6 probably, that's probably related to that  
7 attachment.

8 Q. And you say, "Bias exclusion and  
9 lack of empowerment escalations, this workflow was  
10 meant to be my way of getting exposure, but I  
11 ended up being excluded from the senior managers  
12 at the end."

13 What's the workflow you're  
14 referring to?

15 A. This is related to the FRC meeting.  
16 This is a high-level risk committee that's  
17 described in the JPMorgan the 10K, where it shows  
18 that Jamie Dimon, who we talked about before, and  
19 Ashley Bacon, chief risk officer, were meant to --  
20 were, not just meant to, they were the co-chairs  
21 of this, and that's what -- and it's meant to --  
22 or the attachments as well as the submissions --  
23 are meant to give an update on the GACC program  
24 part of that update.

25 MR. IADEVAIA: Tom, I think we've

1       been going almost an hour and a half. Whenever is  
2       a good time, I'd like to take a break, but  
3       whenever you want to.

4                   MR. LINTHORST: Yeah, we can take a  
5       break.

6                   MR. IADEVAIA: Okay.

7                   THE VIDEOGRAPHER: Time is 2:54  
8       p.m.. We're going off the record.

9  
10                   (Whereupon there was a brief  
11       recess.)

12  
13                   THE VIDEOGRAPHER: The time is 3:09  
14       p.m.. We are on the record.

15       BY MR. LINTHORST:

16               Q.       Looking back at Defendant's 13, at  
17       Page Plaintiff's 962 towards the bottom, you say,  
18       "August 20, I escalated bias concerns with regard  
19       to a team member's (Jeanette O'Rourke) behavior.  
20       I was then told that I just don't like when people  
21       do to me what I do to them."

22                   And what was your concern with  
23       Jeanette O'Rourke's behavior?

24               A.       She was very aggressive and rude  
25       and pretty frustrated. I understood her

1 frustration, but not, you know, the aggressiveness  
2 and the rudeness.

3 Q. And your bias concern related to  
4 what?

5 A. So I noticed that a number of other  
6 team members who were also black, Jeanette  
7 O'Rourke had acted the same way towards them and I  
8 observed a pattern with her that I didn't --  
9 these sorts of things don't pop into my head  
10 immediately so it takes me awhile, but I observed  
11 a pattern at this point where it was a black woman  
12 that reported to her for maybe a month, month and  
13 a half, Chrissy Thomas, and was almost immediately  
14 removed from her team. And then the way that she  
15 treated Arlene West, also another black woman on  
16 her team, and the way that she treated Ashon  
17 Taylor and then me, and we happened to be all of  
18 the black people in -- in the department.

19 Q. And who told you that you just  
20 don't like it when people do to you what you do to  
21 them?

22 A. It was -- I need to remember. It  
23 may have been -- it was either Laferriere or  
24 Punke, Chris Punke. I'm not -- I can't remember  
25 right now.

1 Q. And then it says, "I also  
2 highlighted to Melissa that it seems like all the  
3 people of color are seated in one area and all  
4 other team members are seated apart. I asked her  
5 to consider the optics of this seating  
6 arrangement."

7 Now, you had been seated over there  
8 as a result of the first investigation to place  
9 you apart from Garrett Ross?

10 A. I was -- initially I was seated on  
11 the other side of the floor, and then Melissa  
12 moved to the U.S. and created a seating chart and  
13 then this was the seating chart that we all were  
14 in.

15 Q. So you moved again after Melissa  
16 became your supervisor?

17 A. After Melissa moved to the U.S., so  
18 part of the problem with Ross was there was no  
19 manager present on the floor directly where we  
20 were to observe his behavior or at least help  
21 manage it and Melissa was still in the UK, and she  
22 didn't move back until July. And then when she  
23 moved back, myself and two other -- yeah, one,  
24 two, three, four -- four other team members who  
25 were on the other side of the floor, were then

1 consolidated into that area under Melissa and  
2 Brad's seating chart.

3 Q. And you say there has still been no  
4 training since this escalation. What training are  
5 you referring to?

6 A. It might say further up, but  
7 there -- there was a point where I asked Melissa  
8 to -- to assign unconscious bias training and she  
9 said that she would and it didn't happen. It  
10 might be in that attachment. I don't remember,  
11 but I do remember asking for an unconscious bias  
12 training because I thought Jeanette's issues -- I  
13 didn't think she was -- she was aware that she was  
14 engaging in this behavior, so I said to assign the  
15 unconscious bias training to her.

16 Q. Did you receive a written warning  
17 on or about October 24, 2019?

18 A. Yes.

19 Q. And how did you receive that?

20 A. In person.

21 Q. And who was in the meeting?

22 A. Jennifer Boyle-Devine and Elizabeth  
23 Dorritie.

24 Q. And who's Elizabeth? What's her  
25 role at the time?

1 A. She has something to do with HR.  
2 I'm not sure what her role in that was, but she  
3 accompanied Jennifer Boyle-Devine.

4 Q. And how did the meeting come about?

5 A. It was scheduled by Jennifer  
6 Boyle-Devine, I think. It was a calendar invite  
7 on my calendar.

8 Q. And what was said during the  
9 meeting?

10 A. They -- I was told that I was  
11 receiving a written warning, and -- excuse me.  
12 Sorry about that.

13 Q. Not a problem.

14 A. I was told that I was receiving a  
15 written warning. They described the written  
16 warning and then -- or I guess -- yeah, Jennifer  
17 Boyle-Devine went through the written warning and  
18 then Elizabeth Dorritie said -- told me about the  
19 process, the written warning process, and told me  
20 that I had one week to challenge and provide  
21 feedback or respond to the written warning with  
22 any information that I felt was relevant, if I  
23 have any -- well, I misunderstood her when she  
24 first said that, she said that there's a personal  
25 issue, but I thought she said personnel issue.



1 Then I brought up the GIRE investigation and --  
2 and then she clarified and said no, it's personal  
3 to you, meaning if I have like a mental health  
4 problem or some other problem.

5 Q. What did you say about the GIRE  
6 investigation?

7 A. I asked her, well, is it  
8 appropriate to -- I asked her, does she want me to  
9 document personnel problems, and that's when I  
10 would have documented the GIRE investigation, so I  
11 didn't say anything else other than that there was  
12 a GIRE investigation in order to ask that  
13 question, but she told me I had a week to respond  
14 and I can write something up. So I didn't feel  
15 the need to, you know, go into it in that meeting  
16 and they made it seem like it wasn't appropriate  
17 to. It was more of, you have a chance to respond  
18 and -- and you have a week to respond.

19 Q. And did they present you with a  
20 document at the meeting?

21 A. They did.

22 Q. And anything else that was said  
23 during the meeting that you can recall?

24 A. Not that I remember.

25

1 (Whereupon Document with Bates Nos.  
2 Pl. 972 to Pl. 974 was received and marked D-14  
3 for identification.)

4

5 Q. Let's mark this D-14. Plaintiff's  
6 972 through 974. Giving you control and the first  
7 question is, is this a copy of the written warning  
8 that you received in that meeting?

9 A. No, it is not. This employee did  
10 not sign. This part was blank.

11 Q. Okay. Other than that, does this  
12 appear to be a copy of the written warning that  
13 you received in the meeting?

14 A. It looks like it.

15 Q. And in terms of Jennifer, did it  
16 seem like she was reading through this or  
17 summarizing or are you not sure?

18 A. It looked like she was summarizing  
19 it.

20 Q. And were you given a copy of this  
21 document?

22 A. I was.

23 Q. And were you asked to sign?

24 A. I was -- yes, I was told that I  
25 could -- in a week -- I have one week to respond

1 and acknowledge receipt of the warning.

2 Q. Well, were you asked to sign in the  
3 meeting that you have read the warning and  
4 received a copy?

5 A. No, I wasn't. I was told that I  
6 could take it with me and I have a week to  
7 respond.

8 Q. Was anything else said during this  
9 meeting?

10 A. Not that I remember off the top of  
11 my head.

12 Q. So first two pages of the meeting  
13 -- of the warning provides some feedback and  
14 you're free to look through it, but the question  
15 will be, did you feel that any of the feedback had  
16 merit?

17 MR. IADEVAIA: Objection. You can  
18 answer.

19 A. When I read through the written  
20 warning, I also didn't have an opportunity to read  
21 through it during that meeting, so that was  
22 another reason why I had to take it with me to  
23 read through it. I -- when I read through it more  
24 thoroughly after the meeting, my impression was  
25 that the -- that this was retaliation, that

1 these -- this feedback, the negative feedback,  
2 that's related to, you know, my escalations and  
3 just protected activity. I was escalating an  
4 issue with related to the falsification of  
5 documents, inaccurate books and records, and  
6 inadequate or nonexistent controls and that I was  
7 refusing to engage in illegal conduct, and this  
8 was their response to my refusal to engage in that  
9 conduct.

10 Q. Did you read through it that same  
11 day after the meeting?

12 A. I did. I did.

13 Q. And at the time, did you think that  
14 any of the performance feedback reflected in the  
15 warning had merit or was valid?

16 MR. IADEVAIA: Objection. You can  
17 answer.

18 A. I thought that the negative  
19 feedback was related or was in retaliation to  
20 complaints of illegal behavior.

21 Q. I take it then you did not feel  
22 like any of the negative feedback was valid in  
23 terms of an assessment of your performance?

24 MR. IADEVAIA: Objection. You can  
25 answer.

1           A.     I believe that this document, or  
2     the -- you know, the negative feedback in this  
3     document were directly related to instances where  
4     I refused to engage in criminal conduct.

5           Q.     I take it then you didn't feel that  
6     it was valid in terms of performance feedback?

7                   MR. IADEVAIA:  Objection.  You can  
8     answer.

9           A.     I have the same answer.  I believe  
10    that it was related to my refusal to engage in  
11    criminal conduct.

12          Q.     Is it possible to be retaliated  
13    against with negative feedback for refusing to  
14    engage in criminal conduct and yet that feedback  
15    is valid and accurate in terms of a performance  
16    assessment?

17                   MR. IADEVAIA:  Objection.  You can  
18    answer.

19          A.     I don't know how that -- how to  
20    answer that.  It seems that these -- again, the  
21    negative complaints are -- or negative comments  
22    are related to the refusing to engage in criminal  
23    conduct, so I'm not willing to lose my license, my  
24    reputation, which is -- just to, you know,  
25    continue to get a paycheck at JPMorgan.  I'd

1       rather do my job properly.

2               Q.       Were there any areas of feedback in  
3 the warning that you decided, after reviewing the  
4 warning, you would attempt to improve on?

5               A.       I -- I don't remember because I was  
6 in the process of drafting my response, but didn't  
7 have a chance to submit it because I was  
8 terminated before I could even respond during the  
9 response period, which would have folded this  
10 into -- I thought would have folded this into the  
11 whistleblower retaliation investigation that was  
12 already happening.

13              Q.       Was there anything in the warning  
14 that you agreed with?

15              A.       I don't remember. I would have to  
16 review my -- my draft of -- my draft response that  
17 I never got to send.

18              Q.       Well, is there anything in the  
19 warning now that you agree with?

20              A.       I'd have to review it in order to  
21 assess it.

22              Q.       Go ahead.

23              A.       I don't seem to have control of the  
24 document.

25                               MR. IADEVAIA: Take your time

1 reviewing the document, please.

2 THE WITNESS: Um-hum. I'm just  
3 having mouse difficulties.

4 There we go.

5 A. Okay, I've read it.

6 MR. IADEVAIA: Is there a question?

7 MR. LINTHORST: Yeah. Can you hear  
8 me or am I on mute?

9 MR. IADEVAIA: Now we can hear you.

10 Q. So the question is, is there  
11 anything in terms of the feedback of your  
12 performance that you agree with?

13 MR. IADEVAIA: And I'm objecting.  
14 You can answer.

15 A. Here, where it says, "On August  
16 25th and 26th, Quala accused three EMEA regional  
17 team members of attempting to intentionally hide  
18 risk issues from senior management due to edits  
19 that they suggested to language she drafted in a  
20 PowerPoint deck. Others working on the deck did  
21 not view the language changes as substantive or as  
22 indicating an attempt to hide risk issues."

23 So the first part of that is true.  
24 I believe that they were intentionally attempting  
25 to falsify documents, which would be a record of

1 the program.

2 Q. What does EMEA stand for?

3 A. Europe Middle East Africa. So that  
4 would be Melissa Laferriere's old team when she  
5 transferred back to New York.

6 Q. And what was the PowerPoint deck?

7 A. This was the project, the TPI  
8 project that we talked about earlier.

9 Q. The enhancement project?

10 A. Remediation and enhancement  
11 project.

12 Q. Okay. Anything else you agree  
13 with?

14 MR. IADEVAIA: Same objection. You  
15 can answer.

16 A. That I agree with?

17 No. See, a lot of the things in  
18 here are either not true or are related to my  
19 refusal to engage in illegal conduct.

20 Q. Going back to the entry you were  
21 talking about the EMEA regional team members, what  
22 were the risk issues that -- or what were the  
23 edits they had suggested to language in the  
24 PowerPoint deck?

25 A. Sure. They didn't want to use the



1 words, industry standard terms, issue gap,  
2 remediation or risk because Cathy Duffy would have  
3 ripped their heads off, that's what Martin  
4 MacKenzie said, the head of India, and so they had  
5 to use euphemisms instead for multiple reasons;  
6 one being Cathy doesn't want to see that, second  
7 is Cathy will criticize folks for not  
8 understanding what those terms mean -- really  
9 mean, but then, when I've asked people to define  
10 those terms, no one could or would have. And then  
11 the last was that -- it was discoverable by  
12 regulators because this -- the meeting that -- the  
13 Mia team, Martin MacKenzie, as well as Rajib -- is  
14 another meeting that is also described in the 10K  
15 as a regional compliance meeting where, you know,  
16 the notes and updates from these meetings are  
17 produced or regularly produced to regulators. So  
18 they did not want industry standard language in  
19 those materials, they wanted euphemisms to cover  
20 up what was happening in the --

21 Q. Is what -- go ahead.

22 A. Which was what I was told  
23 specifically by Mia Korot and Aaron Smith that  
24 that shouldn't be the case going forward, I  
25 shouldn't be prevented from using these industry

1 standard terms.

2 Q. And what terms were the Mia  
3 regional team members attempting to use in this  
4 particular deck?

5 A. I don't remember what euphemisms  
6 they were going to replace them with.

7 Q. And what were the risk issues that  
8 they were applying these euphemisms to?

9 A. Some were gaps, some were issues,  
10 some were remediations that they didn't want to  
11 call remediation. They just didn't want that  
12 language in the deck.

13 Q. What was the remediation?

14 A. One example of the remediation that  
15 was required was the unidentified TPIS, so that's  
16 the -- there were a number of ways that TPIS could  
17 be hired through the firm and the Mia team noted  
18 previously when they were benchmarking with other  
19 competitors in India, they found that JPMorgan's  
20 TPI levels were much lower than our counterparts  
21 and so something has got to be wrong. And then  
22 later on it connected with me and I was showing  
23 them, you know, all of these different paths that  
24 were not monitoring, which is probably one of the  
25 root causes of why they didn't -- weren't able to

1 identify the volume of TPIs that they were looking  
2 for to match what their competitors which later,  
3 you know, turned into the combined project that we  
4 were doing.

5 Q. And so the deck discussed that  
6 issue, but instead of calling it a remediation, it  
7 called it something else that was a euphemism?

8 A. That's correct.

9 Q. Do you still have a copy of the  
10 draft response to the written warning?

11 A. Draft -- no, it was on my JPMorgan  
12 system.

13 Q. During -- at the end of the meeting  
14 about -- on the written warning, did you comment  
15 about red blotches on Jennifer Boyle-Devine's  
16 face?

17 A. Oh yes, she was starting to get  
18 hives or having some sort of allergic reaction. I  
19 remember that now, yeah. She -- my little brother  
20 has the same thing, sometimes either he eats  
21 something or something in the air. Yeah, it was  
22 going up her neck throughout the meeting and then  
23 was all over her face by the end, so I was quite  
24 concerned -- usually folks don't -- at least with  
25 my brother anyway, he doesn't realize it's

1       happening and by the time he actually feels his  
2       throat it's too late, so it's best to kind of tell  
3       them as soon as you see them, the hives going from  
4       the neck.

5               Q.       And did you do anything differently  
6       in your performance following your receipt of the  
7       written warning?

8               MR. IADEVAIA:  Objection.  You can  
9       answer.

10              A.       I don't know what else I could have  
11       done other than, you know, to stop or to start  
12       engaging in illegal conduct with my colleagues  
13       which is essentially what they were asking me to  
14       do and drop in and start, you know, violating SEC  
15       regs.

16              Q.       Was Joseph Vilani transitioning to  
17       a role with TPI responsibilities?

18              A.       Yes, along with Indira Lazala, so  
19       it was Joseph Vilani and Indira Lazala together.

20              Q.       And were you asked to assist them  
21       with that transition?

22              A.       Yes.

23              Q.       And did you do so?

24              A.       Yes.

25              Q.       And did Mr. Vilani ask you to help

1 him make sense of materials, and did you reply to  
2 him, that was his job?

3 A. No.

4 Q. I take it asking to help transition  
5 Mr. Vilani to TPI wasn't asking you to engage in  
6 illegal activity, right?

7 A. That's right, so that's why I  
8 agreed to do it. It was Mr. Vilani and Ms. Lazala  
9 together, yes.

10 It keeps moving. Oh, okay.

11

12 (Whereupon Document with Bates Nos.  
13 Pl. 1193 to Pl. 1194 was received and marked D-15  
14 for identification.)

15

16 Q. Let's mark this as Defendant's 15,  
17 which is Plaintiff's 1193 and 1194. It starts  
18 with an e-mail from you to certain individuals on  
19 October 25th, 2019, copy to Melissa Laferriere and  
20 she then responds to you and several others and  
21 then she responds directly to you.

22 What do you understand this  
23 exchange to be? I'll give you control.

24 A. Oh, okay. I can get to the bottom.  
25 Yeah.

1                   So this is a -- was a long-standing  
2                   issue between one, two, three -- three ACCO groups  
3                   where there's been a lot of confusion, so I comply  
4                   the system where the TPI profiles are housed and  
5                   then they're kind of grouped by which business  
6                   line they belong to and that grouping depends on  
7                   where the relationship manager rolls up in the HR  
8                   phone book, and so the people in these areas, so  
9                   John Pierotti and Temple Kearns are CCB, and Brett  
10                  Becker is enterprise functions, which has global  
11                  real estate inside of it, and then global real  
12                  estate has their own kind of group. And so what  
13                  happens in either a test or an audit is that  
14                  they'll pull -- testing or audit will pull a  
15                  sample and then sometimes the sample is in John  
16                  Pierotti's -- it appears to be John Pierotti's  
17                  coverage area, but it really belongs to the GRE  
18                  team under Brett, so it would just be like a  
19                  heads-up, and we did a heads-up e-mail maybe a few  
20                  months before this -- no, maybe even more -- I  
21                  want to say springtime when Melissa first joined,  
22                  we did a heads-up e-mail to them just saying hey  
23                  you guys, okay, another test is coming or another  
24                  audit's coming, please remember if they ask you  
25                  about something that you don't recognize, it's

1 probably because it belongs to these guys, so then  
2 don't -- don't sweat it, just, you know, refer  
3 them over. And I was giving these guys a heads-up  
4 that audit is pulling -- not audit, sorry, testing  
5 is pulling some information from GRE which  
6 would -- so, you know, their worlds would get  
7 pulled into it. And again, don't mind it, they  
8 may or may not do it. It looks like testing did  
9 not include, you know, this other part so it's  
10 just basically a heads-up e-mail just to remind  
11 everyone of the prior agreement.

12 Q. And ACCO stands for what?

13 A. Anti-Corruption Compliance  
14 Officers, so these are, I guess, my -- they would  
15 come to me if they needed advice for TPI. I would  
16 be their specialist or, you know, higher level  
17 more complicated conversations they need to have  
18 about what's happening with regard to TPIs in  
19 their world.

20 Q. And what does CCB stand for?

21 A. I forgot. It's maybe Merchant  
22 Banking, but I forgot what the term CCB is.

23 Q. What does GRE stand for?

24 A. Global real estate.

25 Q. And is anybody asking you to do

1 anything illegal in this exchange?

2 A. No, I'm giving everyone here a  
3 heads-up.

4 Q. All right. And Melissa asked, "Did  
5 you reach out to the testing team before sending  
6 the e-mail?"

7 Did you ever respond to this?

8 A. This was the day that I was  
9 terminated, so if I was still at my desk before I  
10 was terminated by Cathy Duffy, then I may have.  
11 I'm not sure if this is the last e-mail in this  
12 chain.

13 Q. Melissa responds in the middle  
14 here, "I just reached out to Tammie on the below."

15 Do you know who Tammie is?

16 A. Tammie Egbert, the head of employee  
17 compliance testing.

18 Q. What do you understand Melissa to  
19 be saying in this e-mail?

20 A. She's saying that she is including  
21 CCB in the TPI review, which is different from  
22 what my e-mail is saying. I'm -- my e-mail, I'm  
23 relaying information that I've received from the  
24 GRE team where they confirmed with Tammie that it  
25 wasn't happening. So I just -- I believed them



1 when they told me, this is happening, I told them  
2 okay, as GRE I've told GRE as a follow up, I will  
3 give John, Brett, Temple a heads-up if they see  
4 anything, just in case that's not the case to, you  
5 know, send all the relevant GRE files to you.

6 Q. And you did not copy Tammie on your  
7 e-mail?

8 A. No, because it was a heads-up to  
9 these folks.

10 Q. Based on information that you  
11 received that they would not be including GRE?

12 A. From the GRE team, right. So the  
13 GRE team relayed their understanding to me and  
14 then I sent the heads-up e-mail.

15

16 (Whereupon Document with Bates Nos.  
17 JPMC 1377 to JPMC 1384 was received and marked  
18 D-16 for identification.)

19

20 Q. Let's mark this D-16, JPMC 1377 to  
21 1384. It's an e-mail from Melissa to you and  
22 Maria -- how do you pronounce her last name?

23 A. Ouli.

24 Q. Ouli? Copy to Chris Punke --  
25 Punke, and she says, "Jennifer called me into her

1 office this morning to discuss the waiver request.  
2 She would like us to finish our impact assessment  
3 ASAP and come to her with final recommendations  
4 before she signs off on it. She also doesn't  
5 understand why it has taken so long to complete  
6 the impact assessment."

7 Were you and Maria conducting an  
8 impact assessment?

9 A. Yes, Melissa asked Maria and I to  
10 -- (Inaudible).

11 THE REPORTER: I'm sorry, give me  
12 that answer again.

13 THE WITNESS: Maria -- Melissa had  
14 asked Maria and I to co-lead that.

15 THE REPORTER: Thank you.

16 Q. This was an impact assessment on  
17 the impact of the difference between the online/  
18 off-line versions of the TPI risk matrix?

19 A. That's correct.

20 Q. And the impact assessment, what was  
21 the waiver request?

22 A. So the model risk governance team  
23 is -- is the team that oversees anything in the  
24 bank that could be related to a -- or it could be  
25 a model, and that means, you know, either

1 quantitative or qualitative, and in this case it  
2 was deemed -- and sorry, a bit more history on  
3 that. So the reason that that team was stood up  
4 and why it's so important is because it was  
5 created in the wake of the London Whale case and  
6 the bank didn't -- was, of course, extremely  
7 embarrassed by it and didn't want any models,  
8 meaning, you know, calculators or risk --  
9 basically risk calculators to be just a regular  
10 spreadsheet that anyone can change or manipulate  
11 at will. And so, this model risk governance team  
12 was created to house and oversee all models, and  
13 it's up to the control officers, Greg Powell, to  
14 certify whether anything in the team -- in the  
15 group was a model; he failed to do that for  
16 multiple years, but I escalated it and it was  
17 determined that it was a model which means it was  
18 also a policy violation which means it was also --  
19 we needed a waiver to continue to use it until we  
20 had -- we get it approved because it is operating  
21 or they were, the various risk matrices -- risk  
22 matrixes are operating outside of the policy and  
23 were in violation.

24 Q. And so before they could get a  
25 waiver to continue to use it, they were waiting on

1 the risk assessment?

2 A. That's -- that's right, I believe  
3 so. That among a few other -- other things that  
4 had to happen. I don't remember, I need to check  
5 the e-mail trail on it.

6 Q. And so obtaining the waiver would  
7 allow -- (Inaudible).

8 THE REPORTER: I'm sorry, you broke  
9 up again.

10 "So obtaining the waiver would  
11 allow" --

12 Q. -- allow continued use of it until  
13 it could get approved?

14 A. That's correct.

15 Q. Were you notified of the  
16 termination of your employment?

17 A. Yes.

18 Q. And how were you notified?

19 A. I was called on -- on October 30th,  
20 I was called to Cathy Duffy's office in the middle  
21 of the workday, and then I went to her office  
22 where I saw Cathy Duffy and Nelly Childs and then  
23 that's when we -- they told me that my employment  
24 was terminated.

25 Q. And what did they say?

1           A.       They said that I -- I can't  
2       remember the exact conversation, but they told me  
3       that -- that I was terminated and I responded and  
4       told them that I believed this was in retaliation  
5       for raising the complaints about the program and,  
6       you know, criminal conduct by the folks here and  
7       that there was a GIRE investigation. And we were  
8       talking about the GIRE investigation, I asked them  
9       -- they handed me a paper with a severance offer  
10      and told me that Jeannie Chung, that I should only  
11      speak with Jeannie Chung going forward about all  
12      my HR matters and that I -- they would need a  
13      response on whether I would be accepting their  
14      severance offer.

15           Q.       Anything else?

16           A.       That I shouldn't return to the  
17      office and I should no longer access firm  
18      computers. That's what I can remember off the top  
19      of my head, but I'm sure there's more.

20           Q.       Is there anything else as it  
21      relates to the GIRE investigation that was said?

22           A.       I can't remember off the top of my  
23      head.

24           Q.       Going back to the risk -- to the  
25      impact assessment on the TPI risk matrix, I take

1 it there was nothing inappropriate about asking  
2 you to conduct that risk impact?

3 MR. IADEVAIA: Objection. You can  
4 answer.

5 A. And just to clarify, it wasn't -- I  
6 wasn't the only person working on this, it was a  
7 co effort with Maria Ouli, so if it was late, then  
8 both of us would have been late. At the  
9 beginning, the discovery of the several versions  
10 of the risk matrixes as well as a lack of -- these  
11 are usually accompanied by a rationale explaining  
12 why, you know, certain -- or just how it works and  
13 why certain points are given to certain attributes  
14 within the risk matrix and the methodology as it's  
15 sometimes called is -- didn't exist, so that was  
16 -- that's the definition of a gap, meaning it's  
17 not there, nothing is there. And it was related  
18 to the FCA, the Financial Conduct Authority,  
19 requested information about the rationale behind  
20 the TPI risk ranking matrix, and what Melissa had  
21 initially asked me to do was to create one for the  
22 purpose of pretending that it existed just for the  
23 FCA, and then the other purpose of her initial ask  
24 was to make sure that something was in place for  
25 the updates related to -- to the NPA, because at

1 that point we had -- we had no risk based approach  
2 without a methodology behind it. So when she  
3 initially asked me to perform that exercise, I  
4 refused to do it for that purpose. Also -- she  
5 also asked me to provide a doctored version of the  
6 risk matrix to the model risk governance team and  
7 I also refused to do that, and I gave -- I gave  
8 the model risk governance team the right version.  
9 So when she initially asked, yes, that was a legal  
10 activity, but then once, you know, I think I  
11 remember there's an e-mail where I sent to her  
12 where I, you know, clarified what the purpose is  
13 that I'm doing this for and kind of moved on from  
14 there to kind -- to fix -- to fix it and so then I  
15 worked with Maria Ouli as Melissa instructed me to  
16 do to do the impact analysis. And one of the  
17 things that Melissa wouldn't allow us to do was to  
18 ask for a report from technology. And so that  
19 e-mail that you showed, the header is -- was  
20 related to us finally getting the information from  
21 technology that we needed to complete the  
22 analysis, but Maria Ouli and I had been working on  
23 it together for -- since July.

24 Q. On the impact analysis?

25 A. That's correct.

1 Q. And what was Maria Ouli's role?

2 A. So Maria Ouli is on the EMEA team,  
3 EMEA team as well, so formally reported directly  
4 to Melissa Laferriere or -- does she pronounce her  
5 name Laferriere?

6 Q. I don't know specifically.  
7 Laferriere.

8 A. Okay. Melissa Laferriere was her  
9 manager when she -- before she moved back to the  
10 United States and so her role was, she was part  
11 of, you know, doing this risk matrix with me and  
12 she was also part of the TPI project as well.

13 Q. And what was her level?

14 A. She was a vice president.

15 Q. And in what sense was the version  
16 of the risk matrix that you were to send to MRG  
17 doctored?

18 A. So Melissa didn't want -- so I'll  
19 back up. Before -- before the group, the TPIS  
20 were housed in a system called Patrol; all the due  
21 diligence profiles were in the system called  
22 Patrol and they were also in a system called  
23 Access Database, and what happened was, in order  
24 to transition from Patrol to iComply, the  
25 technology team needed information to have a



1 one-to-one transfer and in that process Garrett  
2 Ross was involved in providing the materials to  
3 technology, then testing those materials. So  
4 after technology put it into the system, there's a  
5 period where it's tested -- and this was all  
6 before I was hired -- and then after it's tested,  
7 everyone says this looks the same, it's  
8 implemented. So the document that I had, in terms  
9 of, you know, what came out of iComply was the --  
10 a different version from what was in Patrol and  
11 then, sometime while iComply was in production,  
12 another change happened to the risk matrix that  
13 was approved, that we knew about. So Melissa had  
14 asked me to remove that second edit from the  
15 iComply version so that it didn't look like there  
16 was that much of a difference. It wasn't  
17 recognizable in terms of a difference, and it was  
18 essentially a doctored version of the -- of the  
19 actual document that I had.

20 Q. What was the purpose of sending the  
21 document to the model risk group?

22 A. So that they can evaluate it to  
23 determine whether -- at that point, this was  
24 around July, August time, so they were still  
25 evaluating whether -- whether it could be a model.

1 Q. And so what you were sending to  
2 them was for their review and approval as to  
3 whether it could be a model?

4 A. That's right.

5 Q. And so you could send them whatever  
6 you wanted them to review and approve to be the  
7 model, couldn't you?

8 A. Well, the request was -- from model  
9 risk governance team was to send them what was in  
10 production in order to move forward with the  
11 review, and what Melissa had asked me to do was  
12 not what was in production.

13 Q. And the effect, if you had sent it,  
14 would be that model risk government -- governance  
15 would review that to determine whether it would  
16 approve it as -- as a model?

17 A. Right. And the reason -- and going  
18 back to the reason why they exist, the model risk  
19 governance team exists, they needed to determine  
20 whether it was a model in order to continue to  
21 comply with the regulatory commitment from the  
22 London Whale mess.

23 Q. So whatever Melissa or you or,  
24 let's say, Melissa wanted MRG to approve, would be  
25 what you would send them to review and approve?

1 MR. IADEVAIA: Objection. You can  
2 answer.

3 A. I -- ethically and then also in --  
4 I would send them what they asked for because  
5 they're also complying with the regulatory  
6 commitment and a -- and that would be a doctored  
7 record and then it's also considered an internal  
8 control. So to doctor that or change it in any  
9 way in order to have some other group review it  
10 and make it look more favorable, it -- that's  
11 participating in illegal -- illegal conduct and  
12 it's also unethical.

13 Q. Well --

14 A. And a violation of the code of  
15 conduct as well.

16 Q. If that version was more favorable  
17 from a compliance standpoint, isn't that the  
18 version you'd want MRG to approve for use as a  
19 model?

20 A. It's not more favorable as a  
21 compliance, it's more favorable in covering up  
22 what happened and they would not -- they would not  
23 have been provided the appropriate information or  
24 the accurate information that they needed in order  
25 to assess risk. So it's more favorable to

1 covering up than it is to protecting JPMorgan's  
2 interest and so if I state that differently, it  
3 was more favorable to covering up -- I guess it's  
4 more favorable to Melissa's interests than  
5 JPMorgan's interest.

6 Q. So if you had submitted the  
7 document that Melissa initially asked you to  
8 submit, what would MRG have reviewed for approval?

9 A. A doctored version of the risk  
10 matrix.

11 Q. And so if Melissa didn't want that  
12 version to be approved as the model and wanted the  
13 middle version or some other version to be  
14 approved as the model, then that's the version  
15 that should go to the group that's approving for  
16 the model, right?

17 MR. IADEVAIA: Objection. Asked  
18 and answered. You can answer again.

19 A. No, it wasn't about what Melissa  
20 had decided. This wasn't an anti-corruption  
21 compliance issue, this was a model risk governance  
22 issue and what they'd asked for was the most  
23 recent version of what was in production. If we  
24 gave them something other than what they'd asked  
25 for, then we would be uncooperative, and then also

1 doctoring that material is again, not -- it's  
2 illegal conduct.

3 Q. So getting back to my original  
4 question, you doing the risk impact of the  
5 difference between the versions of the TPI risk  
6 matrix was one of the steps towards closing the  
7 gap, right?

8 A. That's right.

9 Q. Because once did you that then the  
10 waiver request could go in and they could decide  
11 whether to approve a continued use of the risk  
12 matrix. Is that correct?

13 A. I think so. Again, I need to  
14 review some e-mails to see what was model risk  
15 governance requests. So understanding the  
16 differences between all the different versions of  
17 the risk matrices versus, you know, bribing a  
18 methodology are two different things and I'd have  
19 to see which -- which things are related to what  
20 model risk governance is asking for. I think at  
21 this time period, it was like October 2019,  
22 Batterman and Ruggieri were investigating at this  
23 point. I wouldn't be surprised if Cathy Duffy,  
24 you know, were also curious as to why her -- her  
25 original approvals were not honored. So there --

1       yeah, I need to see what model risk governance had  
2       asked for versus what Cathy Duffy was asking for.

3               Q.       Did you ever allege a failure of  
4       accounting controls?

5               A.       That's correct.

6               Q.       In what respect?

7               A.       So in -- in terms -- well, we can  
8       just use the Tony Blair example as one example of  
9       this. He has -- he was paid using an emergency  
10      payment method that the global suppliers services  
11      team, Tim Napier, escalated to me and it didn't  
12      meet any of the criteria for that method, and the  
13      CFO signed off on all of his invoices for the wet  
14      signature, and at an institution like this it's  
15      very odd that she's not approving something like  
16      this through a system. And at the time the CFO  
17      was Marianne Lake and it seemed -- or not seemed,  
18      this is actually what was happening, Mr. Blair --  
19      Mr. Blair's expenses as a TPI were being paid  
20      through this method as an emergency where it  
21      should have just been a typical TPI salary payment  
22      and that payment method was wide open for anyone  
23      to use; as long as they knew where it was, they  
24      could just click through it and pay whoever they  
25      wanted for whatever they wanted.

1 Q. If they had the approval of the  
2 CFO?

3 A. You actually don't need it. So  
4 when Tim Napier showed me -- showed me the  
5 website, I was -- I didn't have any special access  
6 and as an anticorruption compliance group, we  
7 don't have access to much really. I was able to  
8 (inaudible) without a problem.

9 Q. I'm sorry, you were able to what?

10 A. Click, click straight through  
11 without a problem.

12 Q. Straight through to what?

13 A. That emergency payment method  
14 system. The only thing they had was a red text at  
15 the top telling people what, you know, the purpose  
16 of what the payment method is. It doesn't seem to  
17 be any controls around it.

18 Q. So you could have paid an unlimited  
19 amount of JPMorgan Chase's money to whoever you  
20 wanted?

21 MR. IADEVAIA: Objection. You can  
22 answer.

23 A. I don't know. I just know that  
24 this payment method, and the way that it was used  
25 for Mr. Blair, was an example of failed accounting

1 control.

2 Q. Any other failed accounting  
3 controls that you raised during your employment?

4 A. Well, in -- the SEC regs call them  
5 internal accounting controls and there were a  
6 number that are featured in the issues log that I  
7 had as well as the PowerPoint presentation that  
8 a -- I can't think off the top of my head right  
9 now, but if I had those e-mails I could provide  
10 more details.

11 Q. Your counsel has produced an SEC  
12 order relating to Quad Graphics?

13 A. Yes.

14 Q. Do you have any understanding as to  
15 how that relates to this case?

16 A. So Quad Graphics was -- the SEC  
17 determined that Quad Graphics violated internal  
18 controls and books and records for various  
19 reasons. The one reason that stands out is  
20 because of OFAC violations. So they lack the  
21 internal controls to screen for OFAC violations  
22 and then they move forward and paid the OFAC  
23 sanctioned entities which became a books and  
24 records violation.

25 Can I take a quick break?



1 MR. IADEVAIA: We've been going for  
2 awhile.

3 MR. LINTHORST: Sure, no problem.  
4 10 minutes?

5 MR. IADEVAIA: Sure. During the --  
6 well, I'll let him go off.

7 THE VIDEOGRAPHER: 4:23, we're  
8 going off the record.

9  
10 (Whereupon there was a brief  
11 recess.)

12  
13 THE VIDEOGRAPHER: The time is 4:38  
14 p.m.. We are on the record.

15 BY MR. LINTHORST:

16 Q. Ms. Williams, who at JPMorgan Chase  
17 do you contend was biased against you based on  
18 raising protective complaints or concerns?

19 MR. IADEVAIA: You're on mute.

20 A. I don't understand the question.  
21 What do you mean by biased against me?

22 Q. Angry, upset, held it against you  
23 that you raised such concerns.

24 A. Oh, okay. So Garrett Ross, Tim  
25 Bridgeford, Melissa Laferriere, Jennifer

1 Boyle-Devine. There were some people in the TPI  
2 project meeting as well.

3 Q. Who were those?

4 A. Oh. Martin MacKenzie, Maria Ouli,  
5 Laura Angulo, Chris Punke. Those are some  
6 examples of people.

7 Q. Anybody else?

8 A. Those are the examples that I can  
9 remember right now.

10 Q. Why do you think Chris Punke was  
11 biased against you for making protective  
12 complaints?

13 A. Because he pressured me to  
14 remove -- (Inaudible).

15 THE REPORTER: Remove what? There  
16 was noise.

17 THE WITNESS: Materials.

18 THE REPORTER: Thank you.

19 A. Remove certain materials from the  
20 presentations and he didn't want me to escalate  
21 the sanctions and AML screening problems. The --  
22 in the risk matrix conversations he was -- he  
23 would roll his eyes while we were on the call when  
24 I was talking about being transparent. Those  
25 are -- those are some examples.

1 Q. What was his role?

2 A. He took over from Alicia Avelo as  
3 the governance lead for GACC and I think antitrust  
4 as well.

5 Q. When did you first consult with an  
6 attorney with respect to your employment at  
7 JPMorgan Chase?

8 A. You mean with respect to my  
9 termination?

10 Q. With respect to anything relating  
11 to your employment with JPMorgan Chase.

12 A. What do you mean by consult with an  
13 attorney? Could it just be a person that happens  
14 to be an attorney or someone I've hired?

15 Q. Someone from whom you sought or  
16 received legal advice.

17 A. Not until after I was told I was  
18 terminated, so October 30th was when --

19 MR. IADEVAIA: I'm just going to  
20 instruct you not to disclose any of the  
21 information. You can disclose the date, but not  
22 the information that you discussed with a lawyer.

23 THE WITNESS: Sure.

24 A. So October 30th was the date that I  
25 was told to -- that I was terminated by Cathy

1 Duffy and Nelly Childs, so it would had to have  
2 been after that date.

3 Q. Was it on that date?

4 A. I don't remember.

5 Q. And who was the first lawyer you  
6 consulted with?

7 MR. IADEVAIA: Again, I'm going to  
8 caution the witness, you can say who, just not  
9 what you discussed.

10 A. I don't remember who the first  
11 lawyer was.

12 Q. Now, we talked about other  
13 positions at JPMorgan Chase that you started  
14 applying to once Jennifer Boyle-Devine allowed you  
15 the exception in January of 2019. Did you also  
16 explore and apply for external positions while you  
17 were still employed with JPMorgan Chase?

18 A. Yes.

19 Q. Did you receive any offers for  
20 external positions during your employment at  
21 JPMorgan Chase?

22 A. During my employment?

23 Q. Yeah.

24 A. No.

25 Q. Did you receive any offers from any

1 of the internal applications that you made?

2 A. No.

3 Q. Now, let's just mark D-17.

4 MR. LINTHORST: Bless you, whoever  
5 sneezed.

6 MR. IADEVAIA: It's me coughing.  
7 Sorry.

8 MR. LINTHORST: I'll bless you  
9 anyway.

10 MR. IADEVAIA: I appreciate it.

11

12 (Whereupon Document with Bates No.  
13 Pl. 7666 was received and marked D-17 for  
14 identification.)

15

16 Q. This is D-17 which is Plaintiff's  
17 7666. I'll share control. And the question is  
18 just, what is this?

19 A. I don't know. Oh, maybe WhatsApp?

20 Q. It appears to be WhatsApp with  
21 someone calling themselves Lau, L-a-u?

22 A. Yes, yes. Okay.

23 Q. Does this have any relevance to  
24 this case?

25 A. Yes, that's Laura Angulo, the ACCO

1 for Latin America. She was going to visit the New  
2 York office around this time. I was on vacation.  
3 This is when Tim was fired and it was -- I felt  
4 sorry for her being there for such an awkward  
5 thing.

6 Q. All right.

7 A. And with Laura Angulo, she was also  
8 CIB, yeah, just in terms of her title, she was  
9 ACCO and CIB. I forgot to mention it.

10 Q. And what's a CID, what does that  
11 stand for?

12 A. C-I-B -- like boy. It's corporate  
13 investment banking.

14

15 (Whereupon Document with Bates Nos.  
16 Pl. 543 to Pl. 544 was received and marked D-18  
17 for identification.)

18

19 Q. We'll mark this D-18, Plaintiff's  
20 543 to 544.

21 What is this document?

22 A. An application to the AG's office  
23 for the solicitor general's department or section.

24 Q. And did you apply for that on or  
25 about August 8 of 2019?

1 A. Yes.

2

3 (Whereupon Document with Bates Nos.  
4 Pl. 545 to Pl. 546 was received and marked D-19  
5 for identification.)

6

7 Q. And this will be D-19 which is  
8 Plaintiff's 545 to 546. What is this document?

9 A. This is an application with New  
10 York AG, assistant attorney general application.

11 Q. And was this for the charity  
12 section?

13 A. Maybe. It says C-h-a-r. Maybe  
14 that's short for charity.

15 Q. And did you put in an application  
16 for this role on or about August 8, 2019?

17 A. Yes.

18

19 (Whereupon Document with Bates Nos.  
20 Pl. 2134 to Pl. 2136 was received and marked D-20  
21 for identification.)

22

23 Q. And we'll mark this D-20, which is  
24 Plaintiff's 2134 to 36. And this appears to be an  
25 e-mail you received from ZipRecruiter on August

1 31, 2019. Is that what this is?

2 A. Yeah, looks like it.

3 Q. It says, "We noticed you haven't  
4 heard back from the following companies."

5 Do these reflect companies to which  
6 you had applied as of this date?

7 A. Maybe, yes.

8 Q. Can you think of any reason that it  
9 would say you haven't heard back from them if you  
10 hadn't applied for them?

11 MR. IADEVAIA: Objection. You can  
12 answer.

13 A. Yeah, I don't know. Sometimes you  
14 can just save them or if you just click into it it  
15 might -- it might think you applied there, but I  
16 don't know. I don't know how ZipRecruiter works.

17 Q. Based on your recollection of your  
18 job search activities around this time, do you  
19 think you applied to these companies?

20 A. It's possible.

21

22 (Whereupon Document with Bates Nos.  
23 Pl. 3340 to Pl. 3351 was received and marked D-21  
24 for identification.)

25



1 Q. Let's mark this D-21, Plaintiff's  
2 3340 to -- oh, sorry. Plaintiff's 3340 to 3351.  
3 I'll share control.

4 Does this appear to be an  
5 application you completed for the New York  
6 Attorney General's Office?

7 A. Yes.

8 Q. And when you filled this out, did  
9 you believe all the information to be accurate?

10 A. I believe so.

11 Q. And this says, "To be completed  
12 only after initial interview."

13 Let's see if there is a date on  
14 here. It looks like it's December 12th signed by  
15 you. Had you had an initial interview with the  
16 New York AG's office as of that date?

17 A. Yes.

18 Q. And for what role was this  
19 application in connection with?

20 A. I believe the charities bureau.

21 Q. Now, on Page 3342 there's a section  
22 for past employers and references. You list  
23 JPMorgan, Morgan Stanley and HSBC Middle East, and  
24 then there's a column for supervisor and telephone  
25 and you didn't fill anything in there. Why didn't

1 you list supervisors and telephone numbers?

2 MR. IADEVAIA: Objection. You can  
3 answer.

4 A. I think I wrote see attachments.

5 Q. Okay. And do you think that had  
6 your supervisors and telephone numbers for these  
7 employers?

8 A. Yes. If they were still -- if they  
9 were still working there, I may have put them in  
10 there. I don't remember.

11 Q. 43 says, "Have you ever had any  
12 debts turned over to a collection agency, failed  
13 to pay a just debt that has been overdue for more  
14 than 60 days, or failed to repay a student loan"  
15 and you clicked "yes."

16 What information did you have that  
17 was responsive to that question?

18 MR. IADEVAIA: I'd like to  
19 designate this portion of the testimony as  
20 confidential. Go ahead.

21 (The following testimony is a  
22 confidential portion under separate cover.)  
23  
24  
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MR. LINTHORST: Can we go  
unconfidential now, Jeremiah?

17

MR. IADEVAIA: Yeah, sure.

18

(Confidential portion concluded.)

19

20

(Whereupon Document with Bates No.

21

Pl. 495 was received and marked D-22 for

22

identification.)

23

24

Q. Let's mark this as D-22. This is

25

Plaintiff's 495. This is references for Quala

1 Williams. Do you believe this to be the  
2 attachment and the references you submitted to the  
3 New York AG's office in connection with the  
4 application we were looking at in D-21?

5 A. Yes.

6 Q. And how did you know the Honorable  
7 Doris Ling-Cohan?

8 A. I was her intern in law school.

9 Q. And who is Bob Werner?

10 A. A former supervisor.

11 Q. At which employer?

12 A. At HSBC and Goldman Sachs.

13 Q. What was the other one besides  
14 HSBC?

15 A. Goldman Sachs.

16 Q. Oh. And how about Matthew Moore,  
17 where was he your supervisor/mentor?

18 A. Goldman Sachs.

19 Q. How about William Malpica?

20 A. Law school. Yeah, I interned for  
21 him in law school.

22 Q. And how about Lauren Rasmus?

23 A. She was my supervisor at Morgan  
24 Stanley.

25 Q. And who is David Gillis?

1           A.     An attorney with JPMorgan and the  
2     company's secretary.

3           Q.     And what sort of working  
4     interactions did you have with Mr. Gillis?

5           A.     So I assisted him with a TPI  
6     on-boarding India, I believe in October, just  
7     before I was terminated, the international  
8     counsel. So Tony Blair and others were in India  
9     with Prime Minister Modi to strike a deal on some  
10    community effort in India between JPMorgan and  
11    India, and there was a TPI that also had to help  
12    interact with the local Indian government  
13    alongside with Tony Blair and the other  
14    international unidentified TPIS that are on the  
15    international counsel to make that deal happen.

16          Q.     He was never your supervisor at  
17    JPMorgan Chase, right?

18          A.     No, I have him listed there as a  
19    client.

20

21                   (Whereupon Document with Bates Nos.  
22    Pl. 496 to Pl. 500 was received and marked D-23  
23    for identification.)

24

25          Q.     Let's mark this as D-23.

1 Plaintiff's 496 to 500 starts at the bottom with  
2 an e-mail to you from Jenna Moran on December 20,  
3 2019.

4 Who is Jenna Moran?

5 A. Director of Human Resources in New  
6 York State Office of the Attorney General.

7 Q. And she said, "To move forward we  
8 need additional information about references to  
9 speak to the quality of your work at JPMorgan as  
10 well as an HR point of contact at JPMorgan."

11 And did you respond to her on  
12 December 21st, giving her the contact for Jeannie  
13 Chung and David Gillis?

14 A. Yes.

15 Q. And then you sent another note  
16 giving David Gillis' cell. And then on December  
17 23rd, Ms. Moran told you they were able to speak  
18 with David Gillis and they attempted to contact  
19 Jeannie Chung, but it appears she no longer works  
20 for JPM HR. Is that right?

21 A. That's right.

22 Q. And that day you responded to her  
23 that you were happy they were able to get ahold of  
24 David and referred her to the general -- JPM  
25 general HR inbox for a general number, and you

1 gave her some information and told her you'd give  
2 her the rest verbally, right?

3 A. I didn't refer her to a general HR  
4 inbox, I referred her to the ER mailbox that  
5 Jeannie Chung also used and I was able to get some  
6 responses from them whenever -- like if she was  
7 unavailable.

8 Q. Okay. And did you refer to this as  
9 JPM general HR inbox?

10 A. Right.

11 Q. And then on December 27th you asked  
12 if Ms. Moran needed additional information from  
13 you. Is that right?

14 A. That's right.

15 Q. And then on December 31st she asked  
16 that you provide a supervisory reference that is  
17 more current than 2014?

18 A. Yes.

19 Q. And further indicated that the  
20 supervisor and telephone information was left  
21 blank and asked you to complete that. Is that  
22 right?

23 A. That's right.

24 Q. And then you indicated that on your  
25 last call with Ms. Moran, Bob Werner was your

1 supervisor through 2016 and you provided David  
2 Gillis, Managing Director at JPMorgan as an  
3 additional reference?

4 A. Yes.

5

6 (Whereupon Document with Bates Nos.  
7 Pl. 509 to Pl. 522 was received and marked D-24  
8 for identification.)

9

10 Q. Let's mark this as D-24, which is  
11 Plaintiff's 509 to 522. And if we pick it up on  
12 Plaintiff's 511, we see the December 31st message  
13 that we were just reviewing in D-23, and the chain  
14 continues with a message, an e-mail from you to  
15 Jenna Moran on January 3rd. Is that right?

16 A. Yes.

17 Q. You again mention that you provided  
18 Werner as a reference and further that you reached  
19 out to an additional reference at Morgan Stanley  
20 to speak with her and told her when she heard back  
21 from your contact at Morgan Stanley you would have  
22 submitted seven references. Is that right?

23 A. That's right.

24 Q. And then note Ms. Moran on January  
25 6th that you got ahold of Lauren and she wants to



1 be prepared for the call and you asked if you  
2 could tell her that Moran wanted -- needed her to  
3 speak to the quality of work as her supervisor and  
4 whether there's anything else she should be  
5 prepared to speak about. Is that right?

6 A. That's right.

7 Q. And Ms. Moran said you can tell  
8 it's a standard reference check based on her  
9 supervision of you and your work product, and  
10 asked you to provide her contact information by  
11 close of business that day, which was January 6th.  
12 Is that correct?

13 A. That's right.

14 Q. You then asked if Ms. Moran was  
15 available for a call. Is that right?

16 A. That's right.

17 Q. And that same day you wrote to  
18 Jenna and said that Lauren was ready to provide a  
19 positive supervisor reference for you, but when  
20 she checked with Morgan Stanley HR they notified  
21 her that she is restricted from providing  
22 professional personal references for any current  
23 or former employee per firm policy.

24 Is that right?

25 A. That's right.

1 Q. You said then, "I believe you have  
2 all of my past supervisors since law school except  
3 the references from MFY Legal Services, Morgan  
4 Stanley and JPMorgan." You offered to provide  
5 your supervisor from MFY and you noted that you  
6 also provided a professional reference from a non  
7 supervisor senior client, David Gillis, who spoke  
8 to your behavior and work product at JPMorgan in  
9 2018 and 2019. Is that right?

10 A. That's right.

11 Q. And is it accurate that Mr. Gillis  
12 is the only person from JPMorgan that you provided  
13 as a reference?

14 A. No, I provided Jeannie Chung and  
15 the ER mailbox.

16 Q. Anyone else?

17 A. No, I thought that would have been  
18 sufficient.

19 Q. And in fact, Mr. Gillis did provide  
20 a reference for you. Is that right?

21 A. That's what Ms. Moran told me. I  
22 had no reason not to believe her.

23

24 (Whereupon Document with Bates Nos.  
25 Pl. 16 to Pl. 17 was received and marked D-25 for

1 identification.)

2

3 Q. Let's mark this as D-25, which is  
4 Plaintiff 16 to 17 and it starts at the bottom  
5 with an e-mail from Ms. Moran on January 9th  
6 regrets -- expressing her regrets that they are  
7 unable to move forward with your application and  
8 appreciate your interest and best of luck in your  
9 future endeavors. Is that right?

10 A. That's right.

11 Q. And you responded that same day  
12 asking for more background to understand why you  
13 failed the background process? Is that correct?

14 A. That's right.

15 Q. And she said the OAG does not  
16 provide information to candidates about internal  
17 decision making and she apologized they couldn't  
18 offer you a position and wished you the best of  
19 luck. Is that right?

20 A. That's right.

21 Q. And you said, "Based on our  
22 conversation, the only issue is that two of my  
23 former supervisors could not provide references  
24 due to their respective HR policies to only  
25 provide neutral references for all current and

1 former employees. It seems odd that I'm being  
2 punished for something that I cannot control."

3 Your preference is to join the  
4 attorney general's office and you're willing to  
5 ask JPMorgan and Morgan Stanley for exceptions to  
6 their policies only if she believed it will aid in  
7 reinstating your offer and passing background.

8 Is that what you wrote?

9 A. Yes.

10 Q. And did you receive a response to  
11 this e-mail?

12 A. No, I don't remember receiving one.

13 Q. And when you say two of my former  
14 supervisors could not provide references due to  
15 their respective HR policies, who are you  
16 referring to?

17 A. Lauren Rasmus and I'm assuming it's  
18 Laferriere.

19 Q. Did you ask Melissa Laferriere to  
20 provide you with a reference?

21 A. No, I sent it to ER, which I  
22 assumed would have forwarded it along to her.

23 Q. What did you send to ER?

24 A. I sent Jenna Moran to ER. As I was  
25 instructed to just engage in all, you know, HR

1 related conversations with Jeannie moving forward  
2 and since Jeannie was no longer there, I used the  
3 appropriate e box -- e-mail box that she was  
4 using.

5 Q. But you sent the New York AG's  
6 office directly to David Gillis, right?

7 A. He wasn't my --

8 MR. IADEVAIA: Objection. Hold on.  
9 Objection. You can answer.

10 A. He wasn't my supervisor. I believe  
11 that's who she was really wanting to speak to and  
12 in my conversations with her, she, especially  
13 considering that I disclosed that I was terminated  
14 based on whistleblower retaliation, they were  
15 really interested in JPMorgan's side, you know, or  
16 at least she was, you know, taken aback by how  
17 Morgan Stanley wouldn't -- had a neutral reference  
18 policy, but, you know, was happy that she could  
19 actually speak to a human to tell her that. But  
20 in the case of JPMorgan being my most recent  
21 employer and also the whistleblower retaliation  
22 issue, she really needed to speak to someone at  
23 JPMorgan even if it was just HR.

24 Q. And what efforts -- are you aware  
25 of any efforts they made to contact JPMorgan HR?

1 A. Only what Jenna Moran told me.

2 Q. And what did she tell you?

3 A. That she reached out to all of the  
4 available means that I gave her, so I gave her the  
5 e-mail mailbox that Jeannie Chung gave me -- or  
6 Jeannie Chung was using; I gave her the general  
7 numbers that also Jeannie gave me.

8 Q. And what did she say?

9 A. That no one would talk to her.

10 Q. Did she say whether she got a  
11 response from the e-mail box?

12 A. No, she didn't. She said no one  
13 would talk to her and she said she wanted someone  
14 on the phone to talk to her.

15 Q. Did she say whether she spoke to  
16 anybody on the phone?

17 A. She said she spoke to someone at  
18 Morgan Stanley; I believe I gave a name and number  
19 to her and she followed up with them and they had  
20 a conversation, but she wasn't able to have a  
21 conversation with anyone at JPMorgan.

22 Q. And when she spoke to Morgan  
23 Stanley they simply confirmed that they could not  
24 provide a reference?

25 A. That's correct. That's what she

1 told me the conversation was, and that's also what  
2 the HR person told me, that that's all she's going  
3 to be able to say based on the policies, so. I  
4 told her, well, she just wants to speak with  
5 someone on the phone, it can't just be me telling  
6 her this policy exists, she wants -- she wants  
7 to talk to someone and understand what it is and  
8 yeah, just have the conversation.

9 Q. Did you understand from her  
10 communication asking for you to provide the  
11 contact information for your Morgan Stanley  
12 supervisor by close of business on January 6th and  
13 her earlier request for some supervisor more  
14 recent than 2014, that if Morgan Stanley had been  
15 able to provide that reference you would have  
16 passed the background process for the New York  
17 Attorney General's Office?

18 A. No, I still wouldn't have passed  
19 without JPMorgan because JPMorgan was my most  
20 recent employer and there was a whistleblower  
21 retaliation termination issue.

22 Q. Do you know whether anyone at  
23 JPMorgan communicated with the New York Attorney  
24 General's office?

25 A. I don't.

1 Q. Other than Mr. Gillis?

2 A. Only what Jenna Moran told me,  
3 which was she got ahold of Mr. Gillis, but she  
4 really needs to speak with a supervisor or someone  
5 from HR that can comment on the whistleblower  
6 retaliation.

7 Q. And you don't contend that  
8 Mr. Gillis did anything to interfere with your  
9 application for the New York Attorney General's  
10 office, do you?

11 A. Based on my conversation with Jenna  
12 Moran, or Moran, it sounded like a positive  
13 conversation and she continued moving forward with  
14 trying to get more -- more information, so it  
15 didn't seem that way.

16 Q. Do you have any information or  
17 evidence, other than the communications we've  
18 discussed, that anyone at JPMorgan interfered with  
19 your application to the New York Attorney  
20 General's office?

21 MR. IADEVAIA: Objection. You can  
22 answer.

23 A. Not that I'm aware of. It seems  
24 that the only road block was her talking to  
25 someone at JPMorgan at that point.



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(Whereupon Document with Bates No. Pl. 13 was received and marked D-26 for identification.)

Q. Let's mark this as D-26, Plaintiff's 13. This is an e-mail from you to Sandra Grannum on January 9th?

A. Um-hum.

Q. And who is Sandra Grannum?

A. She is the diversity officer at New York AG's office.

Q. And you wrote to her and said you just received an offer from another potential employer. You have until the end of day tomorrow to accept or decline. The AG's office is your first pick and you asked for her advice.

Is that right?

A. Yes.

Q. And who is the other employer from whom you had an offer?

A. Wells Fargo.

Q. Okay. And did you end up getting more time to respond to that offer?

A. No.

1 Q. Did you end up accepting that  
2 offer?

3 A. Yes.

4 Q. And when did you accept it?

5 A. When I -- I received the decline.

6 Q. Okay. Well, this indicates that  
7 you had until January 10 to accept or decline.

8 A. Um-hum.

9 Q. And it looks like you received your  
10 decline from the U.S. attorney's office on January  
11 9?

12 A. The attorney general's office.

13 Q. Right. And so you accepted the job  
14 at Wells Fargo?

15 A. Yes, I was unemployed, so.

16 Can I take a quick break?

17 Q. Yeah, of course.

18 THE VIDEOGRAPHER: Time is 5:28  
19 p.m.. We're going off the record.

20

21 (Whereupon there was a brief  
22 recess.)

23

24 THE REPORTER: Jeremiah, did you  
25 need a copy?

1 MR. IADEVAIA: Yeah, we'll  
2 definitely order a copy.

3  
4 (Whereupon there was a brief  
5 recess.)

6  
7 THE VIDEOGRAPHER: The time is 5:40  
8 p.m.. We're on the record.

9 BY MR. LINTHORST:

10 Q. Is the position that you've held  
11 with Wells Fargo since your hire, have you ever  
12 been engaged in the role of an attorney?

13 A. No.

14  
15 (Whereupon Document with Bates Nos.  
16 Pl. 1454 to Pl. 1455 was received and marked D-27  
17 for identification.)

18  
19 Q. And let's mark this as D-27. And  
20 this is Plaintiff's 1454 to 1455. I'll share  
21 control.

22 The question will be, is this a  
23 copy of a resume that you prepared?

24 A. Yes.

25 Q. And at the time you prepared it,

1 did you believe all of the information to be  
2 accurate?

3 A. Yes.

4 Q. And when did you prepare this?

5 A. I don't know.

6 Q. And it indicates work experience at  
7 Wells Fargo as a vice president anticorruption,  
8 January 2020 to the present. Is that accurate?

9 A. I'm not a -- I'm not a vice  
10 president. I must have -- this must be a draft or  
11 something where I forgot to update it.

12 Q. Well this, I will represent, from  
13 the production, is the resume you submitted to  
14 Panasonic in March of 2021.

15 A. Well, yeah, that must be a -- yeah,  
16 I'm not a vice president at Wells Fargo.

17 Q. So why do you have a resume that  
18 you're submitting to third parties that indicate  
19 you as a vice president at Wells Fargo?

20 MR. IADEVAIA: Objection. You can  
21 answer.

22 A. Yeah, it's a -- it's a typo. I  
23 must have copied and pasted the JPMorgan and  
24 didn't update the title.

25 Q. And what is -- what was your title

1 upon hire?

2 A. Associate.

3 Q. Was it senior associate?

4 A. I think so. I think so. Was that  
5 an e-mail that was sent or was it a draft?

6

7 (Whereupon Document with Bates Nos.  
8 Pl. 843 to Pl. 844 was received and marked D-28  
9 for identification.)

10

11 Q. Here's another version. We'll mark  
12 this D-28, 843, Plaintiff's 843 to 844. Another  
13 resume that reflects you as a vice president at  
14 Wells Fargo, and this reflects the year, New  
15 Jersey State Bar Association admission by motion  
16 was pending.

17 Do you see that?

18 A. That's right, yeah. Yeah.

19 Q. And what period of time was your  
20 admission by motion pending?

21 A. Oh, when did I start? When I  
22 started the -- I can't remember when I submitted  
23 the application.

24 Q. Okay. When were you admitted?

25 A. I think we've talked about it.

1 Last year on the -- September, September of last  
2 year.

3 Q. Okay. So I take it this resume was  
4 prepared prior to September of last year?

5 A. Yes. Yes.

6 Q. And if we go back to D-27 at 1455  
7 and we look at the bottom, you indicate in  
8 admissions and licensures, New York State Bar with  
9 no reference to New Jersey. Is that right?

10 A. Yeah, I don't know what this is  
11 attached to. That would be helpful in determining  
12 the timing of when this document was created.

13 Q. But it looks like you updated this  
14 document to D-28 to indicate your New Jersey  
15 status and yet didn't change your Wells Fargo  
16 status as a vice president of anti-corruption.

17 MR. IADEVAIA: Objection. You can  
18 answer if you know, if you understand.

19 A. What's the -- what's the question?

20 Q. Well, D-27 is a version of your  
21 resume that you prepared and we see at the bottom  
22 here on 1455 that you indicate New York State Bar  
23 Association and no reference to New Jersey, and  
24 when we look at D-28 at Plaintiff's 844 we now see  
25 an update for New Jersey Bar Association admission

1 by motion pending, right?

2 A. Right.

3 Q. So you -- I take it you updated  
4 your resume to reflect your New Jersey Bar status?

5 MR. IADEVAIA: Objection. You can  
6 answer.

7 A. At some point, yes.

8 Q. But you didn't change the reference  
9 to being a vice president at Wells Fargo, right?

10 MR. IADEVAIA: Objection. You can  
11 answer.

12 A. I don't know the timing of these  
13 two documents.

14 Q. Well, does it matter?

15 A. It does.

16 MR. IADEVAIA: Objection.

17 Q. Were you ever a vice president at  
18 Wells Fargo?

19 MR. IADEVAIA: Objection.

20 A. No.

21 Q. Would there be a time when you  
22 prepared either of these documents where it would  
23 be accurate to say you were a vice president at  
24 Wells Fargo?

25 MR. IADEVAIA: Objection. Asked

1 and answered.

2 Q. You can answer.

3 MR. IADEVAIA: You can answer.

4 A. What was the question?

5 Q. Would there be any time that you  
6 prepared either of those documents where it would  
7 be accurate to say you're a vice president at  
8 Wells Fargo?

9 MR. IADEVAIA: Objection. You can  
10 answer.

11 A. No.

12

13 (Whereupon Document with Bates Nos.  
14 Pl. 1835 was received and marked D-29 for  
15 identification.)

16

17 Q. Let's mark this as D-29. This is a  
18 document, Bates Plaintiff's 1835. This is a  
19 compensation summary statement for your employment  
20 at Wells Fargo?

21 A. Looks like it, yes.

22 Q. Did you receive an "exceeds  
23 performance" rating for 2020?

24 A. Yes.

25 Q. Was your title at the time



1 financial crimes senior associate?

2 A. Yes.

3 Q. Were you given a new title of  
4 financial crimes officer?

5 A. Yes.

6 Q. And was that a promotion?

7 A. Yes.

8 Q. And were you hired at a salary, an  
9 annual salary, of 150,000?

10 A. In 2020? Yes, I guess so.

11 Q. And were you paid a bonus of 18,600  
12 for performance year 2020?

13 A. Yes. That was prorated for the  
14 three weeks I wasn't there, yes.

15 Q. The 18,600 is the prorated amount?

16 A. No, that amount would have been  
17 reduced by the three weeks that I wasn't on staff.

18 Q. And you got a 6.67% raise for 2021  
19 to 160,000?

20 A. That's right.

21 Q. Have you ever had any direct  
22 reports at Wells Fargo?

23 A. No.

24 Q. And who do you report to at Wells  
25 Fargo?

1 A. Morgan Hayer.

2 Q. I'm sorry, what's the name?

3 A. Morgan Hayer.

4 Q. How do you spell the last name?

5 A. H-a-y-e-r.

6 Q. Is that a man or a woman?

7 A. It's a lady.

8 Q. And has she been your supervisor  
9 throughout your employment at Wells Fargo?

10 A. Yes.

11 Q. And what's her title?

12 A. Director.

13 Q. And who does she report to?

14 A. Russ -- Russ Benson.

15 Q. And what's his title?

16 A. I don't know. I think he's also a  
17 director. I'm not sure.

18 Q. And who does he report to?

19 A. I think Nick Piccininni.

20 Q. And what's his title?

21 A. BSA officer and chief financial  
22 crimes officer, I believe.

23 Q. Who does he report to?

24 A. Oh, gosh, I can see her face.  
25 Paula Dominick.

1 Q. What is Ms. Dominick's title?

2 A. Chief compliance officer.

3 Q. Who does she report to?

4 A. Derek -- Derek Flowers.

5 Q. And what's his title?

6 A. Chief risk officer.

7 Q. Who does he report to?

8 A. Charlie Sharf.

9 Q. CEO?

10 A. CEO.

11

12 (Whereupon Document with Bates Nos.

13 Pl. 1836 was received and marked D-30 for

14 identification.)

15

16 Q. Let's mark this as D-30,  
17 Plaintiff's 1836. Is this a compensation summary  
18 statement for your employment at Wells Fargo for  
19 2021?

20 A. Yes.

21 Q. And did you receive a "meets  
22 performance" rating?

23 A. Yes.

24 Q. And a bonus of 30,400 for 2021  
25 performance year?

1 A. Yes.

2 Q. And a raise to 163,200 in your  
3 salary?

4 A. Yes.

5 Q. And are you the lead financial  
6 crimes officer?

7 A. Yes.

8 Q. And if you were to be promoted,  
9 what is the next promotion you could be promoted  
10 to?

11 A. Manager.

12 Q. Financial crimes manager?

13 A. Yes.

14 Q. And if you were promoted after  
15 that, what would you be promoted to?

16 A. Senior manager.

17 Q. And after that, what would you be  
18 promoted to?

19 A. Director.

20 Q. And after that, senior director?

21 A. I don't think there's a senior  
22 director. I think it just goes -- goes to the  
23 chiefs after that.

24 Q. So is it fair to say that there's  
25 no title of vice president in your job chain?

1 A. Not now, no.

2 Q. Was there ever?

3 A. Yes. The managers were -- used to  
4 be called vice president. I think associates used  
5 to be called consultant fives; it was a completely  
6 different thing and it switched over shortly after  
7 I joined.

8 Q. And how would you characterize the  
9 job you were hired for at Wells Fargo as compared  
10 to the job you had at JPMorgan Chase?

11 A. Similar. Now I'm doing policy  
12 training and reg change, so I'm more of a  
13 governance role than a -- so it's more similar to  
14 my Morgan Stanley role and -- but it's ABC  
15 focused, so it's kind of like a mix.

16 Q. And do you contend that it's a  
17 more -- a role two levels below your JPMorgan  
18 Chase role?

19 A. When I joined?

20 Q. Yeah.

21 A. When I joined -- I joined as a  
22 senior associate, so then officer, senior officer.  
23 Yeah, if you count -- yeah, I think if you don't  
24 count where I am now, then yeah, the two levels of  
25 officers would have been the two levels below the

1 manager position.

2 Q. I'm sorry, I didn't understand  
3 that.

4 A. Yes. Yes, it's two levels below.

5 Q. What's below a senior manager?

6 A. Manager.

7 Q. Is there anything below a manager?

8 A. Senior officer.

9 Q. But you were paid more upon your  
10 hire at Wells Fargo than you were making at  
11 JPMorgan Chase?

12 A. In -- in salary, yes.

13 Q. And in total compensation?

14 A. I don't believe so.

15 Q. How about base and bonus?

16 A. You mean just cash, right?

17 Q. Yeah.

18 A. Just base and bonus, cash, yes.

19 Q. And have you applied for other  
20 positions since you were hired by Wells Fargo?

21 A. Yes.

22 Q. And what kind of positions have you  
23 applied to?

24 A. Some in legal space, some as  
25 transfers within Wells Fargo compliance -- in the

1 compliance space.

2 Q. You apply to any law firms?

3 A. That's in the legal space, yes.

4 Q. And which law firms have you  
5 applied to?

6 A. I don't remember. They would have  
7 been New Jersey based.

8 Q. Have you received any offers for  
9 any other employment for anywhere you've applied  
10 to since you were hired by Wells Fargo?

11 A. No.

12 Q. Following the termination of your  
13 employment from JPMorgan Chase, did you seek any  
14 treatment for emotional distress?

15 A. Yes.

16 Q. When was that?

17 A. When the -- when the therapist  
18 became available at my doctor's office. I think  
19 -- I think it was late last year, winter of last  
20 year.

21 Q. So approximately a year after the  
22 termination of your employment?

23 A. So when did I -- sorry, when did I  
24 seek? Sorry, can you repeat the question?

25 Q. Yeah, when did you seek any

1 treatment for emotional distress following the  
2 termination of your employment?

3 A. Following. Okay. So I was  
4 attempting to get treatment when I got my  
5 insurance. So when I got health insurance again,  
6 it wasn't until March of 2020 and then the whole  
7 virus happened, no one was available obviously and  
8 then I wasn't successful in finding someone until  
9 winter of last year.

10 Q. Why were you not successful in  
11 finding someone until winter of last year?

12 A. No one was available. It was --  
13 everyone was booked and especially those that took  
14 health insurance, it was very difficult to find  
15 anyone who had availability and then anyone that  
16 had availability that also took health insurance.  
17 So I -- my doctor's office is kind of a full  
18 service kind of suite and they told me that they  
19 were looking into getting therapists, and so I  
20 waited until they got them.

21 Q. Did you inquire of any other  
22 therapists to see if you could receive treatment?

23 A. No, I believed my doctors -- and  
24 this -- this isn't the first time I received this  
25 response while I was employed by JPMorgan. My --



1 my doctors were NYU and this was before the  
2 pandemic even. I was told twice that it's -- you  
3 know, it's impossible to find anyone in New York,  
4 which I thought was shocking, in New York and in  
5 New York that would accept health insurance. And  
6 the alternative was the apps, they have therapists  
7 on, you know, like phone apps, but they -- I was  
8 afraid of using them because they sell your  
9 personal information.

10 Q. And -- but to answer my question,  
11 did you inquire as to any other therapists, prior  
12 to the ones you found in the winter of last year  
13 since your termination with JPMorgan Chase, to  
14 inquire of their availability to accept you as a  
15 patient?

16 A. Yes, I inquired NYU. I inquired at  
17 my doctor's office and they didn't have any until  
18 winter of last year.

19 Q. And NYU was an inquiry you made  
20 while you were employed at JPMorgan Chase?

21 A. Yes.

22 Q. So since the termination of your  
23 employment, the only inquiry you made for a  
24 therapist to treat emotional distress was with  
25 your existing doctor?

1           A.       Yes. I relocated here in 20 --  
2       well, full time here in 2020, so I went and set  
3       up, I guess, in May, set up with this new doctor's  
4       office, May 2020, and I asked them then and I kind  
5       of waited while the virus was happening, so that's  
6       why.

7           Q.       You certainly could have found  
8       another therapist in the New York metropolitan  
9       area, couldn't you?

10           MR. IADEVAIA: Objection. You can  
11       answer.

12           A.       I was no longer located in the New  
13       York metropolitan area.

14           Q.       Where were you located?

15           A.       I'm in New Jersey.

16           Q.       You can certainly find a multitude  
17       of therapists in New Jersey, couldn't you?

18           MR. IADEVAIA: Objection. You can  
19       answer.

20           A.       I asked my doctor and I believed  
21       them when they said it would be impossible to find  
22       anyone and that they were going to have therapists  
23       on staff soon, so I just kept a lookout and when  
24       they got them I asked for an appointment.

25           Q.       Did your mother and father suffer

1 from mental illness?

2 A. Not that I'm aware of.

3 Q. Did your father suffer from  
4 substance abuse?

5 A. Yes.

6

7 (Whereupon Document with Bates Nos.  
8 Pl. 1926 to Pl. 1931 was received and marked D-31  
9 for identification.)

10

11 Q. So let's mark this as D-31, and  
12 these are medicals records that were produced  
13 pursuant to your authorization.

14 MR. IADEVAIA: We're going to ask  
15 that this portion of the transcript be marked  
16 confidential.

17 MR. LINTHORST: No objection.

18 (The following testimony is a  
19 confidential portion under separate cover.)

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(Confidential portion concluded.)

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Q. Have you spoken with any press or media about your case against JPMorgan Chase?

8

A. No.

9

10

Q. Spoken with any press or media about your employment at JPMorgan Chase?

11

A. No.

12

13

14

Q. To your knowledge, has your counsel spoken with any press or media about your case or your employment at JPMorgan Chase?

15

16

A. Not that I'm aware of. I don't know.

17

Q. I have no further questions.

18

19

MR. IADEVAIA: Okay. Ms. Williams, I just have just a couple of questions for you.

20

21

CROSS EXAMINATION BY MR. IADEVAIA:

22

23

24

25

Q. Ms. Williams, you were asked earlier in your deposition -- or do you recall being asked earlier in your deposition if you had ever been involuntarily terminated from a job, and

1 I believe your answer to that question had been  
2 no. Do you wish to clarify that answer?

3 A. Oh, other than JPMorgan, no.

4 Q. Okay. So you're clarifying by  
5 specifying that you were involuntarily terminated  
6 from JPMorgan. Is that correct?

7 A. That's correct.

8 Q. Okay. You were asked earlier to  
9 identify individuals who you believe have  
10 retaliated against you and you gave a list of  
11 names. Do you recall that testimony generally?

12 A. Yes.

13 Q. Okay. Is there anyone else that  
14 you did not previously list that you can, as you  
15 sit here today, remember that you believe  
16 retaliated against you?

17 A. I think I went -- I went through  
18 Jennifer Boyle-Devine, but I would say Cathy  
19 Duffy, Frank Pern as additional examples.

20 Q. Okay. And earlier, do you recall  
21 testimony you gave about meetings that were called  
22 opportunities and enhancement meetings --  
23 enhancements meetings?

24 A. Yes.

25 Q. Okay. And did you -- are you

1 alleging or were you in fact prohibited or  
2 censored in any way in connection with those  
3 meetings?

4 MR. LINTHORST: Objection. Leading  
5 and asked and answered.

6 Q. You can answer.

7 A. I wasn't -- I was prohibited from  
8 using certain terms like gap issue, risk,  
9 remediation and replacing those terms with  
10 euphemisms, but the issues were either contained  
11 in the PowerPoint presentation or the issues log.

12 Q. And who do you -- are you saying  
13 prohibited you from using those terms?

14 A. For the opportunities and  
15 enhancements meetings or other --

16 Q. Yeah, I'm only asking about the  
17 opportunities and enhancement meetings?

18 A. That was Garrett Ross, Alicia  
19 Avelo, Tim Bridgeford, Mailys Abos and --

20 Q. I'm sorry, please finish your  
21 answer.

22 A. I think that's it.

23 Q. I don't have any other questions.

24 MR. LINTHORST: Nothing further  
25 from me.

1 THE VIDEOGRAPHER: Shall we go off  
2 the record?

3 MR. LINTHORST: Yes, please.

4 MR. IADEVAIA: Yes.

5 THE VIDEOGRAPHER: All right. This  
6 concludes the deposition. The time is 7:02  
7 p.m..

8 (Whereupon deposition was  
9 concluded.)

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C E R T I F I C A T I O N

I, ROBYN PULZONE, License Number XI01494,  
a Certified Court Reporter of the State of New  
Jersey, certify that the foregoing is a true and  
accurate transcript of the deposition of SHAQUALA  
WILLIAMS, who was first duly sworn by me at the  
place and on the date hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither  
attorney nor counsel for, nor related to or  
employed by, any of the parties to the action in  
which this deposition was taken, and further that  
I am not a relative or employee of any attorney or  
counsel employed in this case, nor am I  
financially interested in the action.



Certified Court Reporter of the  
State of New Jersey

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