

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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Dr. LAQUAN DYCE,	:	
	:	Case No.:
Plaintiff,	:	
	:	
v.	:	<b><u>COMPLAINT</u></b>
	:	
JP MORGAN CHASE,	:	
	:	<b><u>JURY TRIAL DEMANDED</u></b>
Defendant.	:	
	:	
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Dr. LaQuan Dyce (“Plaintiff,” “Dyce” or “Dr. Dyce”), by and through his attorneys, Mesidor PLLC, as and for his Complaint against JP Morgan Chase (“JP Morgan” or “the Company”), alleges as follows:

**PRELIMINARY STATEMENT**

1. JP Morgan Chase, one of the nation’s leading financial institutions, publicly promotes its commitment to fostering an “equitable and inclusive culture” for employees and business. However, behind closed doors, the Company has engaged in systemic racial discrimination against black employees, routinely assigning them to underperforming branches and denying them career-advancing opportunities. This discriminatory practice is so pervasive within the culture of JP Morgan that the company previously settled a lawsuit brought by several black employees who faced similar mistreatment<sup>1</sup>.

2. As part of the 2018 settlement, JP Morgan paid \$24 million to the affected employees and committed \$4.5 million to bias training, a *review of branch assignments*, and

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<sup>1</sup> See generally Kori Hale, *JP Morgan’s Bad Treatment of Black Advisors Cost It \$24 Million*, FORBES (Sep. 14, 2018, 1:00 PM), <https://www.forbes.com/sites/korihale/2018/09/14/jpmorgans-bad-treatment-of-black-advisors-cost-them-24-million>

a coaching program for black financial advisers. Yet, just seven years later, JP Morgan has made it clear that its promises to black employees were nothing more than lip service.

3. On August 5, 2006, Dr. LaQuan Dyce joined JP Morgan as a Licensed Personal Banker. During his 17-year tenure at JPMorgan Chase, Dr. Dyce demonstrated exceptional leadership capabilities, as evidenced by his consistent upward trajectory from Assistant Branch Manager (2007) to Market Director (2019) overseeing multiple branches and more than 150 employees. Throughout his career, he received regular promotions every two years on average between 2007-2019, earned recognition as a National Achiever in 2014, and was specifically selected for challenging assignments, including post-Hurricane Sandy recovery and improving the underperforming Munsey Park branch (which he transformed into a top-10 performing location nationwide).

4. Despite his strong work ethic and multiple promotions, Dr. Dyce quickly discovered an invisible ceiling at JP Morgan—one that systematically barred black employees from accessing the highly lucrative branch assignments readily given to their white counterparts. It became undeniable that JP Morgan did not see him as equally deserving of advancement, no matter his qualifications or dedication. In response to the Company's systemic mistreatment of black financial advisors, Dr. Dyce began reporting discriminatory treatment to HR.

5. Unfortunately, once JP Morgan's discriminatory mindset became evident, their actions quickly followed, subjecting Dr. Dyce to less favorable treatment than his Caucasian peers. It became increasingly clear that he was being singled out, with several glaring examples of disparate treatment, including:

- (i) subjecting Dr. Dyce to excessive micromanagement compared to his white peers;

- (ii) openly criticizing and devaluing his performance in meetings with senior leadership, while simultaneously praising white colleagues with weaker market performance;
- (iii) assigning him to a historically underperforming rural market—one of the worst in the region—while affording his white colleagues opportunities in more lucrative markets;
- (iv) failing to compensate him fairly based on his education and tenure, resulting in a significant pay disparity compared to his white colleagues; and
- (v) disparaging his decision to take paternity leave following the birth of his child and significantly reducing his bonus as retaliation for exercising his protected rights.

6. On two separate occasions, when Dr. Dyce went on paternity leave, he was subjected to harsh criticism, a significant deduction of a bonus on one occasion, and threats of losing his position. In his time at JP Morgan, Dr. Dyce has never witnessed such harsh criticism directed at his female colleagues. He was not given the same congratulatory response or compassion that was extended to female employees on parental leave. What should have been a joyous time for Dr. Dyce became extremely stressful due to the discriminatory actions of JP Morgan. The actions of JP Morgan violated both state and federal laws that prohibit pregnancy and gender discrimination.

7. In response to the discriminatory actions of JP Morgan employees, Dr. Dyce filed an internal complaint with Human Resources (HR). Shortly after filing his complaint, JP Morgan rescinded an offer they gave Dr. Dyce for the position of Private Banker with JP Morgan Private Wealth Management division without cause—a blatant act of retaliation.

8. In June 2023, in yet another attempt to bring JP Morgan's unlawful conduct to management's attention, Dr. Dyce repeatedly reported his concerns about the Company's hostile work environment to HR. He specifically informed HR that he was experiencing racial discrimination and disparate treatment compared to his white colleagues. However, despite clear evidence to the contrary, Human Resources repeatedly dismissed his concerns as unfounded. Shortly after filing these complaints, Dr. Dyce noticed a shift in his performance evaluations, which became increasingly negative—allowing his supervisors to lay the groundwork to justify his termination.

9. In another blatant act of retaliation, just one month after filing his complaint with Human Resources, Dr. Dyce was placed on a pretextual performance improvement plan. From that point forward, he was subjected to relentless scrutiny, harsh criticism, aggressive tones, and baseless accusations about his performance and engagement—all from his colleagues at JP Morgan. With nowhere else to turn, he once again reported the hostile work environment to HR, explicitly stating his belief that his supervisors were attempting to force him out. Yet again, no action was taken. JP Morgan willfully failed to support or protect Dr. Dyce from this unlawful conduct.

10. In November 2023, Dr. Dyce was given a written warning. At that point, it became obvious to Dr. Dyce that this was the beginning of the end of his tenure at JP Morgan. He continued to endure a hostile work environment, facing heightened scrutiny and undue criticism from his colleagues.

11. In April 2024, while on medical leave for a spinal injury, Dr. Dyce applied for and was approved for parental leave in anticipation of the birth of his third child, set to begin upon the child's arrival. His child's due date was approximately mid-May 2024. Yet, in a blatant act

of gender and pregnancy discrimination, JP Morgan notified him that he risked losing his position if he did not return to work. Fearing for his job, Dr. Dyce felt immense pressure to cut his leave short and return to work earlier than planned.

12. Unfortunately, Dr. Dyce's efforts to appease his supervisors at JP Morgan were in vain. Upon his return, he was abruptly informed that he was under investigation for the wrongful termination of another employee—yet another pretextual attempt by JP Morgan to undermine and discredit him. It became increasingly clear that the Company was determined to push him out.

13. Sadly, Dr. Dyce learned the consequences of reporting discriminatory treatment at JP Morgan. One day after Dr. Dyce returned to work, JPMorgan Chase abruptly terminated him citing “deficient leadership skills”—a claim that contradicts their own history of repeatedly promoting him to positions of increasing responsibility. This termination occurred only after he began reporting discrimination within the company and just weeks before his approved parental leave, clearly demonstrating that his firing was a retaliatory action rather than a legitimate response to performance issues.

14. In addition to the loss of employment, JP Morgan's actions have caused irreparable damage to Dr. Dyce's mental health. He has experienced severe emotional distress, depression and post-traumatic stress syndrome for which he is currently receiving treatment. The loss of income has put him in a strained financial position. This has impacted his home life as the head of his household, both mentally, physically, financially, and emotionally.

15. JP Morgan's actions violate state and federal laws prohibiting discrimination, retaliation, and wrongful termination. Plaintiff alleges racial discrimination, gender discrimination, disability discrimination, hostile work environment, and retaliation under

Section 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 (“Section 1981”); the Americans with Disabilities Act, 42 U.S.C. § 12112 (“ADA”); the Family Medical Leave Act, 29 U.S.C. §§ 2601 *et seq.* (“FMLA”); and the New Jersey Law Against Discrimination, N.J. Stat. Ann. §§10:5-1 *et seq.* (the “NJLAD”).

16. Plaintiff seeks declaratory relief, injunctive relief, compensatory and punitive damages, and attorneys’ fees and costs for Defendant’s unlawful conduct.

### **JURISDICTION AND VENUE**

17. This Court has jurisdiction over Plaintiff’s claims under 28 U.S.C. § 1331 (federal question jurisdiction) and 28 U.S.C. § 1367 (supplemental jurisdiction over state law claims).

18. Venue is proper in this Court under 28 U.S.C. § 1391(b) because Defendant conducts business in this District, and the events giving rise to the claims occurred here.

### **ADMINISTRATIVE PROCEDURES**

19. Section 1981 does not require Plaintiff to exhaust any administrative remedies before filing this Complaint in federal court.

20. Plaintiff has filed charges of race and gender-based discrimination with the United States Equal Employment Opportunity Commission (“EEOC”) under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* (“Title VII”). When Plaintiff receives the notice of his right to sue from the EEOC, he will seek to amend the Complaint to add claims for discrimination under Title VII. The facts set forth herein support those claims as well, and therefore there will be no prejudice to JP Morgan by this procedure.

### **PARTIES**

21. Plaintiff, Dr. Dyce, is an African-American male who resides in New Jersey and worked for Defendant from August 5, 2006 until May 8, 2024. At all relevant times, Plaintiff was an “employee” within the meaning of Section 1981, and NJLAD.

22. Defendant, Company JP Morgan, is a corporation with its principal place of business located in New York. Defendant operates banking and financial services nationwide, including in New Jersey. Defendant employs over 300,000 individuals. At all relevant times, Defendant was an “employer” within the meaning of Section 1981, and NJLAD.

### **FACTUAL ALLEGATIONS**

#### **I. JP Morgan Stifled Dr. Dyce’s Career Advancement Due to Racial Discrimination**

20. Dr. Dyce began working for JP Morgan on August 5, 2006, as a Licensed Personal Banker. Over his 17-year tenure, Dr. Dyce excelled in various roles, receiving positive performance reviews and earning multiple promotions due to his hard work and dedication.

21. Despite amassing multiple promotions and achievements, Dr. Dyce soon discovered an unspoken, invisible ceiling for black employees at JP Morgan, restricting how far they could rise within the Company. JP Morgan’s consistent practice of assigning black financial advisers to historically underperforming markets made it clear that Dr. Dyce’s opportunities for advancement into more lucrative markets would be systematically restricted. Although he was eventually promoted to Market Director of Banking, his career trajectory was significantly constrained compared to his white counterparts.

22. In July 2019, Dr. Dyce expressed interest in the Market Director of Banking position for the Upper West Side-Manhattan market—an affluent, high-performing, and predominantly white banking sector. His supervisor, Gregg Kleinbaum, a Caucasian man, responded by laughing in his face, making it clear he found the notion of a black man holding that position absurd. Adding further insult, Mr. Kleinbaum forced Dr. Dyce to cover the role temporarily while the Company actively sought other candidates, all without allowing Dr. Dyce to interview. A few months later, the position was awarded to a white employee recruited from another region.

23. In October 2019, after being passed over, Dr. Dyce was instead assigned as Market Director for Sussex County, a struggling, underperforming market in rural New Jersey. The Sussex County region was widely regarded as a “dead-end assignment,” where previous Market Directors consistently faced failure and struggled to secure more lucrative promotions as a result. JP Morgan’s placement of Dr. Dyce to this underperforming market was not an isolated incident but rather part of JP Morgan’s systemic practice of steering black employees into failing territories<sup>2</sup> while granting their white counterparts access to high-performing, lucrative markets.

24. However, Dr. Dyce was determined not to let this assignment hinder his career advancement. Through perseverance and strategic leadership, he successfully transformed the underperforming Sussex County branch, eventually generating profits on par with his

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<sup>2</sup> Emily Flitter, *This Is What Racism Sounds Like in The Banking Industry*, NY TIMES (July 13, 2021), <https://www.nytimes.com/2019/12/11/business/jpmorgan-banking-racism.html#:~:text=Less%20than%20two%20weeks%20later,dumping%20them%20in%20poorer%20branches.> (“JPMorgan agreed to pay \$24 million to end a class-action lawsuit brought by other black employees who said the company had discriminated against them — in some cases by isolating them from colleagues and dumping them in poorer branches.”). A copy of this article is attached as Exhibit A.



white colleagues in higher-performing markets. Despite his accomplishments, his colleagues continued to undermine his success, subjecting him to ongoing discrimination based on his race, gender, disability, and engagement in protected activities.

## **II. JP Morgan Employees Discriminated Against Dr. Dyce Based on His Gender by Openly Criticizing His Parental Leave and Reducing His Bonus in Retaliation**

26. In April 2020, Dr. Dyce's wife gave birth to their first child. Dr. Dyce exercised his right to take 16 weeks of parental leave in order to care for his wife and newborn. However, what should have been a joyful moment for Dr. Dyce, was quickly extinguished by discriminatory comments from his supervisors and colleagues. JP Morgan employees began to openly criticize and shame Dr. Dyce for exercising his right to take the full family leave.

27. During a conversation with his colleague, Harold Compere, Dr. Dyce learned that his supervisors and colleagues were openly criticizing him for taking his full parental leave. Mr. Compere informed him that one Market Director blatantly remarked, "What the hell is wrong with LaQuan, taking the full four months [of parental leave]!?" This blatant contempt for his legally protected leave further underscored JP Morgan's discriminatory attitude toward male employees who sought to exercise their parental rights.

28. When Dr. Dyce expressed frustration to Mr. Compere over these remarks, he quickly realized that such discriminatory attitudes were not only tolerated but ingrained in JP Morgan's workplace culture. Mr. Compere quickly dismissed his concerns, stating, "No other Market Director has done that," and suggested that Dr. Dyce should understand why the criticism was justified. JP Morgan employees had never subjected female colleagues to the same scrutiny or criticism for taking the same amount of parental leave, highlighting the company's clear pattern of gender-based discrimination.

29. In August 2022, following the birth of his second child, Dr. Dyce once again exercised his right to 16 weeks of parental leave. Upon his return, he discovered that his full bonus had been unfairly reduced. When he inquired about the discrepancy, his supervisor, John Bonhomme, admitted that a portion of Dr. Dyce's bonus had been diverted to another Market Director—a white woman—who covered his territory during his leave. This unjust penalty was one that JP Morgan did not impose on female employees who took maternity leave, further underscoring the company's pattern of gender-based discrimination.

30. Defendant's actions constituted gender discrimination under NJLAD and FMLA interference.

### **III. JP Morgan Discriminated Against Dr. Dyce's by Denying Him Reasonable Disability-Related Accommodations and Unlawfully Terminating Him During His Recovery from a Spinal Injury**

30. In January 2024, Dr. Dyce sustained a serious spinal injury that required medical attention. As a result, he took short-term disability leave to recover. Following a medical evaluation, he formally requested a reasonable accommodation—to work remotely two days per week to allow for adequate healing from his injuries.

31. However, instead of supporting Dr. Dyce as he recovered from a significant injury, Human Resources called and threatened to terminate him if he did not immediately return to work. Fearing for his job and his ability to provide for his family, Dr. Dyce was forced to return on May 7, 2024—three weeks earlier than his scheduled return date of May 30, 2024. Despite his documented medical condition, Human Resources failed to engage in the legally required process to explore reasonable accommodations, in direct violation of the ADA and the NJLAD.

32. Instead, in a predictable pattern of retaliation, JP Morgan once again used coercive tactics—threatening to terminate Dr. Dyce for exercising his federally protected rights—solely to force his premature return to work, only to fire him shortly thereafter. Upon his return, the company immediately subjected him to heightened scrutiny and, in a final act of retaliation, terminated his employment the very next day, on May 8, 2024.

**IV. JP Morgan Retaliated Against Dr. Dyce by Rescinding a Job Offer, Imposing Baseless Performance Plans and Terminating His Employment for Reporting Discrimination**

34. In response to the disparate treatment he faced, Dr. Dyce filed multiple internal complaints with Human Resources in June 2022 and June 2023. Instead of properly investigating his complaints or taking corrective action, JP Morgan retaliated against him—rescinding a new job offer, issuing unfavorable performance reviews, and escalating disciplinary actions for minor infractions.

35. In July 2022, Dr. Dyce was contacted by Andrew Stone, Vice President of East Region Talent Acquisition for JP Morgan Private Bank, and was offered a new role as a Private Banker—Executive Director in the Private Banking Wealth Management Division at the Summit, NJ office—a role that came with a significant salary increase (approximately \$200,000 plus commission). However, after reporting a Company employee, Darcie Gore, for making racist remarks during a business meeting, the job offer was abruptly rescinded without cause.

36. In June 2022, during a business review meeting with fellow Market Directors and company executives, Ms. Gore (New Jersey Lending Manager) publicly singled out and

harshly criticized Dr. Dyce's market performance, despite his metrics surpassing those of several white peers.

37. In stark contrast, Ms. Gore later praised Dr. Dyce's white counterpart, Shawn Smith, despite his weaker market performance, without subjecting him to the same scrutiny. Dr. Dyce found Ms. Gore's actions particularly troubling, as she had no supervisory authority over Market Directors. Her deliberate attempt to publicly undermine Dr. Dyce in front of his peers and senior leadership appeared intended to diminish his achievements in a challenging banking market while unjustifiably elevating his white counterparts. Following this meeting, Mr. Dyce formally filed a complaint with HR against Ms. Gore, citing racial discrimination, as her inconsistent and unequal evaluation of Mr. Dyce's performance was clearly driven by factors unrelated to actual results.

38. Instead of addressing Dr. Dyce's concerns with a proper investigation, JP Morgan resorted to the same retaliatory tactics. While filing his complaint, an HR representative informed him that they were aware of his upcoming transition to a new role and assured him that filing the complaint "wouldn't affect that." Dr. Dyce found this statement extremely concerning, as his decision to report improper conduct by an employee in a separate division had no relevance to his job transition, raising further concerns about the Company's handling of workplace discrimination.

39. Unfortunately, Dr. Dyce soon realized that advocating for fair and equitable treatment at JP Morgan came at a cost—rescinded opportunities for advancement. After following up on the job offer he received in July 2022, he was met with radio silence. When Dr. Dyce eventually reached out to the Hiring Manager, Alma DeMetropolis, she admitted

that “a lot of politics” were involved with transitioning him into this new role, ultimately leading to the rescission of his job offer. Ms. DeMetropolis said that she would “try again next year,” suggesting that he could be considered for the position in the future. However, that was mere lip service as Dr. Dyce was never contacted by Ms. DeMetropolis again.

40. A few months later, HR informed Dr. Dyce that they had concluded their investigation into Ms. Gore’s conduct, determining there were “no findings” and subsequently closed the case. This outcome not only dismissed Dr. Dyce’s legitimate concerns but also reinforced JP Morgan’s pattern of shielding discriminatory behavior while retaliating against employees who dared to expose the discrimination running rampant within the company.

41. Disturbingly, JP Morgan has recently admitted in writing, to rescinding the Private Banker position only after learning that Dr. Dyce’s wife was expecting their third child in August and that he would likely be on parental leave through January 2023.<sup>3</sup> This blatant decision underscores their retaliatory actions under FMLA and clear-cut gender discrimination, punishing him for exercising his legally protected rights.

42. Undeterred, Dr. Dyce continued to advocate for himself, raising concerns about his pay being significantly lower than that of Market Directors with similar education and

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<sup>3</sup> On March 7, 2025, JP Morgan submitted a Position Statement in response to Dr. Dyce’s EEOC charge, in which the Company acknowledged that his supervisor, John Bonhomme, had attempted to place him in an “individual contributor position.” JP Morgan maintained that the company rescinded the offer after Dr. Dyce stated he could not start until January 2023. However, JP Morgan’s counsel inaccurately claimed that Dr. Dyce stated he was unavailable until January 2024. Further, Dr. Dyce maintains that JP Morgan informed him that the Private Banker role was referred to as an “individual contributor position.” Dr. Dyce further asserts that he informed Mr. Bonhomme that his wife was expecting their child in August 2022, leading Mr. Bonhomme to assume that parental leave would prevent him from starting the role until January 2023. *See* JP Morgan, Position Statement to Equal Employment Opportunity Commission, Charge No. 524-2025-00393 at 7 (March 7, 2025) (on file with author).

experience. Despite having over 17 years of experience at JP Morgan and a doctoral degree in Executive Educational Leadership, Management, and Policy, Dr. Dyce earned over \$100,000 less than his white male counterparts. For years, he attempted to address this blatant pay disparity, only to be met with resistance from his superiors, who justified his lower salary by citing his assignment to Sussex County—an underperforming market.

43. However, in 2023, Dr. Dyce’s leadership led to a dramatic turnaround, with Sussex County reporting financial metrics comparable to Brooklyn, NY, and other affluent markets for the first time under his tenure. Yet, despite this undeniable success, JP Morgan continued to deny his requests for increased compensation, further underscoring the systemic discrimination he faced.

44. In July 2023, four months after formally requesting a pay increase, and one month after complaining to HR, Dr. Dyce’s supervisor, John Bonhomme, abruptly placed him on a Performance Improvement Plan (PIP) with false information, for the first time in his career—despite having no prior history of negative performance reviews and successfully leading a well-performing market.

45. When Dr. Dyce questioned the reasoning behind this decision, Mr. Bonhomme vaguely stated that Dr. Dyce needed additional coaching because he was “not a good leader.” This feedback was not only baseless but deeply insulting, given that Dr. Dyce holds a doctoral degree specializing in organizational leadership, had been in a leadership role at JP Morgan for 16 years, instructed college-level courses on leadership for over seven (7) years, obtained leadership certifications, and had years of experience as a subject matter expert training others to become more effective leaders at numerous conference and workshops. In

addition to Dr. Dyce's extensive leadership experience, he also received glowing reviews from his direct reports in several Employee Opinion Surveys throughout his tenure at JP Morgan. This was a baseless accusation without substance to support the concerted effort to terminate Dr. Dyce.

46. To further justify the PIP, Mr. Bonhomme cherry-picked a negative comment from an employee opinion survey—one that reflected an employee's overall experience at JP Morgan rather than specific feedback about Dr. Dyce. He then misleadingly included it in Dr. Dyce's PIP, falsely creating the narrative that Dr. Dyce was solely responsible for the employee's dissatisfaction. This deliberate misrepresentation further demonstrated JP Morgan's bad faith efforts to manufacture a justification for its retaliatory actions against Dr. Dyce.

47. In response, Dr. Dyce alerted HR that he was being deliberately targeted for termination. Rather than taking immediate action to address his concerns, HR prolonged the investigation for nine months—during which time his supervisor placed him on a written warning, strategically creating grounds for his termination. When the investigation finally concluded, HR once again dismissed Dr. Dyce's claims, stating they found "no findings" and closing the case. This blatant indifference not only ignored the overwhelming evidence of retaliation but also underscored JP Morgan's active complicity in fostering a workplace culture where discrimination and retaliation were not just tolerated, but weaponized against those who dared to challenge the Company's systemic inequities.

48. Over the following months, JP Morgan employees continuously targeted and tormented Dr. Dyce through the following patterns of retaliatory behavior:

- **Public Humiliation:** In August 2023, Andrea Principe, Northeast Divisional Director of Consumer Banking berated Dr. Dyce in a meeting full of senior leadership, demanding he put his phone away—despite there being no Company policy prohibiting phone use in meetings, and while white Market Directors and other colleagues, including herself, openly used their devices without reprimand.
- **False Performance Allegations:** That same month, John Bonhomme publicly accused Dr. Dyce of failing to hold consistent meetings and communicate with company stakeholders—claims that were provably false, as Dr. Dyce provided documentation showing his meetings far exceeded those of his white colleagues.
- **Hostile Work Environment:** In July 2023, John Bonhomme made sexually inappropriate and offensive comments during his mandated coaching sessions with Dr. Dyce. When Dr. Dyce refused to comply with Mr. Bonhomme’s demeaning directives, Mr. Bonhomme further escalated the campaign to push Dr. Dyce out.
  - During specific coaching sessions in July 2023 and September 2023, Mr. Bonhomme addressed concerns raised by some of Dr. Dyce’s white female colleagues about working with him. Instead of providing professional guidance on workplace dynamics, Bonhomme shockingly advised Dr. Dyce to “treat these bitches like [he’s] trying to f\*\*\*” to get along with them. Mr. Bonhomme further admitted that the hostility toward Dr. Dyce was racially motivated, acknowledging that the criticism from white employees stemmed from the fact that Dr. Dyce is black.



- **Discriminatory Targeting:** In January 2024, Divisional Director Andrea Principe engaged in racially discriminatory targeting during a Zoom meeting by specifically inquiring about only two employees—Dr. LaQuan Dyce and Harold Compere, both Black males—for not having their cameras on. Despite multiple employees, including white employees, being logged into the meeting without video, Principe did not ask about any white employees who also had their cameras off. Instead, she singled out only Dr. Dyce and Mr. Compere by asking their direct supervisor, John Bonhomme, where Dr. Dyce was while failing to question the absence of white employees on video. Notably, Dr. Dyce was not only present on the call but was the second person to log in, following Regional Director Monica Nation. Following this incident, Mr. Bonhomme issued a memo the following week, implementing a new rule requiring all employees to have their cameras on during Zoom meetings. This was not a JPMorgan Chase policy but a targeted directive that disproportionately affected Dr. Dyce. Despite the rule, white employees consistently kept their cameras off in subsequent meetings without any consequence, confirming that this was not a neutral policy but rather a retaliatory measure aimed explicitly at Dr. Dyce because of his race. Further demonstrating the discriminatory nature of the directive, Mr. Bonhomme messaged his regional director colleagues in their group chat and later showed Dr. Dyce their responses. When Mr. Bonhomme asked whether Ms. Principe had requested their employees to have their cameras on, they all responded, “no.” This confirmed that Dr. Dyce and Mr. Compere were the only employees specifically targeted, reinforcing the pattern of disparate treatment against Black employees.

49. In April 2024, Dr. Dyce informed HR that he was anticipating the birth of his third child (May 2024) and planned to take paternity leave, which would overlap with his short-term disability leave. During this period, Dr. Dyce participated in the firm-wide Employee Opinion Survey (EOS), where he provided candid feedback about the toxic work culture within the Northeast Division and the New Jersey Region. Specifically, Dr. Dyce explained how his experience at JP Morgan was marred by discrimination, microaggressions, favoritism, and micromanagement. Further, he explicitly stated that he had been subjected to persistent discrimination in his role as Market Director.

50. Just days after submitting the survey, he received an email from Jorj Bono, an Employee Relations (ER) representative from JP Morgan's Intake and Triage team, requesting that he provide names and details to substantiate his claims. Given his prior experiences with reporting employee misconduct to HR, Dr. Dyce was hesitant to comply.

51. With that history in mind, Dr. Dyce informed Ms. Bono that he was not comfortable sharing further details, fearing yet another cycle of retaliation. Dr. Dyce's intention was to document his concerns through the EOS survey—not to reopen a process he knew would result in further harm to his mental health and professional reputation. Ms. Bono responded by stating she respected his decision, yet her response failed to provide any assurance that his concerns would be taken seriously or that the Company would take actionable steps to protect him from further retaliation.

52. On April 30, 2024, less than a week after Dr. Dyce expressed these concerns to Ms. Bono, he received an email and a phone call from Carletta Roseboro, an HR

representative. This sudden outreach—coming just days after he declined to provide further details—was no coincidence. Dr. Dyce repeatedly made it clear that he was not comfortable providing additional details regarding his survey responses, given HR’s past dismissive and retaliatory handling of his complaints. However, his resistance to HR’s pressure became the final straw. In response, the company moved swiftly and decisively to push him out, making it evident that his refusal to comply was being used as justification for his ultimate removal.

53. Shortly after, on May 1, 2024, Dr. Dyce received an email notifying him that he was not eligible for job protection under JPMorgan Chase’s Family and Medical Leave Policy. He was given a strict deadline to return to work by May 7, 2024, and warned that if he did not comply, his position could be posted due to “business needs.” The email further stated that if he was unable to return, he would be placed on a 60-day unpaid job search with no guarantee of re-employment.

54. Despite the company’s Accommodating Disabilities and Temporary Work Restrictions Policy, no effort was made to discuss reasonable accommodations, offer flexibility, or explore alternative solutions. The message to Dr. Dyce was clear: return under coercion or be forced out.

55. On May 7, 2024, Dr. Dyce returned to work. However, just one day later, he was falsely accused of age discrimination toward a Lead Associate of Operations and was immediately terminated—without being provided any evidence to support the claim. The timing of his termination—occurring within 24 hours of his forced return—was a deliberate act of retaliation, not mere coincidence. JP Morgan conducted no genuine investigation into

the allegations made against Dr. Dyce nor was he given an opportunity to respond before the decision to terminate his employment was made.

56. To further underscore the egregiousness of JP Morgan's conduct, Dr. Dyce's termination was strategically timed just weeks before his scheduled parental leave, set to begin around May 20, 2024. By deliberately terminating him before he could take protected leave, JPMorgan ensured it would not have to honor his parental leave benefits. The sequence of events leaves no doubt that this was a premeditated effort to eliminate him before he could exercise his legally protected rights, further reinforcing the company's entrenched pattern of retaliation and discrimination.

57. The pattern of events leaves no doubt that JPMorgan orchestrated a calculated campaign of retaliation in direct response to Dr. Dyce's whistleblowing. First, after submitting his survey, HR reached out, pressuring him to provide more details. When he declined, HR escalated its efforts, contacting him less than a week later—reinforcing his well-founded concerns that he was being targeted. Soon after, he was forced to return to work under the explicit threat of losing his position, despite being on an approved medical leave. Then, in a final act of retaliation, within just 24 hours of his coerced return, he was falsely accused and terminated without due process, cementing JP Morgan's deliberate effort to silence him and remove him from the company.

58. JP Morgan's termination of Dr. Dyce had nothing to do with his performance or misconduct—it was a deliberate and premeditated act of retaliation designed to silence him, punish him for speaking out, and shield those responsible for fostering a toxic and discriminatory workplace. His termination was not an isolated incident but part of JP

Morgan's well-documented pattern of retaliating against and ultimately firing black employees who dare to challenge the systemic mistreatment and bias within the Company.<sup>4</sup>

59. As a direct consequence of his unjust termination, Dr. Dyce has been effectively blacklisted from the banking and finance industry, making it nearly impossible for him to secure new employment in his field. The banking sector is a tightly connected industry where professionals and executives maintain strong networks, and word travels quickly.

60. Despite his extensive qualifications and decades of experience, Dr. Dyce has been forced out of the profession where he built his reputation, all because he dared to speak out against discrimination and retaliation at JP Morgan. JP Morgan's firing of Dr. Dyce was not just about removing him from the company, it was about ensuring that he could not work in the industry again.

61. As a result of JP Morgan's discrimination and retaliation, Dr. Dyce has suffered severe emotional distress, economic hardship, and lasting psychological trauma. The stress of being unjustly terminated and blacklisted from his industry has led to chronic anxiety, depression, and persistent sleep disruptions.

### **FIRST CAUSE OF ACTION**

#### **(Discrimination and Retaliation in Violation of Section 1981)**

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<sup>4</sup> Flitter, *supra* note 2; *see also* Emily Flitter, *What Counts as Race Discrimination? A Suit Against JPMorgan Is a Test*, NY TIMES, (Oct. 27, 2020), <https://www.nytimes.com/2020/10/27/business/race-discrimination-lawsuit-jpmorgan.html> ("For the first time, Ms. Wilson felt that she was not on equal footing with her white colleagues, according to the suit. She complained to JPMorgan officials, but the bank's response shattered her faith in her employer, she said. After she was unable to find a different job within JPMorgan, the bank fired her."). A copy of this article is attached as Exhibit B.

62. Dr. Dyce hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

63. By the acts described above, Defendants discriminated against Dyce based on his race in violation of Section 1981.

64. By the acts described above, Defendants retaliated against Dyce after he made protected complaints of race discrimination that violated Section 1981.

65. As a direct and proximate result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, monetary and/or economic harm for which he is entitled to an award of damages, in addition to reasonable attorneys' fees and costs.

66. As a direct and proximate result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, mental anguish and emotional distress for which he is entitled to an award of compensatory damages and other relief.

67. Defendants' conduct was willful and/or showed reckless disregard for Dyce's statutorily protected rights.

**SECOND CAUSE OF ACTION**  
**(Discrimination and Retaliation in Violation of the Americans with Disabilities Act)**

68. Dr. Dyce hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

69. By the acts described above, Defendants discriminated against Dyce based on his disability in violation of the ADA.

70. Dr. Dyce is categorized as disabled within the meaning of the ADA

71. As a company with over 300,000 employees, Defendant is subject to the ADA.

72. Dr. Dyce was terminated by Defendant after seeking a reasonable accommodation for his disability.

73. By the acts described above, Defendants retaliated against Dyce after he made a protected request to HR for an accommodation due to his disability. In response to Dyce's request, Defendant terminated Dr. Dyce's employment

74. As a direct and causal result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, monetary and/or economic harm for which he is entitled to an award of damages, in addition to reasonable attorneys' fees and costs.

75. As a direct and causal result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, mental anguish and emotional distress for which he is entitled to an award of compensatory damages and other relief.

76. Defendants' conduct was willful and/or showed reckless disregard for Dyce's statutorily protected rights.

**THIRD CAUSE OF ACTION**  
**(Interference and Retaliation in Violation of the Family Medical Leave Act)**

77. Dr. Dyce hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

78. By the acts described above, Defendants interfered with Dyce's statutorily protected parental leave in violation of FMLA.

79. Dr. Dyce was eligible to take parental leave under the FMLA. Defendant was an employer as defined under the FMLA. Dyce gave notice of to Defendant of his intention to take parental leave. Defendant terminated Dyce as a result of his intention to take parental leave.

80. As a direct and causal result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, monetary and/or economic harm for which he is entitled to an award of damages, in addition to reasonable attorneys' fees and costs.

**FOURTH CAUSE OF ACTION**  
**(Discrimination and Retaliation in Violation of the New Jersey Law Against Discrimination)**

81. Dyce hereby repeats, reiterates and re-alleges each and every allegation as contained in each of the preceding paragraphs as if fully set forth herein.

82. By the acts described above, Defendants discriminated against Dyce based on his race and gender.

83. Defendants also retaliated against Dyce for his protected complaints about discrimination.

84. As a direct and proximate result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, monetary and/or economic harm for which he is entitled to an award of damages, in addition to reasonable attorneys' fees and costs.

85. As a direct and proximate result of Defendants' unlawful conduct, Dyce has suffered, and continues to suffer, mental anguish and emotional distress for which he is entitled to an award of compensatory damages and other relief.



86. Defendants' conduct was willful and/or showed reckless disregard for Dyce's statutorily protected rights.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Declare that Defendant's actions violated federal and state laws;
2. Award Plaintiff compensatory damages for lost wages, emotional distress, and reputational harm;
3. Award punitive damages;
4. Award Plaintiff attorneys' fees and costs;
5. Grant injunctive relief requiring Defendant to implement anti-discrimination training and policies; and
6. Grant any other relief the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable.

Dated: March 27, 2025

Respectfully submitted

Livington, NJ

By: /s/ Crystal Pettiford\_\_\_\_\_

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*Counsel for Plaintiff*



# **EXHIBIT A**

# *This Is What Racism Sounds Like in the Banking Industry*

A JPMorgan employee and a customer secretly recorded their conversations with bank employees.



By Emily Flitter

Published Dec. 11, 2019 Updated July 13, 2021

Jimmy Kennedy earned \$13 million during his nine-year career as a player in the National Football League. He was the kind of person most banks would be happy to have as a client.

But when Mr. Kennedy tried to become a “private client” at JPMorgan Chase, an elite designation that would earn him travel discounts, exclusive event invitations and better deals on loans, he kept getting the runaround.

At first, he didn’t understand why. Then, last fall, he showed up at his local JPMorgan branch in Arizona, and an employee offered an explanation.

“You’re bigger than the average person, period. And you’re also an African-American,” the employee, Charles Belton, who is black, told Mr. Kennedy. “We’re in Arizona. I don’t have to tell you about what the demographics are in Arizona. They don’t see people like you a lot.” Mr. Kennedy recorded the conversation and shared it with The New York Times.

It’s no secret that racism has been baked into the American banking system. There are few black executives in the upper echelons of most financial institutions. Leading banks have recently paid restitution to black employees for isolating them

from white peers, placing them in the poorest branches and cutting them off from career opportunities. Black customers are sometimes profiled, viewed with suspicion just for entering a bank and questioned over the most basic transactions.

This year, researchers for the National Bureau of Economic Research found that black mortgage borrowers were charged higher interest rates than white borrowers and were denied mortgages that would have been approved for white applicants.

Banks, including JPMorgan, say they are committed to eradicating the legacy of racism. And they insist that any lingering side effects simply reflect stubborn socioeconomic imbalances in society as a whole, not racial bias among their employees.

What recently transpired inside a cluster of JPMorgan branches in the Phoenix area suggests that is not true.

Mr. Kennedy was told he was essentially too black. His financial adviser, Ricardo Peters, complained that he, too, was a victim of racial discrimination. What makes their cases extraordinary is not that the two men say they faced discrimination. It is that they recorded their interactions with bank employees, preserving a record of what white executives otherwise might have dismissed as figments of the aggrieved parties' imaginations.

Patricia Wexler, a JPMorgan spokeswoman, defended the bank's overall treatment of Mr. Peters and Mr. Kennedy. She said that the bank hadn't been aware of all of the audio recordings and that "in light of some new information brought to us by The New York Times," the company put one of its executive directors on administrative leave while the bank investigates his conduct.

## **The Back of the Branch**

Mr. Peters started his career at JPMorgan as a salesman in the bank's credit cards division. After about eight years in various roles, he was promoted to a financial adviser position in Phoenix in 2016. His job was to help bank customers prudently

invest their money.

Mr. Peters had won numerous performance awards at the bank, but things soon started going wrong for him.



Mr. Peters won numerous awards from his employer, JPMorgan. Ash Ponders for The New York Times

He was working in a JPMorgan branch in the affluent Sun City West area of Phoenix. He sought a promotion to become a private client adviser, a job that would have let him work with wealthier and more lucrative clients.

The promotion never came. Instead, Mr. Peters was moved out of an office at the heart of the branch where he worked with other financial advisers and was relegated to a windowless room in the back.

In April 2017, one of his bosses, Frank Venniro, told Mr. Peters that another manager had accused him of taking customers' files home at night, a violation of the bank's code of conduct. Mr. Peters denied it, and Mr. Venniro accepted that he was telling the truth, according to a recording of the conversation. But, he added, Mr. Peters needed to be more cognizant of how his colleagues perceived him.

Mr. Peters was left with the impression that his managers, who were white, were predisposed to view him suspiciously. Could he prove it? No. What happened next was clearer.

Mr. Peters complained to Mr. Venniro that another financial adviser was trying to steal a prospective client: a woman who had just received a \$372,000 wrongful death settlement after her son died. She was black.

Mr. Venniro told Mr. Peters that there was no point in his intervening in the dispute, because the woman was not a worthwhile client. "You've got somebody who's coming from Section 8, never had a nickel to spend, and now she's got \$400,000," Mr. Venniro said, referring to the federal program that provides vouchers to help with housing costs and whose title is sometimes used as a racial slur. "What do you think's going to happen with that money? It's gone."

"But I thought that's why we get involved," Mr. Peters protested.

Mr. Venniro said no. "You're not investing a dime for this lady," he said. He knew from experience that she would quickly burn through the money. "It happens every single time."

When Mr. Peters tried to argue, Mr. Venniro interjected. "This is not money she respects," he said. "She didn't earn it."

Mr. Venniro declined to comment.

Ms. Wexler, the bank spokeswoman, said that Mr. Venniro was put on leave after inquiries from The Times and that he resigned last Thursday. "Our employee used extraordinarily bad judgment and was wrong to suggest we couldn't help a

customer,” she said. She said Mr. Venniro knew the client was in subsidized housing but didn’t know her race.

## Marching Orders

In February 2018, Mr. Peters was transferred from the Sun City West branch to a JPMorgan branch in a less wealthy neighborhood. He perceived it as another example of managers, including Mr. Venniro, mistreating him because he was black.

One day, Mr. Peters met Mr. Kennedy, then 38. Mr. Kennedy had played for five N.F.L. teams as a defensive tackle. In 2011, he had joined the New York Giants — a homecoming that, The Times wrote at the time, was notable because of his impoverished childhood in Yonkers, N.Y. That season, Mr. Kennedy and the Giants won the Super Bowl.

Mr. Kennedy retired and later moved to Phoenix. JPMorgan bankers had been courting his business, but he hadn’t liked the financial advisers the bank had proposed to manage his investments. Then he met Mr. Peters. “The chemistry was just so real because he knew exactly what I needed to do,” Mr. Kennedy said in an interview.

In the summer of 2018, Mr. Kennedy gradually moved \$800,000 to the bank. Mr. Peters and a colleague promised he would get “private client” status, which was reserved for accounts with more than \$250,000.





Jimmy Kennedy, a former N.F.L. player. Ash Ponders for The New York Times

Landing a wealthy client like Mr. Kennedy was a big win for Mr. Peters, but he was anxious about being targeted by his superiors. On Aug. 24, he filed a formal complaint with the bank. He said he had alerted Mr. Venniro “that I feel that I am being treated differently because of my race and color of my skin” and that Mr. Venniro had suggested that the solution was for him to work in the less-wealthy branch.

Less than two weeks later, JPMorgan agreed to pay \$24 million to end a class-action lawsuit brought by other black employees who said the company had discriminated against them — in some cases by isolating them from colleagues and dumping them in poorer branches.

On Oct. 5, Mr. Venniro took Mr. Peters to a meeting room and said he was being fired. Mr. Venniro said he didn't know why. "I'm just given marching orders," Mr. Venniro told him, according to a recording of the conversation.

Mr. Peters filed a discrimination claim with the federal Equal Employment Opportunity Commission and the civil rights division of the Arizona attorney general's office, accusing JPMorgan of racial discrimination. JPMorgan denied that and said Mr. Peters was fired for improperly assigning credit for a new client to an employee who managers didn't think deserved it.

"We stand by our decision to terminate Peters," Ms. Wexler, the spokeswoman, said. "The facts are indisputable."

Mr. Peters disputed the facts. He said that he had given credit to the correct employee. He said the bank was using a mundane internal dispute as an excuse to fire him. He has since started his own investment advisory firm in Arizona.

## **'If This Dude Gets Upset'**

Mr. Peters's termination left Mr. Kennedy in the lurch. A number of his transactions were frozen or not carried out. In one case, \$92,000 of Mr. Kennedy's money that was supposed to go into a new investment product ended up in a holding account, inaccessible to Mr. Kennedy. (Ms. Wexler said the problems were caused by administrative errors.)

JPMorgan assigned him a new financial adviser, Mr. Belton. He struck Mr. Kennedy as inexperienced. He was black, and Mr. Kennedy felt that was the only reason they'd been paired. Mr. Kennedy said he began recording their conversations so he could get feedback from other people about Mr. Belton's financial recommendations.

Mr. Kennedy had been under the impression that he had been granted the coveted "private client" status that Mr. Peters had promised. When Mr. Kennedy learned that was not the case, he complained to Mr. Belton — and then to Mr. Venniro.

Mr. Belton warned Mr. Kennedy not to talk to Mr. Venniro again. In two secretly recorded conversations in October last year, he asked Mr. Kennedy to think about the impression he left on people at the bank. He pointed out that Mr. Kennedy was a big black man in Arizona. And he said that Mr. Venniro had been afraid to tell Mr. Kennedy that his application to become a private client had been deleted when Mr. Peters was fired.

A few days later, Mr. Kennedy went back to the branch, and the conversation returned to the question of why the bank refused to grant Mr. Kennedy the status and perks of being a private client.

Mr. Belton said that bank employees were scared of dealing with him and that therefore Mr. Kennedy would be better off interacting only with Mr. Belton.

“They’re not going to say this, but I don’t have the same level of intimidation that they have — you know what I’m saying? — not only being a former athlete but also being two black men,” Mr. Belton said. Referring to Mr. Venniro, he added, “You sit in front of him, you’re like three times his size — you feel what I’m saying? — he already probably has his perception of how these interactions could go.”

Moments later, he said: “We’ve seen people that are not of your stature get irate, and it’s like, ‘Well, if this dude gets upset, like what’s going to happen to me?’”

Mr. Kennedy asked if Mr. Belton was saying that Mr. Venniro was racist. “I don’t think any person at that level is dumb enough for it to be that blatant,” Mr. Belton replied. “I don’t have any reason to believe blatantly that he’s that way. You feel what I’m saying? Now, whether there’s some covert action? To be honest? I always err on the side of thinking that. You know, people that are not us probably have some form of prejudice toward us.”

Mr. Kennedy pulled most of his money out of JPMorgan and filed a grievance with an industry watchdog, and in June the bank sent him a letter trying to put an end to his complaining.

“You stated that Mr. Belton informed you that our firm was prejudiced against you and intimidated by you because of your race,” the letter said. “We found no evidence to substantiate your allegations.”

*A correction was made on Dec. 11, 2019: An earlier version of this article mischaracterized comments by a JPMorgan spokeswoman about the bank's handling of accusations from a customer and an employee. She defended the overall treatment of Mr. Peters and Mr. Kennedy; she did not deny that the bank had discriminated against them.*

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When we learn of a mistake, we acknowledge it with a correction. If you spot an error, please let us know at [nytnews@nytimes.com](mailto:nytnews@nytimes.com). [Learn more](#)

**Emily Flitter** covers banking and Wall Street. Before joining The Times in 2017, she spent eight years at Reuters, writing about politics, financial crimes and the environment. [More about Emily Flitter](#)

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A version of this article appears in print on , Section B, Page 1 of the New York edition with the headline: This Is What Racism Sounds Like in Banking

# **EXHIBIT B**

# *What Counts as Race Discrimination? A Suit Against JPMorgan Is a Test*

A former employee accuses JPMorgan Chase of failing to stop what she said was racially driven bullying. The bank says race had nothing to do with it.



By Emily Flitter

Oct. 27, 2020

Over 18 years of working as a secretary at JPMorgan Chase, Wanda Wilson had learned to brush aside remarks directed at her race.

“Wanda, do you mind if I tell a Black joke?” a colleague once asked her. Another co-worker told her that she disliked Black people in general but made an exception for Ms. Wilson.

Ms. Wilson saw no reason to complain. JPMorgan had been a good employer, giving her opportunities to rise through the secretarial ranks and providing assistance during a fraught time in her personal life. She felt proud defending her career to her family, which included several prominent civil rights activists. (Her mother is the poet Amina Baraka, and her stepfather was Amiri Baraka, the playwright and poet. Her younger brother is Ras Baraka, the mayor of Newark.)

But things soured in 2016 after a new colleague began to bully Ms. Wilson and order her around, according to a lawsuit Ms. Wilson filed against JPMorgan and its chief executive, Jamie Dimon. For the first time, Ms. Wilson felt that she was not on equal footing with her white colleagues, according to the suit. She complained to JPMorgan officials, but the bank’s response shattered her faith in her employer,

she said. After she was unable to find a different job within JPMorgan, the bank fired her. She then sued, alleging race discrimination and retaliation and seeking an unspecified amount in damages.

JPMorgan said its officials had done everything in their power to make things right for Ms. Wilson. “The firm denies that it engaged in any race discrimination or harassment or retaliation with respect to Ms. Wilson’s employment,” said Joe Evangelisti, a JPMorgan spokesman.

The bank tried to have the lawsuit, filed in 2018, dismissed. This month, a judge ruled that the two sides should engage in mediation instead.

Wall Street has come under growing scrutiny for how it treats people of color, and Black employees in particular. Last year, The New York Times detailed allegations of racism at Phoenix-area branches of JPMorgan. Recently, a former head of global diversity at Morgan Stanley, a Black woman, sued the bank for discrimination.





Two Black employees at JPMorgan said race was a constant undertone in their interactions with non-Black employees. Seth Wenig/Associated Press

But while such cases claim broad and systemic discrimination involving banks, Ms. Wilson’s lawsuit tells the complicated story of interactions between co-workers that can carry racist undertones. It shows how allegations of racism in a workplace can be difficult to verify, even when a company conducts an investigation. That’s especially so in the absence of explicit language or actions — such as a racial slur or blackface — that are easily identifiable as racist.

“This isn’t the ’60s or the ’50s,” said David Carlor, a financial adviser who is Black. “No one’s going to tell you: ‘Because you’re Black, go get us coffee.’ You’re just going to find that you’re the one that’s being treated most disrespectfully in the office.”



**Sign up for the Race/Related Newsletter** Join a deep and provocative exploration of race, identity and society with New York Times journalists. [Get it sent to your inbox.](#)

At JPMorgan, Ms. Wilson was often the first to arrive and the last to leave, according to three of her former colleagues, who spoke on the condition of anonymity. She got lunch and coffee for her superiors and ran errands that seemed well outside her job description, like buying a mirror for her boss's office.

In March 2016, Ms. Wilson joined the audit department as an executive administrative assistant — a coveted position among secretaries because it involved handling duties for one senior executive in that department.

Around the same time, Janet Jarnagin was also assigned to Ms. Wilson's boss as a team leader. A midlevel executive, Ms. Jarnagin's duties included helping the audit department prepare presentations and reports, according to a publicly available résumé.

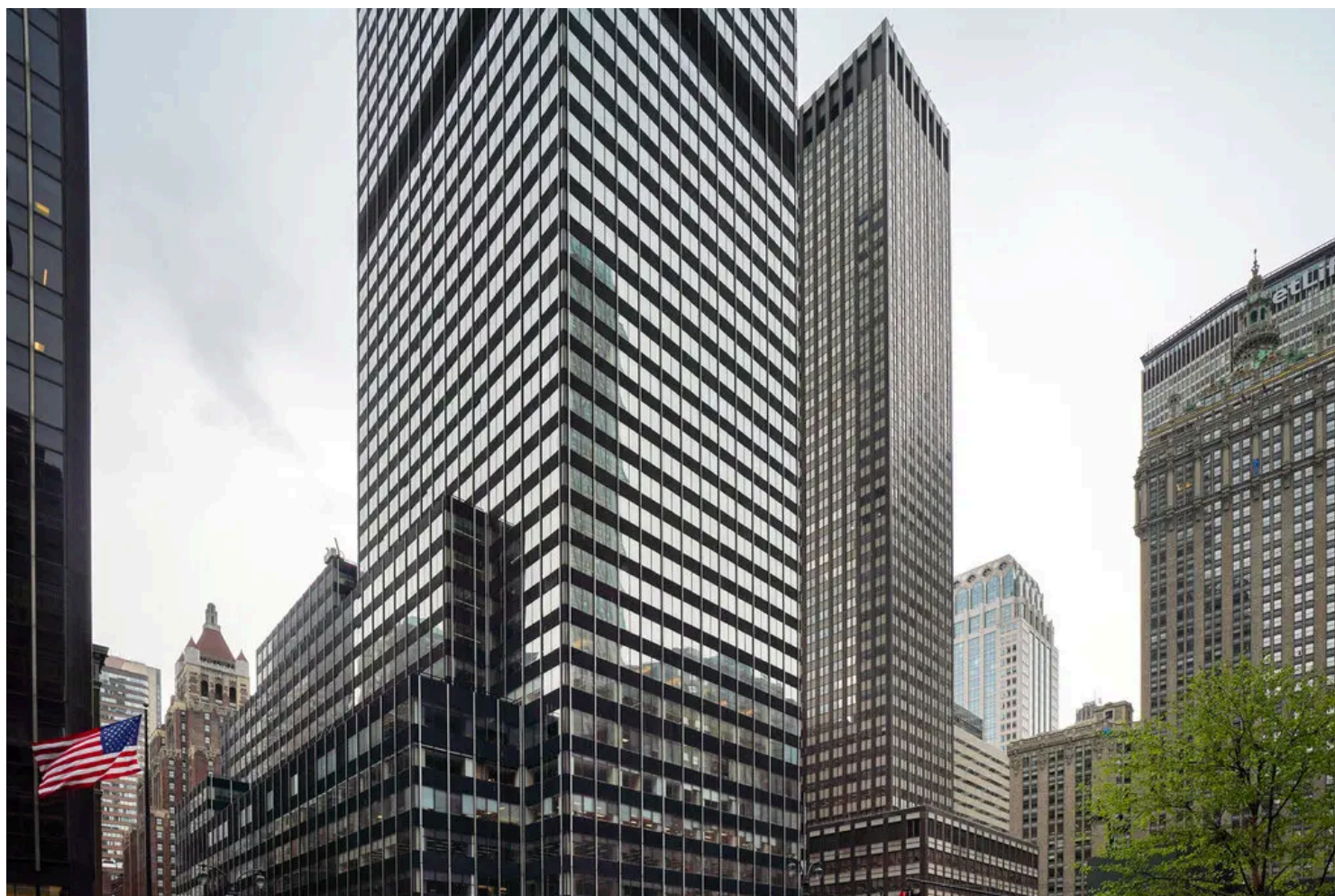
Over the next few months, Ms. Jarnagin began ordering Ms. Wilson to hang coats, get coffee and lunch, or carry out requests — such as making photocopies — by visitors to the department, according to the lawsuit.

Once, Ms. Jarnagin stood up from her desk and announced that she was “sending Wanda out for coffee,” asking if anyone else wanted to place an order with her. Other Black secretaries who had overheard Ms. Jarnagin later teased Ms. Wilson about being treated like Kizzy, an enslaved character in the book and television mini-series “Roots.”

Ms. Wilson said that she asked Ms. Jarnagin not to use the term “sending” any more, but that Ms. Jarnagin ignored her. Ms. Wilson described the incident in a 2017 interview with a JPMorgan official, a recording of which she provided to The Times.

In her lawsuit, Ms. Wilson described how Ms. Jarnagin had been making these demands only of her — the lone Black secretary in the vicinity. She tried to distance herself. When she rearranged her desk so that the two women no longer had an unobstructed view of each other, Ms. Jarnagin mocked her for trying to build a “Mexican wall” out of a stack of folders on her desk, according to the lawsuit.

Ms. Wilson complained about Ms. Jarnagin to their boss, who told her to work things out on her own, according to the complaint. She then told a human resources representative that Ms. Jarnagin was ordering her around and bad-mouthing her work. JPMorgan’s Mr. Evangelisti said the bank had begun investigating Ms. Wilson’s complaints immediately.



Ms. Wilson’s lawsuit says a colleague at the Manhattan office singled her out for demands, like “sending” her out for coffee. Chang W. Lee/The New York Times

Henry Klingeman, a lawyer for Ms. Jarnagin, dismissed the allegations. “In the high-intensity, high-stress world of New York banking, Janet was no more rude than a male employee who is assertive,” he said in an email. “That she asked an administrative assistant to get coffee for senior management is one of the criticisms made against her. There is nothing to this, much less implied racism.”

Ms. Wilson eventually emailed Mr. Dimon: “I have followed the chain of command and have not received any assistance.” Mr. Dimon did not personally respond, but her complaint was promptly shared with senior bank officials who stepped up their investigation.

Bank officials interviewed people in the immediate vicinity of Ms. Wilson and Ms. Jarnagin, two people familiar with the investigation said. The investigators determined that Ms. Jarnagin had behaved rudely toward Ms. Wilson. However, since Ms. Jarnagin had been rude in the past to other employees who were not Black, they concluded that her behavior was not racially motivated, the people said.

Mr. Evangelisti said the officials’ conclusions had been “based on information provided by Ms. Wilson at the time.”

Ms. Jarnagin was given two “coaching” sessions, including one by her boss, the people said. She was never formally disciplined, but was advised to treat Ms. Wilson more gently, they said. Ms. Jarnagin left JPMorgan in November 2017.

JPMorgan officials also did a broader “climate study” of the area where Ms. Wilson worked, the people familiar with the matter said. The study concluded that there did not appear to be a problem with racism.

However, two Black employees interviewed for the study, who did not want to be identified for fear of retaliation, told The Times that race was a constant undertone in their interactions with non-Black employees. One said Black secretaries felt it was harder for them to get promotions, and they believed they were underpaid. But the Black employees said they downplayed the racism they witnessed to bank officials, partly because it wasn’t directed at them.

JPMorgan officials have recently acknowledged that some employees still do not feel safe speaking up. In March, the bank announced that it had reviewed its anti-discrimination practices and identified several areas for improvement.

Things didn't improve for Ms. Wilson after her complaint.

Mr. Evangelisti said JPMorgan gave her nearly a year to search for a new job inside the bank as well as a raise and bonus during that time. Ms. Wilson said the only job the bank offered her was a role working for a man who had become enraged at her over a disagreement with her boss when she worked in the audit department.

Mr. Evangelisti said the role would have come with the same title, grade and compensation as her prior job, "but Ms. Wilson declined the role and refused to provide any context about an 'unpleasant exchange' she claims to have had."

**Emily Flitter** writes about finance and how it impacts society. More about Emily Flitter

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A version of this article appears in print on , Section B, Page 3 of the New York edition with the headline: Case Against JPMorgan Will Test What Counts as Race Discrimination



CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Dr. LaQuan Dyce

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Mesidor PLLC
600 Fifth Avenue, 2nd Floor
New York, NY 10020
(315) 847 - 5174

DEFENDANTS

JP Morgan Chase

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Morgan, Lewis & Bockius LLP
502 Carnegie Center
Princeton, NJ 08540

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Personal Injury, Real Property, Labor, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1981, 42 U.S.C. § 12112, 29 U.S.C. §§ 2601
Brief description of cause: Race and Gender Discrimination, Retaliation; Disability Discrimination; Family Medical Leave Act Interference

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 13,000,000 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 03/20/25 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket. **PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.