SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

1440 NEW YORK AVENUE, N.W. WASHINGTON, D.C. 20005-2111

TEL: (202) 371-7000 FAX: (202) 393-5760 www.skadden.com

DIRECT DIAL
202-371-7180
DIRECT FAX
202-661-9010
EMAIL ADDRESS
BRIAN, BREHENY@SKADDEN, COM

December 17, 2024

FIRM/AFFILIATE OFFICES BOSTON CHICAGO HOUSTON LOS ANGELES NEW YORK PALO ALTO WILMINGTON BEIJING BRUSSELS FRANKFURT HONG KONG LONDON MUNICH PARIS SÃO PAULO SEOUL SHANGHAI SINGAPORE

TOKYO TORONTO

VIA STAFF ONLINE FORM

U.S. Securities and Exchange Commission Division of Corporation Finance Office of Chief Counsel 100 F Street, N.E. Washington, D.C. 20549

Re: Letter Submitted by

Matthew D. Pinnavaia

Ladies and Gentlemen:

This letter is submitted on behalf of JPMorgan Chase & Co., a Delaware corporation (the "Company"), pursuant to Rule 14a-8(j) promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"). The Company requests that the staff of the Division of Corporation Finance (the "Staff") of the U.S. Securities and Exchange Commission (the "Commission") not recommend enforcement action if the Company omits from its proxy materials for the Company's 2025 Annual Meeting of Shareholders (the "2025 Annual Meeting") the letter (the "Submission") submitted by Matthew D. Pinnavaia ("Mr. Pinnavaia").

This letter provides an explanation of why the Company believes it may exclude the Submission and includes the attachments required by Rule 14a-8(j). In accordance with relevant Staff guidance, we are submitting this letter and its attachments to the Staff through the Staff's online Shareholder Proposal Form. A copy of this letter also is being sent to Mr. Pinnavaia as notice of the Company's intent to omit the Submission from the Company's proxy materials for the 2025 Annual Meeting.

Rule 14a-8(k) and Section E of Staff Legal Bulletin No. 14D (Nov. 7, 2008) provide that shareholder proponents are required to send companies a copy of any

correspondence that the shareholder proponents elect to submit to the Commission or the Staff. Accordingly, we are taking this opportunity to remind Mr. Pinnavaia that if he submits correspondence to the Commission or the Staff with respect to the Submission, a copy of that correspondence should be furnished concurrently to the Company.

Background

On September 4, 2024, the Company received the Submission from Mr. Pinnavaia dated August 28, 2024. While the title of the Submission stated "A DOCUMENT TO THE SHAREHOLDERS" and "A shareholder resolution proposal," the Submission did not reference Rule 14a-8, the Company's annual meeting of shareholders or any other indication that Mr. Pinnavaia intended the Submission as a shareholder proposal to be included in the Company's proxy materials under Rule 14a-8.

Given the uncertainty regarding Mr. Pinnavaia's intent, on September 16, 2024, the Company sent a letter to Mr. Pinnavaia, via email, identifying certain deficiencies under both Rule 14a-8 and the Company's By-laws if the Submission were intended to be submitted for consideration at the 2025 Annual Meeting (the "Deficiency Letter"). Specifically, with respect to the requirements under Rule 14a-8, the Deficiency Letter requested (i) a written statement from the record holder of Mr. Pinnavaia's shares verifying that Mr. Pinnavaia had beneficially owned the requisite number of shares of the Company's common stock continuously for at least the requisite period preceding and including the date of submission of the Submission; (ii) clarification for which meeting of Company shareholders the Submission was submitted: (iii) a written statement that Mr. Pinnavaia intends to continue to hold the requisite amount of the Company's common stock through the date of the shareholders' meeting for which the Submission is submitted; and (iv) a written statement from Mr. Pinnavaia with respect to his ability to meet with the Company regarding the Submission in accordance with Rule 14a-8(b)(1)(iii). With respect to the requirements under the Company's By-laws, the Deficiency Letter referenced the relevant section of the Company's By-laws as well as the Company's 2024 proxy statement filed with the Commission.

On September 27, 2024, the Company received a letter from Mr. Pinnavaia dated September 25, 2024 (the "Second Submission") stating, among other things, Mr. Pinnavaia's "status as a legal shareholder of the JP Morgan Chase & Company," accompanied by what appears to be an excerpt from an account statement from E*TRADE for the period of July 1-31, 2024, purporting to verify Mr. Pinnavaia's stock ownership (the "Account Statement"). The Second Submission did not include a statement that Mr. Pinnavaia intends to continue to hold the requisite amount of the Company's common stock through the date of the shareholders' meeting for which

the Submission is submitted and did not specify the business days and specific times that Mr. Pinnavaia was available to discuss the Submission with the Company. Notably, the Second Submission did not clarify whether Mr. Pinnavaia intended the Submission as a shareholder proposal to be included in the Company's proxy materials under Rule 14a-8 or to be considered at the 2025 Annual Meeting under the Company's By-laws.

Copies of the Submission, Deficiency Letter, the Second Submission and related correspondence are attached hereto as <u>Exhibit A</u>.

Summary of the Submission

The text of the Submission follows:

I hereby do propose to all shareholders of the JP Morgan Chase & Company a "Shareholder Resolution" which would be a corporate confession to the nation of Israel and would consist of a "Letter of Apology" to the nation of Israel and would consist of a special compensation fund in the financial amount of \$25 billion dollars to the nation of Israel. And, the corporate resignation of Chairman Dimon from the JP Morgan Chase & Company.

Bases for Exclusion

We hereby respectfully request that the Staff concur in the Company's view that it may exclude the Submission from the proxy materials for the 2025 Annual Meeting pursuant to Rule 14a-8(f)(1) because Mr. Pinnavaia has failed to satisfy the eligibility requirements of Rule 14a-8(b).

<u>Analysis</u>

A. The Submission May Be Excluded Pursuant to Rule 14a-8(f)(1) Because Mr. Pinnavaia Has Failed to Satisfy the Eligibility Requirements of Rule 14a-8(b).

Rule 14a-8(b)(1) provides that, in order to be eligible to submit a proposal, a shareholder must satisfy certain requirements. As demonstrated below, Mr. Pinnavaia failed to satisfy the eligibility requirements of Rule 14a-8(b)(1)(i), Rule 14a-8(b)(1)(ii) and Rule 14a-8(b)(1)(iii).

1. Mr. Pinnavaia failed to provide proof of the requisite continuous stock ownership.

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal, a proponent must have continuously held:

- at least \$2,000 in market value of the company's common stock for at least three years, preceding and including the date that the proposal was submitted;
- at least \$15,000 in market value of the company's common stock for at least two years, preceding and including the date that the proposal was submitted; or
- at least \$25,000 in market value of the company's common stock for at least one year, preceding and including the date that the proposal was submitted.

If the proponent is not a registered holder, he or she must provide proof of beneficial ownership of the securities. Under Rule 14a-8(f)(1), a company may exclude a shareholder proposal if the proponent fails to provide evidence that he or she meets the eligibility requirements of Rule 14a-8(b), provided that the company notifies the proponent of the deficiency within 14 calendar days of receiving the proposal and the proponent fails to correct the deficiency within 14 days of receiving such notice.

In addition, an account statement does not satisfy the requirements of Rule 14a-8(b)(1) because it fails to demonstrate continuous ownership of a company's securities for the requisite period. In Section C.1.c (2) of Staff Legal Bulletin No. 14 (July 13, 2001), the Staff addressed whether periodic investment statements, such as account statements, could satisfy the continuous ownership requirements of Rule 14a-8(b):

(2) Do a shareholder's monthly, quarterly or other periodic investment statements demonstrate sufficiently continuous ownership of the securities?

No. A shareholder must submit an affirmative written statement from the record holder of his or her securities that specifically verifies that the shareholder owned the securities *continuously* for a period of one year as of the time of submitting the proposal.

In accordance with these requirements, the Staff has on numerous occasions permitted exclusion under Rule 14a-8(f)(1) of proposals on the grounds that the brokerage statement or account statement submitted in support of a proponent's ownership was insufficient proof of such ownership under Rule 14a-8(b). See, e.g., FedEx Corp. (Jun. 28, 2018) (an account statement, broker trade confirmation and a list of stock transactions was insufficient verification of continuous ownership); PepsiCo, Inc. (Jan. 20, 2016) (account statement showing ownership of company shares as of a certain date was insufficient verification of continuous ownership); Int'l Business Machines Corp. (Jan. 31, 2014) (security record and position report showing ownership account names and a quantity of company shares held as of a certain date was insufficient verification of continuous ownership); E.I. du Pont de Nemours and Co. (Jan. 13, 2012) (one-page excerpt from proponent's monthly brokerage statement was insufficient proof of ownership); Verizon Communications *Inc.* (Jan. 25, 2008) (broker letter that provided current ownership of shares and original date of purchase was insufficient proof of ownership); General Motors Corp. (Apr. 5, 2007) (account summary was insufficient verification of continuous ownership); Yahoo! Inc. (Mar. 29, 2007) (account statements, trade confirmations, email correspondence, webpage printouts and other selected account information was insufficient to specifically verify continuous ownership); General Electric Co. (Jan. 16, 2007) (brokerage statement was insufficient to prove continuous ownership); Sky Financial Group (Dec. 20, 2004, recon. denied Jan. 13, 2005) (monthly brokerage account statement was insufficient proof of ownership); *Int'l* Business Machines Corp. (Jan. 11, 2005) (pages from quarterly 401(k) plan account statements was insufficient proof of ownership); Bank of America Corp. (Feb. 25, 2004) (monthly brokerage account statement was insufficient proof of ownership); RTI International Metals, Inc. (Jan. 13, 2004) (monthly account statement was insufficient proof of ownership).

In this instance, Mr. Pinnavaia failed to provide adequate evidence of eligibility to submit a shareholder proposal to the Company after receiving a timely deficiency notice from the Company. In this regard, on September 4, 2024, the Company received the Submission, which did not include any information relating to Mr. Pinnavaia's ownership of the Company's common stock. Accordingly, on September 16, 2024, the Company sent the Deficiency Letter to Mr. Pinnavaia, via email, timely notifying Mr. Pinnavaia of his failure to provide adequate proof of the

requisite stock ownership. The Deficiency Letter specifically referenced the ownership verification defect and explained how the deficiency could be cured, noting the requirements of Rule 14a-8(b)(1)(i). In particular, the Deficiency Letter requested a written statement from the record holder of Mr. Pinnavaia's shares "verifying that you beneficially held the requisite number of shares of JPMC common stock for the required holding period including August 28, 2024." The Deficiency Letter also requested that Mr. Pinnavaia furnish such written statement to the Company within 14 days of Mr. Pinnavaia's receipt of the Deficiency Letter. The Deficiency Letter was sent to Mr. Pinnavaia, via email, on September 16, 2024. Accordingly, to be timely, adequate proof of ownership would have needed to be received by the Company by September 30, 2024.

In response to the Deficiency Letter, on September 27, 2024, the Company received a letter from Mr. Pinnavaia dated September 25, 2024, accompanied by the Account Statement. However, the Account Statement does not provide sufficient evidence of Mr. Pinnavaia's continuous ownership of the Company's common stock for the requisite period, as brokerage statements or account statements, such as the Account Statement, are insufficient proof of continuous ownership under Rule 14a-8(b). Even if account statements generally could be deemed sufficient proof of continuous ownership (which they are not), the Account Statement here related to only the one month period of July 1 through 31, 2024, which falls short of the requisite holding period. Moreover, in the Account Statement, the information relating to Mr. Pinnavaia's ownership of the Company's common stock — including the number of shares owned — was redacted and thus did not establish Mr. Pinnavaia's ownership of the Company's common stock. Accordingly, Mr. Pinnavaia has failed to provide adequate proof of ownership. The Company did not receive any other purported proof of Mr. Pinnavaia's stock ownership.

2. Mr. Pinnavaia failed to provide a written statement of his intent to continuously hold the requisite amount of Company securities.

Rule 14a-8(b)(1)(ii) provides that, in order to be eligible to submit a proposal, a proponent must provide the company with a written statement that the proponent intends to continue to hold the requisite amount of company securities, through the date of the shareholders' meeting for which the proposal is submitted.

The Staff has consistently permitted exclusion under Rule 14a-8(f)(1) of stockholder proposals where a proponent failed to provide a written statement regarding their commitment to hold company securities through the date of the annual meeting as required by Rule 14a-8(b)(1)(ii). See, e.g., Getty Images Holdings, Inc. (May 2, 2023) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's intent to continue holding the requisite number of shares through the date of the annual

meeting after receiving the company's timely deficiency notice); *The Walt Disney Co.* (Jan. 12, 2022) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's intent to continue holding the requisite number of shares through the date of the annual meeting after receiving the company's timely deficiency notice); *The Walt Disney Co.* (Sept. 28, 2021)* (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's intent to continue holding the requisite number of shares through the date of the annual meeting after receiving the company's timely deficiency notice).

In this instance, Mr. Pinnavaia failed to respond to the Company's timely request to provide a written statement required under Rule 14a-8(b)(1)(ii). The Deficiency Letter notified Mr. Pinnavaia of the requirements of Rule 14a-8(b)(1)(ii) and how related deficiencies could be cured. In particular, the Deficiency Letter requested Mr. Pinnavaia to clarify for which meeting of Company shareholders the Submission was submitted, and provide a written statement that Mr. Pinnavaia intends to continue to hold the requisite amount the Company's common stock through the date of the shareholders' meeting for which the Submission is submitted. Mr. Pinnavaia's response to the Deficiency Letter did not include such statement.

3. Mr. Pinnavaia failed to provide a written statement of his availability to meet with the Company.

Rule 14a-8(b)(1) provides that, in order to be eligible to submit a proposal, a shareholder must provide a written statement that he or she is able to meet with the company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the shareholder proposal and include contact information as well as business days and specific times of availability to discuss the proposal that are within the regular business hours of the company's principal executive offices.

The Staff has consistently permitted exclusion under Rule 14a-8(f)(1) of stockholder proposals where a proponent failed to provide a written statement regarding their availability to meet with the company as required by Rule 14a-8(b)(1)(iii). See, e.g., Textron Inc. (Jan. 23, 2023) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's availability to meet with the company after receiving the company's timely deficiency notice); Molina Healthcare, Inc. (Jan. 17, 2023) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's availability to meet with the company after receiving the company's timely deficiency notice); Deere & Company

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^{*} Citations marked with an asterisk indicate Staff decisions issued without a letter.

(Dec. 5, 2022) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's availability to meet with the company that was compliant with Rule 14a-8(b)(1)(iii) after receiving the company's timely deficiency notice); *PPL Corp.* (Mar. 9, 2022) (permitting exclusion under Rule 14a-8(f)(1) of a proposal where the proponent failed to provide a statement regarding the proponent's availability to meet with the company after receiving the company's timely deficiency notice).

Here, the Deficiency Letter notified Mr. Pinnavaia of the requirements of Rule 14a-8(b)(1)(iii) and how related deficiencies could be cured. In particular, the Deficiency Letter requested Mr. Pinnavaia to provide a written statement that Mr. Pinnavaia is able to meet with the Company in person or via teleconference no less than 10 calendar days, nor more than 30 days, after submission of the Submission. Mr. Pinnavaia's response to the Deficiency Letter failed to provide such written statement.

Accordingly, because Mr. Pinnavaia has failed to satisfy the eligibility requirements of Rule 14a-8(b) after the Company timely provided the Deficiency Letter, which, consistent with Staff Legal Bulletin No. 14L (Nov. 3, 2021), identified the specific defects in the Submission, the Submission may be excluded pursuant to Rule 14a-8(f)(l).

Conclusion

On the basis of the foregoing, the Company respectfully requests the concurrence of the Staff that the Submission may be excluded from the Company's proxy materials for the 2025 Annual Meeting. If you have any questions or would like any additional information regarding the foregoing, please do not hesitate to contact me at (202) 371-7180. Thank you for your prompt attention to this matter.

Very truly yours,

Brian V. Breheny

Enclosures

cc: John H. Tribolati Corporate Secretary JPMorgan Chase & Co.

Matthew D. Pinnavaia

EXHIBIT A

(see attached)

A DOCUMENT TO THE SHAREHOLDERS A shareholder resolution proposal

JP Morgan Chase & Company

Jamie Dimon, Chairman of JP Morgan Chase & Company has rejected the most horrific chapter in world history - the destruction of European Jewry - "The Holocaust."

JP Morgan Chase & Company are directly and historically involved in the investments to an international company that was responsible for the formation Adolph Hitler and Nazi-Germany.

JP Morgan Chase & Company are therefore responsible for:

The Death Camps of Nazi-Germany:

1.	Auschwitz-Birkenau -	1.3 million	deaths
2.	Belzec	500,000	deaths
3.	Chelmo	152,000	deaths
4.	Majdanek	110,000	deaths
5.	Sobibor	170,000	deaths
6.	Treblinka	925,000	deaths

I hereby do propose to all shareholders of the JP Morgan Chase & Company a "Shareholder Resolution" which would be a corporate confession to the nation of Israel and would consist of a 'Letter of Apology" to the nation of Israel and would consist of a special compensation fund in the financial amount of \$25 billion dollars to the nation of Israel. And, the corporate resignation of Chairman Dimon from the JP Morgan Chase & Company.

Matthew David Pinnavaia Office of the Chairman

Anglo American DeBeers Ltd.

A shareholder in the JP Morgan Chase & Company 08.28.24.

[E-Mail > [Tel >]

"Dedicated to every innocent child, woman, and man who perished in – "The Holocaust."

JPMorganChase

John Tribolati Corporate Secretary Office of the Secretary

September 16, 2024

VIA EMAIL

Matthew David Pinnavaia Office of the Chairman Anglo American DeBeers Ltd.



Dear Mr. Pinnavaia:

I am writing to acknowledge receipt of your letter dated August 28, 2024 to JPMorgan Chase & Co. ("JPMC") (the "Letter") on September 4, 2024. We reviewed the Letter for compliance with the requirements set forth in Rule 14a-8 of the Securities Exchange Act of 1934, as amended, and JPMC's By-laws. As outlined below, we believe there are deficiencies with respect to both Rule 14a-8 and our By-laws.

Rule 14a-8

The Letter contains procedural deficiencies under Rule 14a-8, as set forth below, which Securities and Exchange Commission ("SEC") regulations require us to bring to your attention.

Ownership Verification

To demonstrate eligibility to submit a proposal, Rule 14a-8(b) provides that a shareholder must submit sufficient proof that it has continuously held at least (a) \$2,000 in market value of the company's securities entitled to vote on the proposal for at least three years, preceding and including the date that the proposal was submitted; (b) \$15,000 in market value of the company's securities entitled to vote on the proposal for at least two years, preceding and including the date that the proposal was submitted; or (c) \$25,000 in market value of the company's securities entitled to vote on the proposal for at least one year, preceding and including the date that the proposal was submitted.

JPMC's stock records do not indicate that you are the record owner of sufficient shares to satisfy this requirement. In addition, we have not received proof that you have satisfied the applicable ownership requirements as of August 28, 2024, the date the Letter was submitted to JPMC. Accordingly, you have not demonstrated your eligibility to submit a proposal pursuant to Rule 14a-8.

To remedy this defect, you must submit sufficient proof of ownership of JPMC common

stock. Please provide a written statement from the record holder of your shares of JPMC common stock (usually a broker or a bank) and a participant in the Depository Trust Company ("DTC"), or an affiliate of the DTC participant, verifying that you beneficially held the requisite number of shares of JPMC common stock for the required holding period including August 28, 2024.

In order to determine if the bank or broker holding your shares is a DTC participant, you may check the DTC's participant list at http://www.dtcc.com/client-center/dtc-directories. If the bank or broker holding your shares is not a DTC participant or an affiliate of a DTC participant, you also will need to obtain proof of ownership from the DTC participant or affiliate of the DTC participant through which the shares are held. You should be able to identify the DTC participant or affiliate of the DTC participant by asking your broker or bank. If the DTC participant or affiliate of the DTC participant knows your broker or bank's holdings, but does not know your holdings, you may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, preceding and including the date you submitted the Letter, the required amount of shares were continuously held for the required holding period – with one statement from your broker or bank confirming your ownership, and the other statement from the DTC participant or affiliate of the DTC participant confirming the broker or bank's ownership.

Statement of Continuous Ownership

In addition, Rule 14a-8(b) provides that a shareholder must provide the company with a written statement that it intends to continue to hold the requisite amount of shares, as determined in accordance with Rule 14a-8(b)(1)(i)(A)-(C), through the date of the shareholders' meeting for which the proposal is submitted. You have not provided such a statement.

To remedy this defect, you must clarify for which meeting of JPMC shareholders the Letter was submitted, and provide a written statement that you intend to continue to hold the requisite amount of shares through the date of that meeting.

Engagement Availability

Rule 14a-8(b) provides that a shareholder must provide the company with a written statement that the shareholder is able to meet with the company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the shareholder proposal. You have not provided such a statement.

To remedy this defect, you must identify specific times that you are available to discuss a proposal with JPMC. You must identify times between 9 a.m. and 5:30 p.m. (ET) no less than 10 calendar days and no more than 30 calendar days after August 28, 2024.

Proposal by Proxy

Rule 14a-8(b) also requires that a shareholder proponent using a representative to submit a shareholder proposal on his or her behalf provide written documentation that:

- identifies the company to which the proposal is directed;
- identifies the annual or special meeting for which the proposal is submitted;
- identifies the proponent and the person acting on the proponent's behalf as a representative;

- includes the proponent's statement authorizing the designated representative to submit the proposal and otherwise act on the proponent's behalf;
- identifies the specific topic of the proposal to be submitted;
- includes the proponent's statement supporting the proposal; and
- is signed and dated by the proponent.

To the extent that you intend to submit the "Shareholder Resolution" included in the Letter on behalf of another proponent, the Letter is inconsistent with the requirements set forth above because it fails to identify the annual or special meeting for which the proposal is submitted; fails to identify the proponent and the person acting on the proponent's behalf as a representative; does not provide a statement authorizing the designated representative to submit the proposal and otherwise act on the proponent's behalf; does not include the proponent's statement supporting the proposal; and is not signed and dated by the proponent. We note that your relationship with Anglo American DeBeers Ltd. is unclear.

To remedy these defects, you must submit a sufficient delegation of authority by the shareholder proponent.

For a proposal to be eligible for inclusion in JPMC's proxy materials for a meeting of JPMC's shareholders, the rules of the SEC require that a response to this letter, correcting all procedural deficiencies described in this letter, be postmarked or transmitted electronically no later than 14 calendar days from the date you receive this letter.

JPMorgan Chase & Co. By-laws

Your Letter also fails to comply with JPMC By-laws in material respects, including the advance notice requirements set forth in Section 1.09. Please refer to the JPMC By-laws, and for proposals to be submitted at JPMC's 2025 Annual Meeting of Shareholders, please refer to our 2024 Proxy Statement filed with the SEC on April 8, 2024, which is also available at https://www.jpmorganchase.com/ir/annual-report.

For your reference, please find enclosed a copy of Rule 14a-8 and the JPMC By-laws.

If you have any quest	ions with respect to th	ne foregoing, p	lease contact me.	Please address any
response via email to				

Sincerely,

Enclosures:

Rule 14a-8 under the Securities Exchange Act of 1934

By-laws of JPMorgan Chase & Co., Effective September 19, 2023

Anglo American DeBeers Ltd

September 25, 2024.

Stacy Friedman
Office of the General Counsel
JP Morgan Chase & Company

Letter of Answer to a letter from JP Morgan Chase & Company Office of the Corporate Secretary – Mr. John Tribolati.

General Counsel Stacy Freidman:

Good morning.

As a shareholder in the JP Morgan Chase & Company, I have received and reviewed a letter from the Office of the Corporate Secretary of the JP Morgan Chase & Company - Mr. John Tribolati - (Exhibit 1) which was a response to a document that I had sent to the Office of the Chairman of the JP Morgan Chase & Company - Mr. Jamie Dimon - and to the Board of Directors. The letter of Mr. John Tribolati is hereby refused.

I hereby do allege that the JP Morgan Chase & Company is in direct violation of the U.S. Securities and Exchange Commission "Fair Disclosure Regulation FD", when the JP Morgan Chase & Company did "dismiss" my letter to Chairman Dimon regarding the historical company lineage of the JP Morgan Chase & Company as does relate to a business involvement with Sir Ernest Oppenheimer and the Anglo American corporation and Adolph Hitler and the Third Reich - (Exhibit 2). This letter which does allegedly reveal monumental "moral defects" in the executive corporate leadership of the JP Morgan Chase & Company was not addressed properly by the JP Morgan Chase and Company and the JP Morgan Chase & Company certainly and factually did not legally inform the shareholders of this matter which could not only lead to a permanent "moral stain" upon the corporate image of the JP Morgan Chase & Company, but also could lead to the negative disposition of shareholder assets of the JP Morgan Chase & Company to resolve this matter in a legally fair and equitable manner for all of the concerned parties.

As does pertain to the questions as posed by the Corporate Secretary of the JP Morgan Chase & Company - Mr. John Tribolati – regarding my status as a legal shareholder of the JP Morgan Chase & Company - please refer to (Exhibit 3).

As does pertain to my corporate background, I am the Chairman of the Anglo American DeBeers Ltd corporation – please refer to (Exhibit 4).

Due to the extraordinarily inquisitive nature of the Corporate Secretary of the JP Morgan Chase & Company - Mr. John Tribolati — which I believe to be an arrogant and belligerent corporate tone of voice, may I remind the Office of the Chairman of the JP Morgan Chase & Company and may I remind the "Board of Directors" of the JP Morgan Chase & Company that if they continue to allegedly "violate" the fiduciary trust of the shareholders of the JP Morgan Chase & Company, then I shall proceed in a legal manner under the U.S. "Dodd - Frank Wall Street Reform Act — U.S.C. 5301/Public Law 111-203/111th U.S. Congress", to address the alleged corporate malfeasance of the JP Morgan Chase & Company toward its shareholders in conjunction with the "legal-right" that I do posses as a "shareholder" in the JP Morgan Chase & Company to contact the shareholders (Institutional Investor Shareholders) in the JP Morgan Chase & Company.

I hereby do remain in a "state of shareholder diplomacy" to resolve this matter as does pertain to the corporate health and welfare of both the shareholders of the JP Morgan Chase & Company and as does pertain to the health and welfare of the JP Morgan Chase & Company.

Matthew Imaroi

Matthew D. Pinnavaia

Thank you for your time.

Please refer all correspondence to:

Matthew D. Pinnavaia

[E-Mail > [Tel.]

Exhibits 1, 2 and 4 referenced in this Second Submission have been omitted as they are not relevant to the Company's no-action request. *See* the Staff's "Announcement Regarding Personally Identifiable and Other Sensitive Information in Rule 14a-8 Submissions and Related Materials" (Dec. 17, 2021), available at https://www.sec.gov/corpfin/announcement/announcement-14a-8-submissions-pii-20211217. For the avoidance of doubt, the Company only redacted account numbers in the purported proof of ownership included as Exhibit 3 to this Second Submission.

EXHIBIT 3

E*TRADE

from Morgan Stanley

CLIENT STATEMENT | For the Period July 1-31, 2024

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Account Detail

Self-Directed Brokerage Account

MATTHEW D PINNAVAIA



STOCKS

COMMON STOCKS

Morgan Stanley & Co. LLC (Morgan Stanley) and Morningstar, Inc.'s equity research ratings are shown for certain securities. These ratings represent the opinions of the research provider and are not representations or guarantees of performance. The applicable research report contains more information regarding the analyst's opinions, analysis, and rating, and you should read the entire research report and not infer its contents. For ease of comparison, Morgan Stanley and Morningstar, Inc.'s equity research ratings have been normalized to a 1 (Buy), 2 (Hold), and 3 (Sell). Refer to your June or December statement for a summary guide describing the ratings. We do not take responsibility for, nor guarantee the accuracy, completeness, or timeliness of research prepared for Morningstar, Inc.

TOTAL VALUE	100.00%					\$6.26	1.93%
	Percentage of Holdings		Total Cost	Market Value	Unrealized Gain/(Loss)	Est Ann Income Accrued Interest	Current Yield %
STOCKS	86.71%					****	
	Percentage of Holdings	_	Total Cost	Market Value	Unrealized Gain/(Loss)	Est Ann Income	Current Yield %
Rating: Morgan Stanley: 1, Morningstar: 3; Ne	Total at Dividend Payable 10/2024: Asset Class: Equities		410 			****	
JPMORGAN CHASE & CO (JPM) Reinvestments	Purchases (Man)	212.800		Alimos Shaka	Titolii 1486		
ANGLO AMERICAN PLC (AAUKF) Next Dividend Payable 11/2024; Asset Class:	Equities				Hilama)		illis
Security Description	Quantity	Share Price	Total Cost	Market Value	Unrealized Gain/(Loss)	Est Ann Income	Current Yield %

Unrealized Gain/(Loss) totals only reflect positions that have both cost basis and market value information available. Cash, MMF, Deposits and positions stating 'Please Provide' or 'Pending Corporate Actions' are not included.

ALLOCATION OF ASSETS

	Cash	Equities	Fixed Income & Preferred Securities	Alternatives	Structured Investments	Other
Cash, BDP, MMFs	\$666				_	
Stocks	-	Sibinbo			_	
TOTAL ALLOCATION OF ASSETS		Sitting	_			_

CLIENT STATEMENT | For the Period July 1-31, 2024

from Morgan Stanley

Page 7 of 8

Account Detail

Self-Directed Brokerage Account

MATTHEW D PINNAVAIA

ACTIVITY

CASH FLOW ACTIVITY BY DATE

Activity	Settlemer	nt			20	NO. 100	
Date	Date	Activity Type	Description	Comments	Quantity	Price	Credits/(Debits)
7/31		Qualified Dividend	JPMORGAN CHASE & CO				
7/31		Dividend Reinvestment	JPMORGAN CHASE & CO	ACTED AS AGENT			(
	100000000			DIVIDEND REINVESTMENT			

NET CREDITS/(DEBITS)

\$0.00

Purchase and Sale transactions above may have received an average price execution. Details regarding the actual prices are available upon request.

MESSAGES

Senior Investor Helpline

For any inquiries or potential concerns, senior investors or someone acting on their behalf may contact our Firm by calling (800) 280-4534.

Important: Options Disclosure Document Updated

The Options Clearing Corporation (OCC) has published an updated Options Disclosure Document, summarizing the characteristics and risks of trading standardized options.

You can view the updated document at https://www.theocc.com/Company-Information/Documents-and-Archives/Options-Disclosure-Document.

If you would like a paper copy, please contact us.