

# APPENDIX VOLUME III OF III

## TO THE REPORT OF INVESTIGATION INTO ALLEGATIONS OF SEXUAL HARASSMENT BY GOVERNOR ANDREW M. CUOMO



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL  
LETITIA JAMES

Anne L. Clark  
Yannick Grant

Joon H. Kim  
Jennifer Kennedy Park  
Abena Mainoo  
Rahul Mukhi

Vladeck, Raskin & Clark, P.C.

Cleary Gottlieb Steen & Hamilton LLP

**August 3, 2021**

# EXHIBIT 75

To: Richard Azzopardi [REDACTED]  
From: Alphonso David [REDACTED]  
Sent: Fri 12/11/2020 11:23:09 AM Eastern Standard Time  
Subject: Documents  
Attachment: [REDACTED]  
Attachment: [REDACTED]  
Attachment: [REDACTED]  
Attachment: [REDACTED]

---

Privileged and confidential  
Attorney client communication  
Per request, these are the only relevant documents I have which should be appear in the official counsel file.

Sent from [Mail](#) for Windows 10

# EXHIBIT 76

**Conversation Among Peter Ajemian, Melissa DeRosa, Brendan Lyons, Casey Seiler, and Beth Garvey (Possibly) – Excerpt**

**March 13, 2021**

*This transcript has been prepared by the investigative team and reflects an attempt to best capture the substance of the conversations. The exact words reflected in the transcript may not always be accurate. We have also endeavored to identify the names of individuals on the recordings, but this information may not always be accurate.*

**DeRosa:** Can I send you something off the record?

**Seiler:** Ugh, no, no! Not off the record.

**Lyons:** I don't want that because, you know, I had one of your people trying to send me Boylan's personnel record, and I didn't want that either. I just don't think—

**DeRosa:** You know, that's fine. I'll send you on the record but can we agree jointly that you won't publish it unless I'm ok with it?

**Seiler:** Why would you send it to us unless you're not ok with us . . . ?

**DeRosa:** So that Brendan can see context.

**Seiler:** No, don't send us anything unless it's on the record, Melissa, ok?

**DeRosa:** I'm fine to send it on the record.

**Seiler:** Great.

**DeRosa:** Brendan, are you in front of your email?

**Lyons:** I am.

**DeRosa:** Beth, speak now or forever hold your peace.

**Unknown speaker [possibly Beth Garvey]:** Melissa, I have no idea what you're sending, so the idea that I'm going to bless whatever it is that you're about to do, but like, I'm just not, so do whatever you want against legal advice. At this point, I'm not sure why we're still on the call.

**DeRosa:** Alright. I will wait to talk to Beth before sending anything over. Anything else?

# EXHIBIT 77

1:29

LTE

< 791

BH

Bernadette >

Sun, Dec 13, 10:54 AM

Can i call you?

I'll call you in 5

Sorry on a walk missed you  
but yes

Sun, Dec 13, 12:14 PM

One sec on the phone

Sun, Dec 13, 1:36 PM

One second on the other line

Did you send the docs yet

Hey

ETA?

Call back in 10

Alright



iMessage



1:30

LTE

< 791

BH

Bernadette >

Call back in 10

Alright

Azzo is sending to you any minute

Good

Thanks

Print deadline is 5:30  
otherwise it's not making it in

Tweet has been up since 9 am

Azzo said he was sending  
I'll call him again

He won't pick up my calls so

This is really getting to be  
absurd

I just texted him!!



iMessage





# EXHIBIT 78

Date: Sunday, December 13 2020 10:36 AM

Subject: [Chat #3698]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

It's Bamberger Sorry to bug Can i call you when you have a second

----METADATA INFORMATION- ----

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 10:42 AM

Subject: [Chat#3699]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

Yeah, let's talk. Just give me a few minutes. I'll call you.

----METADATA INFORMATION----

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 10:55 AM

Subject: [Chat #3700]

From: Bamberger

To: [Redacted] [Dave Caruø];

---

K

----METADATA INFORMATION----

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 11:39 AM

Subject: [Chat#3701]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

We're going to have to write this soon, as it's picking up steam. Think the governor is going to address it?

----METADATA INFORMATION----

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 11:51 AM

Subject: [Chat#3702]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

Got it Working on that now

----METADATA INFORMATION----

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 11:52 AM

Subject: [Chat#3703]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

Please don't post without giving me a heads up Trying to get you something now

----METADATA INFORMATION----

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 11:53 AM

Subject: [Chat#3704]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

Will do.

----METADATA INFORMATION----

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118



Date: Sunday, December 13 2020 01:00 PM

Subject: [Chat#3705]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

We're holding this thing right now waiting for an on-the-record response. I probably can't keep it off the wire for much longer.

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 01:05 PM

Subject: [Chat#3706]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

K Standby

----METADATA INFORMATION----

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 01:35 PM

Subject: [Chat#3707]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

Hey, we've got to go out with what we have. We can update the story with more as it becomes available.

----METADATA INFORMATION----

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 01:37 PM

Subject: [Chat #3708]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

Just texted them again It's coming from Azzopardi

---METADATA INFORMATION---

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 01:37 PM

Subject: [Chat #3709]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

OK. We'll look for it. Thanks for your help.

---METADATA INFORMATION---

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 01:45 PM

Subject: [Chat #3710]

From: [REDACTED] Bamberger

To: [REDACTED] [Dave Caruso];

---

It's coming to you in minutes Going to you first Standby Hold if you can

---METADATA INFORMATION---

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 03:01 PM  
Subject: [Chat #3711]  
From: Bamberger  
To: [Redacted] [Dave Caruso];  
Attachments: IMG\_6802.jpeg

---

FYI From 2018

---METADATA INFORMATION---

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118



**Lindsey Boylan** ✓

@LindseyBoylan



Andrew Cuomo Is New York's Best  
Choice for Governor 🙌🙌👍👍

[nytimes.com/2018/11/01/opi...](https://nytimes.com/2018/11/01/opi...)

7:08 AM · Nov 4, 2018 · Twitter for iPhone





Date: Sunday, December 13 2020 03:05 PM

Subject: [Chat#3712]

From: Dave Caruso [REDACTED]

To: Bamberger [REDACTED]

---

I see that. Thank you.

---METADATA INFORMATION---

Device Owner:

[REDACTED] Bamberger, Rich

ICCID:

8914800005814979118

Date: Sunday, December 13 2020 03:13 PM

Subject: [Chat#3713]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

Are you good with paperwork

---METADATA INFORMATION---

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

**Date:** Sunday, December 13 2020 03:15 PM

**Subject:** [Chat#3714]

**From:** Dave Caruso [REDACTED]

**To:** Bamberger [REDACTED]

---

Just going through it now.

---METADATA INFORMATION---

**Device Owner:**

[REDACTED] Bamberger, Rich

**ICCID:**

8914800005814979118

Date: Sunday, December 13 2020 03:15 PM

Subject: [Chat #3715]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

K

---METADATA INFORMATION---

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Monday, December 14 2020 04:52 PM

Subject: [Chat #3717]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

Thanks for your time yesterday I owe you a weekend day back

---METADATA INFORMATION---

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

Date: Monday, December 14 2020 04:52 PM

Subject: [Chat #3718]

From: Bamberger

To: [Redacted] [Dave Caruso];

---

No worries Nothing urgent

---METADATA INFORMATION---

Device Owner:

[Redacted] Bamberger, Rich

ICCID:

8914800005814979118

# EXHIBIT 79

**Date:** Sunday, December 13 2020 11:15 AM

**Subject:** [Chat#11585]

**From:** Dani Lever [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Rich Bamberger]; + [REDACTED] [Melissa DeRosa];  
[REDACTED] [Rich Azzopardi];

---

Dana slowed down too. Did the off the record but also wants to see the stuff in file and would take that off record

-----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092





# EXHIBIT 80

**To:** zbudryk@thehill.com[zbudryk@thehill.com]

**From:** Richard Azzopardi[/O=NYEC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RAZZOPARTI]

**Sent:** Mon 12/14/2020 10:19:41 AM Eastern Standard Time

**Subject:** As discussed

**Attachment:** 202012131419.pdf

---



# EXHIBIT 81

**To:** Kramer, Marcia G[mgkramer@cbs2ny.com]

**From:** Richard Azzopardi[/O=NYEC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RAZZOPARTI]

**Sent:** Mon 12/14/2020 11:20:07 AM Eastern Standard Time

**Subject:** As discussed

**Attachment:** 202012131419.pdf

---

Last thing. Please don't show or post, (with the complainants redacted it looks weird.)



# EXHIBIT 82

**To:** Zack Fink[zack.fink@ny1news.com]

**From:** Richard Azzopardi[/O=NYEC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RAZZOPARTI]

**Sent:** Mon 12/14/2020 3:01:47 PM Eastern Standard Time

**Subject:** As discussed

**Attachment:** 202012131419.pdf

---



# EXHIBIT 83

**Date:** Tuesday, December 15 2020 03:30 PM  
**Subject:** [Chat#10215]  
**From:** Joshua Vlasto [REDACTED]  
**To:** [REDACTED] [Mike Gartland];  
**Attachments:** 202012131419.pdf

---

-----METADATA INFORMATION-----

**Device Owner:**  
[REDACTED] Josh Vlasto  
**ICCID:**  
8914800006264344092






# EXHIBIT 84

Start Date December 16, 2020 10:00:13 PM UTC

End Date December 16, 2020 10:01:03 PM UTC

Chat Account t  
 Melissa DeRosa [redacted] Annabel Walsh  
 [redacted] Dani Lever [redacted] Stephanie Benton  
 [redacted] Melissa DeRosa [redacted] Annabel Walsh  
 [redacted] Dani Lever [redacted]  
 Stephanie Benton [redacted] Dani Lever [redacted]  
 [redacted], Melissa DeRosa [redacted] Annabel Walsh  
 [redacted] Stephanie Benton [redacted]  
 Melissa DeRosa [redacted]

 Just sent u guys current op ed 22:00:13

[redacted] has agreed to do 22:00:23

Alphonso said if we need him he will do 22:00:31

[redacted] and [redacted] lookinh now 22:00:50

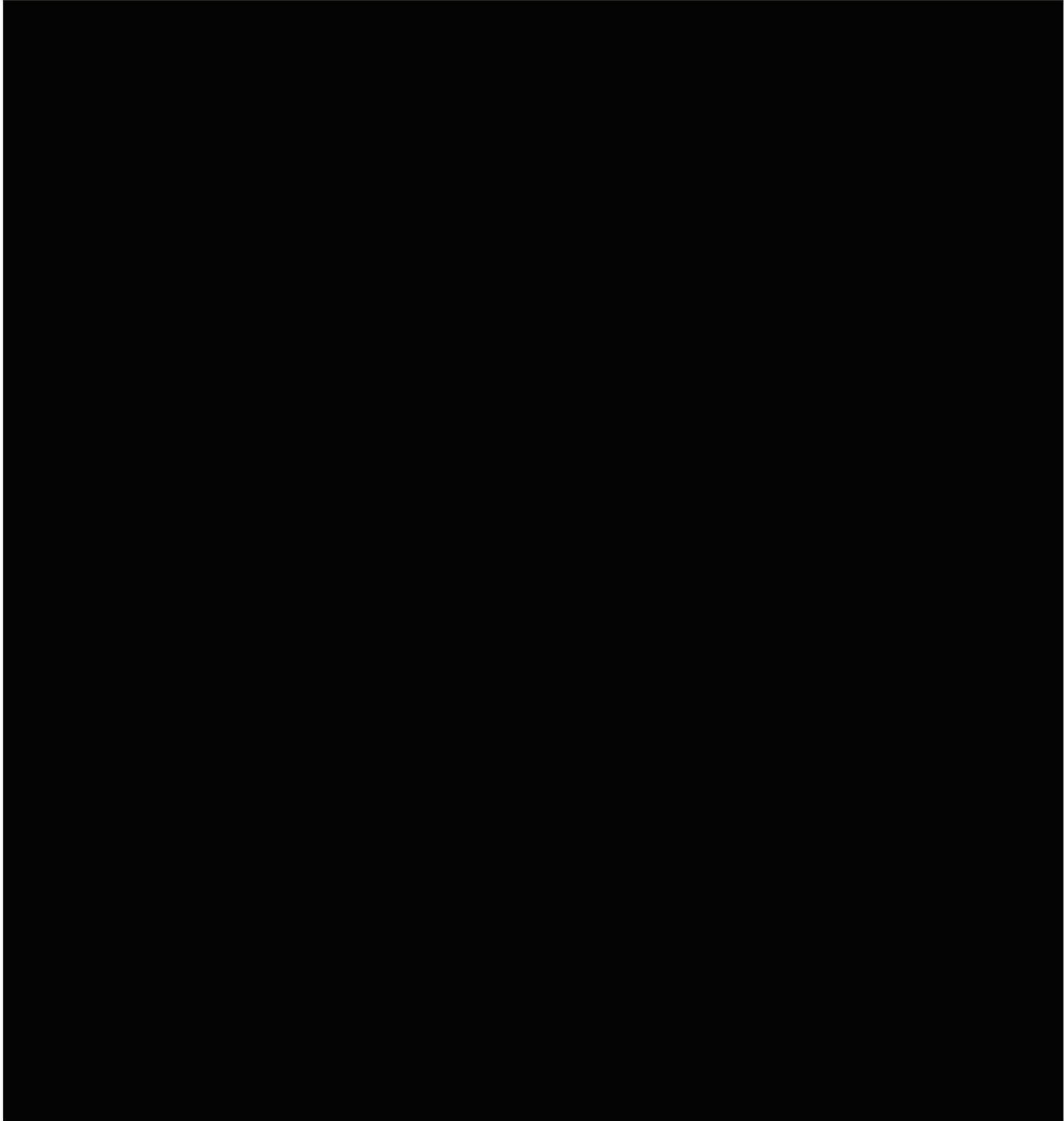
I wouldn't ask you guys if we weren't fighting for our lives 22:01:03

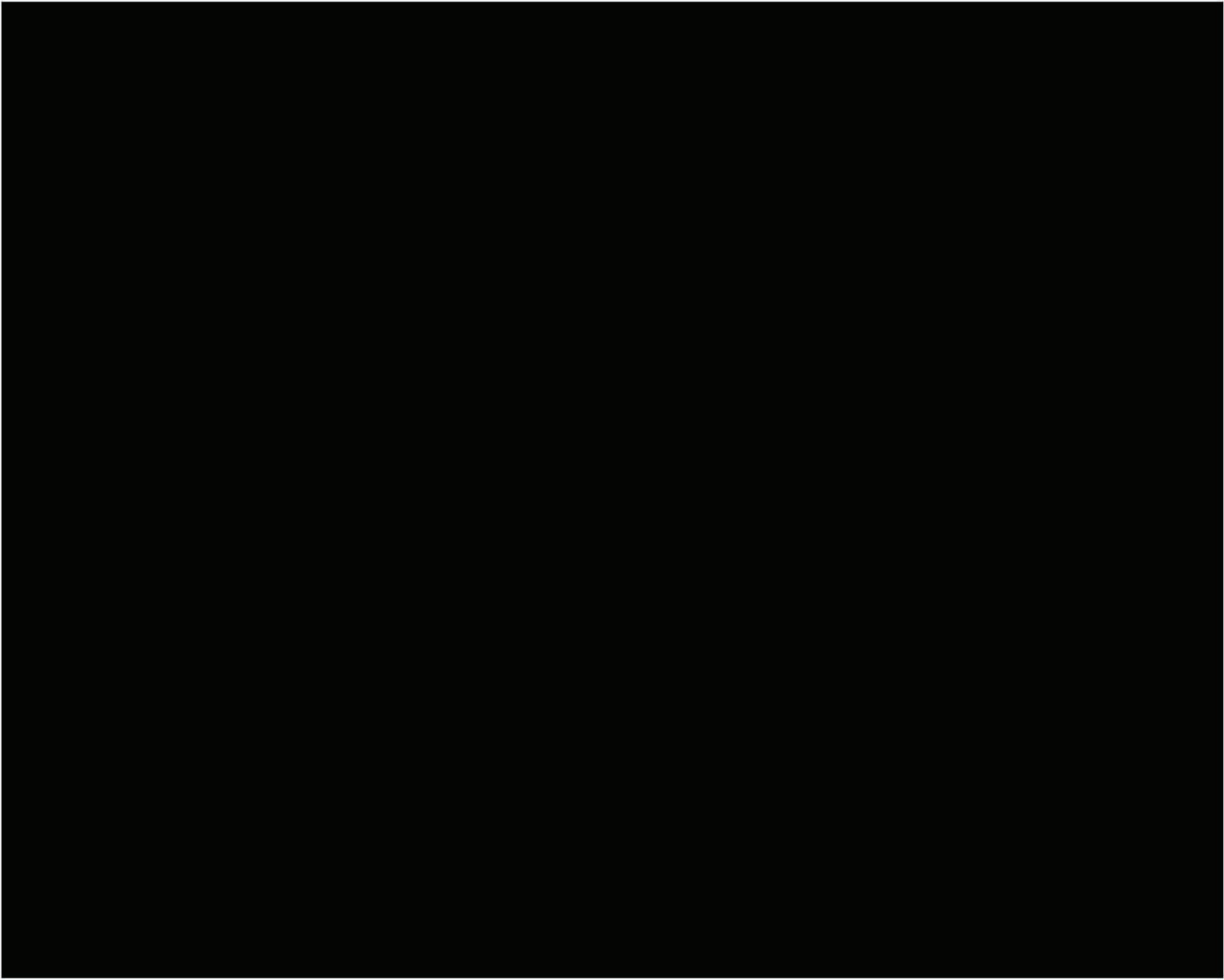


# EXHIBIT 85

---

**From:** Bernadette Hogan [REDACTED]  
**Sent:** Wednesday, March 17, 2021 12:19 PM  
**To:** Josh Vlasto [REDACTED]  
**Subject:** Copy of letter -- is this what you've seen



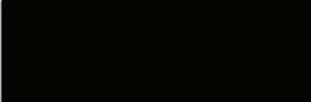


**BERNADETTE HOGAN**

**Albany Reporter, *New York Post***

LCA - PO Box 7269, New York State Capitol

Albany, NY 12224



# EXHIBIT 86

Message

---

**From:** Annabel Walsh [REDACTED]  
**on behalf of** Annabel Walsh [REDACTED]  
**Sent:** 12/17/2020 1:36:49 AM  
**To:** Melissa DeRosa [REDACTED]  
**Subject:** Re:

I know you know all of this and i love you and it's going to be okay.

- 1) don't do this (but i get it)
- 2) let this story die
- 3) why give her this insanely amazing platform, if i am running for office this is the best thing that has ever happened to me
- 4) do the tom brokaw letter if you have to do anythign



this entire thing is castigating her



why this is just attacking







# EXHIBIT 87

Message

---

**From:** Annabel Walsh [REDACTED]  
**on behalf of** Annabel Walsh <[REDACTED]>  
**Sent:** 12/17/2020 4:21:02 PM  
**To:** Melissa DeRosa [REDACTED]  
**Subject:** Fwd:

----- Forwarded message -----

**From:** **Annabel Walsh** [REDACTED]  
**Date:** Wed, Dec 16, 2020 at 8:47 PM  
**Subject:** Re:  
**To:** Melissa DeRosa [REDACTED]

below is the tom brokaw [letter](#).

I think that there are MANY, MANY people that would sign on to a letter talking about how incredible he is and how empowered they felt by him etc, I really think that is a much more powerful message that people would be (legally and otherwise) okay signing onto - I will gush forever. Attacking her isn't going to be signed onto by anyone and personally feels like the opposite of useful.

and you have all of this in your back pocket if necessary

**Subject: Letter on Tom Brokaw**

*As professional women, we fully endorse the conversation around abuse of power in the workplace. In the context of that conversation, we would like to share our perspectives on working with Tom Brokaw.*

*We are current and former colleagues of Tom's, who have worked with him over a period spanning four decades. We are producers, correspondents, anchors, directors, executives, researchers, personal assistants, editors and technical staff.*

*Tom has treated each of us with fairness and respect. He has given each of us opportunities for advancement and championed our successes throughout our careers. As we have advanced across industries — news, publishing, law, business and government — Tom has been a valued source of counsel and support. We know him to be a man of tremendous decency and integrity.*

*Signed,*

*Susanna Aaron*

*Anne Binford Allen*

*Heather Allan*

*Marilyn Altman*

*Liz Bowyer*

*Mary Casalino*

*Christine Colvin Casper*

*Martha Cotton*

*Karen Curry*

*Sara Cusimano*

*Helene Darvick*

*Linda Ellman*

*Judy Farinet*

*Dianne Festa*

*Tammy Fine*

*Mary Laurence Flynn*

Susan Friedman  
Soraya Gage  
Maralyn Gelefsky  
Cheryl Gould  
Erika Beck Grothues  
Colleen Halpin  
Jody Henefeld  
Susan Morris Holey  
Julie Holstein  
Julie Huang  
Peggy Hubble  
Kiko Itasaka  
Nancy Jacoby  
Kat Keeney  
Ann Kolbell  
Audrey Beles Kolina  
Susan LaSalla  
Rachel Maddow  
Donna Mastrangelo-Ryan  
Andrea Mitchell  
Mauri Moore  
Frieda Morris  
Elena Nachmanoff  
Michele Neubert  
Kelly O'Donnell  
Bonnie Optekman  
Mary Alice O'Rourke  
Nancy Doyle Palmer  
Polly Powell  
Meaghan Rady  
Elizabeth Vaughan Romaine  
Amy Rosenberg  
Stephanie Ruhle  
Bita Ryan  
Ruby Shamir  
Maria Shriver  
Robin Skolnick  
Andrea Smith  
Patricia Sullivan  
Clare Duffy Swift  
Yuka Tachibana  
Bambi Tascarella  
Zoya Taylor  
Dee Dee Thomas  
Anne Thompson  
Kelly Venardos  
Kristen Welker  
Carolyn Wheatley  
Mary Wolf

On Wed, Dec 16, 2020 at 8:36 PM Annabel Walsh <[REDACTED]> wrote:

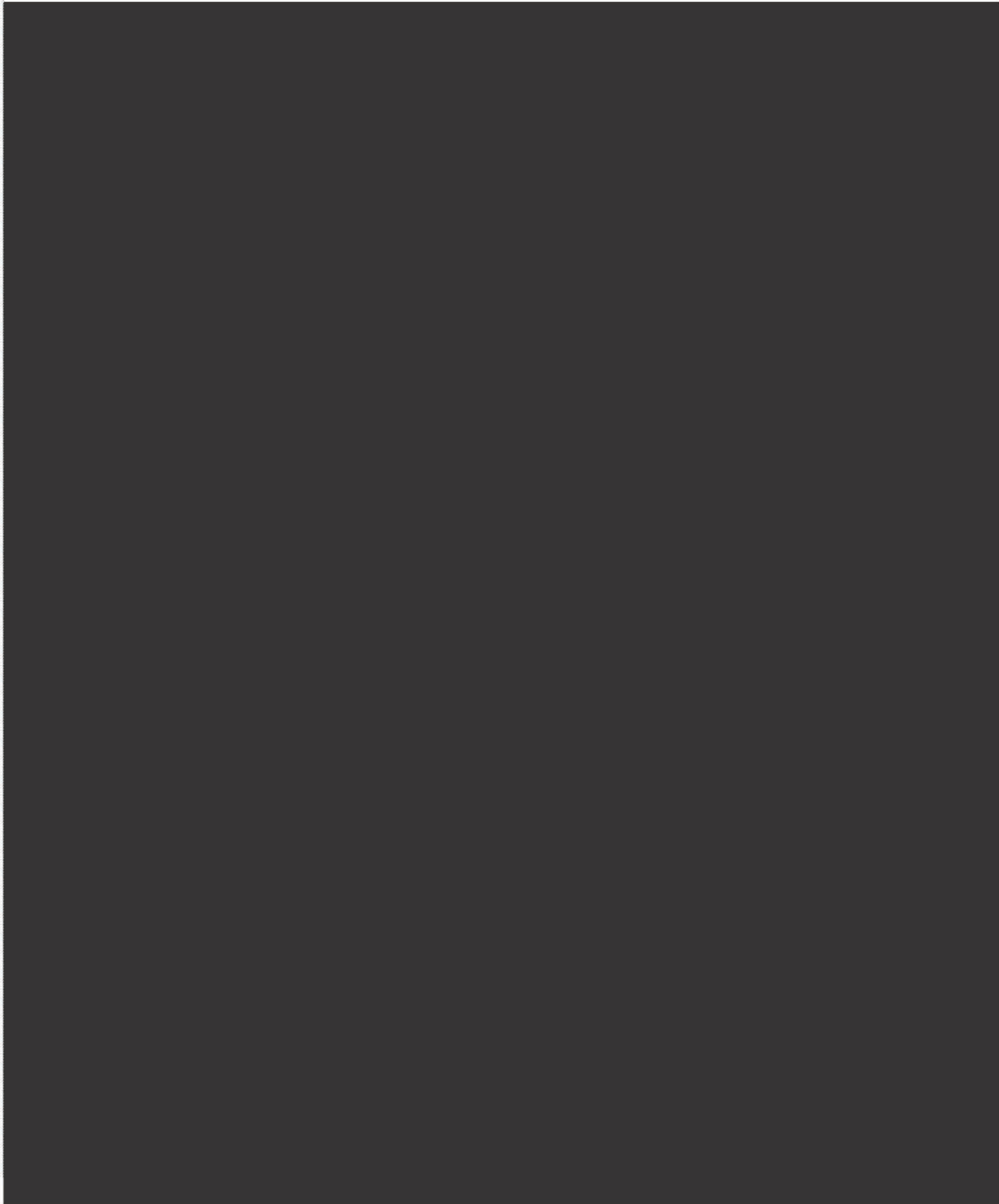
I know you know all of this and i love you and it's going to be okay.

1) don't do this (but i get it)

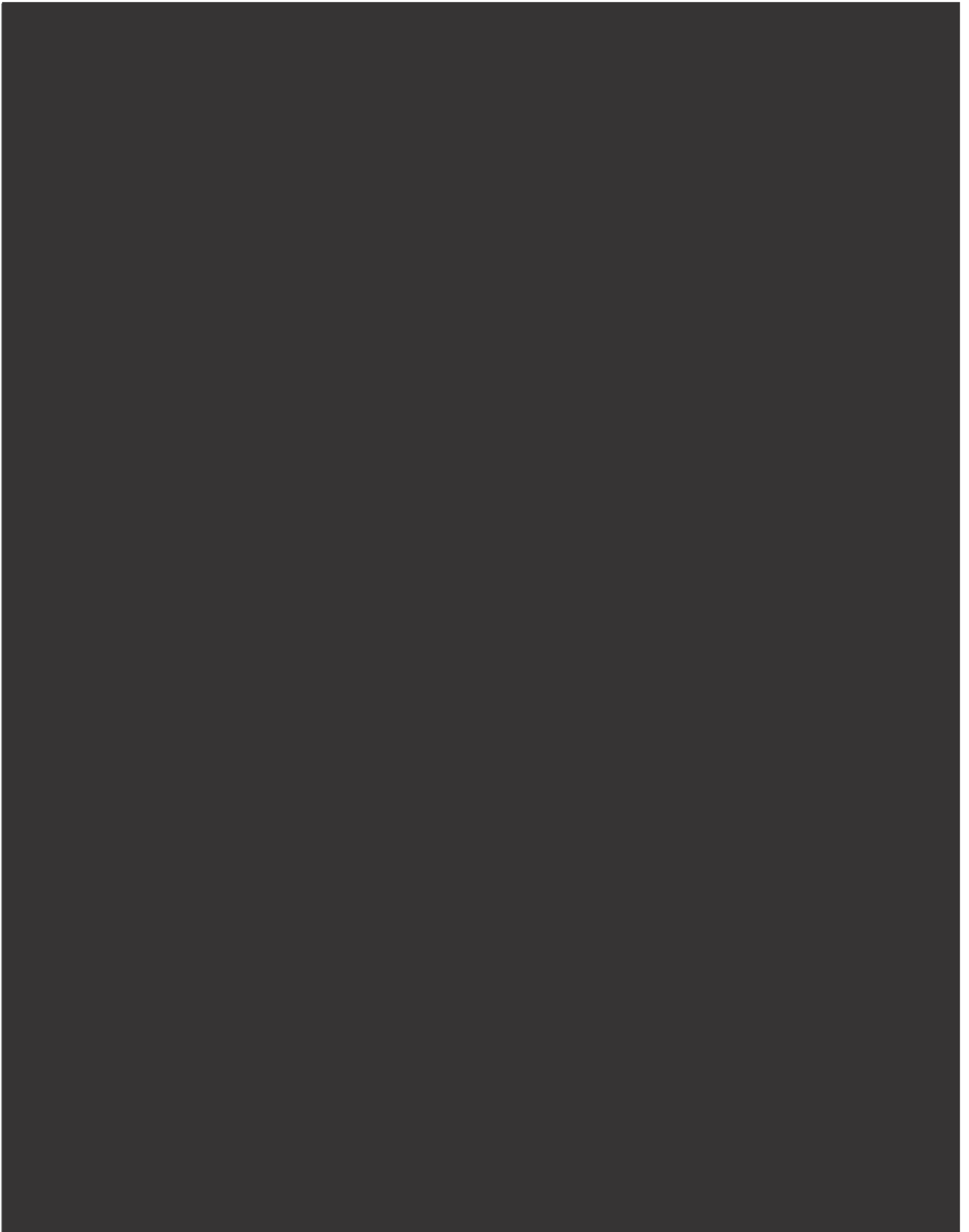
2) let this story die

3) why give her this insanely amazing platform, if i am running for office this is the best thing that has ever happened to me

4) do the tom brokaw letter if you have to do anythign

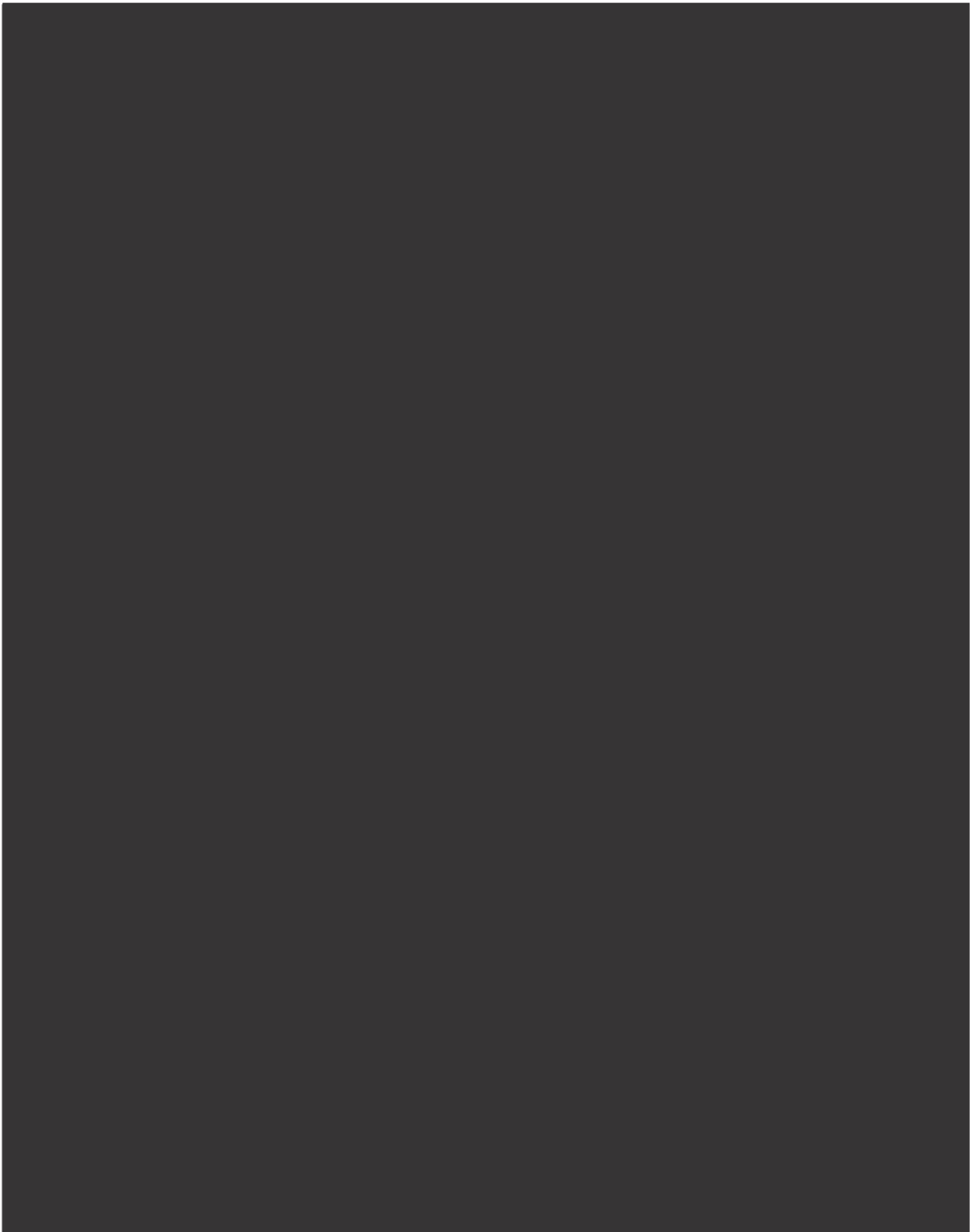












# EXHIBIT 88

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**From:** Melissa DeRosa [REDACTED]  
**Sent:** 12/17/2020 11:22:35 AM  
**To:** Steven Cohen [REDACTED] Linda Lacewell [REDACTED] Alphonso David  
[REDACTED] Josh Vlasto [REDACTED]

**Subject: Letter on Tom Brokaw**

*As professional women, we fully endorse the conversation around abuse of power in the workplace. In the context of that conversation, we would like to share our perspectives on working with Tom Brokaw. We are current and former colleagues of Tom's, who have worked with him over a period spanning four decades. We are producers, correspondents, anchors, directors, executives, researchers, personal assistants, editors and technical staff.*

*Tom has treated each of us with fairness and respect. He has given each of us opportunities for advancement and championed our successes throughout our careers. As we have advanced across industries — news, publishing, law, business and government — Tom has been a valued source of counsel and support. We know him to be a man of tremendous decency and integrity.*

# EXHIBIT 89

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**From:** Stephanie Benton  
**Sent:** Friday, December 18, 2020 9:22 AM  
**To:** Linda A Lacewell [REDACTED]; Alphonso David  
**Subject:** RE: Privileged Confidential

I'm gonna do a real list so we can track who is calling whom and their agreement to sign

---

**From:** Lacewell, Linda A (DFS) [REDACTED]  
**Sent:** Friday, December 18, 2020 9:18 AM  
**To:** Stephanie Benton [REDACTED]; Alphonso David  
[REDACTED]  
**Subject:** Re: Privileged Confidential

also I got

[REDACTED]

---

**From:** Lacewell, Linda A (DFS) [REDACTED]  
**Sent:** Friday, December 18, 2020 9:09 AM  
**To:** Benton, Stephanie (CHAMBER) [REDACTED]; Alphonso David  
[REDACTED]  
**Subject:** Re: Privileged Confidential

Fonz let us know who you take to call

I have signoff from

[REDACTED]

---

**From:** Lacewell, Linda A (DFS)  
**Sent:** Friday, December 18, 2020 4:37 AM  
**To:** Benton, Stephanie (CHAMBER) [REDACTED]  
**Cc:** DeRosa, Melissa (CHAMBER) [REDACTED]  
**Subject:** Re: Privileged Confidential

[REDACTED]



[REDACTED]

We have lots more on the original list you did with Judy

Sent from my iPhone

On Dec 17, 2020, at 9:53 PM, Stephanie Benton  
[REDACTED] wrote:

[REDACTED]

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network

---

**From:** Stephanie Benton  
**Sent:** Thursday, December 17, 2020 9:43 PM  
**To:** Linda A Lacewell [REDACTED]  
**Cc:** Melissa DeRosa  
**Subject:** Privileged Confidential

So this is progress. How do we get him 50 plus names. Would be great to keep his mind on this path and would be real shot in the arm if we can get him names in am.

[REDACTED]

[REDACTED]

[REDACTED]

And I want to put eyes on stupid list again to grab more of the kids. But I can't right now. I just can't.

Send to linda tell her ask 50 names to sign the following letter. "We all worked for Governor Cuomo directly. His motto wa Performance Integrity Pride, we

[REDACTED]

work for the people. He has always been true to that pledge. He is strong tough respectful inclusive and effective. He showed the teams capacity with a long record of accomplishments and the world sw it in the teams product during covid. We are all glad and proud to have served him and the people of the state.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.



# EXHIBIT 90

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**From:** Lacewell, Linda A [REDACTED]  
[REDACTED]  
**Sent:** 12/18/2020 4:42:31 PM  
**To:** Benton, Stephanie (CHAMBER) [REDACTED]  
**Subject:** updated chart  
**Attachments:** statement revised.xlsx

To Be Called

| Person Calling     | Yes or No      |
|--------------------|----------------|
| Linda              | Y pending work |
| Linda              | Y              |
| Alphonso           | Y              |
| Linda              | Y pending work |
| Alphonso           | Y              |
| Alphonso           | checking work  |
| Alphonso           | Y              |
| Steph              | Y              |
| Steph              | Y              |
| Steph              |                |
| Linda              | Y              |
| Linda              | Y              |
| Linda              | Y              |
| Steph              | Y              |
| Alphonso           | MSG            |
| Linda              | Y              |
| Linda              | Y pending work |
| Steph              | Y              |
| Steph              | Y              |
| Alphonso           | MSG            |
| Steph              | Y              |
| HOLD               |                |
| HOLD (MSNBC)       |                |
| Alphonso           | MSG            |
| Steph              | Y              |
| Alphonso (holding) |                |
| Alphonso (holding) |                |
| Steph              | Y              |
| Steph              | Y              |
| Steph              | Y              |
| Steph              | Y              |
| Steph              | Y              |
| Linda              | Y              |
| Steph              | Y              |
| Linda              | MSG            |



Steph Y

Alphonso

Steph Y

Steph Y

HOLD

Linda Y

Linda Y

Linda Y

Linda Y

Linda Y

Linda Y

Linda Y

Linda Y

Linda Y

Linda Y pending work

# EXHIBIT 91



## Instant Messages (26)

| # | From           | To  | Direction | Body   | Message Type | Folder | Source          | Timestamp-Date | Timestamp-Time               |
|---|----------------|---|-----------|--|--------------|--------|-----------------|----------------|------------------------------|
| 1 | Alphonso David | <p>[REDACTED] Linda Lacewell (owner) - Read: 12/17/2020 3:37:53 PM(UTC-5)</p> <p>[REDACTED] Melissa DeRosa</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Linda Lacewell (owner)</p> | Incoming  | <p>Bad news from [REDACTED].</p> <p>Connected with my counsel and as the company's spokeswoman they prefer I not sign on. Let me know if there is any other way I can be helpful.</p> <p>Sorry this didn't work out.</p> | iMessage     | Inbox  | Native Messages | 12/17/2020     | 12/17/2020 3:33:06 PM(UTC-5) |
| 2 | Alphonso David | <p>[REDACTED] Linda Lacewell (owner) - Read: 12/17/2020 3:37:53 PM(UTC-5)</p> <p>[REDACTED] Melissa DeRosa</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Linda Lacewell (owner)</p> | Incoming  | <p>Would still focus on the strategy. Can cross this bridge more later.</p>  | iMessage     | Inbox  | Native Messages | 12/17/2020     | 12/17/2020 3:33:48 PM(UTC-5) |



|                       |   |  |                          |                               |              |                        |                        |                                     |                                     |
|-----------------------|---|--|--------------------------|-------------------------------|--------------|------------------------|------------------------|-------------------------------------|-------------------------------------|
| <p>Alphonso David</p> | <p>Linda Lacewell (owner) - Read: 12/17/2020 5:25:09 PM(UTC-5)</p> <p>Melissa DeRosa</p> <p>Steve Cohen</p> <p>Linda Lacewell (owner)</p> | <p>Incoming</p>  | <p>Call me together.</p> | <p>iMessage</p>               | <p>Inbox</p> | <p>Native Messages</p> | <p>12/17/2020</p>      | <p>12/17/2020 5:24:47 PM(UTC-5)</p> |                                     |
| <p>3</p>              | <p>Linda Lacewell</p>   | <p>Alphonso David</p> <p>Melissa DeRosa</p> <p>Steve Cohen</p> <p>Linda Lacewell (owner)</p> | <p>Outgoing</p>          | <p>She is sending dial in</p> | <p>SMS</p>   | <p>Sent</p>            | <p>Native Messages</p> | <p>12/17/2020</p>                   | <p>12/17/2020 5:31:38 PM(UTC-5)</p> |
| <p>4</p>              |   |  |                          |                               |              |                        |                        |                                     |                                     |



|                                      |   |   |                              |                         |                 |                        |                        |                                     |                                     |
|--------------------------------------|---|---|------------------------------|-------------------------|-----------------|------------------------|------------------------|-------------------------------------|-------------------------------------|
| <p>[REDACTED]<br/>Alphonso David</p> | <p>[REDACTED] Linda Lacewell (owner) - Read: 12/17/2020 5:31:50 PM(UTC-5)</p> <p>[REDACTED] Melissa DeRosa</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Linda Lacewell (owner)</p> | <p>Incoming</p>   | <p>Ok. Let's do dial in.</p> | <p>iMessage</p>         | <p>Inbox</p>    | <p>Native Messages</p> | <p>12/17/2020</p>      | <p>12/17/2020 5:31:50 PM(UTC-5)</p> |                                     |
| <p>5</p>                             | <p>[REDACTED] Melissa DeRosa</p>  | <p>[REDACTED] Linda Lacewell (owner) - Read: 12/17/2020 5:32:04 PM(UTC-5)</p> <p>[REDACTED] Alphonso David</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Linda Lacewell (owner)</p> | <p>Incoming</p>              | <p>Steph is sending</p> | <p>iMessage</p> | <p>Inbox</p>           | <p>Native Messages</p> | <p>12/17/2020</p>                   | <p>12/17/2020 5:31:59 PM(UTC-5)</p> |
| <p>6</p>                             |   |   |                              |                         |                 |                        |                        |                                     |                                     |



|                                  |   |                 |   |                 |              |                        |                   |                                      |
|----------------------------------|---|-----------------|---|-----------------|--------------|------------------------|-------------------|--------------------------------------|
| <p>7</p> <p>Melissa DeRosa</p>   | <p>Linda Lacewell (owner)</p> <p>Alphonso David</p> <p>Steve Cohen</p> <p>Linda Lacewell (owner)</p>  | <p>Incoming</p> |   | <p>iMessage</p> | <p>Inbox</p> | <p>Native Messages</p> | <p>12/17/2020</p> | <p>12/17/2020 5:32:05 PM(UTC-5)</p>  |
| <p>8</p> <p>Stephanie Benton</p> | <p>Linda Lacewell (owner) - Read: 12/18/2020 11:13:20 AM(UTC-5)</p> <p>Alphonso David</p> <p>Judith Mogul</p> <p>Linda Lacewell (owner)</p> | <p>Incoming</p> | <p>both raised why no men on sign on.</p> | <p>iMessage</p> | <p>Inbox</p> | <p>Native Messages</p> | <p>12/18/2020</p> | <p>12/18/2020 11:10:29 AM(UTC-5)</p> |



|                                      |  |  |          |   |          |                 |                 |                               |                               |
|--------------------------------------|--|--|----------|---|----------|-----------------|-----------------|-------------------------------|-------------------------------|
| <p>[REDACTED]<br/>Linda Lacewell</p> | <p>[REDACTED]<br/>Stephanie Benton<br/>[REDACTED]<br/>Alphonso David<br/>[REDACTED]<br/>Judith Mogul<br/>[REDACTED]<br/>Linda Lacewell (owner)</p> | Outgoing   | Ok       | SMS   | Sent     | Native Messages | 12/18/2020      | 12/18/2020 11:13:33 AM(UTC-5) |                               |
| 9                                    | <p>[REDACTED]<br/>Stephanie Benton</p>   | <p>[REDACTED]<br/>Linda Lacewell (owner) - Read: 12/18/2020 11:24:14 AM(UTC-5)<br/>[REDACTED]<br/>Alphonso David<br/>[REDACTED]<br/>Judith Mogul<br/>[REDACTED]<br/>Linda Lacewell (owner)</p> | Incoming | Who can help make these calls. Really hard for me while with him. | iMessage | Inbox           | Native Messages | 12/18/2020                    | 12/18/2020 11:24:08 AM(UTC-5) |
| #                                    |  |  |          |   |          |                 |                 |                               |                               |



|   |                  |  |          |                        |          |       |                 |            |                               |
|---|------------------|--|----------|------------------------|----------|-------|-----------------|------------|-------------------------------|
| # | Linda Lacewell   | Stephanie Benton<br>Alphonso David<br>Judith Mogul<br>Linda Lacewell (owner)           | Outgoing | Fonz about to call me  | SMS      | Sent  | Native Messages | 12/18/2020 | 12/18/2020 11:26:57 AM(UTC-5) |
| # | Linda Lacewell   | Stephanie Benton - Delivered: 12/18/2020 12:49:14 PM(UTC-5)<br>Linda Lacewell (owner)  | Outgoing | is "pending work" also | iMessage | Sent  | Native Messages | 12/18/2020 | 12/18/2020 12:49:13 PM(UTC-5) |
| # | Stephanie Benton | Linda Lacewell (owner) - Read: 12/18/2020 12:50:18 PM(UTC-5)<br>Linda Lacewell (owner) | Incoming | Kk                     | iMessage | Inbox | Native Messages | 12/18/2020 | 12/18/2020 12:50:17 PM(UTC-5) |
| # |                  |  |          |                        |          |       |                 |            |                               |



|   |                |  |          |                                    |          |      |                 |            |                               |
|---|----------------|--|----------|------------------------------------|----------|------|-----------------|------------|-------------------------------|
| # | Linda Lacewell | Stephanie Benton -<br>Delivered: 12/18/2020 12:53:18 PM(UTC-5) | Outgoing | Fonz calling:<br>[REDACTED]        | iMessage | Sent | Native Messages | 12/18/2020 | 12/18/2020 12:53:17 PM(UTC-5) |
| # | Linda Lacewell | Stephanie Benton -<br>Delivered: 12/18/2020 12:53:27 PM(UTC-5) | Outgoing | Put my name by [REDACTED]          | iMessage | Sent | Native Messages | 12/18/2020 | 12/18/2020 12:53:27 PM(UTC-5) |
| # | Linda Lacewell | Stephanie Benton -<br>Delivered: 12/18/2020 4:43:21 PM(UTC-5)  | Outgoing | Sent updated chart plz take a look | iMessage | Sent | Native Messages | 12/18/2020 | 12/18/2020 4:43:21 PM(UTC-5)  |
| # |                |  |          |                                    |          |      |                 |            |                               |



|   |                  |  |          |  |          |       |                 |            |                              |
|---|------------------|--|----------|--|----------|-------|-----------------|------------|------------------------------|
| # | Linda Lacewell   | Stephanie Benton -<br>Delivered: 12/18/2020 4:43:44 PM(UTC-5)  | Outgoing | Remainder either I don't have tel number or don't know. We can discuss when you're ready | iMessage | Sent  | Native Messages | 12/18/2020 | 12/18/2020 4:43:43 PM(UTC-5) |
|   |                  | Linda Lacewell (owner)   |          |  |          |       |                 |            |                              |
| # | Stephanie Benton | Linda Lacewell (owner) -<br>Read: 12/18/2020 5:21:02 PM(UTC-5) | Incoming | You're nailing it.   | iMessage | Inbox | Native Messages | 12/18/2020 | 12/18/2020 5:08:42 PM(UTC-5) |
|   |                  | Linda Lacewell (owner)   |          |  |          |       |                 |            |                              |
| # | Linda Lacewell   | Stephanie Benton -<br>Delivered: 12/18/2020 5:21:09 PM(UTC-5)  | Outgoing | Thank you!   | iMessage | Sent  | Native Messages | 12/18/2020 | 12/18/2020 5:21:08 PM(UTC-5) |
|   |                  | Linda Lacewell (owner)   |          |  |          |       |                 |            |                              |
| # |                  |  |          |  |          |       |                 |            |                              |





|   |                |   |          |                                      |          |      |                 |            |                              |
|---|----------------|---|----------|--------------------------------------|----------|------|-----------------|------------|------------------------------|
| # | Linda Lacewell | Stephanie Benton -<br>Delivered: 12/18/2020 5:21:24 PM(UTC-5) | Outgoing | Also had wrong number for [REDACTED] | iMessage | Sent | Native Messages | 12/18/2020 | 12/18/2020 5:21:23 PM(UTC-5) |
| # | Linda Lacewell | Stephanie Benton -<br>Delivered: 12/21/2020 1:40:15 PM(UTC-5) | Outgoing | If you're bored I did A-L on list    | iMessage | Sent | Native Messages | 12/21/2020 | 12/21/2020 1:40:14 PM(UTC-5) |



|   |                |  |          |   |          |      |                 |            |                              |
|---|----------------|--|----------|---|----------|------|-----------------|------------|------------------------------|
| # | Linda Lacewell | Alphonso David -<br>Delivered:12/18/2020 9:02:44 AM(UTC-5) | Outgoing | We have all worked for Governor Cuomo directly. His motto was Performance Integrity Pride, we work for the people.<br>He has always been true to that pledge. He is strong tough respectful inclusive and effective. He showed the teams capacity with a long record of accomplishments and the world saw it in the teams product during covid. We are all glad and proud to have served him and the people of the state. | iMessage | Sent | Native Messages | 12/18/2020 | 12/18/2020 9:02:43 AM(UTC-5) |
| # | Linda Lacewell | Alphonso David -<br>Delivered:12/18/2020 9:09:55 AM(UTC-5) | Outgoing | Emailed you the top 50, let us know who you take  | iMessage | Sent | Native Messages | 12/18/2020 | 12/18/2020 9:09:54 AM(UTC-5) |



|   |                |  |          |   |          |       |                 |            |                              |
|---|----------------|--|----------|---|----------|-------|-----------------|------------|------------------------------|
| # | Linda Lacewell | Alphonso David -<br>Delivered: 12/18/2020 3:24:06 PM(UTC-5)    | Outgoing | Plz Lmk any updates thx   | iMessage | Sent  | Native Messages | 12/18/2020 | 12/18/2020 3:24:05 PM(UTC-5) |
|   |                | Linda Lacewell (owner)   |          |   |          |       |                 |            |                              |
| # | Linda Lacewell | Linda Lacewell (owner) -<br>Read: 12/18/2020 9:02:12 AM(UTC-5) | Incoming | We all worked for Governor Cuomo directly. His motto was Performance Integrity Pride, we work for the people. He has always been true to that pledge. He is strong tough respectful inclusive and effective. He showed the teams capacity with a long record of accomplishments and the world saw it in the teams product during covid. We are all glad and proud to have served him and the people of the state. | iMessage | Inbox | Native Messages | 12/18/2020 | 12/18/2020 9:02:08 AM(UTC-5) |
|   |                | Linda Lacewell (owner)   |          |   |          |       |                 |            |                              |



|                |  |          |  |          |      |                 |          |                            |
|----------------|--|----------|--|----------|------|-----------------|----------|----------------------------|
| Linda Lacewell | <div data-bbox="318 191 459 453"> <p>Linda Lacewell -<br/>Delivered:3/6/2021 2:32:08 PM(UTC-5)</p> </div> <div data-bbox="318 453 459 617"> <p>Linda Lacewell (owner)</p> </div> | Outgoing | <p>In response to Ms. Reade's allegation, Kate Bedingfield, a deputy Biden campaign manager, said in a statement: "Vice President Biden has dedicated his public life to changing the culture and the laws around violence against women. He authored and fought for the passage and reauthorization of the landmark Violence Against Women Act. He firmly believes that women have a right to be heard — and heard respectfully. Such claims should also be diligently reviewed by an independent press. What is clear about this claim: It is untrue. This absolutely did not happen."</p> | iMessage | Sent | Native Messages | 3/6/2021 | 3/6/2021 2:32:07 PM(UTC-5) |
|----------------|--|----------|--|----------|------|-----------------|----------|----------------------------|

#



# EXHIBIT 92

To: Melissa DeRosa



Thu, Dec 17, 9:14 AM

12:44

Messages



Tweet



Kaitlin

Keep talking, Lindsey. Men like him should not be in positions of power.

6:42 PM · 12/13/20 · Twitter for iPhone

2 Likes



iMessage



# EXHIBIT 93

Date: Monday, March 1 2021 05:37 PM

Subject: RE: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

From: Peter Ajemian [REDACTED]

To: Melissa DeRosa [REDACTED] Lis Smith [REDACTED]

Beth Garvey [REDACTED] Jeffrey Pollock [REDACTED]

CC: Judith Mogul [REDACTED] Linda A Lacewell [REDACTED]

[REDACTED] Richard Azzopardi [REDACTED] Steven

Cohen [REDACTED]

Spoke to Jesse and then to Dean Chang and made our points

Jesse's not the lead and didn't seem that committed

Dean said he understood where we are coming from and assumed he'd be getting a call and acknowledged that in a vacuum it's not a story but said in context of the two prior stories and with this new woman's words it's a story

Story is basically- this is part of a pattern of words and actions by the gov that have made women feel uncomfortable

Here are the quotes – my rec is just refer to yesterday's statement and be done:

"I was so confused and shocked and embarrassed. I turned my head away and didn't have words in that moment."

"That was the one section of my dress that was open so it was just my bare skin, which of course adds to my discomfort," Ms. Ruch said. "I promptly removed his hand with my hand, which I would have thought was a clear enough indicator that I was not wanting him to touch me."

"He said, 'Can I kiss you?'" Ms. Ruch said. "I felt so uncomfortable and embarrassed when really he is the one who should have been embarrassed."

"It's the act of impunity that strikes me," Ms. Ruch said. "I didn't have a choice in that matter. I didn't have a choice in his physical dominance over me at that moment. And that's what infuriates me. And even with what I could do, removing his hand from my lower back, even doing that was not clear enough."

---

**From:** Lis Smith [REDACTED]

**Sent:** Monday, March 01, 2021 4:40 PM

**To:** Melissa DeRosa

**Cc:** Beth Garvey; Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED] Peter Ajemian; Richard Azzopardi; Steven Cohen

**Subject:** Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

I would also push back hard on the times here/ this is absurd. In front of dozens of people and with cameras around? At a wedding? This doesn't pass the smell test.

This is not harassment-

On Mon, Mar 1, 2021 at 4:37 PM Melissa DeRosa [REDACTED] wrote:

OK then let's just leave it alone

not reference review - this won't be reviewed - its not workplace sexual harassment



**From:** Lis Smith [REDACTED]  
**Sent:** Monday, March 01, 2021 4:33 PM  
**To:** Judith Mogul  
**Cc:** Beth Garvey; Jeffrey Pollock; Linda A Lacewell [REDACTED]; Melissa DeRosa; Peter Ajemian; Richard Azzopardi; Steven Cohen [REDACTED]  
**Subject:** Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

This also isn't even a thing- sounds like every Italian grand dad at a wedding

Do not do statement Melissa- just refer to comments yesterday

On Mon, Mar 1, 2021 at 4:29 PM Lis Smith <[REDACTED]> wrote:

Yes I agree- no further comment

On Mon, Mar 1, 2021 at 4:28 PM Judith Mogul <[REDACTED]> wrote:

And when he wants to revert to no comment this comment will be thrown back at him. No further comment should mean no further comment

---

**From:** Lacewell, Linda A (DFS) <[REDACTED]>  
**Sent:** Monday, March 1, 2021 4:27 PM  
**To:** Steven Cohen [REDACTED]; Melissa DeRosa <[REDACTED]>  
**Cc:** Jeffrey Pollock [REDACTED]; Beth Garvey [REDACTED]; Peter Ajemian <[REDACTED]>; Judith Mogul <[REDACTED]>; Richard Azzopardi [REDACTED]  
**Subject:** Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

You're going to comment on each and every allegation now

[Get Outlook for iOS](#)

---

**From:** Melissa DeRosa <[REDACTED]>  
**Sent:** Monday, March 1, 2021 4:25:49 PM  
**To:** Cohen, Steven (ESD) <[REDACTED]>; Lacewell, Linda A (DFS) <[REDACTED]>  
**Cc:** Jeffrey Pollock [REDACTED]; Garvey, Beth (CHAMBER) [REDACTED]; Ajemian, Peter (CHAMBER) [REDACTED]; Mogul, Judith (CHAMBER) [REDACTED]; Azzopardi, Richard (CHAMBER) [REDACTED]  
**Subject:** Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

I just spoke w lis and she agrees w me

what is the issue?

The Governor has kissed and hugged and posed for photos with men and women alike at thousands of public events for the last 40 years. If that has offended anyone in anyway, it was not his intention. In this instance, there was a photographer less than 5 feet away in a room filled with hundreds of people where he was performing a wedding ceremony.



---

**From:** Cohen, Steven (ESD) [REDACTED]  
**Sent:** Monday, March 01, 2021 4:25 PM  
**To:** Linda A Lacewell [REDACTED]  
**Cc:** Melissa DeRosa; Jeffrey Pollock; Beth Garvey; Peter Ajemian; Judith Mogul; [REDACTED]  
[REDACTED] Richard Azzopardi; [REDACTED]  
**Subject:** Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

Agree with No.

On Mar 1, 2021, at 4:23 PM, Lacewell, Linda A (DFS) [REDACTED] > wrote:

No

Sent from my iPhone

On Mar 1, 2021, at 4:21 PM, Melissa DeRosa [REDACTED] wrote:

Can we give this?

The Governor has kissed and hugged and posed for photos with men and women alike at thousands of public events for the last 40 years. If that has offended anyone in anyway, it was not his intention. In this instance, there was a photographer less than 5 feet away in a room filled with hundreds of people where he was performing a wedding ceremony.

---

**From:** Jeffrey Pollock [REDACTED]  
**Sent:** Monday, March 01, 2021 4:03 PM  
**To:** Beth Garvey; Peter Ajemian; Melissa DeRosa; Linda A Lacewell [REDACTED] Judith Mogul; Steven Cohen [REDACTED]  
**Cc:** [REDACTED] Richard Azzopardi; [REDACTED]  
**Subject:** RE: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

agreed

---

**From:** Beth Garvey [REDACTED]  
**Sent:** Monday, March 1, 2021 4:03 PM  
**To:** Peter Ajemian <[REDACTED]>; Melissa DeRosa [REDACTED] Linda A Lacewell [REDACTED] Judith Mogul [REDACTED] Steven Cohen [REDACTED]  
**Cc:** [REDACTED]  
Richard Azzopardi [REDACTED]  
[REDACTED] Jeffrey Pollock [REDACTED]  
**Subject:** RE: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

[EXT EMAIL]

I think we need to lean in to – we have an ongoing review now, a referral has been made, no further comment on this or related matters.

---

**From:** Peter Ajemian [REDACTED]  
**Sent:** Monday, March 1, 2021 4:00 PM  
**To:** Melissa DeRosa [REDACTED]; Linda A Lacewell [REDACTED]  
>; Judith Mogul [REDACTED]; Beth Garvey [REDACTED]; Steven Cohen [REDACTED]  
**Cc:** [REDACTED]  
Richard Azzopardi [REDACTED]; Jeffrey Pollock [REDACTED]  
**Subject:** privileged & confidential - please see. FW: Comment on 2019 wedding interaction

I think we have to refer to yesterday's statement.

**From:** Jesse McKinley [REDACTED]  
**Sent:** Monday, March 1, 2021 3:53 PM  
**To:** Richard Azzopardi [REDACTED]; Peter Ajemian [REDACTED]  
**Subject:** Comment on 2019 wedding interaction

Rich, Peter,

Working on an article with Matt Flegenheimer, who interviewed the main subject, that involves an accusation by a 33-year-old woman, who says that the governor touched her inappropriately at a 2019 wedding (Gareth's, though he is not mentioned), and tried to kiss her even after she had conveyed her discomfort.

The woman, Anna Ruch, is on the record. She said in an interview that the governor put his hand on her bare lower back and after she removed it, the governor asked if he could kiss her, placing his palms on her face against her wishes and drawing closer as she pulled her head away. He then kissed her on the cheek.

There are photos of this moment, some of which are bouncing around Instagram.

I'll reflect the governor's previous comments on the Bennett/Boylan accusations, but can, of course, include any additional comment.

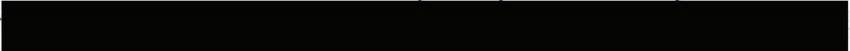
Jesse

--  
Jesse McKinley  
New York Times  
Bureau Chief  
Albany

[REDACTED]  
Twitter: @jessemckinley





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# EXHIBIT 94

**Date:** Saturday, March 6 2021 05:56 AM

**Subject:** Re: Priv and Confidential FW: Washington Post- request for comment (on deadline) privileged and confidential.

**From:** Judith Mogul [REDACTED]

Melissa DeRosa [REDACTED] Josh Vlasto [REDACTED] Jeffrey Pollock

**To:** [REDACTED] Lis Smith [REDACTED] Dani Lever [REDACTED]

**CC:** Linda A Lacewell [REDACTED] Steven Cohen [REDACTED]  
[REDACTED] Beth Garvey [REDACTED]

blue highlighting is Kaitlin?

---

**From:** Melissa DeRosa

**Sent:** Friday, March 05, 2021 7:42 PM

**To:** Josh Vlasto; Jeffrey Pollock; Lis Smith; Dani Lever

**Cc:** Judith Mogul; Linda A Lacewell [REDACTED] Steven Cohen [REDACTED] Beth Garvey

**Subject:** RE: Priv and Confidential FW: Washington Post- request for comment (on deadline) privileged and confidential.

We have officially jumped the shark. Karen Hinton is the furthest thing in the world from a wallflower, and the idea that she waited 21 years to surface an allegation about a hug in a hotel room when she was no longer employed at HUD is absurd.

---

**From:** Melissa DeRosa

**Sent:** Friday, March 5, 2021 7:25 PM

**To:** Josh Vlasto [REDACTED] Jeffrey Pollock [REDACTED]; Lis Smith

[REDACTED] Dani Lever [REDACTED]

**Cc:** Judith Mogul [REDACTED] Linda A Lacewell [REDACTED] Steven Cohen

[REDACTED] Beth Garvey [REDACTED]

**Subject:** Priv and Confidential FW: Washington Post- request for comment (on deadline) privileged and confidential.

See below

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Brittain, Amy [REDACTED]

**Sent:** Friday, March 5, 2021 7:02 PM

**To:** Richard Azzopardi

**Subject:** Washington Post- request for comment (on deadline)

Hi Rich,

I'm working with my colleague Josh Dawsey on a piece related to the workplace environment under Andrew Cuomo. We'd welcome the opportunity to interview Gov. Cuomo and to speak to aides close to him who may want to share their own accounts of what it is like to work for him.

Specifically, we plan to report the following:

- Karen Hinton, who worked for Cuomo at HUD, alleges that he summoned her to his dimly lit hotel room and physically embraced her following a work event in 2000, when Cuomo led the U.S. Department of Housing and Urban Development. Hinton says that she pulled away from Cuomo but he pulled her back toward his body, holding her before she broke away and left the room.
- Hinton has discussed the allegation in detail, saying that it happened after she left her fulltime job with the agency, when she was working as a consultant for HUD. She said the trip was to California, where she worked with the governor to help arrange press coverage on his media tour.
- Hinton said there was a "power dynamic" at play even though she was a consultant at the time, not an employee. "It



was the same to me," she said, adding that was she concerned about the "the personal and professional problems that could have been created." She said she described his move as a "power play" for "manipulation and control."

- Hinton has said that she and Cuomo never discussed the incident after she left his room that night.
- Two male aides who worked for Cuomo over the course of his career say that he berated them with explicit language: sometimes calling them "pussies" and sometimes saying "you have no balls," among other comments.
- Two women, both of whom worked in the governor's office several years ago as young staffers, says that Cuomo quizzed them about their dating lives. They have said they did not view the encounters as propositions but rather as part of an office culture they believed was degrading to young women.
- An additional woman has said that during a meeting with Gov. Cuomo, he insinuated that his male staffer should date her. She said that it was part of a larger pattern of a hostile workplace — defined by blame cast upon others, angry outbursts and a pattern of undermining colleagues — that left her with crippling anxiety and feelings of questioning her self worth.
- Altogether, over 20 former Cuomo staffers have told us in interviews that Cuomo fostered a hostile workplace culture in which he makes searing verbal attacks on subordinates. Some said he seemed to delight in humiliating his employees, particularly in group meetings. Most said they still fear his wrath and his power to destroy careers.
- We are also planning on including comments from other staffers who say they never witnessed abusive behavior.

We plan to include some of Gov. Cuomo's remarks from his Wednesday press conference, and we would welcome the chance to include his detailed responses to these new allegations. Our deadline is 1 p.m. tomorrow.

I'm at [REDACTED] if you have any questions concerning this request.

Best,  
Amy

Amy Brittain  
Reporter  
The Washington Post



# EXHIBIT 95



**Date:** Thursday, March 11 2021 04:12 PM

**Subject:** RE: LATEST VERSION FOR THE 4 pm RE: Second go around Beth/ Judy/ Lis? Josh/ Dani please read over. RE: i took a stab at some answers here - see below - priv and confidential

**From:** Richard Azzopardi [REDACTED]

**To:** Beth Garvey [REDACTED]; Melissa DeRosa [REDACTED]; Judith Mogul [REDACTED]; Linda A Lacewell [REDACTED]; Steven Cohen [REDACTED]

**CC:** Peter Ajemian [REDACTED]; Lis Smith' [REDACTED]; [REDACTED]

---

**From:** Beth Garvey [REDACTED]

**Sent:** Thursday, March 11, 2021 4:07 PM

**To:** Richard Azzopardi [REDACTED]; Melissa DeRosa <[REDACTED]> Judith Mogul [REDACTED]; Linda A Lacewell (dfs.ny.gov) <[REDACTED]> Steven Cohen [REDACTED]

**Cc:** Peter Ajemian [REDACTED]; Lis Smith' [REDACTED]; [REDACTED]

**Subject:** RE: LATEST VERSION FOR THE 4 pm RE: Second go around Beth/ Judy/ Lis? Josh/ Dani please read over. RE: i took a stab at some answers here - see below - priv and confidential

TYPOS fixed below

---

**From:** Richard Azzopardi [REDACTED]

**Sent:** Thursday, March 11, 2021 3:53 PM

**To:** Melissa DeRosa [REDACTED]; Judith Mogul <[REDACTED]> Linda A Lacewell [REDACTED]; Steven Cohen [REDACTED]; Beth Garvey <[REDACTED]>

**Cc:** Peter Ajemian <[REDACTED]> Lis Smith' <[REDACTED]> [REDACTED]

**Subject:** LATEST VERSION FOR THE 4 pm RE: Second go around Beth/ Judy/ Lis? Josh/ Dani please read over. RE: i took a stab at some answers here - see below - priv and confidential

**General statement on toxic, hostile, demanding workplace:**

From Rich Azzopardi, senior advisor to the governor: "The people of this state elected the Governor to represent them four times during the last 14 years and they know he works day and night for them. There is no secret these are tough jobs, and the work is demanding, but we have a top tier team with many employees who have been here for years and many others who have left and returned because they know the work we do matters, a fact that was underscored throughout COVID."

**I have a number of further queries related to Rebecca Traister's reported feature. The feature broadly reports on a series of allegations that the Governor has fostered a culture of harassment, cruelty and deception, and that multiple former staffers allege that the atmosphere in the governor's office resembles a high-school clique.**

There are a number of queries related to a woman I will refer to as source A:



—Source A says she met the governor in 2016 at a fundraiser for the governor – THIS PERSON WAS RECOMMENDED BY A THEN CONGRESSMAN/FORMER COUNTY CHAIR AS A SMART, SAVVY, RISING STAR – THE GOVERNOR’S OFFICE IS ALWAYS LOOKING TO RECRUIT CANDIDATES WHO ARE BOTH SKILLED AND ALSO HAVE AN UNDERSTANDING OF POLITICS

—as the governor left the fundraiser, source A introduced herself, saying that she had once worked in local government – SEE ABOVE

—the governor replied that she would soon be working in state government – NO RECOLLECTION OF THIS CONVERSATION

—he then took her arms and held her in a pose as if they were dancing while their photograph was taken – THE GOVERNOR TOOK PHOTOS WITH NEARLY 100 PEOPLE AT THAT EVENT – MEN AND WOMEN – ALMOST ALL POSING WITH HUGS, ARM AROUND THE PERSON IN IT THE PICTURE

—the same week, source A received a voicemail from the governor’s office asking her to come and interview for a job – THIS WAS AFTER THIS PERSON WAS RECOMMENDED – SEE ABOVE

—She felt she had been contacted only because of her appearance. – IF THAT WAS HER IMPRESSION, SHE IS WRONG – SHE WAS CONTACTED AFTER HER CURRENT EMPLOYER AND PAST EMPLOYER GAVE HER GLOWING RECOMMENDATIONS

She came in for the interview and asked for a very high salary, one that she expected would make it impossible for the governor to hire her. Instead, she was hired. She believes she was hired solely based on her appearance – SHE WAS NOT HIRED BASED ON HER APPEARANCE, PERIOD. THE SALARY SHE REQUESTED, FROM HOW SHE PRESENTED IT TO US, MATCHED BOTH WHAT SHE WAS MAKING AT HER CURRENT JOB PLUS THE MONEY SHE WOULD LOSE BY NOT BEING ABLE TO TAKE A SECOND WEEKEND JOB DUE TO THE TIME DEMANDS OF THE OFFICE

—Once on the job, source A was given little specific direction. The governor instructed her to “be a sponge” and learn from his more senior staff. – SHE HAD A VERY SPECIFIC ROLE, SUPPORTING THE GOVERNOR’S DIRECTOR OF THE OFFICE AND ALSO ASSISTING IN MOVING THE BRIEFING PROCESS FORWARD TO ENSURE DEADLINES WERE BEING MET TO GET THE GOVERNOR THE MATERIALS HE NEEDED BY THE TIME THEY WERE DUE; SHE ALSO ANSWERED PHONES, ETC –THE ‘SPONGE’ COMMENT WAS ABOUT ABSORBING AND LEARNING THE PROCESS FROM THOSE AROUND HER.

—certain mornings, source A would receive a message that the governor was leaving home earlier than scheduled, and that she must be in the office when he arrived. She would leave home in a rush, without attending to her appearance as much as she normally might. In these instances, the governor would ask her questions such as “You didn’t put on makeup today?” or “You decided not to get ready today?”

—source A noted that the governor and his top female aides expected that women in the office dress well and expensively. – THERE WAS NOT NOW NOR WAS THERE EVER AN EXPECTATION THAT WOMEN WOULD DRESS A CERTAIN WAY FROM SENIOR FEMALE STAFF – IN FACT, SENIOR FEMALE STAFF DRESS RANGE FROM JEANS WITH BLAZERS TO SUITS TO DRESSES – PEOPLE DRESS HOWEVER THEY ARE COMFORTABLE IN THE OFFICE UNLESS THERE IS A PUBLIC FACING EVENT OR MEETING IN THE OFFICE FOR WHICH THE EXPECTATION IS THAT ALL STAFF – MALE AND FEMALE – ARE DRESSED PROFESSIONALLY

--Source A once wore a red plaid shirt to the office; the governor told her she looked like a lumberjack. IF THIS HAPPENED, IT WAS CLEARLY A JOKE

—Source A asked the governor whether he wanted her personal cell phone number in order to reach her if he needed anything outside of work hours. The governor responded as if she were making a romantic advance, which was not source A's intent — NO MEMORY OF THIS CONVERSATION, BUT IF IT HAPPENED IT WAS CLEARLY A JOKE

—the governor asked source A about her dating life — THE GOVERNOR ASKS MEN AND WOMEN IN THE OFFICE ABOUT THEIR LIVES — IT IS MEANT TO BRING LEVITY AND TAKE THE TEMPERATURE DOWN IN WHAT IS A VERY INTENSE ENVIRONMENT

—one day, Cuomo asked source A to come to his office and look up car parts on eBay. He sat in a chair and turned it toward her, while asking her to work at his computer, which required her to bend over in close proximity to him, while wearing a skirt and heels. — THE GOVERNOR IS NOTORIOUSLY TECHNOLOGICALLY INEPT — HE STILL USES A BLACKBERRY, DOES NOT RUN HIS OWN SOCIAL MEDIA, HAS LITTLE UNDERSTANDING OF TWITTER, ETC. MALE AND FEMALE STAFFERS HAVE FOR YEARS ASSISTED THE GOVERNOR WITH HIS COMPUTER — IF SHE WAS UNCOMFORTABLE ASSISTING HIM WITH THE COMPUTER, SHE DID NOT LET ANYONE KNOW AT THE TIME

—In 2017, the Governor's campaign office rented out a bar called Dorrian's for a Super Bowl party. At the end of the night, the bar opened to outside patrons, and source A says she saw the governor sitting in the back room speaking to a woman with a tattoo of a dove. The next morning, at a staff meeting, source A remembers that the governor asked aides to find the woman with the dove tattoo and perhaps offer her a job

—source A was often asked to sort through photos after the governor's events and present a selection of images to him. These photos depicted the governor with various supporters, and he would send them to supporters with personal notes. If the governor did not like how he looked in such photos, source A says that he would yell at her. — AFTER EVENTS, THE OFFICE SENDS OUT PHOTOS TO THOSE WHO ATTENDED.

—source A remembers the governor yelling at her when he pressed the wrong button on her phone and mistakenly dropped a call she was attempting to transfer to him — IT IS A HIGH STRESS ENVIRONMENT AND YES, SOMETIMES TEMPERS FLARE WHEN MISTAKES ARE MADE

—source A remembers that the governor asked her to send email messages to several state officials asking them, as she remembers it, "if they liked their jobs" and "wanted to keep them" — WE HAVE NO RECOLLECTION OF THIS — WE ASK FOR SOME EVIDENCE THAT THIS HAPPENED

—source A recalls the governor calling her at five in the morning to deliver a list of all the things he wanted her to work on that day. Later, in the office, he claimed that she's gotten all of it wrong. — NO RECOLLECTION OF THIS BUT THE GOVERNOR STARTS WORKING THE MINUTE HE WAKES UP AND SURROUNDS HIMSELF WITH PEOPLE WHO DO THE SAME

—source A heard rumors that the governor's administration would prevent staffer who wanted to leave his office from securing other jobs — THAT WAS AN OLD RUMOR FROM EARLY DAYS OF THIS ADMINISTRATION — THE OFFICE FULLY SUPPORTS THOSE WHO WISH TO MOVE ON, OFTEN FOCUSED ON TIMING TO ENSURE ORDERLY TRANSITION OF DUTIES

—source A considers her experience in the governor's office one of verbal and mental abuse, and describes the work style in the governor's office as one of coercive control — IF SHE FELT THAT WAY, SHE DID NOT CONVEY THAT AT THE TIME AND WE'RE SORRY IF SHE HAD A NEGATIVE EXPERIENCE

—source A recalls that when she first began working in the governor's office, she felt that Cuomo's senior

female staff did not like that the governor seemed to express interest in her. – IF THAT WAS HER INTERPRETATION, IT WAS NOT ACCURATE – THE ONLY THING THE SENIOR STAFF WAS FOCUSED ON WAS GOVERNMENT COMPETENCE AND GETTING THE JOB DONE

She recalls that the governor seemed to enjoy this dynamic, and asked her about “the mean girls”.” That group was generally understood to include Melissa DeRosa, Jill DesRosiers, Stephanie Benton, and Linda Lacewell. Source A recalls that female senior staff would frequently not make eye contact with her when she approach them to converse – AGAIN, THIS IS SILLY, AND WE QUESTION IF THIS WOULD BE WRITTEN ABOUT MEN. AT THE TIME THIS PERSON WORKED IN THE CHAMBER, TOP STAFFERS: SECRETARY TO THE GOVERNOR, THE COMMUNICATIONS DIRECTOR AND STATE OPERATIONS DIRECTOR WERE MEN

The following allegations relate to a woman I’ll refer to as source B:

—Source B worked in the governor’s office as a briefer

—Source B worked late one night, when she was called into an office where the governor was talking about gossip with his scheduler, Annabel Walsh

—Source B remembers that Walsh commented on her dress and asked the governor if he liked it. The governor replied that he did, and asked her to spin around – THE GOVERNOR’S OFFICE DENIES THIS ACCOUNT.

The following queries relate to Ana Liss:

—Ana Liss says that the governor frequently called her nicknames such as Sparky, Blondie, Sweetheart, and Honey – THE GOVERNOR USES NICKNAMES FOR MEN AND WOMEN ALIKE.

—Ana Liss says that [REDACTED] once told her that the governor liked her and thought she was cute -- WE WOULD NEED TO ASK [REDACTED] IF SHE SAID THAT, IT WASN’T BASED ON ANYTHING SHE WAS TOLD

—Liss says that [REDACTED] told her that when the governor was present, she needed to look very good – AGAIN, WOULD NEED TO ASK [REDACTED] BUT IF SHE SAID THIS IT WAS NOT BASED ON ANYTHING SHE WAS INSTRUCTED TO SAY/DO BY ANY OTHER STAFF

—Liss recalls that in December, she received a call from Rich Azzopardi asking her if she had been in contact with Lindsay Boylan – RICH’S ON THE RECORD ON THIS “After Ms. Boylan’s tweets in December, she, and her lawyers and members of the press began reaching out to former members of the Chamber, many of whom never worked with her. Those former members of the Chamber called to let various staff people know and convey that they were upset by the outreach. As a result, we proactively reached out to some former colleagues to check in and make sure they had a heads up.”

The following queries relate to source C:

—in 2015, source C interviewed for a speechwriting position in the governor’s office and was hired within 24 hours. Source C was given a desk close to the governor’s office. In her time as a speechwriter, she wrote 30 sets of remarks, of which the governor used only one. – THERE ARE MANY MALE AND FEMALE SPEECHWRITERS WHO PREPARE REMARKS FOR THE GOVERNOR AND WHOSE REMARKS HE ULTIMATELY DOES NOT USE. THEIR WORK GENERALLY INFORMS THE FINAL PRODUCT, BUT HE TENDS TO WRITE THE FINAL VERSIONS HIMSELF.

– SIMILARLY, HIS FATHER HAD MANY SPEECH WRITERS BUT ALSO ULTIMATELY TYPICALLY WROTE HIS OWN

## REMARKS

—Source C was a Black woman and felt that she was brought into the office as a token rather than as a valued contributor – WE ARE SORRY IF SHE FELT THIS WAY, IT IS NOT TRUE – WE HIRED HER BASED ON HER PAST EXPERIENCE, WHICH INCLUDED SPEECH WRITING.

The following queries relate to Yuh-Line Niou:

—Niou alleges that she was not given assistance obtaining hand sanitizer or masks in the spring of 2020, as Covid-19 was hitting her district

—Niou alleges that she repeatedly requested these supplies, but that the governor's office responded by telling her that she had not requested them

We do not play politics with COVID, period. In the early days of the pandemic, supplies were limited and we prioritized healthcare intuitions. Once we received more supplies, we expanded our reach. On May 8<sup>th</sup>, the Assemblymember received 10 cases of 2 oz bottles (500 2 oz bottles) and 25 cases of gallons (100 gallons) of the NYS Clean.

The following queries relate to Alessandra Biaggi:

—in 2016, Biaggi took a job working for Alphonso David

—soon after she was hired, she attended a party at the governor's office. The governor approached her, grabbed her elbow, and complimented her on her dance moves. –WHEN/WHERE WAS THIS PARTY? WE HAVE NO RECORD OF BIAGGI ATTENDING A PARTY – WOULD LIKE TO TRY TO RUN THIS DOWN BUT CANNOT BASED ON THE INFORMATION PROVIDED HERE

—Biaggi left the governor's office to run for office herself, but saw the governor again at a wedding in 2018. He greeted her, kissed her face, and asked her fiancé, who was standing nearby, whether he was jealous – THIS WAS AT THE GOVERNOR'S NIECE'S WEDDING AND HE WAS JOKING.

—after Biaggi had won her primary election, on the day before the general election, she says she received a call from the governor's office alerting her that the governor wanted to see her. Biaggi brought two campaign staffers to the meeting, but the governor's staff did not permit them to go with her into the meeting. At the end of her meeting with Cuomo, which was largely unremarkable, the governor asked her, "Tell me again how your grandfather's career ended?" She told him that he knew the answer to the question, but he insisted that he did not. She then left the meeting.

—on the day after Amazon pulled out of its deal to open HQ2 in New York, Biaggi says she received a call from the governor at 9:30 am in which he yelled at her for having criticized the deal. – THE SENATE DEMOCRATS OPPOSITION TO AMAZON COST NEW YORKERS THOUSANDS OF GOOD PAYING JOBS – IT WASN'T A SECRET THEN OR NOW THAT WE HELD THEM RESPONSIBLE AND DISAGREED WITH THEIR DECISIONS

There are a series of general queries we'd like comment on:

—It has been widely reported that the governor's daughter Cara previously dated a New York State trooper. In the fall of 2020, the trooper was transferred out of the governor's mansion. Why was the trooper transferred out of Cuomo's office? Do you have a comment for those observers who have speculated that the transfer was intended to intimidate the trooper? THIS TROOPER REQUESTED A TRANSFER. Statement from Beau Duffy,

State Police spokesman [REDACTED] requested a voluntary transfer to Troop B this past May, stating that he wanted to gain more field experience and further his career advancement track to the rank of sergeant. Such requests are routine, and it was granted.”

—a source who I’ll refer to as source D recalls a party at the governor’s mansion in 2017 to which a number of new staff members were invited. During the party, source D recalls that several members of the governor’s staff took part in an extended joke aimed at Melissa DeRosa, consisting of showing DeRosa a series of photographs of prominent state officials and asking DeRosa if she could identify them, which she could not. – MELISSA IS LASER FOCUSED ON HER WORK – SHE IS NOTORIOUSLY BAD WITH NAMES/FACES AND THIS WAS AN ATTEMPT TO MAKE LIGHT OF THIS AT AN INFORMAL SETTING.

—source D recalls that the governor was very eager to travel to Puerto Rico after Hurricane Maria, and brought a photographer along on the trip. The governor’s team mistakenly left the photographer behind when they travelled back to New York – THIS WAS NOT A MISTAKE, THE PHOTOGRAPHER STAYED BACK INTENTIONALLY TO UPLOAD PHOTOS, ETC AND TOOK THE NEXT FLIGHT BACK – WHY IS THIS INTERESTING?

—several former staffers allege that the governor was interested in public appearances first and foremost, and policy announcements were made in service of those appearances, rather than the other way around – A look at the record shows the exact opposite. Among other policy victories, the Governor passed a \$15 minimum wage, free tuition at public colleges and the strongest paid family leave and gun safety laws in the nation. These are all issues that Washington is still catching up on.

—a former staffer recalls being asked to prepare briefing books for a trip the governor planned to take to Israel. At the last minute, the staffer learned the governor had gotten off the plane to instead travel to a train accident in New Jersey. Her perception was that it was very important that he arrive first. THE GOVERNOR WAS SET TO FLY TO ISRAEL TO PAY RESPECTS TO SHIMON PERES – WHEN HE REACHED THE AIRPORT HE LEARNED THAT A TRAIN ACCIDENT HAD OCCURRED IN NEW JERSEY WITH MANY NEW YORKERS ON BOARD AND POSSIBLE FATALITIES – IT WAS A DIFFICULT DECISION, BUT THE RIGHT ONE TO STAY BACK TO ENSURE NEW YORKERS’ SAFETY AND TO ADDRESS THE EMERGENCY AT HAND. THIS IS WHAT PEOPLE EXPECT.

—another former staffer in the governor’s office recalls a day, two years into her tenure, when she was awoken for work purposes at 4am and worked until 11pm. She spent the whole day at her computer receiving emails from Melissa DeRosa that severely reprimanded her. The staffer did not feel that she could get up to eat or use the restroom. The next day, DeRosa saw this staffer in the office and introduced herself as if they had never before met. This was the fourth such introduction DeRosa had made. – MELISSA DOES NOT REMEMBER THIS BUT READILY ACKNOWLEDGES THAT HER WORK DAY GENERALLY STARTS AT 4 AM AND ENDS WHEN HER HEAD HITS THE PILLOW – AGAIN SHE IS NOTORIOUSLY BAD WITH NAMES AND FACES – IF THIS INCIDENT UPSET THIS PERSON, SHE APOLOGIZES.



# EXHIBIT 96

**Date:** Sunday, March 14 2021 06:44 PM

**Subject:** Re: Privileged & confidential. Fwd: Time-sensitive comment request

**From:** Peter Ajemian [REDACTED]

**To:** Melissa DeRosa [REDACTED] Stephanie Benton [REDACTED] Jeffrey Pollock [REDACTED] Linda A Lacewell [REDACTED]

**CC:** Lis Smith [REDACTED] Josh Vlasto [REDACTED] Judith Mogul [REDACTED] Beth Garvey [REDACTED] Richard Azzopardi [REDACTED] Steven Cohen [REDACTED] Mitra Horhozi [REDACTED]

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updated drafts

**Boylan alleges that former and current aides and allies of the Governor have retaliated against her in a variety of ways, including making calls about her.**

Will look like WSJ – about calls that were made and tenor.

Her ongoing and continued claim that those calls were intimidating or intended to suss out what her plans were or cast aspersions about her.

Melissa and Rich and Abbey Collins are mentioned.

From Rich Azzopardi, senior advisor to the Governor: “After Ms. Boylan’s tweets in December, she, and her lawyers and members of the press began reaching out to former members of the Chamber, many of whom never worked with her. Those former members of the Chamber called to let various staff people know and convey that they were upset by the outreach. As a result, we proactively reached out to some former colleagues to check in and make sure they had a heads up.”

**She accuses Melissa DeRosa of leaking her personnel file and questions the legality of the leak. Do you or does Melissa have a response?**

From Beth Garvey, Acting Counsel: "With certain limited exceptions, as a general matter, it is within a government entity's discretion to share redacted employment records, including in instances when members of the media ask for such public information and when it is for the purpose of correcting inaccurate or misleading statements. Given the ongoing review by the State Attorney General, we cannot comment further at this time."

OFF THE RECORD: HOW WOULD LINDSEY KNOW WHO RELEASED IT? WHAT IS THE BASIS FOR HER ASSERTION? WE CAN'T GET INTO SPECS BECAUSE OF THE AG'S INVESTIGATION, BUT PRINTING THAT MELISSA WAS THE ONE WHO GAVE IT TO THE PRESS WOULD BE INACCURATE.

**Boylan describes a culture of hostility and bullying under the governor. She and others recall seeing a dart board with a photo of Bill DeBlasio on it while attending a pool party. Do you or the governor have any comment on the dart board and the intentions behind it?**

**Boylan says, as previously alleged in her Medium post, that the governor fixated on her, tracked her location through aides to an extent she found uncomfortable, and showed a level of interest that she found inappropriate in their interpersonal interactions.**

Fixated on her – her characterization of him – her interpretation of these events was he was repeatedly inquiring about her and in their own interactions, eye contact, touching, and signaling his interest in ways she found uncomfortable





Incremental new pieces of communiqués – from editorial and fact checking standpoint – a cache of communications similar to what we’ve already seen – Stephanie Benton email from March 2017 sharing the governor’s pin, responding to Lindsey getting a bberry, “Smiley face. Feel free to pin gov. he’ll be very happy to hear from you.” about her being issued a bberry with pin capacity and that’s something the gov will be happy about -

From a spokesperson re Stephanie: “Part of Stephanie’s job is to make sure senior staff know how and when they can get in touch with the Governor, and Blackberry pin is how any member of the team would communicate with him.”

Re Jill’s email: “Jill oversaw events and scheduling, so it was her job to understand what senior members of the team would be attending Governor events.”

From a spokesperson: “All senior staff receive these kinds of instructions, requests and communications. Nothing about these exchanges are unique in this regard.”

**She says that she felt objectified and professionally diminished, and recounts an incident at the December 2016 REDC awards during which she says she was ordered to accompany the Governor and Maria Bartiromo on a return helicopter flight rather than remain and continue to engage with her direct-reports on substantive matters.**

From a spokesperson: “Lindsey was the relevant policy lead, so of course she would staff the Governor for a discussion with a business reporter.”

**Boylan speaks about what she perceived to be a lack of boundaries between the Governor and female staffers. She says that Stephanie Benton asked her, also at a pool party, whether she had yet been swimming in the pool at the governor’s residence.**

From a spokesperson: "Stephanie has no recollection of this."

**On the subject of the "strip poker" comment that her Medium post claimed the governor made on a flight in October 2017, Boylan disputes the group denial and says that Abbey Fashouer Collins was sitting next to her when the comment was made.**

**She reiterates her claim that the governor kissed her on the lips in 2018.**

From a spokesperson: "As we said before, Ms. Boylan's claims of inappropriate behavior are quite simply false."

**On the subject of Melissa, she recounts a convo in which Melissa screamed at her on the phone – in the final days of Lindsey being in her job – July 2018 – when things became really**

From a spokesperson: “Lindsey regularly bypassed senior staff and went directly to the Governor against protocol, an ongoing source of frustration that was also disruptive. This led to a heated conversation between her and the Secretary.”

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**From:** Melissa DeRosa

**Sent:** Sunday, March 14, 2021 5:49 PM

**To:** Stephanie Benton; Jeffrey Pollock; Peter Ajemian; Linda A Lacewell [REDACTED]

**Cc:** Lis Smith; Josh Vlasto; Judith Mogul; Beth Garvey; Richard Azzopardi; Steven Cohen [REDACTED] Mitra Hormozi



**Subject:** RE: Privileged & confidential. Fwd: Time-sensitive comment request

"Ms. Boylan's current argument is self-defeating -- if she was "afraid" of the Governor than why did she have conflict with the senior staff for constantly circumventing the chain of command and going directly to the Governor? It makes no sense. By her logic she would have wanted the senior staff as a buffer she considered them an obstacle at her gaining access to him and that was the constant conflict."

**Boylan alleges that former and current aides and allies of the Governor have retaliated against her in a variety of ways, including making calls about her.**

Will look like WSJ – about calls that were made and tenor.

Her ongoing and continued claim that those calls were intimidating or intended to suss out what her plans were or cast aspersions about her.

Melissa and Rich and Abbey Collins are mentioned.

From Rich Azzopardi, senior advisor to the Governor: "After Ms. Boylan's tweets in December, she, and her lawyers and members of the press began reaching out to former members of the Chamber, many of whom never worked with her. Those former members of the Chamber called to let various staff people know and convey that they were upset by the outreach. As a result, we proactively reached out to some former colleagues to check in and make sure they had a heads up."

Re allegation that the calls were "intimidation," from Rich Azzopardi: "False."

**She accuses Melissa DeRosa of leaking her personnel file and questions the legality of the leak. Do you or does Melissa have a response?**

Something of ongoing reporting and fact checking calls

*From Beth Garvey, Acting Counsel:* "With certain limited exceptions, as a general matter, it is within a government entity's discretion to share redacted employment records, including in instances when members of the media ask for such public information and when it is for the purpose of correcting inaccurate or misleading statements. Given the ongoing review by the State Attorney General, we cannot comment further at this time."

OFF THE RECORD: HOW WOULD LINDSEY KNOW WHO RELEASED IT? WHAT IS THE BASIS FOR HER ASSERTION? WE CAN'T GET INTO SPECS BECAUSE OF THE AG'S INVESTIGATION, BUT PRINTING THAT MELISSA WAS THE ONE WHO GAVE IT TO THE PRESS WOULD BE INACCURATE.

**Boylan describes a culture of hostility and bullying under the governor. She and others recall seeing a dart board with a photo of Bill DeBlasio on it while attending a pool party. Do you or the governor have any comment on the dart board and the intentions behind it?**

IGNORE

**Boylan says, as previously alleged in her Medium post, that the governor fixated on her, tracked her location through aides to an extent she found uncomfortable, and showed a level of interest that she found inappropriate in their interpersonal interactions.**

Fixated on her – her characterization of him – her interpretation of these events was he was repeatedly inquiring about her and in their own interactions, eye contact, touching, and signaling his interest in ways she

found uncomfortable

Incremental new pieces of communiques – from editorial and fact checking standpoint – a cache of communications similar to what we’ve already seen – Stephanie Benton email from March 2017 sharing the governor’s pin, responding to Lindsey getting a bberry, “Smiley face. Feel free to pin gov. he’ll be very happy to hear from you.” about her being issued a bberry with pin capacity and that’s something the gov will be happy about -

From a spokesman: “Part of Stephanie’s job is to make sure senior staff know how and when they can get in touch with the Governor, and Blackberry pin is how any member of the team would communicate with him.”

Re Jill’s email: “Jill oversaw events and scheduling, so it was her job to understand what senior members of the team would be attending Governor events.”

From a spokesperson: “To all outward appearances, Lindsey seemed to welcome being included in events with the Governor and being part of the Governor’s orbit.”

**She says that she felt objectified and professionally diminished, and recounts an incident at the December 2016 REDC awards during which she says she was ordered to accompany the Governor and Maria Bartiromo on a return helicopter flight rather than remain and continue to engage with her direct-reports on substantive matters.**

**This is not true – she was not on the flight**

-  
From a spokesperson: “Lindsey was the subject matter expert, so of course the Governor would have asked her to join him during the course of a lengthy interaction with a member of media, especially one as respected as Maria Bartiromo whose beat encompassed Lindsey’s economic development portfolio.”

**Boylan speaks about what she perceived to be a lack of boundaries between the Governor and female staffers. She says that Stephanie Benton asked her, also at a pool party, whether she had yet been swimming in the pool at the governor’s residence.**

IS THIS TRUE? DO WE COMMENT?

The context is that she puts this against the backdrop of an increasingly uncomfortable situation where boundaries were crossed, she felt pursued and not completely safe

Implication appeared to be: it was a question of whether in her time working for the gov had she been swimming in the pool, as if it were a normal thing that female staff would have done

Timeframe: late in her time working in NY government, maybe 2018 – would have been after she moved to the chamber

**On the subject of the "strip poker" comment that her Medium post claimed the governor made on a flight in October 2017, Boylan disputes the group denial and says that Abbey Fashouer Collins was sitting next to her when the comment was made.**

TO DISCUSS

Ronan reached out to Abbey on this point. Has existing statement.



There's a bit of a logical inconsistency – specifically that the group statement says we were there and we can say for a fact this never happened

But when you talk to people about it, there's inconsistency as to whether people were there.

Do you want to maintain as an absolute that abbey was on the plane for all possible moments that it could have happened

She says abbey was next to her, remembers it because abbey was younger and pretty and would be vulnerable to it and had a fleeting thought of concern

I STAND BY MY EARLIER STATEMENT

**She reiterates her claim that the governor kissed her on the lips in 2018.**

PLEASE INCLUDE PRIOR STATEMENT FROM PRESS SECRETARY CAITLIN GIROAUD: "As we said before, Ms. Boylan's claims of inappropriate behavior are quite simply false."

**On the subject of Melissa, she recounts a convo in which Melissa screamed at her on the phone – in the final days of Lindsey being in her job – July 2018 – when things became really**

Mdr screamed "what the fuck did you do?"

Boylan said she hung up.

An anecdote that traveled within the chamber

An exchange about a work matter

Against backdrop of the dissolution of the relationship

According to a spokesperson: "Lindsey repeatedly violated proper chain of command and communication by taking issues directly to the Governor instead of first discussing them with members of the senior team, as was the protocol. She had been admonished for this sort of behavior previously, but did it anyway, leading to a heated conversation with the Secretary."

**In not quite as late a period, there's an exchange she described with [REDACTED] in which she says she was fearful of the governor**

She was awaiting a Gov meeting at capitol

Waiting in [REDACTED] office and says she was frightened

[REDACTED] replied and said you've done mtgs with the gov a million times, why would you be fearful? because the gov liked her in a "different way"

Lindsey said to [REDACTED] that she was afraid of the Governor.

[REDACTED] replied, I thought he only liked blondes.

DRAFT if needed from [REDACTED] [trying to get this knocked out OTR]: "I respect every person's right to come forward if they have a concern, however if Lindsey has a recollection of an exchange as described, it did not involve me."

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**From:** Jeffrey Pollock [REDACTED]

**Sent:** Sunday, March 14, 2021 3:55 PM

**To:** Melissa DeRosa; Peter Ajemian; Linda A Lacewell [REDACTED]

**Cc:** Lis Smith; Josh Vlasto; Judith Mogul; Beth Garvey; Richard Azzopardi; Steven Cohen [REDACTED] Stephanie Benton; Mitra Hormozi



**Subject:** RE: Privileged & confidential. Fwd: Time-sensitive comment request

My suggestion is once peter sends the stuff, we get back on the phone.

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**From:** Melissa DeRosa [REDACTED]  
**Sent:** Sunday, March 14, 2021 3:48 PM  
**To:** Peter Ajemian [REDACTED]; Linda A Lacewell [REDACTED]  
**Cc:** Lis Smith [REDACTED]; Jeffrey Pollock [REDACTED]; Josh Vlasto <[REDACTED]>  
[REDACTED]; Judith Mogul [REDACTED]; Beth Garvey [REDACTED]; Richard Azzopardi [REDACTED]; Steven Cohen [REDACTED]; Stephanie Benton <[REDACTED]>  
[REDACTED]; Mitra Hormozi [REDACTED]  
**Subject:** Re: Privileged & confidential. Fwd: Time-sensitive comment request

[EXT EMAIL]

Can we give a global statement that includes the fact that she asked for her job back after she was confronted w bullying/harassment of 3 subordinates as well as colleagues?

---

**From:** Peter Ajemian  
**Sent:** Sunday, March 14, 2021 1:05 PM  
**To:** Linda A Lacewell [REDACTED]  
**Cc:** Melissa DeRosa; Lis Smith; Jeffrey Pollock; Josh Vlasto; Judith Mogul; Beth Garvey; Richard Azzopardi; Steven Cohen [REDACTED]; Stephanie Benton; Mitra Hormozi  
**Subject:** Re: Privileged & confidential. Fwd: Time-sensitive comment request

Privileged / confdientnal / draft

Deadline:

Responses today would be much appreciated. If there's something substantial and factual that needs to be meaningfully disputed, he will hear us out and consider.

**Boylan alleges that former and current aides and allies of the Governor have retaliated against her in a variety of ways, including making calls about her.**

Will look like WSJ – about calls that were made and tenor.

Her ongoing and continued claim that those calls were intimidating or intended to suss out what her plans were or cast aspersions about her.

Melissa and Rich and Abbey Collins are mentioned

**She accuses Melissa DeRosa of leaking her personnel file and questions the legality of the leak. Do you or does Melissa have a response?**

SAYING SPECIFICALLY THAT MELISSA LEAKED HER FILES

Something of ongoing reporting and fact checking calls

*From Beth Garvey, Acting Counsel:* "With certain limited exceptions, as a general matter, it is within a government entity's discretion to share redacted employment records, including in instances when members of the media ask for such public information and when it is for the purpose of correcting inaccurate or misleading statements. Given the ongoing review by the State Attorney General, we cannot comment further at this time."

**Boylan describes a culture of hostility and bullying under the governor. She and others recall seeing a dart board with a photo of Bill DeBlasio on it while attending a pool party. Do you or the governor have any comment on the dart board and the intentions behind it?**

IS THIS TRUE?

**Boylan says, as previously alleged in her Medium post, that the governor fixated on her, tracked her location through aides to an extent she found uncomfortable, and showed a level of interest that she found inappropriate in their interpersonal interactions.**

Fixated on her – her characterization of him – her interpretation of these events was he was repeatedly inquiring about her and in their own interactions, eye contact, touching, and signaling his interest in ways she found uncomfortable

Incremental new pieces of communiques – from editorial and fact checking standpoint – a cache of communications similar to what we’ve already seen – Stephanie Benton email from March 2017 sharing the governor’s pin, responding to Lindsey getting a bberry, “Smiley face. Feel free to pin gov. he’ll be very happy to hear from you.” about her being issued a bberry with pin capacity and that’s something the gov will be happy about -

Tracked location – in reference to the Jill email, part of pattern, what she deemed escalating harassment.

Elaboration of claims she’s already made

**She says that she felt objectified and professionally diminished, and recounts an incident at the December 2016 REDC awards during which she says she was ordered to accompany the Governor and Maria Bartiromo on a return helicopter flight rather than remain and continue to engage with her direct-reports on substantive matters.**

DIDN'T SHE OFTEN REQUEST THAT SHE FLY WITH THE GOVERNOR?

Her interpretation of that is she’s being professionally diminished

What she described as a pattern of grouping together women in an ornamental fashion – that appears to be why she raised that anecdote

Her read was: the gov wanted Maria and Lindsey by his side “like dolls” was more important than anything she was doing workwise

**Boylan speaks about what she perceived to be a lack of boundaries between the Governor and female staffers. She says that Stephanie Benton asked her, also at a pool party, whether she had yet been swimming in the pool at the governor's residence.**

IS THIS TRUE? DO WE COMMENT?

The context is that she puts this against the backdrop of an increasingly uncomfortable situation where boundaries were crossed, she felt pursued and not completely safe

Implication appeared to be: it was a question of whether in her time working for the gov had she been swimming in the pool, as if it were a normal thing that female staff would have done

Timeframe: late in her time working in NY government, maybe 2018 – would have been after she moved to the chamber



**On the subject of the "strip poker" comment that her Medium post claimed the governor made on a flight in October 2017, Boylan disputes the group denial and says that Abbey Fashouer Collins was sitting next to her when the comment was made.**

TO DISCUSS

Ronan reached out to Abbey on this point. Has existing statement.

There's a bit of a logical inconsistency – specifically that the group statement says we were there and we can say for a fact this never happened

But when you talk to people about it, there's inconsistency as to whether people were there.

Do you want to maintain as an absolute that abbey was on the plane for all possible moments that it could have happened

She says abbey was next to her, remembers it because abbey was younger and pretty and would be vulnerable to it and had a fleeting thought of concern

**She reiterates her claim that the governor kissed her on the lips in 2018.**

PLEASE INCLUDE PRIOR STATEMENT FROM PRESS SECRETARY CAITLIN GIROAUD: "As we said before, Ms. Boylan's claims of inappropriate behavior are quite simply false."

**On the subject of Melissa, she recounts a convo in which Melissa screamed at her on the phone – in the final days of Lindsey being in her job – July 2018 – when things became really**

Mdr screamed "what the fuck did you do?"

Boylan said she hung up.

An anecdote that traveled within the chamber

An exchange about a work matter

Against backdrop of the dissolution of the relationship

**In not quite as late a period, there's an exchange she described with Brendan Hughes in which she says she was fearful of the governor**

She was awaiting a Gov meeting at capitol

Waiting in Brendan's office and says she was frightened

Brendan replied and said you've done mtgs with the gov a million times, why would you be fearful?

Lindsey said to Brendan that she was afraid of the Governor.

Brendan replied, I thought he only liked blondes.

Passing description of Lindsey being in a car with GAMC and hearing him scream at a prominent journalist because he was upset about a story – no specs on the journalist or the story – a characterization of the gov's relationship with her and the press.

Mentions:

Jill

Stephanie

Brendan

Melissa



Rich

---

**From:** Peter Ajemian

**Sent:** Sunday, March 14, 2021 11:40 AM

**To:** Linda A Lacewell [REDACTED]

**Cc:** Melissa DeRosa; Lis Smith; Jeffrey Pollock; Josh Vlasto; Judith Mogul; Beth Garvey; Richard Azzopardi; Steven Cohen [REDACTED] Stephanie Benton; Mitra Hormozi

**Subject:** Re: Privileged & confidential. Fwd: Time-sensitive comment request

Update: speaking to him at noon

On Mar 14, 2021, at 10:44 AM, Peter Ajemian [REDACTED] wrote:

Privileged / confidential / draft

We've exchanged emails but he hasn't called back yet - said he was on another call and would call me when he's off. Started putting together notes for discussion because I fear we are not going to have a lot of time. Should we hop on phone now to discuss?

- Boylan alleges that former and current aides and allies of the Governor have retaliated against her in a variety of ways, including making calls about her.
  - CALLS TO WHO? WHAT WAS SAID? WHAT IS THE BASIS FOR THIS ALLEGATION?
- She accuses Melissa DeRosa of leaking her personnel file and questions the legality of the leak. Do you or does Melissa have a response?

**From Beth Garvey, Special Counsel & Senior Advisor:** "With certain limited exceptions, as a general matter, it is within a government entity's discretion to share redacted employment records, including in instances when members of the media ask for such public information and when it is for the purpose of correcting inaccurate or misleading statements. Given the ongoing review by the State Attorney General, we cannot comment further at this time."

- Boylan describes a culture of hostility and bullying under the governor. She and others recall seeing a dart board with a photo of Bill DeBlasio on it while attending a pool party. Do you or the governor have any comment on the dart board and the intentions behind it?
  - IS THIS TRUE?
- Boylan says, as previously alleged in her Medium post, that the governor fixated on her, tracked her location through aides to an extent she found uncomfortable, and showed a level of interest that she found inappropriate in their interpersonal interactions.
  - WHAT SPECIFICALLY IS SHE REFERRING TO? DID SHE GIVE EXAMPLES?



- She says that she felt objectified and professionally diminished, and recounts an incident at the December 2016 REDC awards during which she says she was ordered to accompany the Governor and Maria Bartiromo on a return helicopter flight rather than remain and continue to engage with her direct-reports on substantive matters.
  - DIDN'T SHE OFTEN REQUEST THAT SHE FLY WITH THE GOVERNOR?
- Boylan speaks about what she perceived to be a lack of boundaries between the Governor and female staffers. She says that Stephanie Benton asked her, also at a pool party, whether she had yet been swimming in the pool at the governor's residence.
  - IS THIS TRUE? DO WE COMMENT?
- On the subject of the "strip poker" comment that her Medium post claimed the governor made on a flight in October 2017, Boylan disputes the group denial and says that Abbey Fashouer Collins was sitting next to her when the comment was made.
  - TO DISCUSS
- She reiterates her claim that the governor kissed her on the lips in 2018.
  - PLEASE INCLUDE PRIOR STATEMENT FROM PRESS SECRETARY CAITLIN GIROAURD: "As we said before, Ms. Boylan's claims of inappropriate behavior are quite simply false."

On Mar 14, 2021, at 9:12 AM, Lacewell, Linda A (DFS) [REDACTED] wrote:

+ Mitra

Sent from my iPhone

On Mar 14, 2021, at 9:01 AM, Peter Ajemian [REDACTED] wrote:

Can someone please loop Mitra? I don't have her email.

Begin forwarded message:

**From:** Peter Ajemian [REDACTED]  
**Date:** March 14, 2021 at 8:59:40 AM EDT  
**To:** Peter Ajemian [REDACTED]  
**Subject:** Fwd: Time-sensitive comment request

-----Forwarded message -----

**From:** Farrow, Ronan [REDACTED]  
**Date:** Sun, Mar 14, 2021 at 8:57 AM  
**Subject:** Time-sensitive comment request  
**To:** [REDACTED]



Hi Peter,

We're preparing to publish a story about Lindsey Boylan's claims about the Governor and I wanted to seek any information your office wants to share. Please send me any comments you'd like included today. I'm also available today to talk, at [REDACTED]

This story largely reiterates the account already narrated in Boylan's Medium post and other remarks. Pertinent points are highlighted below:

- Boylan alleges that former and current aides and allies of the Governor have retaliated against her in a variety of ways, including making calls about her.
- She accuses Melissa DeRosa of leaking her personnel file and questions the legality of the leak. Do you or does Melissa have a response?
- Boylan describes a culture of hostility and bullying under the governor. She and others recall seeing a dart board with a photo of Bill DeBlasio on it while attending a pool party. Do you or the governor have any comment on the dart board and the intentions behind it?
- Boylan says, as previously alleged in her Medium post, that the governor fixated on her, tracked her location through aides to an extent she found uncomfortable, and showed a level of interest that she found inappropriate in their interpersonal interactions.
- She says that she felt objectified and professionally diminished, and recounts an incident at the December 2016 REDC awards during which she says she was ordered to accompany the Governor and Maria Bartiromo on a return helicopter flight rather than remain and continue to engage with her direct-reports on substantive matters.
- Boylan speaks about what she perceived to be a lack of boundaries between the Governor and female staffers. She says that Stephanie Benton asked her, also at a pool party, whether she had yet been swimming in the pool at the governor's residence.
- On the subject of the "strip poker" comment that her Medium post claimed the governor made on a flight in October 2017, Boylan disputes the group denial and says that Abbey Fashouer Collins was sitting next to her when the comment was made.
- She reiterates her claim that the governor kissed her on the lips in 2018.

Again, always welcome all information in the interest of keeping this fair and accurate. Would also be glad to be in touch more broadly about the wider unfolding story.

Thanks very much, Peter. Best wishes,

Ronan

# EXHIBIT 97

Thank you

**From:** Lis Smith [REDACTED]  
**Sent:** Friday, February 26, 2021 12:01 PM  
**To:** Jeffrey Pollock [REDACTED]  
**Cc:** Dani Lever [REDACTED] Judith Mogul [REDACTED] Linda A Lacewell [REDACTED]  
[REDACTED] Melissa DeRosa [REDACTED] Steven Cohen [REDACTED]  
[REDACTED]  
**Subject:** Re: Priv and Confidential

Melissa I thought th plan was now not to do this

On Fri, Feb 26, 2021 at 11:00 AM Jeffrey Pollock [REDACTED] wrote:

This doesn't feel different. I think someone needs to stop and do an outline of what needs to be accomplished. And if it were me, it would start with contrition not Boylan

Jeffrey Pollock  
President

[REDACTED]  
My pronouns: he, him, his

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** Friday, February 26, 2021 10:27:55 AM  
**To:** Linda A Lacewell [REDACTED] Judith Mogul [REDACTED]; Steven Cohen ([REDACTED])  
[REDACTED] Dani Lever <[REDACTED]>  
[REDACTED] Jeffrey Pollock <[REDACTED]>  
[REDACTED]  
**Subject:** Re: Priv and Confidential

[EXTERNAL]

My edits:

Let me address a couple of matters. First, the situation with Ms. Boylan and let me start by establishing the facts. I never physically touched her inappropriately. There was never a discussion about strip poker on the plane. There were four people crammed on the prop plane, all within earshot, and no one heard the comment because it was not said. As far as knees or feet or legs making contact during the flight, anyone who has been on the very small state plane knows that you are sitting across from each other and facing each other, making it virtually impossible not to be in incidental physical contact. There are also people sitting less than two feet across the aisle from you.



# EXHIBIT 98

**Date:** Saturday, February 27 2021 01:10 PM

**Subject:** Re: latest draft

**From:** Peter Ajemian [REDACTED]

**To:** Richard Azzopardi [REDACTED]; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED]

**CC:** Jeffrey Pollock [REDACTED]; Judith Mogul [REDACTED]; Linda A Lacewell [REDACTED]; Lis Smith [REDACTED]; Stephanie Benton [REDACTED]; Steven Cohen [REDACTED]; Christopher Cuomo [REDACTED]

---

And I agree w Rich on outside vs independent.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Peter Ajemian

**Sent:** Saturday, February 27, 2021 1:01 PM

**To:** Richard Azzopardi; Josh Vlasto; Melissa DeRosa

**Cc:** Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED]; Lis Smith; Stephanie Benton; Steven Cohen [REDACTED]; Christopher Cuomo

**Subject:** Re: latest draft

---

So everyone knows - Jesse said the only additional quote is this: At one juncture, Ms. Bennett says the governor also noted that he felt "anyone above the age of 22 is fine, he's fine with anyone above the age of 22," a point that arose after they had discussed a speech she made at Hamilton [College], on her 25th birthday.

And yes Lindsey Boylan is mentioned in the story as context - this is on the heels of etc

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Richard Azzopardi

**Sent:** Saturday, February 27, 2021 12:55 PM

**To:** Josh Vlasto; Melissa DeRosa

**Cc:** Peter Ajemian; Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED]; Lis Smith; Stephanie Benton; Steven Cohen [REDACTED]; Christopher Cuomo

**Subject:** Re: latest draft

---

Fwiw I prefer outside investigation to independent. I feel like the press will be set off by that word.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Josh Vlasto

**Sent:** Saturday, February 27, 2021 12:51 PM

**To:** Melissa DeRosa

**Cc:** Peter Ajemian; Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED]; Lis Smith; Richard Azzopardi; Stephanie Benton; Steven Cohen [REDACTED]; Christopher Cuomo

**Subject:** latest draft

---

Ms. Bennett has every right to speak out.

Let me be clear, I have never made sexual advances toward women in the workplace.

Ms. Bennett was a hardworking and valued member of our team during COVID. When she came to me and opened up about being a sexual assault survivor and how it shaped her, I tried to be supportive and helpful. The last thing I would ever have wanted was her to feel any of the things that are being reported.



This situation should not and cannot be resolved in the press so I believe the best way to get to the truth is through a full, thorough and independent investigation. I have asked XYZ to lead this investigation and I am directing all state employees to comply with her team.

On Sat, Feb 27, 2021 at 12:37 PM Josh Vlasto [REDACTED] wrote:

Ms. Bennett has every right to speak out.

Let me be clear, I have never made sexual advances toward women in the workplace.

Ms. Bennett has been a hardworking and valued member of our team during COVID. I appreciate and respect the work she has done for us. When she came to me and opened up about being a sexual assault survivor and how it shaped her, I tried to be supportive. I never intended to be anything but supportive and helpful and the last thing I would ever have wanted was her to feel any of the things that are being reported.

This situation should not and cannot be resolved in the press so I believe the best way to get to the truth is through a full, thorough and independent investigation. I have asked XYZ to lead this investigation and I am directing all state employees to comply with her team.

On Sat, Feb 27, 2021 at 12:23 PM Josh Vlasto [REDACTED] wrote:

apologies  
use this version

Recent claims that I made sexual advances toward women in the workplace are untrue.

When Ms. Bennett came to me and opened up about being a sexual assault victim and how it shaped her, I tried to be supportive and relate to her sharing struggles in my own life. I never intended to be anything but supportive and constructive and I am sorry and deeply regret that she felt anything otherwise.

I have a different perspective on the dynamics of our interactions however absolutely respect a woman's right to speak out.

This situation should not and cannot be resolved in the press. I believe the best way to get to the truth is through a full, thorough and independent investigation to review these matters. I have asked XYZ to conduct this



investigation and I am directing all state employees to comply with her team.

On Sat, Feb 27, 2021 at 12:21 PM Josh Vlasto [REDACTED] wrote:

Recent claims that I made sexual advances toward women in the workplace are untrue.

When Ms. Bennett came to me and opened up about being a sexual assault victim and how it shaped her, I tried to relate and be supportive, including sharing struggles in my own life. I never intended to be anything but supportive and constructive and I am sorry and deeply regret that she felt anything otherwise.

I have a different perspective on the dynamics of our interactions however absolutely respect a woman's right to speak out.

This situation should not and cannot be resolved in the press. I believe the best way to get to the truth is through a full, thorough and independent investigation to review these matters. I have asked XYZ to conduct this investigation and I am directing all state employees to comply with her team.

On Sat, Feb 27, 2021 at 8:40 AM Melissa DeRosa [REDACTED] wrote:

Sorry read this version -->

Ms. Bennett came to work in the governor's office for a short period of time.

During her time in the office, she told the Governor that she had been a victim of sexual assault and then started an organization to promote awareness of sexual assault. She explained that her alma mater had denied her allegations of sexual assault after an investigation and that her family was not fully supportive of her exposing the allegations. Ms. Bennett said she came to the Governor's office because of his work protecting sexual assault victims, especially against universities. The Governor sensed she was still suffering from the trauma and tried to be supportive as Ms Bennett says, he was 'paternalistic' and they had a 'mentor-mentee' relationship.

At one point Ms Bennett said she would be giving a keynote speech on the issue of sexual assault; the Governor said he would happy to help her with it. He thought it could be cathartic and encouraged her to own what happened to her and use her voice to proclaim her truth. The Governor tried to be supportive and suggested developing real friendships and healthy loving and positive emotional relationships, exercise and therapy to help her in moving forward. The Governor tried to lighten her spirits. At one point, Ms Bennett



said she was thinking of getting a tattoo. The Governor said his opinion was that she would find it was a mistake later in life and that she should at least do it where it would be hidden. Ms. Bennett said she was reviewing the Governor's incoming mail and many women were interested in dating him, and he joked that he was lonely and ready for a girlfriend and that she should screen the mail and find him good candidates.

At one point Ms Bennett approached an aide and requested to be transferred to a position she previously expressed interest in with the health team. The aide then proactively set up a meeting with the Governor's special counsel, a former federal prosecutor, for a formal interview. In that interview, Ms Bennett said she had shared personal information with the Governor which she now regretted and felt uncomfortable. She was asked specifically if she felt the Governor sexually harassed her or if there was any improper contact and she said no. She was asked if she felt there should be any further action to determine if the Governor did anything improper; Ms. Bennett said no. Ms. Bennett's initial impression that the governor was being 'paternalistic' and a 'mentor-mentee' was and remained correct.

We have nothing but respect for Ms. Bennett and the work she did for the state. Understanding what she survived previously in her life, we would only want her to feel supported and valued.

We believe the best way to affirm the truth on this and the matter involving Ms Boylan is through a full, fact-based and independent investigation by an outside counsel.

---

**From:** Melissa DeRosa

**Sent:** Saturday, February 27, 2021 8:32 AM

**To:** Josh Vlasto; Peter Ajemian

**Cc:** Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED] Lis Smith; Richard Azzopardi; Stephanie Benton; Steven Cohen [REDACTED]

**Subject:** priv confidential - pls review this draft for the call [REDACTED] is putting on

Sorry read this version -->

Ms. Bennett came to work in the governor's office for a short period of time.

During her time in the office, she told the Governor that she had been a victim of sexual assault and then started an organization to promote awareness of sexual assault. She explained that her alma mater had denied her allegations of sexual assault after an investigation and that her family was not fully supportive of her exposing the allegations. Ms. Bennett said she came to the Governor's office because of his work protecting sexual assault victims, especially against universities. The Governor sensed she was still suffering from the trauma and tried to be supportive as Ms Bennett says, he was 'paternalistic' and they had a 'mentor-mentee' relationship.

At one point Ms Bennett said she would be giving a keynote speech on the issue of sexual assault; the Governor said he would be happy to help her with it. He thought it could be cathartic and encouraged her to own what happened to her and use her voice to proclaim her truth. The Governor tried to be supportive and suggested developing real friendships and healthy loving and positive emotional relationships, exercise and

therapy to help her in moving forward. The Governor tried to lighten her spirits. At one point, Ms Bennett said she was thinking of getting a tattoo. The Governor said his opinion was that she would find it was a mistake later in life and that she should at least do it where it would be hidden. Ms. Bennett said she was reviewing the Governor's incoming mail and many women were interested in dating him, and he joked that he was lonely and ready for a girlfriend and that she should screen the mail and find him good candidates.

At one point Ms Bennett approached an aide and requested to be transferred to a position she previously expressed interest in with the health team. The aide then proactively set up a meeting with the Governor's special counsel, a former federal prosecutor, for a formal interview. In that interview, Ms Bennett said she had shared personal information with the Governor which she now regretted and felt uncomfortable. She was asked specifically if she felt the Governor harassed her in any way or if there was any improper contact and she said no. She was asked if she felt there should be any further action to determine if the Governor did anything improper; Ms. Bennett said no. Ms. Bennett's initial impression that the governor was being 'paternalistic' and a 'mentor-mentee' was and remained correct. We have nothing but respect for Ms. Bennett and the work she did for the state. Understanding what she survived previously in her life, we would only want her to feel supported and valued.

We believe the best way to get to the truth is through a full, fact-based and independent investigation by an outside counsel, including Ms. Boylan.

---

**From:** Melissa DeRosa

**Sent:** Saturday, February 27, 2021 8:05 AM

**To:** Josh Vlasto; Peter Ajemian

**Cc:** Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED] Lis Smith; Richard Azzopardi; Stephanie Benton; Steven Cohen [REDACTED]

**Subject:** Re: privileged / confidential / draft

A different approach:

Ms. Bennett came to work in the governor's office for a short period of time.

During her time in the office, she told the Governor that she had been a victim of sexual assault and then started an organization to promote awareness of sexual assault. She explained that her alma mater had denied her allegations of sexual assault after an investigation and that her family was not fully supportive of her exposing the allegations. Ms. Bennett said she came to the Governor's office because of his work protecting sexual assault victims, especially against universities. The Governor sensed she was still suffering from the trauma and tried to be supportive as Ms Bennett says, he was 'paternalistic' and they had a 'mentor-mentee' relationship.

At one point Ms Bennett said she would be giving a keynote speech on the issue of sexual assault; the Governor said he would happy to help her with it. He thought it could be cathartic and encouraged her to own what happened to her and use her voice. The Governor tried to be supportive and suggested developing healthy friendships and supportive relationships, exercise and therapy to help her in moving forward. The Governor tried to lighten her spirits. At one point, Ms Bennett said she was thinking of getting a tatoo. The Governor said his opinion was that she would find it was a mistake later in life and that she should at least do it where it would be hidden. Ms. Bennett said she was reviewing the Governor's incoming mail and many women were interested in dating him, and he joked that she should screen the mail and find him good candidates.

At one point Ms Bennett approached an aid and requested to be transferred to a position she previously expressed interest in with the health team. The aide then proactively set up a meeting with the Governor's special counsel, a former federal prosecutor, for a formal interview. Ms Bennet said she had shared personal information with the Governor which she now regretted and felt uncomfortable. She was asked specifically if she felt the Governor harassed her in any way or if there was any improper contact and she said no. She was asked if she felt there should be any further action to determine if the Governor did anything improper; Ms. Bennett said no. Ms. Bennett's initial impression that the governor was being 'paternalistic' and a 'mentor-mentee' was and remained correct. We have nothing but respect for Ms. Bennett and the work she did for the state. Understanding what she survived previously in her life, we would only want her to feel supported and valued.

We believe the best way to get to the truth is through a full, fact-based and independent investigation by an outside counsel.

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** Saturday, February 27, 2021 7:58 AM  
**To:** Peter Ajemian  
**Cc:** Jeffrey Pollock; Judith Mogul; Linda A Lacewell [REDACTED] Lis Smith; Melissa DeRosa; Richard Azzopardi; Stephanie Benton; Steven Cohen [REDACTED]  
**Subject:** Re: privileged / confidential / draft

Seems right to me  
Comes in a release I imagine with a sentence or two about the person picked?

On Sat, Feb 27, 2021 at 7:45 AM Peter Ajemian [REDACTED] wrote:  
Relooping Josh

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

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**From:** Peter Ajemian  
**Sent:** Saturday, February 27, 2021 7:18 AM  
**To:** Lis Smith  
**Cc:** Melissa DeRosa; Judith Mogul; Linda A Lacewell [REDACTED] Stephanie Benton; Steven Cohen [REDACTED] Jeffrey Pollock; Richard Azzopardi  
**Subject:** Re: privileged / confidential / draft

Sounds right. One tweak in caps for clarity.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Lis Smith

**Sent:** Saturday, February 27, 2021 12:52 AM

**To:** Peter Ajemian

**Cc:** Melissa DeRosa; Judith Mogul; Linda A Lacewell [REDACTED] Stephanie Benton; Steven Cohen [REDACTED] Jeffrey Pollock; Richard Azzopardi

**Subject:** Re: privileged / confidential / draft

removed "complex" and reworked a little:

I have nothing but respect for Charlotte and the work she did for the state. Understanding what she survived PREVIOUSLY IN HER LIFE, I would only want her to feel supported and valued. I believe the best way to get to the truth is through a full, fact-based and independent investigation by an outside counsel who has the expertise to review matters like this one and can recommend remedial steps if warranted.

On Sat, Feb 27, 2021 at 12:39 AM Lis Smith [REDACTED] wrote:  
Additional option:

I have nothing but respect for Charlotte and the work she did for the state. Understanding what Charlotte survived the way I do, I never would have said anything to her that didn't make her feel supported and valued. I believe the best way to get to the truth is through a full, fact-based and independent investigation by an outside counsel who has the expertise to review complex matters like this one and can recommend remedial steps if warranted.

On Fri, Feb 26, 2021 at 11:39 PM Peter Ajemian [REDACTED] wrote:  
Understanding this needs work, here's an initial draft to discuss.

I have nothing but respect for Charlotte and the work she did for the state, and I have tremendous sympathy for what she had been through in her life. I regret and am saddened that she felt anything other than supported and valued at work, as I want nothing but the best for her. I have a different perspective on the dynamic presented here and believe the best way to get to the truth is through a full, fact-based and independent investigation by an outside counsel who has the expertise to review complex matters like this one and can recommend remedial steps if warranted.

On Feb 26, 2021, at 8:40 PM, [REDACTED] wrote:

Plus Chris Cuomo

Sent from my iPhone



# EXHIBIT 99

Message

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**From:** Jeff Pollock [REDACTED]  
**Sent:** 3/3/2021 6:37:24 PM  
**To:** [REDACTED] Beth Garvey [REDACTED] Stephanie Benton  
Cell [REDACTED] Former Consultant [REDACTED] Lis Smith [REDACTED] Former Consultant  
[REDACTED] Melissa DeRosa [REDACTED] Dani [REDACTED] Josh Vlasto [REDACTED]  
[REDACTED]  
**Subject:** 3/3/2021 1:37:24 PM -05:00 : Jeff Pollock [REDACTED] [13 parties]

And now he is not sounding contrite so let's get back to that



# EXHIBIT 100

Message

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**From:** Lis Smith [REDACTED]  
**Sent:** 3/3/2021 6:37:41 PM  
**To:** [REDACTED] Dani [REDACTED] Jeff Pollock [REDACTED]  
[REDACTED] Josh Vlasto [REDACTED] Former Consultant [REDACTED] Beth Garvey [REDACTED]  
[REDACTED] Stephanie Benton [REDACTED] Former Consultant [REDACTED] Melissa DeRosa [REDACTED]  
**Subject:** 3/3/2021 1:37:41 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

Tone is not contrite





# EXHIBIT 101

| Name       | Msg # | From                  | To   | Body   | Timestamp: Date | Timestamp: Time             |
|------------|-------|-----------------------|--|--|-----------------|-----------------------------|
| [REDACTED] | 186   | [REDACTED] Lis Smith  | [REDACTED] Dani Lever (owner)<br>Josh Vlasto<br>Melissa Derosa<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner) | I don't love the word paternalistic  | 2/27/2021       | 2/27/2021 2:11:12 PM(UTC-5) |
| [REDACTED] | 187   | [REDACTED] Lis Smith  | [REDACTED] Dani Lever (owner)<br>Josh Vlasto<br>Melissa Derosa<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner) | In the statement but Melissa he seemed pretty set on it- I think it sounds creepy rereading  | 2/27/2021       | 2/27/2021 2:11:33 PM(UTC-5) |
| [REDACTED] | 194   | [REDACTED] Dani Lever | [REDACTED] Josh Vlasto<br>Melissa Derosa<br>Lis Smith<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner)          | Is "reported" here a problem? She spoke to him on the record. It's not just being reported, these are her words. — "The last thing I would ever have wanted was to make her feel any of the things that are being reported." | 2/27/2021       | 2/27/2021 2:16:52 PM(UTC-5) |
| [REDACTED] | 195   | [REDACTED] Lis Smith  | [REDACTED] Dani Lever (owner)<br>Josh Vlasto<br>Melissa Derosa<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner) | I don't love that part but Chris/Andrew wanted in  | 2/27/2021       | 2/27/2021 2:27:55 PM(UTC-5) |
| [REDACTED] | 199   | [REDACTED] Lis Smith  | [REDACTED] Dani Lever (owner)<br>Josh Vlasto<br>Melissa Derosa<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner) | Chris wants to make sure we have enough contrition in here   | 2/27/2021       | 2/27/2021 4:05:12 PM(UTC-5) |
| [REDACTED] | 200   | [REDACTED] Lis Smith  | [REDACTED] Dani Lever (owner)<br>Josh Vlasto<br>Melissa Derosa<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner) | Do you think we do   | 2/27/2021       | 2/27/2021 4:05:16 PM(UTC-5) |
| [REDACTED] | 201   | [REDACTED] Lis Smith  | [REDACTED] Dani Lever (owner)<br>Josh Vlasto<br>Melissa Derosa<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner) | Ok we do   | 2/27/2021       | 2/27/2021 4:10:33 PM(UTC-5) |
| [REDACTED] | 229   | [REDACTED] Dani Lever | [REDACTED] Josh Vlasto<br>Melissa Derosa<br>Lis Smith<br>Rich Azzopardi<br>Peter Ajemien<br>Jefrey Pollock<br>[REDACTED] Dani Lever (owner)          | She posed for a photo  | 2/27/2021       | 2/27/2021 6:27:23 PM(UTC-5) |

# EXHIBIT 102

**Date:** Wednesday, March 3 2021 01:51 PM

**Subject:** [Chat#2915]

**From:** Melissa DeRosa [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)]; [REDACTED]  
[REDACTED] [Liz Smith]; [REDACTED] [Peter Ajemian]; [REDACTED] [Rich Azzopardi];  
[REDACTED] [Jefrey Pollock]; [REDACTED] [Dani Lever]; [REDACTED] [Linda Lacewell]; [REDACTED]  
[REDACTED] [Steven M. Cohen]; [REDACTED] [Stephanie Benton]; [REDACTED] [REDACTED]

---

Should we all jump on phone fast?

**-----METADATA INFORMATION-----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092



**Date:** Wednesday, March 3 2021 01:51 PM

**Subject:** [Chat#2916]

**From:** Melissa DeRosa [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)"]; [REDACTED] [Liz Smith]; [REDACTED] [Peter Ajemian]; [REDACTED] [Rich Azzopardi];  
[REDACTED] [Jefrey Pollock]; [REDACTED] [Dani Lever]; [REDACTED] [Linda Lacewell]; [REDACTED]  
[REDACTED] [Steven M. Cohen]; [REDACTED] [Stephanie Benton]; [REDACTED]

---

I think spin is getting back to work

**-----METADATA INFORMATION-----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092



**Date:** Wednesday, March 3 2021 01:51 PM

**Subject:** [Chat#2917]

**From:** Jeffrey Pollock [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)"]; [REDACTED] [Liz Smith]; [REDACTED] [Peter Ajemian]; [REDACTED] [Rich Azzopardi];  
[REDACTED] [Melissa DeRosa]; [REDACTED] [Dani Lever]; [REDACTED] [Linda Lacewell]; [REDACTED]  
[REDACTED] [Steven M. Cohen]; [REDACTED] [Stephanie Benton]; [REDACTED]

Sure

-----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092



**Date:** Wednesday, March 3 2021 01:52 PM

**Subject:** [Chat#2918]

**From:** Melissa DeRosa [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)"]; [REDACTED] [Liz Smith]; [REDACTED] [Peter Ajemian]; [REDACTED] [Rich Azzopardi]; [REDACTED] [Jefrey Pollock]; [REDACTED] [Dani Lever]; [REDACTED] [Linda Lacewell]; [REDACTED] [Steven M. Cohen]; [REDACTED] [Stephanie Benton]; [REDACTED]

---

Ok

**-----METADATA INFORMATION-----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092



**Date:** Wednesday, March 3 2021 01:52 PM

**Subject:** [Chat#2919]

**From:** Jeffrey Pollock [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)"]; [REDACTED] [Liz Smith]; [REDACTED] [Peter Ajemian]; [REDACTED] [Rich Azzopardi];  
[REDACTED] [Melissa DeRosa]; [REDACTED] [Dani Lever]; [REDACTED] [Linda Lacewell]; [REDACTED]  
[REDACTED] [Steven M. Cohen]; [REDACTED] [Stephanie Benton]; [REDACTED]

---

Spin is getting back to work

**-----METADATA INFORMATION-----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092





**Date:** Wednesday, March 3 2021 01:52 PM

**Subject:** [Chat#2920]

**From:** Melissa DeRosa [REDACTED]

**To:** [REDACTED] [Joshua Vlasto (owner)"]; [REDACTED] [Liz Smith]; [REDACTED] [Peter Ajemian]; [REDACTED] [Rich Azzopardi];  
[REDACTED] [Jefrey Pollock]; [REDACTED] [Dani Lever]; [REDACTED] [Linda Lacewell]; [REDACTED]  
[REDACTED] [Steven M. Cohen]; [REDACTED] [Stephanie Benton]; [REDACTED]

---

Spin is full throated emotional apology

**-----METADATA INFORMATION-----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092



# EXHIBIT 103

Message

---

**From:** Former Consultant  
**Sent:** 3/9/2021 12:34:13 PM  
**To:** Melissa DeRosa Former Consultant  
**Subject:** 3/9/2021 12:34:13 PM -05:00: Former Consultant -> [Melissa DeRosa Former Consultant

I said this to u before but I will reiterate again. I think he needs to say he is going to counseling for his tendency to be aggressive and to reacclimate how he interacts with people. AG report may find no offense but will find inappropriate behavior so why not get out ahead of this now. So the pattern of all these allegations is addressed with this effort for counseling and training. I know a group in DC called mine the gap (I think that's the name) a woman I went to college with runs it [REDACTED] Sorry my personal life has been intense and I want to check in on u personally and soon. But on these other issues he needs to do something about the pattern of behavior - counseling and training is taking action to insure change - that I think is the permission for folks to focus on his positive attributes rather than the bully and inappropriate behavior.

# EXHIBIT 104

**Date:** Tuesday, March 16 2021 10:23 AM

**Subject:** [Chat#15431]

**From:** Joshua Vlasto [REDACTED]

**To:** **Former Consultant** [REDACTED] [Rich Bamberger];

---

Steve told me this morning they are asking him to spread oppo on Joon Kim. Don't think we want to be getting down with that crowd

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

8914800006264344092

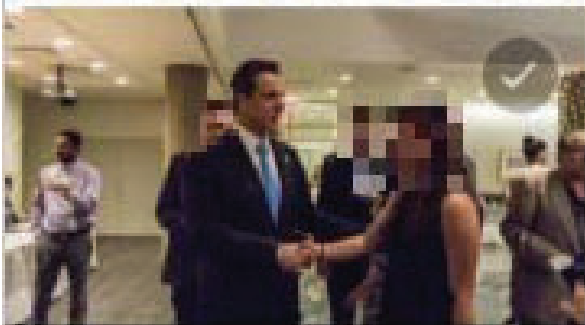
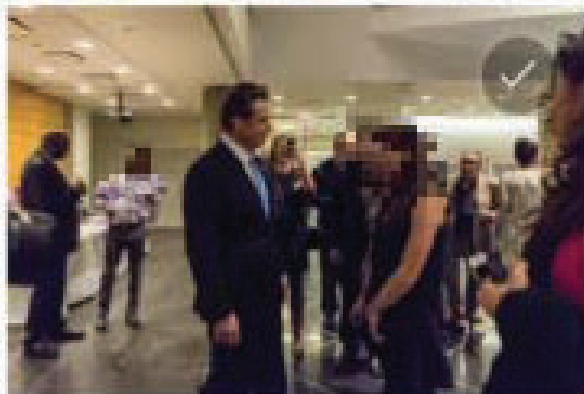


# EXHIBIT 105

Recents

0 Selected

Select All



# EXHIBIT 106



**Date:** Sunday, December 13 2020 04:23 PM

**Subject:** [Chat#3635]

**From:** Josh Vlasto [REDACTED]

**To:** [REDACTED] (owner)"; [REDACTED] [Dani Lever]; [REDACTED] Melissa DeRosa]; [REDACTED]  
[Linda Lacewell]; [REDACTED] Rich Azzopardi];

---

Give them the docs!

**-----METADATA INFORMATION-----**

**Device Owner:**

[REDACTED] Bamberger, Rich

**ICCID:**

8914800005814979118

**Date:** Sunday, December 13 2020 04:24 PM

**Subject:** [Chat#3636]

**From:** Rich Azzopardi [REDACTED]

**To:** [REDACTED] (owner)"; [REDACTED] [Dani Lever]; [REDACTED] [Josh Vlasto]; [REDACTED]  
[Melissa DeRosa]; [REDACTED] [Linda Lacewell];

---

I don't know if I trust them

-----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Bamberger, Rich

**ICCID:**

8914800005814979118

**Date:** Sunday, December 13 2020 04:24 PM

**Subject:** [Chat#3638]

**From:** Josh Vlasto [REDACTED]

**To:** [REDACTED] (owner)"; [REDACTED] [Dani Lever]; [REDACTED] [Melissa DeRosa]; [REDACTED]  
[Linda Lacewell]; [REDACTED] [Rich Azzopardi];

---

Fair enough

-----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Bamberger, Rich

**ICCID:**

8914800005814979118

# EXHIBIT 107

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 3/14/2021 10:35:59 PM  
**To:** Garvey, Beth (CHAMBER) [REDACTED]; Ajemian, Peter (CHAMBER) [REDACTED];  
Lacewell, Linda A (DFS) [REDACTED]; Jeffrey Pollock [REDACTED]  
**CC:** Benton, Stephanie (CHAMBER) [REDACTED]; Lis Smith [REDACTED]; Josh  
Vlasto [REDACTED]; Mogu, Judith (CHAMBER) [REDACTED]; Azzopardi, Richard  
(CHAMBER) [REDACTED]; Cohen, Steven (ESD) [REDACTED]; Mitra Hormozi  
[REDACTED]  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

retaliatory how? if u want to cut out the last part and make purely factual fine but how is it retaliatory to respond to her attacks factually?

---

**From:** Beth Garvey  
**Sent:** Sunday, March 14, 2021 10:33 PM  
**To:** Melissa DeRosa; Peter Ajemian; Linda A Lacewell [REDACTED]; Jeffrey Pollock  
**Cc:** Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen [REDACTED]; Mitra  
Hormozi  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

We don't have to make news with that answer it can be spun as retaliatory.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Melissa DeRosa  
**Sent:** Sunday, March 14, 2021 10:24 PM  
**To:** Peter Ajemian; Linda A Lacewell [REDACTED]; Jeffrey Pollock  
**Cc:** Beth Garvey; Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen  
[REDACTED]; Mitra Hormozi  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

# EXHIBIT 108

---

**From:** Beth Garvey [REDACTED]  
**Sent:** 3/14/2021 10:00:02 PM  
**To:** Ajemian, Peter (CHAMBER) [REDACTED]; DeRosa, Melissa (CHAMBER) [REDACTED]; Jeffrey Pollock [REDACTED]; Benton, Stephanie (CHAMBER) [REDACTED]; [REDACTED] Mogul, Judith (CHAMBER) [REDACTED]; Lacewell, Linda A (DFS) [REDACTED]; Azzopardi, Richard (CHAMBER) [REDACTED]; Dani Lever [REDACTED]  
**Subject:** Re: peter are we sending this as well? priv

Melissa on last answer why don't we just point back to our statement on hostile work environment- Any way we slice this we could make the retaliation claim here and we just should leave it alone.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Peter Ajemian  
**Sent:** Sunday, March 14, 2021 9:55 PM  
**To:** Melissa DeRosa; Jeffrey Pollock; Stephanie Benton; Judith Mogul; Linda A Lacewell (dfs.ny.gov); Beth Garvey; Richard Azzopardi; Dani Lever  
**Subject:** Re: peter are we sending this as well? priv

yes on w Beth - two min

---

**From:** Melissa DeRosa  
**Sent:** Sunday, March 14, 2021 9:45 PM  
**To:** Jeffrey Pollock; Stephanie Benton; Judith Mogul; Linda A Lacewell (dfs.ny.gov); Beth Garvey; Peter Ajemian; Richard Azzopardi; Dani Lever  
**Subject:** peter are we sending this as well? priv

---

**From:** Melissa DeRosa  
**Sent:** Sunday, March 14, 2021 3:46 PM  
**To:** Jeffrey Pollock; Stephanie Benton; Judith Mogul; Linda A Lacewell (dfs.ny.gov); Beth Garvey; Peter Ajemian; Richard Azzopardi; Dani Lever  
**Subject:** Re: Privileged. Fw: A NEW phone number coming momentarily. Pin will remain the same.

are we sending this?

Peter what time is the deadline and is there one email w everything cobbled together that we should go back through as a group?

---

**From:** Jeffrey Pollock [REDACTED]  
**Sent:** Sunday, March 14, 2021 2:37 PM  
**To:** Stephanie Benton; Judith Mogul; Linda A Lacewell (dfs.ny.gov); Beth Garvey; Peter Ajemian; Melissa DeRosa; Richard Azzopardi; Dani Lever  
**Subject:** Re: Privileged. Fw: A NEW phone number coming momentarily. Pin will remain the same.

Good Start. Keep looking. I'm sure you have more personalized ones

Jefrey Pollock  
President

[REDACTED]  
My pronouns: he, him, his

---

**From:** Stephanie Benton [REDACTED]  
**Sent:** Sunday, March 14, 2021 2:33:10 PM  
**To:** Judith Mogul [REDACTED]; Linda A Lacewell (dfs.ny.gov) [REDACTED]; Beth Garvey [REDACTED]; Peter Ajemian [REDACTED]; Melissa DeRosa [REDACTED]; Richard Azzopardi [REDACTED]; Jefrey Pollock [REDACTED]; Dani Lever [REDACTED]  
**Subject:** Privileged. Fw: A NEW phone number coming momentarily. Pin will remain the same.

[EXT EMAIL]

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Mujica, Robert F (BUDGET) [REDACTED]  
**Sent:** Sunday, March 14, 2021 2:30 PM  
**To:** Stephanie Benton  
**Subject:** Fwd: A NEW phone number coming momentarily. Pin will remain the same.

Sent from my iPad

Begin forwarded message:

**From:** Stephanie Benton [REDACTED]  
**Date:** January 28, 2021 at 10:51:49 AM EST  
**Subject:** A NEW phone number coming momentarily. Pin will remain the same.

---

**From:** Stephanie Benton  
**Sent:** Wednesday, January 27, 2021 4:45 PM  
**To:** Robert F Mujica [REDACTED]; Kelly Cummings [REDACTED]; Dana Carotenuto [REDACTED]; Peter Ajemian [REDACTED]; Richard Azzopardi [REDACTED]; Colleen Deacon [REDACTED]; Dennice Brown [REDACTED]; Abigail Barker [REDACTED]; Beth Garvey [REDACTED]; Jack Davies [REDACTED]; Jade Kraft [REDACTED]; George Cymon [REDACTED]; Michael Kopy [REDACTED]; Will Burns [REDACTED]; Tracy Goodman [REDACTED]; David Dively [REDACTED]; Farrah Kennedy [REDACTED]; Brittany Commisso [REDACTED]

**Subject:** NEW PIN and # for the CE. Make sure you save now.



[REDACTED]  
[REDACTED] please share with your folks.



# EXHIBIT 109

---

**From:** Peter Ajemian [REDACTED]  
**Sent:** 3/15/2021 4:07:17 PM  
**To:** DeRosa, Melissa (CHAMBER) [REDACTED] Garvey, Beth (CHAMBER) [REDACTED] Jeffrey Pollock [REDACTED] Lacewell, Linda A (DFS) [REDACTED]  
**CC:** Benton, Stephanie (CHAMBER) [REDACTED] Lis Smith [REDACTED] Mogul, Judith (CHAMBER) [REDACTED] Azzopardi, Richard (CHAMBER) [REDACTED]  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT







---

**From:** Beth Garvey  
**Sent:** Monday, March 15, 2021 1:55 PM  
**To:** Peter Ajemian; Jeffrey Pollock; Melissa DeRosa; Linda A Lacewell [REDACTED]  
**Cc:** Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen [REDACTED] Mitra Hormozi  
**Subject:** RE: Priv and Confidential - CURRENT DRAFT



Prefer this.

---

**From:** Peter Ajemian [REDACTED]  
**Sent:** Monday, March 15, 2021 1:53 PM  
**To:** Beth Garvey [REDACTED] Jeffrey Pollock [REDACTED] Melissa DeRosa [REDACTED]  
Linda A Lacewell [REDACTED]  
**Cc:** Stephanie Benton [REDACTED] Lis Smith [REDACTED] Josh Vlasto [REDACTED]  
Judith Mogul [REDACTED] Richard Azzopardi [REDACTED]  
Steven Cohen [REDACTED] Mitra Hormozi [REDACTED]  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

Beth, OK?



**From:** Beth Garvey  
**Sent:** Sunday, March 14, 2021 11:02 PM  
**To:** Jeffrey Pollock; Melissa DeRosa; Peter Ajemian; Linda A Lacewell [REDACTED]  
**Cc:** Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen [REDACTED] Mitra Hormozi  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

This is safer, but not without risk- it's all new.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Beth Garvey  
**Sent:** Sunday, March 14, 2021 10:49 PM  
**To:** Jeffrey Pollock; Melissa DeRosa; Peter Ajemian; Linda A Lacewell [REDACTED]  
**Cc:** Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopard; Steven Cohen [REDACTED] Mitra Hormozi  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT



I don't think we have said this before.  
It's fine if in fact she was asked many times, I thought we didn't know that factually.  
Still could be retaliation.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Jeffrey Pollock  
**Sent:** Sunday, March 14, 2021 10:41 PM  
**To:** Beth Garvey; Melissa DeRosa; Peter Ajemian; Linda A Lacewell [REDACTED]  
**Cc:** Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen [REDACTED] Mitra Hormozi  
**Subject:** RE: Priv and Confidential - CURRENT DRAFT

Beth look at the version that Melissa just sent which is close to what we said before. That's what I would like to do.

---

**From:** Beth Garvey [REDACTED]  
**Sent:** Sunday, March 14, 2021 10:40 PM  
**To:** Melissa DeRosa [REDACTED] Jeffrey Pollock [REDACTED] Peter Ajemian [REDACTED]  
[REDACTED] Linda A Lacewell [REDACTED]  
**Cc:** Stephanie Benton [REDACTED] Lis Smith [REDACTED] Josh Vlasto [REDACTED]  
[REDACTED] Judith Mogul [REDACTED] Richard Azzopardi [REDACTED]  
[REDACTED] Steven Cohen [REDACTED] Mitra Hormozi [REDACTED]  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

[EXT EMAIL]

This is new- we haven't said it, and i'm not sure our records reflect this. It's our "recollection" but the records previously released don't have this fact. It is completely relevant, but it can also look like we are inventing facts to suit us.

If, like you said, there's no there there with this story, and we are just pushing back on an anecdote you acknowledged to all of us earlier is true, we are just creating \*new\* liability for a retaliation claim that is ultimately gov's personally.

So his lawyers should weigh in.

It is purely our discretion to release records or disclose, so motive is what carries this. Is anecdote false? No, it's true, you said it was true, so it is just us taking a shot at her. This is something that creates significant risk. I would say no.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Melissa DeRosa  
**Sent:** Sunday, March 14, 2021 10:34 PM  
**To:** Jeffrey Pollock; Peter Ajemian; Linda A Lacewell [REDACTED]  
**Cc:** Beth Garvey; Stephanie Benton; Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen [REDACTED] Mitra Hormozi  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

if we cant send this i'd like to understand legally why. we cannot just send the hostile work envior quote which doesnt answer the quesiton

# EXHIBIT 110



---

**From:** Beth Garvey [REDACTED]  
**Sent:** 3/14/2021 10:12:29 PM  
**To:** Jeffrey Pollock [REDACTED]; Ajemian, Peter [REDACTED]  
DeRosa, Melissa (CHAMBER) [REDACTED]; Benton, Stephanie (CHAMBER) [REDACTED]  
Lacewell, Linda A [REDACTED]  
**CC:** Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Mogul, Judith [REDACTED]  
[REDACTED]; Azzopardi, Richard (CHAMBER) [REDACTED]; Cohen, Steven [REDACTED]  
[REDACTED]; Mitra Hormozi [REDACTED]  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

I spoke to melissa earlier I think she agrees we shouldn't give news to this story if there isn't any and this statement keeping it to prior statements can't create new exposure re retaliation- note her tweets re civil suits.

This is safest

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

---

**From:** Jeffrey Pollock  
**Sent:** Sunday, March 14, 2021 10:07 PM  
**To:** Peter Ajemian; Beth Garvey; Melissa DeRosa; Stephanie Benton; Linda A Lacewell [REDACTED]  
**Cc:** Lis Smith; Josh Vlasto; Judith Mogul; Richard Azzopardi; Steven Cohen [REDACTED]; Mitra Hormozi  
**Subject:** RE: Priv and Confidential - CURRENT DRAFT

---

**From:** Peter Ajemian [REDACTED]  
**Sent:** Sunday, March 14, 2021 10:06 PM  
**To:** Beth Garvey [REDACTED]; Melissa DeRosa [REDACTED]; Stephanie Benton [REDACTED]  
[REDACTED]; Jeffrey Pollock [REDACTED]; Linda A Lacewell [REDACTED]  
[REDACTED]  
**Cc:** Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Judith Mogul [REDACTED]  
[REDACTED]; Richard Azzopardi [REDACTED]; Steven Cohen [REDACTED]  
[REDACTED]; Mitra Hormozi [REDACTED]  
**Subject:** Re: Priv and Confidential - CURRENT DRAFT

# EXHIBIT 111

---

**From:** Steven Cohen [REDACTED]  
**Sent:** Wednesday, December 16, 2020 6:18 PM  
**To:** Melissa DeRosa  
**Cc:** Linda Lacewell; Josh Vlasto  
**Subject:** Re: priv and confidential

Bold/Italics .... I don't like. I raised it but to little avail.

The trump backer is irrelevant. Our theory is that its personal animus and inconsistent with everything she's said previously. We don't have a basis to believe it's motivated by a right wing conspiracy. Sounds a bit like HRC.

I also don't like that we include the "handsome" and "love him" paragraph. Here's why: Neither of those items amount to harassment for a bunch of reasons. And we seem to be saying without saying that she a stalker. Even if she is, it isn't really an excuse for the conduct she alleges. Both could be true. It's just not worth getting into it. And the portion of about her conduct with men sounds like slut-shaming. in addition, there were no formal complaints, and she wasn't counseled about this conduct; that opens us up to the same claim we're making against her, i.e., if it happened why didn't it get raised with her.

Alphonso "counseling" the gov is actually legal advice. I'd drop that or rewrite to avoid a claim that it constitutes some form of waiver.

Underlined portion should be rewritten; so it sounds like one author and not 2 or 3.

On Dec 16 2020, at 5:58 pm, Melissa DeRosa [REDACTED] wrote:

[REDACTED]

[REDACTED]

