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| | IN THE MATTER OF INDEPENDENT INVESTIGATION |
| 7 | UNDER EXECUTIVE LAW 63(8) |
| 8 | |
| | x |
| 9 | |
| 10 | May 19, 2021 |
| 11 | 9:00 a.m. |
| 12 | |
| 13 | |
| 14 | VIRTUAL ZOOM INVESTIGATION, before |
| 15 | Brittany Saline, a Notary Public of the States |
| 16 | of New York and New Jersey. |
| 17 | |
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| 19 | |
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| | Page 2 |
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| 1 | |
| 2 | APPEARANCES: |
| 3 | CLEARY GOTTLIEB STEEN & HAMILTON LLP |
| 4 | One Battery Plaza |
| 5 | New York, New York 10006 |
| 6 | |
| | BY: HYATT MUSTEFA, ESQ. |
| 7 | |
| | -and- |
| 8 | |
| | JENNIFER KENNEDY PARK, ESQ. |
| 9 | |
| 10 | |
| 11 | EMERY CELLI BRINCKERHOFF ABADY WARD & |
| 12 | MAAZEL LLP |
| 13 | Attorneys for Witness |
| 1 4 | 600 Fifth Avenue, 10th floor |
| 15 | New York, New York 10020 |
| 16 | |
| | BY: ZOE SALZMAN, ESQ. |
| 17 | |
| 18 | |
| 19 | ALSO PRESENT: |
| 2 0 | MARCO SOZIO, Videographer |
| 21 | |
| 22 | |
| 23 | |
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THE VIDEOGRAPHER: Good morning. Wе are going on the record at 9 a.m. on May 19th, 2021.

Please note that the microphones are sensitive and may pick up whispering, private conversations and cellular interference. Please turn off all cell phones or place them away from the microphones as they can interfere with the deposition audio.

Audio and video recording will continue to take place unless all parties agree to go off the record.

This is media unit one of the recorded interview of witness, May 19th, 2021, taken by Special Deputy for the New York Attorney General's Office in the matter of The Independent Investigation Under the New York State Executive Law Section 63(8).

The deposition is being held at remote virtual zoom located in Kansas City, Missouri 64111.

My name is Marco Sozio from the firm

| 1 | Witness 5/19/21 |
|----|--|
| 2 | Veritext New York and I'm the |
| 3 | videographer. The court reporter is |
| 4 | Brittany Saline, from the firm Veritext |
| 5 | New York. The notary is Maria Kozan, who |
| 6 | is located in Missouri. |
| 7 | Both parties have agreed to one New |
| 8 | York reporter and one notary in Missouri |
| 9 | to swear in the witness. |
| 10 | I am not authorized to administer an |
| 11 | oath, so will the court reporter well, |
| 12 | will the notary please swear in the |
| 13 | witness. |
| 14 | MS. KOZAN: Kaitlin , will you |
| 15 | raise your right hand, please, and I will |
| 16 | swear you in? |
| 17 | Do you solemnly swear that the |
| 18 | testimony you are about to give in this |
| 19 | case will be the truth, the whole truth |
| 20 | and nothing but the truth so help you God? |
| 21 | THE WITNESS: Yes. |
| 22 | MS. KOZAN: Okay. Thank you. I |
| 23 | will be departing. |
| 24 | THE VIDEOGRAPHER: Thank you. You |
| 25 | may proceed. |

| | Page 6 |
|----|---|
| 1 | Witness 5/19/21 |
| 2 | EXAMINATION BY MS. PARK: |
| 3 | Q Good morning, Kaitlin . My name is |
| 4 | Jennifer Kennedy Park. I am one of the special |
| 5 | deputies to the First Deputy Attorney General |
| 6 | that has been appointed by the New York |
| 7 | Attorney General to conduct the Independent |
| 8 | Investigation under New York Executive Law |
| 9 | Section 63(8) into the allegations of sexual |
| 10 | harassment brought against Governor Andrew |
| 11 | Cuomo as well as the surrounding circumstances. |
| 12 | Thank you for being here today. May |
| 13 | I call you Kaitlin today? |
| 14 | A Yes, please. |
| 15 | Q You understand that you're here |
| 16 | today pursuant to a subpoena that we issued in |
| 17 | connection with the investigation? |
| 18 | A Yes. |
| 19 | Q And as you just heard, we are we |
| 20 | are video recording and I want to make sure |
| 21 | that you are not video recording yourself nor |
| 22 | are you your counsel video recording this in |
| 23 | any way. |
| 24 | A I am not. |

MS. SALZMAN:

Nope. I am not

either.

Α

Q Kaitlin, as you just heard, you are under oath. That means that you have to testify fully and truthfully just as if you were in a court of law sitting before a judge and a jury. Your testimony today is subject to penalty of perjury. Do you understand that?

Q If you would like to make any brief sworn statement on your behalf, we ask that you do so at the conclusion of my examination and I will remind you and your counsel of that at the conclusion.

A Okay.

Yes.

Q Although -- although this is a civil investigation, the New York Attorney General's Office also has criminal enforcement powers. You have the right to refuse to answer any of my questions on the grounds that doing so would incriminate you. However, any failure to answer my question could be used against you in a court of law in a civil proceeding. Do you understand?

Α

Yes.

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Q You are appearing today with your attorney, but this is not a deposition and so you may consult with your attorney about privileged matters, but otherwise we would not expect your counsel to participate in today's testimony. Do you understand?

8 A Yes.

Q As you can see, we've got a court reporter here with us in what is our virtual room and she needs to take down my questions and she needs to take down your answers. To have a clean record, we need to make sure you give verbal responses to my questions, so don't shake your head or nod or anything like that. Do you understand?

17 A Yes.

18 19 Q If you don't know an answer to my question, just tell me you don't know. Okay?

20

A Okay.

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23

Q All right. And I'm sure the court reporter will tell us if we're talking over each other, but you and I will do our best not to do that.

2425

A Okay.

| -1 | | |
|----|---|--|
| | | |
| _ | _ | |

Q You -- you will not be permitted to review a transcript of this hearing, however, if at any time you want to clarify an answer that you've given either to the question I have posed or to a question I have posed before, you should just let me know. Okay?

8 A Okay.

Q I'm going to be asking you for names and dates and other specific information today. Remember a specific name or a specific date, I would ask that you give me your best approximate answer while telling me that it's just an approximation. Okay?

A Okay.

Q If you need a break at any point, just let me know and if there's a question pending, I would just ask that you answer the question I have asked and then we can take a break after your answer.

A Okay.

Q Can you confirm, Kaitlin, that you are alone in the room you're in?

A Yes, I'm alone.

MS. PARK: And, Zoe, are you alone?

| 1 | Witness 5/19/21 |
|----|--|
| 2 | MS. SALZMAN: I am also alone, yes. |
| 3 | Q Okay. And can you confirm, Kaitlin, |
| 4 | that there's no device you're using to allow |
| 5 | anyone to listen in to this testimony? |
| 6 | A There is no device that's set up for |
| 7 | anyone to listen in to this testimony. |
| 8 | MS. PARK: And, Zoe, same question |
| 9 | for you? |
| 10 | MS. SALZMAN: I can also confirm no |
| 11 | one is listening in. |
| 12 | BY MS. PARK: |
| 13 | Q I spoke to your counsel before |
| 14 | today's testimony and advised her of the |
| 15 | provision of Executive Law 63(8) that makes it |
| 16 | a misdemeanor to share any information you |
| 17 | obtain over the course of today's testimony |
| 18 | with anyone. |
| 19 | Do you understand that obligation to |
| 20 | keep this confidential? |
| 21 | A I do understand, yes. |
| 22 | Q If anyone asks you to disclose the |
| 23 | contents of your testimony today, we would ask |
| 24 | you or your counsel to let us know. Do you |
| | |

understand?

| 1 | Witness 5/19/21 |
|----|---|
| 2 | A . |
| 3 | Q Have you ever given testimony |
| 4 | before? |
| 5 | A No, I don't no, no. |
| 6 | Q Other than conversations with your |
| 7 | attorney, did you do anything to prepare for |
| 8 | your testimony today? |
| 9 | A I reviewed notes that I had and then |
| 10 | read the Rebecca Traister article again, just |
| 11 | to make sure I remembered everything. |
| 12 | Q And when you're talking about the |
| 13 | Rebecca Traister article, are you talking about |
| 14 | an article from New York Magazine? |
| 15 | A Yes, sorry, yep. |
| 16 | Q You should have a Koteworks site |
| 17 | that we sent to you last night that contains |
| 18 | the exhibits for your testimony today. Can you |
| 19 | please go ahead and access that site? |
| 20 | A Yes, I have access to the site and |
| 21 | downloaded the documents. I have not opened |
| 22 | them. |
| 23 | Q Great. That was going to be my next |
| 24 | question. Perfect. Can you please open what |
| 25 | is labeled, I believe, Exhibit 1 in the folder |

| 1 | Witness 5/19/21 |
|-----|---|
| 2 | we sent you. |
| 3 | (Whereupon document was marked |
| 4 | Exhibit 1 for identification as of this |
| 5 | date.) |
| 6 | A Mm-hm. Okay. |
| 7 | Q Take a minute to review that and |
| 8 | then when you're ready, just let me know. |
| 9 | A Okay. |
| 10 | Q Do you recognize this as a document |
| 11 | subpoena from the New York Attorney General's |
| 12 | Office that you received? |
| 13 | A Yes, I do. |
| L 4 | Q Did you read the subpoena before |
| 15 | today? |
| 16 | A Yes. |
| 17 | Q What did you do to provide documents |
| 18 | responsive to that subpoena? |
| 19 | A I spoke with Zoe about the subpoena |
| 20 | and then I reviewed my files on my personal |
| 21 | iPhone and my personal computer to respond. I |
| 22 | also went through files that I had at my mom's |
| 23 | house, personal files that have like my Social |
| 24 | Security card, things like that in it and found |

my hiring paperwork from -- from the Executive

| 1 | Witness 5/19/21 |
|----|---|
| 2 | Chamber in . What else? I I looked |
| 3 | at the the files that I had sent previously |
| 4 | too. I think we submitted prior to the |
| 5 | subpoena and I think that's I think that's |
| 6 | all I did. |
| 7 | Q Did your review include looking at |
| 8 | your social media accounts for potentially |
| 9 | responsive information to the subpoena? |
| 10 | A Yes, I reviewed my LinkedIn, my |
| 11 | Twitter and my Facebook and Instagram accounts. |
| 12 | Q Great. We are in receipt of the |
| 13 | productions that you provided through your |
| 14 | counsel and we are also in receipt of your |
| 15 | responses and objections to the document |
| 16 | subpoena. |
| 17 | Why don't you go ahead and open what |
| 18 | is marked in the electronic file as Exhibit 3. |
| 19 | (Whereupon document was marked |
| 20 | Exhibit 3 for identification as of this |
| 21 | date.) |
| 22 | A Okay. |
| 23 | Q Just let me know when you have had a |
| 24 | chance to look at it. |
| 25 | A Yes, I looked at it. |

| | 3 |
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| 1 | Witness 5/19/21 |
| 2 | Q Is this the testimony subpoena you |
| 3 | received from the New York Attorney General's |
| 4 | Office? |
| 5 | A Yes. |
| 6 | Q Did you read the subpoena before |
| 7 | today? |
| 8 | A Yes. |
| 9 | Q And you understand that your |
| 10 | testimony is being taken pursuant to that |
| 11 | subpoena? |
| 12 | A Yes. |
| 13 | Q You can go ahead and just move that |
| 14 | screen aside for a little bit. |
| 15 | Kaitlin, can you tell us how far you |
| 16 | got in school? |
| 17 | A I finished a Master's Degree at |
| 18 | |
| 19 | Q And after you finished your Master's |
| 20 | Degree, did you begin working? |
| 21 | A Yes, I was working throughout my |
| 22 | Master's Degree and then I took another job |
| 23 | after my Master's Degree. |
| 24 | Q Please tell us about your employment |
| 25 | history following your Mastor's Dograd |

| | Page 16 |
|----|--|
| 1 | Witness 5/19/21 |
| 2 | A Following my Master's Degree, I was |
| 3 | working at at at at a second a |
| 4 | . I continued to hold that job. I |
| 5 | also during my last semester was I had an |
| 6 | internship with Congressman , so |
| 7 | after I graduated, I went from an intern status |
| 8 | to a full time position. I don't know the |
| 9 | date, but I'm sure we could find it. |
| 10 | So after my Master's Degree, I was |
| 11 | working for former Congressman |
| 12 | Monday to Friday, 9:00 to 5:00. And then I |
| 13 | would go to, Monday through |
| 14 | Thursday for the 5:45 shift. On Friday's I |
| 15 | could not make it by 4:30, so I didn't ever |
| 16 | work Friday nights and then on weekends, I |
| 17 | would work a shift in the morning or the night |
| 18 | or doubles, depending on what the restaurant |
| 19 | needed. |
| 20 | Q Did there come a time when you |
| 21 | stopped working at and the |
| 22 | internship for former Congressperson |
| 23 | office? |
| 24 | A Was there a time after when I sat |

when I didn't work as an intern and then I

| 1 | Witness 5/19/21 |
|----|--|
| 2 | transitioned to |
| 3 | Q When did that's right. When did |
| 4 | you when did you stop working there and |
| 5 | start working at ? |
| 6 | A When I stopped working for when I |
| 7 | finished my Master's Degree, I wasn't an |
| 8 | intern. I was a full time employee with |
| 9 | with the Congressman. I started working for |
| 10 | in November of 2016, |
| 11 | November 1st, maybe or October 31st, 2016. I |
| 12 | don't know the exact date. I have it I |
| 13 | don't have it. It was right at the beginning |
| 14 | of November, the end of October. |
| 15 | Q Do you have any documents in front |
| 16 | of you? |
| 17 | A I have my notebook, the notes and |
| 18 | then I have a folder of the hiring paperwork |
| 19 | from the chamber in that I submit |
| 20 | that I sent to Zoe, but that's that's all |
| 21 | and my work stuff. |
| 22 | MS. PARK: Can we go off the record |
| 23 | for just a minute? |
| 24 | THE VIDEOGRAPHER: Standby. We are |
| 25 | now off the record at 9:15 a.m. |

| 1 | Witness 5/19/21 |
|----|---|
| 2 | (Discussion held off the record.) |
| 3 | THE VIDEOGRAPHER: We are now on the |
| 4 | record. The time is 9:17 a.m. |
| 5 | BY MS. PARK: |
| 6 | Q So you started at |
| 7 | sometime in October or November of 2016. |
| 8 | What was your role there? |
| 9 | A I was a junior lobbyist. I think my |
| 10 | title was policies I don't remember what my |
| 11 | title was exactly. Maybe policy associate. |
| 12 | Q And what were your responsibilities |
| 13 | in your role as policy associate? |
| 14 | A I was to support the state and local |
| 15 | lobbying team, government team. I was I was |
| 16 | only there for eight weeks. We really didn't |
| 17 | get into a lot of specifics about my role and |
| 18 | assignments. It was on-boarding mostly and |
| 19 | then some events and just kind of getting to |
| 20 | know what they do and the team and the state, |
| 21 | clients, yeah. |
| 22 | Q How did you come to be employed at |
| 23 | ? |
| 24 | A Congressman former Congressman |
| 25 | 's works there. |

| 1 | Witness 5/19/21 |
|----|---|
| 2 | I think he's still there. But he the |
| 3 | Congressman and I the Chief of Staff |
| 4 | , they both knew that I was |
| 5 | working two full time jobs and they had |
| 6 | suggested that I should go work at |
| 7 | because they could pay me more |
| 8 | and they needed to fill that role and they |
| 9 | thought it would help me cut my hours back from |
| 10 | the restaurant and they approached me over the |
| 11 | summer of 2016 first, but didn't offer me |
| 12 | enough money where I could cut back my hours |
| 13 | from the restaurant and so I couldn't take |
| 14 | the their first offer and then they came |
| 15 | back in the fall with more money and then I |
| 16 | accepted that job. |
| 17 | Q And what was your salary at |
| 18 | ? |
| 19 | A I don't remember. I think I started |
| 20 | at in the, I think. |
| 21 | Q While you were employed at , |
| 22 | did you continue to work at ? |
| 23 | A Yes, on the weekends. |
| 24 | Q You said you only worked at |
| 25 | for eight weeks. How did it happen that you |

| 1 | Witness 5/19/21 |
|------------|---|
| 2 | only worked at for eight weeks? |
| 3 | A About six weeks into the job, the |
| 4 | state government, I don't know what it's |
| 5 | called, the state lobbying team was holding a |
| 6 | fundraiser for the Governor and we had to staff |
| 7 | the event and so we were at the fund raising |
| 8 | evening and I met the Governor and he said that |
| 9 | I was going to come work at the state level and |
| 10 | by the end of the week, I had interviewed and |
| 11 | was hired to go to the Governor's office. |
| 12 | Q Do you remember the date of these |
| 13 | lobbying events that you just referred to? |
| 1 4 | A I don't remember the dates, I'm |
| 15 | sorry. I think it was Monday, December 14th. |
| 16 | Q You you said you you met the |
| 17 | Governor at that event; is that correct? |
| 18 | A Yes. |
| 19 | Q Why don't we you open what is in |
| 20 | the electronic exhibit folder as Exhibit 4. |
| 21 | (Whereupon document was marked |
| 22 | Exhibit 4 for identification as of this |
| 23 | date.) |
| 24 | A Mm-hm. Okay. |
| 25 | Q You have that open? |

| 1 | Witness 5, | 19/ | 21 |
|---|------------|-----|----|
|---|------------|-----|----|

- A Mm-hm.
- Q Do you see there are -- there are 4 five photographs in that folder?
- 5 A Yep.

Q Tell us about these photographs.

A Wait. There are five. So this is the night I got to meet the Governor at the Friars Club. It was December 12th, not 14th, 2016. This was the fundraiser. He did a speech in the main room and then as he was walking out, if you look at photo number two or three, behind his left shoulder is the door to exit.

thank you, to say bye, work the room, and he saw me and I introduced myself. I said I worked for . At the time, he's still a Congressman and he -- I don't know, he took this -- he -- he grabbed me -- held onto my hand and then said that he was going to have me work at -- at the state level and then we took these photos and then he took the photo number six or photo five, page six, with the team.

| 1 | Witness 5/19/21 |
|-----|--|
| 2 | Q Had you met Governor Andrew Cuomo |
| 3 | before December 12th, 2016? |
| 4 | A I had thought I had met him briefly |
| 5 | somewhere, just in passing or attending an |
| 6 | event, but I maybe I didn't. I don't know. |
| 7 | It wasn't like I I didn't have this |
| 8 | interaction with him. That was the first time |
| 9 | I ever spoke to the Governor. |
| 10 | Q And on this occasion, on |
| 11 | December 12th, who spoke to whom first? |
| 12 | A He he approached me. I didn't |
| 13 | approach him. |
| L 4 | Q And what did he say when he |
| 15 | approached you? |
| 16 | A I don't remember word for word what |
| 17 | he said to me. I don't know. I don't know how |
| 18 | the conversation started. I just remember |
| 19 | distinctly that he said that I said I used |
| 20 | to work for . I now work at and |
| 21 | introduced myself and he said that I was going |
| 22 | to come back and work in government at the |
| 23 | state level and that stands out because |
| 24 | Q How long did |

Sorry. It's just something that

Α

| 1 | Witness 5/19/21 |
|-----------|---|
| 2 | stands out to me and something I remember just |
| 3 | because it was unique to any situation I ever |
| 4 | had before. I mean he was the Governor. |
| 5 | Q How long did your conversation with |
| 6 | Governor Cuomo on that occasion last? |
| 7 | A Not long. I said two minutes, but |
| 8 | I I don't know how long it was. |
| 9 | Q On that occasion, did you have your |
| 10 | resume with you? |
| 11 | A No, no, I didn't have my resume. |
| 12 | Q On December 12th, on that night, did |
| 13 | you give your resume or something equivalent to |
| 14 | your resume to any member of Governor Cuomo's |
| 15 | senior staff? |
| 16 | A No. |
| 17 | Q Did you have a business card with |
| 18 | you on December 12th, 2016? |
| 19 | A Well, I say I shook my head, but |
| 20 | if I had it on, it wasn't on my person. It |
| 21 | would have been in my purse, probably, in like |
| 22 | a cardholder probably, but I didn't give a card |
| 23 | to anybody. I didn't give my information to |
| 24 | anyhody |

When you say to anybody, you did not

Q

| 1 | Witness 5/19/21 |
|----|---|
| 2 | give your business card to Governor Cuomo or |
| 3 | any members of his staff? |
| 4 | A That's correct. To my recollection, |
| 5 | I did not give my business card or any to |
| 6 | anyone on his staff or the Governor. |
| 7 | Q If you look at the first, second and |
| 8 | third pictures that are in that exhibit, please |
| 9 | describe how Governor Cuomo touched you in |
| 10 | these photos? |
| 11 | A So he first went in to shake my hand |
| 12 | and then he pulled me towards him and then he |
| 13 | grabbed like shifted my body so we were in a |
| 14 | dance pose and then he took the photo with me |
| 15 | and his right arm is on my lower back. |
| 16 | Q How did you feel about the way the |
| 17 | Governor touched you in these photographs and |
| 18 | while these photographs were being taken? |
| 19 | A I was uncomfortable. I recognize |
| 20 | that I'm smiling in these photos, but I it |
| 21 | was uncomfortable. |
| 22 | Q Why did you feel uncomfortable when |
| 23 | you were taking these photos with Governor |
| 24 | Cuomo? |

Several reasons. One, I was in

A

| 1 | Witness 5/19/21 |
|----|--|
| 2 | front of my team that I had just met. There |
| 3 | was a photographer with flashes right next to |
| 4 | us taking these photos and it was a lot of |
| 5 | attention. I just don't get I just am not |
| 6 | comfortable in those situations. |
| 7 | Q Was there anything about the way |
| 8 | Governor Cuomo sorry, I didn't mean to |
| 9 | interrupt you, Kaitlin. |
| 10 | A No, I'm sorry. Just he's the |
| 11 | Governor and it's just a weird situation. |
| 12 | Q Did the Governor on this occasion |
| 13 | ask if he could touch you? |
| 14 | A No. |
| 15 | Q Did he ask if he could hold you in a |
| 16 | dance position? |
| 17 | A No. |
| 18 | Q Did you say anything to the Governor |
| 19 | on this occasion about the way he touched you? |
| 20 | A No. |
| 21 | Q You can put aside the photographs. |
| 22 | What happened after these photographs? Did you |
| 23 | talk to anyone about your interaction with |
| 24 | Governor Cuomo on December 12th, 2016? |

Yes, I left -- excuse me.

A

25

There was

| 1 | Witness 5/19/21 |
|-----|---|
| 2 | banter within amongst the staff before I |
| 3 | left the event, just about how uncomfortable it |
| 4 | was and how the Governor liked me and then I |
| 5 | walked home from the Friars Club to my |
| 6 | apartment and I had called friends and family |
| 7 | and text them, talking about how weird that |
| 8 | interaction was and no I don't know if |
| 9 | people believed me or not, but there is |
| 10 | yeah, that's odd. |
| 11 | Q Let's start with the banter with |
| 12 | your colleagues. Which colleagues did you |
| 13 | speak to after the photograph of the Governor? |
| L 4 | A At the event or |
| 15 | Q Well, let's start with at the event. |
| 16 | A Okay. So at the event, can I pull |
| 17 | up that photo again? I can tell you. |
| 18 | Q Sure. Yes. And are you pulling up |
| 19 | what is the last photo in in that exhibit, |
| 20 | which is a group photo? |
| 21 | A Yes. After the event, I likely |
| 22 | told beginning from left to right, |
| 23 | , who is in the front with the orange tie. |
| 24 | He was on my team and somebody I would |

report -- he wasn't my direct boss, but I would

| 1 | Witness 5/19/21 |
|-----|---|
| 2 | work with and report to him. |
| 3 | , who is over my |
| 4 | right shoulder. |
| 5 | who are next to him. I would have told |
| 6 | . I would have told |
| 7 | She just got married. |
| 8 | That's not her last name now. |
| 9 | was next to and maybe , but |
| 10 | probably not, directly after the event, that |
| 11 | is, before I had left. |
| 12 | Q Directly after the event, these |
| 13 | colleagues that you were speaking to, I think |
| L 4 | you said you discussed that it was |
| 15 | uncomfortable and someone said the Governor |
| 16 | liked you. |
| 17 | What do you remember about your |
| 18 | colleagues saying that the Governor liked you? |
| 19 | A It was it was like like a ooh, |
| 20 | the Governor likes, like yeah, that kind of |
| 21 | like joking around because he had singled me |
| 22 | out and paid attention to me. I don't know |
| 23 | what their intentions were when they made those |
| 2 4 | comments. I just know that they said those |

things.

| 1 | Witness 5/19/21 |
|--|--|
| 2 | Q On December 12th sorry, keep |
| 3 | going? |
| 4 | A Sorry. I just I don't remember |
| 5 | who specifically. I just know it was said. |
| 6 | Q On December 12th, did did |
| 7 | Governor Cuomo, to your knowledge, take |
| 8 | individual photos with others of your |
| 9 | colleagues? |
| 10 | A I don't know. If he did, I would |
| 11 | guess . They have a closer relationship and |
| 12 | they would be in this photo album that |
| 13 | has. |
| 14 | |
| 7.4 | Q Did you see the Governor on this |
| 15 | Q Did you see the Governor on this occasion take a photograph with anyone and hold |
| | <u>-</u> |
| 15 | occasion take a photograph with anyone and hold |
| 15 16 | occasion take a photograph with anyone and hold them in a similar way to the way he held you? |
| 15 16 17 | occasion take a photograph with anyone and hold them in a similar way to the way he held you? A At this occasion, no, I didn't see |
| 15 16 17 18 | occasion take a photograph with anyone and hold them in a similar way to the way he held you? A At this occasion, no, I didn't see that. |
| 15 16 17 18 | occasion take a photograph with anyone and hold them in a similar way to the way he held you? A At this occasion, no, I didn't see that. Q How did you come to have these |
| 15 16 17 18 19 | occasion take a photograph with anyone and hold them in a similar way to the way he held you? A At this occasion, no, I didn't see that. Q How did you come to have these photographs? |
| 15 16 17 18 19 20 21 | occasion take a photograph with anyone and hold them in a similar way to the way he held you? A At this occasion, no, I didn't see that. Q How did you come to have these photographs? A I so they usually send |

screen shot and saved these to show my friends

- and family that this actually happened, so they believe me.
 - Q That was when you were working in the executive chamber?
 - A That's correct, yep.
 - Q And you said that after the December 12th event, you also spoke to some friends and family on your walk home about what had occurred with the Governor. Which family and friends did you speak to?
 - A I know it was my -- my mom, my older sister and my middle sister. Friends, I don't remember every friend I spoke to on my walk home. I would guess it was my roommate, my old roommate and I would guess it was some of my closest friends.
 - Q And in summary, what did you tell your friends and family about what had occurred with the Governor?
 - A What happened at the event that he gave a speech, he was leaving and then he grabbed me and we took those weird photos and that he said I was going to work at -- in government again, at the state level.

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Witness 5/19/21

Q What's the -- after December 12th, what is your next interaction related to Andrew Cuomo?

A I was in a meeting downtown with the city council member, I don't remember which one, and I received a voicemail from the executive chamber asking me to come in for an interview and so when I had got back to the office, I told and and and they told me I had to go and we need to tell and they all said, you know, unfortunately, he's going to poach you and we -- you -- you have to take the job.

Q The voicemail that you received from the Governor's office, who particularly was that voicemail from?

A It was either Stephanie Benton or Jill DeSrosiers. I don't remember. I don't have that voicemail anymore.

Q Do you remember anything else about the voicemail, other than they told you they wanted -- whoever it was said that they wanted you to interview for a position in the Governor's office?

| | Page 31 |
|----|---|
| 1 | Witness 5/19/21 |
| 2 | A No, that's all I remember. Come |
| 3 | to come to their office to to meet I |
| 4 | don't think they said it was for an interview. |
| 5 | I think that was implied. |
| 6 | Q Anything else you remember about the |
| 7 | voicemail saying they they wanted to come |
| 8 | meet or have you come and meet, any description |
| 9 | of a position that was open or they were trying |
| 10 | to have you interview for? |
| 11 | A No. |
| 12 | Q After you you said you received |
| 13 | the voicemail. You spoke to three individuals, |
| 14 | , and and . What did you discuss with |
| 15 | ? |
| 16 | A If I said , I misspoke. |
| 17 | Q Oh, I apologize. I might |
| 18 | have misheard. |
| 19 | A That's okay. |
| 20 | and . They would have been |
| 21 | my management team and then the managing |
| 22 | partner. I told them I asked if they |
| 23 | remembered what happened at the Friars Club and |

they did and I said I told you it was weird and

they had called and wanted me to go to the

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| 1 | Witness 5/19/21 |
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| 2 | Governor's office and they said had |
| 3 | worked I think at the so he |
| 4 | had known how that that the inner circle |
| 5 | worked and he had said that they they all |
| 6 | said that I had to go and they advised me |
| 7 | that they all knew of my financial situation |
| 8 | as well with my other job and they said that |
| 9 | the state has a multi billion dollar budget and |
| 10 | that I should ask for 125,000 for them to match |
| 11 | both of my salaries. |
| 12 | Q What did you say to , and and |
| 13 | ? |
| 14 | A About going over there or the advice |
| 15 | on the salaries? |
| 16 | Q Any anything that you said to |
| 17 | them in response to them them telling you |
| 18 | you had to go and then the salaries? |
| 19 | A That I didn't want to go. I didn't |
| 20 | want to go back to state government because I |
| 21 | needed to make money and that I was not going |
| 22 | to make money in government and I I had |
| 23 | liked my job, kind of liked my job and they |
| 24 | I didn't have a choice. |

I was -- they lobbied the state

| 1 | Witness | 5, | /19 | /21 |
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government and the Governor had wanted me to go over there, so I had to go and then when they told me about the salary, I was like I can't ask for that. I didn't -- it was not something I had been paid before and I didn't think it would ever happen and they insisted that I do it and so when I went over there, I just said 120, for -- I don't know why. It just came out.

Q Before we talk about when you -- you went over there, you said that had -- had worked at the and he knew how the inner circle worked. When you say inner circle, what do you mean?

The executive chamber, the -- at the time it was ______, Alphonso David, Rob

Mujica, I can't think of his name, ______,

Jill DeSrosiers, Melissa DeRosa, Stephanie

Benton, Andrew Ball and Annabel Walsh. It was that inner circle. Dani Lover.

Q For the court reporter's sanity, if you could just, when you're giving lists of names, slow down a little bit.

MS. PARK: Brittany, we will help

| 1 | Witness 5/19/21 |
|----|--|
| 2 | you get the names at a break. |
| 3 | Q But, Kaitlin, if you just could slow |
| 4 | down a little bit when you're giving names, so |
| 5 | she she can make sure she gets them, I |
| 6 | appreciate it. |
| 7 | A Yes, of course, sorry. |
| 8 | THE VIDEOGRAPHER: I'm sorry |
| 9 | MS. PARK: Our videographer |
| 10 | THE VIDEOGRAPHER: Yeah. I just |
| 11 | need to tell you something. Your video is |
| 12 | lagging for the witness. It it seems |
| 13 | like it's starting to lag. Is anyone else |
| 14 | noticing that or is it just me? Time to |
| 15 | time it's just are you on a wireless |
| 16 | right now or are you hard wired into the |
| 17 | computer? |
| 18 | THE WITNESS: It's Wi-Fi. |
| 19 | THE VIDEOGRAPHER: It's Wi-Fi, okay. |
| 20 | We will keep an eye on that. Yeah, so, |
| 21 | okay, we can continue. Just keep an eye |
| 22 | on it. As long as it's not affecting the |
| 23 | audio. Thank you. |
| 24 | BY MS. PARK: |

It's causing us to talk over each

Q

| 1 | Witness 5/19/21 |
|----|---|
| 2 | other a little bit, but I'm going to do my best |
| 3 | to pause and deal with the lag so we can keep |
| 4 | going. |
| 5 | Other than , and , did |
| 6 | you talk to anybody else about the voicemail |
| 7 | before you you returned the executive |
| 8 | chamber phone call? |
| 9 | A Before I returned the phone call? |
| 10 | Q Mm-hm? |
| 11 | A It's possible I told my officemate |
| 12 | and . It's possible I told my |
| 13 | closest friends and my family. I told the I |
| 14 | don't know if it was before or after, but they |
| 15 | all knew about it. |
| 16 | Q And when you say , what was |
| 17 | last name? |
| 18 | A She's married, so |
| 19 | it I don't I think she changed her last |
| 20 | name. |
| 21 | Q And what was last name? |
| 22 | A . |
| 23 | Q Did did you call the executive |
| 24 | chamber back after the voicemail? |
| 25 | A I called the number that I was told |

| ┪ | | Witness 5/19/21 | | | | | |
|---|------------|-----------------|--------|-------|-----|-----|-----------|
| 2 | to call ba | ick. I b | elieve | that | was | the | executive |
| 3 | chamber li | .ne. | | | | | |
| 4 | 0 | Who did | vou sr | eak t | :0? | | |

- Who did you speak to? Q
- Α I believe it was Stephanie Benton.
- Tell us about that conversation with Ms. Benton.
- Α I -- I think I just said I received your call and asked who was calling back and then she had asked me to come in for an interview and I was kind of taken aback by that and I had to go and so I agreed to it and I went -- I went and interviewed. I think I -- I think it was a short conversation.
- And between the conversation with Ms. Benton and the date of your interview, did you speak to anybody else about interviewing with the executive chamber?
- Again, I don't know if it was Α Yes. before or after, but I spoke with former and I spoke to my old Congressman Chief of Staff, I spoke to friends, family, my ex-boyfriend at the time, I -- I likely spoke to management at the restaurant as well.

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Tell us about the conversation with Q

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I went to and Α both asking advice and -- and guidance on what to I had a very frank conversation with them about how we knew why he was hiring me and it was because of what I looked like.

The -- they said that the Governor is known to be a very tough person to work for and the environment is very difficult and I made the comment that I wasn't going to sleep with the Governor and they said no, that you should not do that and I said okay, great. We're on the same page.

It was never implied that I would -it was just like -- yes, we know that he's hiring you because of what you look like. Don't be inappropriate. I'm not going to be inappropriate conversation and I had to go to the interview and I had to take the job.

Q Why did you think you were given an interview with the executive chamber because of what you looked like?

> Because of the interaction that I Α

| 1 | Witness 5/19/21 |
|----|--|
| 2 | had at the Friars Club with the Governor. I |
| 3 | didn't give him any contact information. They |
| 4 | found me on I believe they found me on |
| 5 | website and that's how they got ahold of me. |
| 6 | We never talked about my qualifications or the |
| 7 | job or I never spoke to them about an interest |
| 8 | I had in working for the Governor. |
| 9 | He just it seemed that he liked |
| 10 | me, liked what I looked like and that is why I |
| 11 | was being pulled over to interview and then |
| 12 | being offered the job. |
| 13 | Q Did either or disagree |
| 14 | with your view that you were being hired |
| 15 | because of what you you were being |
| 16 | interviewed because of what you looked like? |
| 17 | A I don't think anybody that I spoke |
| 18 | to disagreed with that assumption. I think |
| 19 | that they probably all thought that before I |
| 20 | had said it as well. |
| 21 | Q And they told you and then you |
| 22 | said in the conversation with , |
| 23 | that you you weren't going to sleep with the |
| 24 | Governor. Why did you say that? |

Because I knew I -- I knew that I

A

| 1 | Witness 5/19/21 |
|----|---|
| 2 | was being hired because of what I looked like |
| 3 | and I didn't want to I didn't I didn't |
| 4 | know what I was getting myself into and I |
| 5 | didn't I was uncomfortable. I was like I'm |
| 6 | not going to sleep with the Governor because he |
| 7 | likes what I look like. This is too much. I |
| 8 | don't want to do this. I don't want to go over |
| 9 | there. |
| 10 | Q But and told you you |
| 11 | had to? |
| 12 | A Everybody told me that I had to take |
| 13 | the job. If the Governor is asking for |
| 14 | something, you don't say no to the Governor. |
| 15 | Q Did anybody tell you why you don't |
| 16 | say no to the Governor? |
| 17 | A I think it was just implied that |
| 18 | he's the Governor. You don't say no to him. |
| 19 | He's a very powerful man in New York. |
| 20 | Q Did and sorry, say |
| 21 | that again? |
| 22 | A And beyond New York and beyond, he's |
| 23 | a very powerful man. |
| 24 | Q Did or say anything |
| 25 | more specific about Mr. Cuomo being tough and |

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Witness 5/19/21

difficult or the chamber being tough and difficult?

and the Governor tried to bring her on board to his staff and she said -- she said no. She was in a position to do so because she wouldn't lose her job with . She had been working for for years. I was early in my career and didn't have that network.

Q Were you concerned that if you -- if you told the executive chamber you did not want to interview, that you would lose your job at?

A Yes.

Q Is there anything else that you remember about your conversations with your ex-boyfriend or friends or family that is different than your conversations that you had with and and ?

A I was probably a little more blunt with my friends, but it was the same -- the message, it was the same. It was -- it was an uncomfortable situation. I can't believe this is happening. I don't want to take this job,

| 1 | Witness 5/19/21 |
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| 2 | but the salary was appealing, so I didn't have |
| 3 | to work two jobs anymore, but beyond that, I |
| 4 | didn't feel like I had a choice. |
| 5 | Q And when you say you were probably |
| 6 | more blunt with your family and friends, do you |
| 7 | recall specifically anything you said to your |
| 8 | family and friends that was more blunt? |
| 9 | A No. I just know how I speak to my |
| 10 | friends and family and how I speak to |
| 11 | professionals is very different, so I just |
| 12 | would assume that I was a little more forward |
| 13 | in my personal conversations. |
| L 4 | Q So you did interview for a position |
| 15 | in the executive chamber, right? |
| 16 | A I did, yep. |
| 17 | Q When was the interview? |
| 18 | A I I believe it was that Friday, |
| 19 | so the 16th, right. |
| 20 | Q And with whom did you interview? |
| 21 | A I went over to 633. I was in Jill |
| 22 | DeSrosiers's office. I believe it was |
| 23 | Stephanie Benton and Annabel and I believe that |
| 2 4 | was in and out because the Governor was |

it was in his office. The door is shut, so

| L | Witness | 5/19/21 |
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| | | |

- yeah, I am pretty sure she was in and out.
 - Q When you say Annabel, do you mean Annabel Walsh?
- 5 A Yes.

6 Q Tell us about what happened in the interview.

They -- I don't remember everything that happened. They asked questions. I -- they described a role that I didn't understand. I remember leaving and people asking me what I was -- what my job was and I was like, I don't know. I don't know what I'm going to be doing. I was -- I had -- they had asked about salary -- I think maybe I had asked about salary and I believe asked what my number was and I said 120 and they laughed and they said that's probably not going to happen and then they had a -- when they called to tell me that I was hired, they agreed to that salary. I

Q During the interview with Ms. Benton and Ms. Walsh, with Ms. DeSrosiers coming in

think that the Governor actually agreed to that

salary.

| 1 | Witness | 5/19/21 |
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and out, did they ask you about your experience working for Congressman

A I honestly don't remember everything that happened in that conversation. The things that stand out, it was not really knowing the position and the salary because I was happy to not have two jobs. I'm sure I talked about my job with and maybe the lobbying firm. I don't know. I can't say with 100 percent certainty that I did.

- Q Do you remember if you felt like it was a real interview? Was there substance to the interview?
- A I don't think I've ever had a real interview to be honest with you. Maybe at but I mean I met and prior to the real interview. Real, I don't know, the one in their office for lunch and we talked about it.

 I -- I don't -- I don't think it was a real interview with Stephanie and Annabel and Jill.
- Q Did you bring your resume to the interview with Stephanie, Annabel and Jill?
- 24 A I did. I did.
 - Q And is that the first time you had

When, what day? So you interviewed

Q

| 1 | Witness 5/19/21 |
|------------|--|
| 2 | on a Friday and what day did you get offered |
| 3 | the position? |
| 4 | A I don't I think I think I I |
| 5 | think I interviewed on a Wednesday and then I |
| 6 | got offered the position on a Friday. |
| 7 | Q Okay. So about 48 hours later? |
| 8 | A Yeah, it was that same week. |
| 9 | Q And who called you to offer you the |
| 10 | position? |
| 11 | A I think it was Stephanie. I don't |
| 12 | remember. Stephanie or Jill. I don't know. |
| 13 | Q What do you remember about the call |
| L 4 | offering you the position in the executive |
| 15 | chamber? |
| 16 | A The salary, I think and that it was |
| 17 | happening. I was very happy to not work in the |
| 18 | restaurant. It was a way out that I didn't |
| 19 | think I would have for a while. |
| 20 | Q And you said they offered you |
| 21 | \$120,000; is that right? |
| 22 | A That's correct. |
| 23 | Q And you recall in that conversation |
| 24 | they said that the Governor had agreed to that |
| | |

salary?

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Witness 5/19/21

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I -- I remember that the Governor Α had agreed to it. I don't know if it was in that conversation, but I remember that he agreed to that salary.

You remember being told that the Governor had agreed to your salary at some point?

> Α Yep.

When did you start working in the executive chamber?

Α The -- I gave two weeks at and my start date I believe was December 30th, I think.

My first like real workday was New Year's Eve and it was the Second Avenue subway opening, but like when I -- the first day in the office, I just went in and did the paperwork and then was told that I could leave and to show up for the subway event.

Between December -- the interview and the day you were told that you got the position and the first day you show up in the executive chamber, who did you talk to, if anyone, about working in the executive chamber?

, with the Congressman. I was told to call

him Governor, to be professional, dress

professional.

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| 1 | Witness | 5/19/21 |
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- I got tips on how to buy clothes that were -- could be a staple and you could change it up with an accessory to make it more affordable, various things to succeed. I don't know.
- Q And what were you told to call the Governor?
 - A Governor, Governor Cuomo, Governor.
- Q And were you told anything more specific about what dressing professional meant in the executive chamber?
- A I don't recall them ever telling me what I needed to wear. It was implied that you dress well and that you -- all the women wore heels. All the women had heels under their desk and you looked nice, nicer than what I had to wear at office or at the lobbying firm.
- Q So after you began working in the executive chamber, you observed that women in the executive chamber kept high heels under their desk?
 - A Yes, everybody had -- yeah, yep.
 - Q And when -- after you started

| 1 | Witness 5/19/21 |
|----|---|
| 2 | working in the executive chamber, what did you |
| 3 | observe about when women would put on their |
| 4 | high heels? |
| 5 | A Whenever the Governor is around, you |
| 6 | had to dress nice. You had to dress well in |
| 7 | heels. It's it's possible I was told that |
| 8 | you had to dress well. Was it in the |
| 9 | requirements of the job description? No, not |
| 10 | that I remember, but it everybody knew that |
| 11 | you wore heels and dressed well around the |
| 12 | Governor. |
| 13 | Q Anything else you remember about |
| 14 | advice you were given about working in the |
| 15 | executive chamber before December 30th of 2016? |
| 16 | A I nothing is coming to mind right |
| 17 | now, but I can follow up if I remember specific |
| 18 | advice. |
| 19 | Q Great. Before December 30th, did |
| 20 | you find out what your title would be? |
| 21 | A I I think that they told me |
| 22 | before I started, yes, I I think so, yes, |
| 23 | yes, they had to |
| 24 | Q What was your title? |

It was deputy director of Governor's

A

| 1 | Witness 5/19/21 |
|------------|---|
| 2 | offices and then director of the New York |
| 3 | office. |
| 4 | Q What was your background check |
| 5 | process? |
| 6 | A A series of paperwork and then I had |
| 7 | to go to Roosevelt Island, I believe, to do |
| 8 | fingerprints with the state troopers and |
| 9 | then |
| 10 | Q To your knowledge, was your |
| 11 | background check complete before you began |
| 12 | working in the executive chamber? |
| 13 | A I don't remember. I don't think it |
| L 4 | was, but I I don't remember. I'm sure there |
| 15 | are dates I can show if it was or not. |
| 16 | Q You said you started on |
| 17 | December 30th, 2016. When did you finish |
| 18 | working in the executive chamber? |
| 19 | A I don't know my last official date |
| 20 | and when I went over to . I don't know. |
| 21 | It's in the paperworks. I'm sorry. |
| 22 | Q Okay. Was it sometime around |
| 23 | January 2018? |
| 2 4 | A Yes, it was in January 2018. |
| 25 | O During that time period, when you |

Witness 5/19/21

were working in the executive chamber, did you learn anything about how long it normally took for someone to complete an interview process with the executive chamber and then begin working at the executive chamber?

A It is my understanding now that if the Governor wants to hire somebody, they will be brought on quickly, across all state agencies that the hiring process takes a long time. It takes a while to get somebody on board. But the -- when the Governor has an interest in bringing somebody into the executive chamber, things are expedited.

Q Can you tell us about anyone else who, while you were in the executive chamber, you knew had an expedited process because the Governor wanted to bring them on board?

A I don't -- I was not privy to every conversation they had with people from start to finish. There was the young woman at the Super Bowl event. I don't remember her being brought on as full time staff, but I was told that she was. That happened quickly. I -- I don't -- I don't know.

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Witness 5/19/21

Q When you say the young woman at the Super Bowl event, tell us what event you're talking about and what happened.

In January of 20 -- no, sorry, February of 2017, the -- there was -- the Super Bowl, they rented out Dorrian's, on the upper east side. They have -- the Governor's campaign office has a buyout to a certain time. A buyout means they -- nobody else could go in. They pay a fee to keep it closed off to the public. And there was a -- I believe she was an intern in the campaign office. She had a dove tattoo on -- I thought it was her hands. Somebody said it was her forearm. She had a dove tattoo and he was sitting in the back having -- close to her. There -- it was an intimate setting. In my eyes, there was no other people at the table. They had been drinking and this is towards the end of the evening. The bar was going to start letting the general public in and so I had walked in the back room. I saw that, went back to the troopers, the state troopers, his protective service unit, and I had said that the Governor

| 1 | Witness |
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should probably go. He's a little close to that young woman and the doors were opening and they kind of like yeah, I hear you, but that's not -- we can't do that. When he's ready, we'll go or when somebody tells us we'll go and then he left sometime shortly after that.

5/19/21

And then the next -- that was

Sunday. So the next day, Monday morning in

the -- the team meeting, with the -- the inner

circle, he had made the comment that he

wanted -- he was interested in that girl. He

wanted to know more about her. Who knew about

her and then wanted -- directed staff to find

her.

- Q Throughout that description you just gave, when you say "he," are you talking about Governor Cuomo?
- A Yes, sorry. The Governor gave that -- the direction to either Stephanie Benton, Jill DeSrosiers or Annabel Walsh to find the young woman with the dove tattoo on Monday.
- Q And to your knowledge, was the woman with the dove tattoo located and hired by the

| 1 | Witness 5/19/21 |
|----------------------------|--|
| 2 | executive chamber? |
| 3 | A That that's what I'm told. I |
| 4 | I don't remember. I thought she had turned |
| 5 | down the position, but I was told that she |
| 6 | accepted the position and that she was doing |
| 7 | like maybe, but it wasn't something |
| 8 | that she had done and then she left shortly |
| 9 | thereafter and took a job, I think, in |
| 10 | . That's what I'm told. I don't |
| 11 | know how accurate that is. |
| 12 | Q Who told you that? |
| 13 | A |
| 14 | I don't know his last name. |
| | |
| 15 | Q And at the Super Bowl event at |
| 15 16 | Q And at the Super Bowl event at Dorrian's, you said they had been drinking. |
| | |
| 16 | Dorrian's, you said they had been drinking. |
| 16 17 | Dorrian's, you said they had been drinking. Was the "they" the Governor and others? |
| 16 17 18 | Dorrian's, you said they had been drinking. Was the "they" the Governor and others? A The Governor was drinking. |
| 16 17 18 | Dorrian's, you said they had been drinking. Was the "they" the Governor and others? A The Governor was drinking. Everybody was drinking. People were watching |
| 16 17 18 19 | Dorrian's, you said they had been drinking. Was the "they" the Governor and others? A The Governor was drinking. Everybody was drinking. People were watching the game. |
| 16 17 18 19 20 | Dorrian's, you said they had been drinking. Was the "they" the Governor and others? A The Governor was drinking. Everybody was drinking. People were watching the game. Q And you said that the Governor was |

a table and his arm was kind of like up against

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Witness 5/19/21

the wall, like around the top of his seat there and they were close. They were sitting closely.

Q You -- you said that you believed her tattoo was on her hand, but you told -- you have been told -- or you thought it was on her forearm and you were told by somebody that it was on her hand. Who told you that?

A I thought it was on her hand and then I was told it was on her forearm.

Q Are there any other occasions on which you understood during your time at the executive chamber that the process for becoming an employee of the state was expedited because the Governor wanted someone to have a position?

A I don't recall if somebody said those exact words. I -- a lot of the information or additional information I received about like the true inner workings was from Staffer #5

. I believe that's how you say his last name. He had worked in the Governor's office for I don't know how many years at the time, but he was

| 1 | Witness | 5 | /19 | /21 |
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there throughout when Joe Percoco was there and he was there after I left and I believe he staffed Joe Percoco, so he had knowledge of that inner circle and then I believe he transitioned to work for Jill DeSrosiers. And then after I left, he transitioned to work and staff the Governor because they couldn't find a replacement.

And did Staffer #5 tell you anything about other individuals being identified by the Governor as someone he wanted to work in executive chamber and the process of hiring them being expedited as a result thereof?

A I don't recall if he ever said that to me directly, but a lot of the information that I found out, the true operations and how things went behind the scenes was from Staffer#5.

He had the knowledge that -- of how -- how things went there.

Q And what did Staffer #5 tell you about how people got hired into the executive chamber?

A He -- I know he spoke about how -- the young woman who was -- who worked there

| 1 | Witness 5/19/21 |
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| 2 | before me, and how she was brought |
| 3 | on and how the the mean girls, Jill, |
| 4 | Annabel, Stephanie, Andrew Ball, who's not a |
| 5 | female, but was looped into the mean girls, how |
| 6 | they were all mean to her and Melissa, sorry, |
| 7 | because of how she was brought on to work for |
| 8 | the Governor and how it was similar to my |
| 9 | situation and the Governor liked her, so they |
| 10 | were not kind to her. Bless you. |
| 11 | Q Thank you. So told you |
| 12 | that had been brought onto the |
| 13 | executive chamber staff in a way similar to |
| 14 | you. When you say similar to you, what do you |
| 15 | mean? |
| 16 | A He had met her somewhere and and |
| 17 | brought her on shortly thereafter. |
| 18 | Q Is there anyone else that you came |
| 19 | to learn of that had been brought onto the |
| 20 | staff of the executive chamber in a way similar |
| 21 | to you? |
| 22 | A I believe there was a speechwriter |
| 23 | who had a similar situation. I I don't |

had short blonde hair. I am trying to think --

remember her name. I think it was

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She

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- I'm sorry. I don't -- I don't recall.
- And what did you come to understand

 about the -- the speechwriter with the short

 blonde hair and how she came to be at the

 executive chamber?
 - A Just that he had met her at an event and liked her and that she came on staff.
 - Q If you -- if you remember her name over the course of your testimony today, just let us know. Okay?
 - A Mm-hm.
 - Q So you -- you join the executive chamber on December 30th as the Deputy Director of The Governor's Office and the Director of the New York Governor's Office. What is your job? What's your role?
 - A I don't know. It was to be a gatekeeper to the Governor. It was -- if people wanted to see the Governor, they couldn't just walk into his office. They had to go through me and Stephanie if she was there. I sat in meetings with the Governor. I attended events with the Governor. I did dictation with the Governor. I set up

| 1 | Witness | 5 | /19 | /21 |
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- meetings, made phone calls. I sent correspondence on behalf of the Governor.

 Eventually I switched roles and started doing the -- the thank you letters and the photo process. I had asked if she had anything I could do because I didn't have any real substantive work to do, so I helped do lighting schedule for the bridge in Queens, but that was not a role that I was hired to do.
 - I also had reached out, when I was there, to and asked him if he had anything I could help with because I didn't have real work to do. This is after a few months. Not right away. And there was some event tracking, but nothing ever really came from that deliverable or with -- from that assignment. I don't recall other things that I was supposed to do.
 - Q So let's go back to the very beginning. So your role is to be sort of gatekeeper for the Governor. Where was your desk in relation to the Governor?
 - A So I would either sit at the desk that I was assigned to, right outside of his

| 1 | Witness | 5, | /19/ | /21 |
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office. The setup of the -- the floor was that the -- they had offices along the perimeter and doors to go in, so his was the corner office and then Stephanie's was right next to his and then so I sat in that -- my desk was outside in that corner and so I would sit there or I would sit at Stephanie's desk when she wasn't in New York.

- Q Were you in a cubicle?
- A Yeah, yeah, it was -- yeah, it was a cubicle.
 - Q Were you on the 39th floor of 633 Third Avenue?
- 15 A Yes.

Q As part of your on-boarding to the chamber, did you receive any training?

A The -- the training was sitting with Stephanie and her telling me what she does day to day and me taking notes. I don't know if I would call that training. She -- that -- I guess you can say that was training, but it wasn't like -- like a specific write out description of my role and what I should be doing day to day.

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| 1 | Witness 5/19/21 |
| 2 | Q Putting aside the training for how |
| 3 | to do your role, did you get training about |
| 4 | policies and procedures of the Governor's |
| 5 | office? |
| 6 | A See, I don't remember. I I |
| 7 | believe I received a hand maybe a handbook |
| 8 | or a link to handbook. I don't remember. I |
| 9 | remember going to and my on-boarding |
| 10 | process there was much more detailed and it was |
| 11 | very different and I remember making the |
| 12 | comment about how easy it was to come on board |
| 13 | at compared to the Governor's office, |
| 14 | but I don't remember exactly what I did in the |
| 15 | chamber for trainings or procedures. |
| 16 | Q If you open up the electronic |
| 17 | exhibit binder that we gave you? |
| 18 | A Mm-hm. |
| 19 | Q Can you open Exhibit 6. |
| 20 | (Whereupon document was marked |
| 21 | Exhibit 6 for identification as of this |
| 22 | date.) |
| 23 | A Okay. |
| 2 4 | Q Take a look at it. The question is |

whether the handbook you just referenced is

| 1 | Witness 5/19/21 |
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| 2 | what is labeled as Exhibit 6? |
| 3 | A I don't know. I can read and see |
| 4 | that it says handbook, but I don't know if I |
| 5 | never I don't think I ever received a hard |
| 6 | copy of this. Maybe it was a link on a sheet |
| 7 | of paper that gave me. I don't |
| 8 | think I have ever looked at this before. |
| 9 | Q Why don't you turn to pages 31 and |
| 10 | 32 of that exhibit, which is the Handbook for |
| 11 | Employees of New York State Agencies. |
| 12 | A The prior arrest records. |
| 13 | Q Sorry, say that again, Kaitlin? |
| 14 | A Is page 31 the prior arrest records |
| 15 | and youthful offender? |
| 16 | Q No. Page 31 of my document, on the |
| 17 | bottom, the page numbers are on the bottom. |
| 18 | A Oh, that's 25. |
| 19 | Q And the top of my page 31 says |
| 20 | General Prohibition Harassment? |
| 21 | MS. SALZMAN: It's page 37 of the |
| 22 | PDF. |
| 23 | Q Thank you. |
| 24 | A Okay. |
| 25 | O Do you remember ever reading during |

| 1 | Witness 5/19/21 |
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| 2 | your time at the executive chamber this section |
| 3 | of the handbook that defines harassment? |
| 4 | A No. |
| 5 | Q Do you remember taking any trainings |
| 6 | while you were a member of the executive |
| 7 | chamber staff of sexual harassment? |
| 8 | A I don't. It's possible that I did. |
| 9 | I don't remember taking them. |
| 10 | Q Why don't you open what is in your |
| 11 | electronic exhibit binder labeled Exhibit 5. |
| 12 | (Whereupon document was marked |
| 13 | Exhibit 5 for identification as of this |
| 1 4 | date.) |
| 15 | Q When you open it, the title of the |
| 16 | document, it should say at the top, Governor's |
| 17 | Office of Employee Relations Equal Employment |
| 18 | Opportunity Rights and Responsibilities E |
| 19 | Learning Course, December 2017. |
| 20 | A Yep. |
| 21 | Q Why don't you page through that and |
| 22 | tell us if you remember ever doing this |
| 23 | training or something similar to it while you |
| 24 | were a member of the executive chamber staff? |

I don't -- I don't remember taking

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- this. I remember the -- I'm now remembering that -- there was an in-person training and provided by -- I can't think of her name. I think she leads JCOPE right now. I don't know. I can't think of her name, but I -- it was in person. We had to attend. It wasn't when I was hired. It was -- I think over the summer.
 - Q Was the JCOPE training that you're recalling on the Public Officers Law or was it on something else?
 - A Yes, yep. It was the Public

 Officers Law. That's what that was, yep. I

 cannot think of her name.

Q ?

- A Nope. It was not her. She just -she left -- I think she was the ethics officer,
 maybe. She left -- she's a lawyer. She left
 some time after I left to go to the private
 sector and she came back and I think she was
 recently appointed to lead JCOPE.
- Q Okay. Can you remember any other training that you -- you received?
- A Her name was Camille. I can't remember the last name.

| 1 | Witness 5/19/21 |
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| 2 | Q Camille Varlack? |
| 3 | A Yes. Yes. Sorry. She did the |
| 4 | JCOPE training. That's the only training I |
| 5 | remember having to do. I don't it's |
| 6 | possible I did that. I don't I don't |
| 7 | remember. |
| 8 | Q Do you remember any training on |
| 9 | record retention and learning what a state |
| 10 | record was? |
| 11 | A No, no. |
| 12 | Q Were you issued electronic devices |
| 13 | by the executive chamber? |
| 14 | A Yes. |
| 15 | Q Which devices did you get? |
| 16 | A I had a Blackberry and then I had my |
| 17 | desk computer. |
| 18 | Q Did you get any training on the use |
| 19 | of state issued devices or personal devices for |
| 20 | state issued business? |
| 21 | A I don't recall. I don't think so. |
| 22 | It's possible. I don't remember. |
| 23 | Q Why don't you open Exhibit 8? Let's |
| 2 4 | see if this refreshes your memory at all. |
| 25 | (Whereupon document was marked |

| 1 | Witness 5/19/21 |
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| 2 | Exhibit 8 for identification as of this |
| 3 | date.) |
| 4 | MS. SALZMAN: Jen, can I ask at some |
| 5 | point in the next minutes if we can take a |
| 6 | short restroom break? |
| 7 | MS. PARK: Yeah, we are going to end |
| 8 | the tape shortly anyway, so let me finish |
| 9 | up this and then we can take a break. |
| 10 | MS. SALZMAN: Perfect, yeah, thanks. |
| 11 | BY MS. PARK: |
| 12 | Q So what is marked Exhibit 8 says |
| 13 | State of New York Executive Chamber Records |
| 14 | Retention and Disposition Schedule. |
| 15 | Can you flip through it and tell us |
| 16 | if you have ever seen this document before? |
| 17 | A I don't I it's possible. I |
| 18 | I don't remember. If I did receive it, I don't |
| 19 | remember anybody reviewing it with me or me |
| 20 | being told that I had to review it. It's |
| 21 | possible that it was one of the links on a |
| 22 | page, if that was provided, I I don't |
| 23 | remember this. |
| 24 | Q And you referred to someone named |
| 25 | earlier. Who is ? |

| 1 | Witness | 5 / | 19 | /21 |
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I don't know her title. Α I don't remember her title, but she was like the office manager, I guess. She helped -- whatever the Governor needed, she helped set up. If it was like a meeting, she would get water, the table tent things. She would help with any issues that came up with IT. She would connect you to the team. She went over the paperwork for me. She helped me get my badge, gave me my Blackberry. She might have helped me set up the -- the background check with the state police, but I don't remember, she -- she did --I think office manager.

Q Okay. Why don't we go off the record, take a break?

THE VIDEOGRAPHER: Standby to go off the record. This is the end of media unit number one. We are now off the record at 10:26 a.m. for break.

(Brief recess taken.)

THE VIDEOGRAPHER: This is the beginning of media unit number two. We are now on the record at 10:35 a.m. back from break.

Witness 5/19/21

BY MS. PARK:

- Q And before we took a break, we were talking about role and that she was essentially an office manager. Who in the executive chamber was part of the human resources function?
- A I believe the human resources office was in Albany in a different -- not in the capitol building, in one of the taller buildings across the street and I don't remember their names.
- I did -- I spoke to -- I think her name is _____, about my retirement and some of like my benefits when I first started. I think that's the only HR office function that I can recall. Maybe _____ -- maybe that was part of her role. I -- but -- I went over my benefits with somebody in the office in Albany.
- Q If you had experienced something that was sexual harassment or discriminatory, who were you supposed to raise that complaint to?
- A I don't know who I was supposed to go to. That was never discussed to -- to my

Witness 5/19/21

recollection. I don't know.

- Q Let's talk a little bit more about
 your role and -- and when you started. So you
 started on, you said, you went in on
 December 30th. You filled out some paperwork
 and your first real day of work was December
 31st. Tell us about that day.
 - A It was the Second Avenue subway opening. I don't recall if I went into the office before the event, but I had to go to the event. I just attend and meet people. My job is just to be there. There was no direction on anything -- any one specific task I was supposed to do, just -- just show up.
 - Q What did you actually do at the event?

| 1 | Witness 5/19/21 |
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| 2 | arrived and I spent a little time with and |
| 3 | then just kind of was there, I don't know, |
| 4 | until I was able to leave. |
| 5 | Q Was that |
| 6 | (spelling)? |
| 7 | A Yes, it was . |
| 8 | Thank you. |
| 9 | Q And after that event, did you |
| 10 | when was the the next time you went into the |
| 11 | physical office, you went to 633 Third Avenue |
| 12 | to work? |
| 13 | A It would have been Monday. If we |
| 14 | weren't in Albany I don't remember if we |
| 15 | were in New York or Albany on Monday, but it |
| 16 | would have been the next workday, business day. |
| 17 | Q And when you began working in the |
| 18 | office, whichever office it was, how often were |
| 19 | you interacting with the Governor? |
| 20 | A In the beginning, my job was to be |
| 21 | there whenever he was there and to be there |
| 22 | before him. So every day and then on the |
| 23 | weekends if they needed staff, I had to go in |
| 24 | on the weekends to staff him. |

In the beginning, what were your

Q

Witness 5/19/21

interactions with the Governor like?

A They were -- it was -- excuse me.

In the beginning, the -- my -- my relationship with the Governor was -- was good. It was -- he was kind. He had an interest in me and he liked me, so he brought me to different events with him and I flew in the helicopter and in the airplane to various events across the state.

I was in the motorcade with him and he gave some direction on the office dynamics and what to think about and to do and then he would ask me about the mean girls. He called them the mean girls. That's not a name I gave them. And how they were treating me and how I was handling it and my reaction was you're not -- you're not wrong, they're mean. I was like, but I grew up with two sisters who were mean, like it was fine. My sisters weren't mean. They were older sisters. But it was -- it was fine. I was just -- they -- I would be fine. Everything was fine.

And then shortly after that, that's like when I noticed things started to change.

1 Witness 5/19/21

The -- the -- I hate to say mean girls, but it's just the easiest way to refer to that group of people. The mean girls, they all started to -- to be short with me because the Governor had an interest and was bringing me around with him to events and I was staffing meetings with him and sitting with him and I was close to the Governor.

Q When -- when you say the Governor called a group of people the mean girls, who did you understand the Governor to be referring to?

A Jill DeSrosiers, Stephanie Benton,
Annabel Walsh, Melissa DeRosa and Andrew Ball,
who I noted is not a female. I don't think he
identifies himself that way, but he was grouped
into that group.

Q Why did you -- or what did you understand about why the Governor referred to that group as the mean girls?

A My understanding was -- I hate -- silly, but what they -- how they're depicted in the movie, that they're just a group of catty, mean, manipulative individuals.

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Witness 5/19/21

- Q When you say the movie, you're talking about the movie Mean Girls featuring Lindsay Lohan?
 - A Yes, sorry, yes.
 - Q And you said that the -- at this point you were traveling with the Governor. What kind of modes of transportation did you travel with him?
 - A I have been in the motorcade with him. I have been in the state police airplane, I think that's what it's called, and the state police helicopter.
 - Q And on those occasions, how close were you sitting to the Governor?
 - A It depends on the event, but there were times I would sit in the -- there are two cars in the motorcade, there are times where I would sit in the front car -- the first car with him, so he would be in the passenger seat and I would be in the back seat.
 - Depending -- I don't know how they determined who went where, but sometimes a trooper would be next to me in the back seat of the motorcade with the Governor. It -- so

1 Witness 5/19/21

other times, when I was riding along in the motorcade, I would be in the second car and there would be staff in the back seat with me.

In the helicopter, it's not big.

It -- so you would have the pilot and I think there was a copilot and then the Governor was sitting across from me and there's a trooper, yeah, I think there's just one trooper in the helicopter and then whatever staff he decided to bring along. Usually Melissa was always there.

In the plane, the pilot, copilot, I think there's a copilot, so the plane had -- it was small. It was seats on both sides. The Governor sat with his back to the pilot, right behind -- right behind the pilot and then there was a seat directly across from the Governor and then I believe there was a fourth row on that same side and then on the other side, it was the copilot, the door to get in, a seat and then I believe a fourth row.

Q When you were traveling with the Governor, did you ever sit next to him, such that your -- any part of your bodies were

Witness 5/19/21

2 touching?

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- 3 A Not to my recollection, no.
- Q Who decided when you would travel with the Governor?
 - A I don't know. That was never clear to me. It was the Governor, Melissa, Jill or Stephanie. Based on how he made other decisions, I would assume it was the Governor who said who else he wanted in the -- whatever we were traveling in.
 - Q On any occasions other than the photographs that we have looked at together, did the Governor touch you?
 - A No, well --
- 16 Did the Governor ever --
- 17 A He never grabbed me like that.
- 18 Q Kaitlin, can you start your answer
 19 over again?
 - A Yes, my apologies. The -- the -- if the Governor had touched me after the December 12th event, it was a handshake. It wasn't anything more than that. The Governor never placed his hands inappropriately on my body besides that one photo.

| | Page 76 |
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| 1 | Witness 5/19/21 |
| 2 | Q And in that photo, did you think the |
| 3 | Governor was inappropriately placing his hands |
| 4 | on your body? |
| 5 | A Yes. |
| 6 | Q On any occasions after that |
| 7 | photograph where the Governor was shaking your |
| 8 | hand, did he ever pull you in close to his |
| 9 | body? |
| 10 | A I don't remember. I just would hate |
| 11 | to say he didn't shake my hand any other time |
| 12 | because I'm sure he did. I just nothing |
| 13 | stands out where he ever touched me |
| 14 | inappropriately. |
| 15 | Q After that photograph, did the |
| 16 | Governor ever hug you? |
| 17 | A Not to my recollection. |
| 18 | Q Did the Governor ever kiss you? |
| 19 | A The Governor never kissed me on the |
| 20 | lips, no. To my recollection, he never kissed |
| 21 | me. Is it possible he did that Italian thing, |
| 22 | maybe, I no, I don't think the Governor ever |
| 23 | kissed me in any way. |

Did the Governor ever speak Italian

Q

to you?

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being called a sponge?

| 1 | Witness | 5, | /19 | /21 |
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A I -- I saw how he treated individuals when -- how he and his inner circle treated individuals when anybody spoke up or spoke out or pushed back. They -- that was not -- I -- I recognize that that was not the right way to do things if I wanted to try to maintain good relationships and so I did not do those things.

Q How would the Governor treat people who spoke up to him?

A It would -- it depends on who you are. If you are -- if you were _____, if you were _____, if you were _____, Alphonso, Melissa, Rob or Jill, you -- I don't want to say fine, but you were fine, like you -- it was more tolerable than it was for anyone else.

one example, , he was, I believe, the when I was there and he would push back or he would let his phone -- wouldn't turn off the sound on his phone on the Monday meetings or he was just a little bit too causal with the inner circle and the Governor and when he was not around, they would speak about him and then

| 1 | Witness | 5/19/21 |
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- slowly I saw that he was pushed out. That was a common way to deal with anything that the inner circle and the Governor did not like or went against their norm.
- Q Other than sponge, did the Governor use any other nicknames for you?
 - A Not that I remember.
- Q Did the Governor ever say anything to you that had sexual content or had sexual -- or was sexual innuendo?
 - A Not that I remember.
- Q Do you remember offering the Governor your personal cell phone number?
- 15 A I do, yes.
- Q Can you tell us what happened?
- 17 A Yes. It was when I first started.
- 18 I -- we were exchanging Blackberry pins. I was
- 19 saving him in my phone and saving my pin in his
- 20 phone. The Governor communicates using a -- he
- 21 | did then, using a pin -- like a message, a
- 22 private message. And I had, in his -- we were
- 23 in his office on the 39th floor at 633 Third
- 24 Avenue and I had asked if he wanted my personal
- 25 number as well because my job at that time was

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Witness 5/19/21

I had to be there whenever the Governor was there, but before him, so I thought it was normal to give your boss your number anyway, but I assumed that he would want to get ahold of me any way that he could and that's how he would reach other people as well. It wasn't uncommon for the Governor to have personal numbers for anybody. But when I said that he kind of like reacted in like a -- a way that made me feel uncomfortable in how he looked at me and asked like why I -- I would give him my personal number.

I felt like -- it made me feel like

I was coming onto the Governor and I -- that

was not my intention. I just -- considering my

role and what I had known at the time, I

thought it was appropriate to offer my personal

number to the Governor.

Q What about what he said or how he reacted made you think he was implying that you were coming onto him?

A It was the look he gave me and the tone in his voice when he asked why he would need my personal number.

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- Q We're on video. So can you do your best to replicate the tone of voice that he used?
- Α Sure. Yes. He -- he was kind of like leaning back and when I asked, he kind of just looked at me intently and was like why would I like need your -- I don't -- it was --I'm not going to do a great job at this, but -mimmicking what he looked like, but it was -it was a slow question. It was like inquisitive like a -- like it meant something more like I don't -- I'm not doing a great job of explaining this. I apologize. I don't know.
- Q How did it make you feel when the Governor had that reaction to you offering to give him your personal cell phone number?
- A I was uncomfortable. I -- I regretted asking him that question because of his reaction.
- Q Did you tell anybody -- because you said because of his reaction. Did you tell anybody about that experience with the Governor?

| 1 | Witness 5/19/21 |
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| 2 | A Immediately after or recently? |
| 3 | Q Before December of 2020, did you |
| 4 | tell anybody about that incident? |
| 5 | A I'm sure. I'm sure I told my |
| 6 | friends, but I I don't know. |
| 7 | Q Do you remember |
| 8 | A who I would have told |
| 9 | specifically, sorry. |
| 10 | Q Do you remember telling anyone in |
| 11 | the executive chamber about that incident? |
| 12 | A It's possible I told Stephanie, but |
| 13 | I don't I don't remember. |
| 14 | Q While you were in the executive |
| 15 | chamber, did you ever hear the Governor making |
| 16 | comments about your clothing? |
| 17 | A Yes. |
| 18 | Q And what did he say about your |
| 19 | clothing? |
| 20 | A The there was one time |
| 21 | specifically I had a Gap black and red button |
| 22 | down and a black skirt. I thought the outfit |
| 23 | was nice and cute and he said I looked like a |
| 24 | lumberjack. |
| 25 | There were times when I would have |

Witness 5/19/21

to get to the office -- well, I would -- I had to be there before him, but when he would leave early from Mount Kisco and I would get a note from the troopers, the PSU, saying that they were on their way and so I would have to rush out of the shower, rush to throw things together in a bag and run over to the office.

I lived on

Avenue, so if I could get a cab in the morning across town, I would, but often I just kind of ran over there and he would come in and say like oh, I see you didn't get dressed -- or I see you didn't get ready today. I see you didn't put makeup on.

He would always comment on what I looked like when I had to show up however I was, but not put together.

Q How did those comments about your appearance make you feel?

A Terrible. Defeated. I remember the first time I was just like taken aback, like what did he just say to me. I remember the first time I remember it was very upsetting and

| 1 | Witness 5/19/21 |
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| 2 | I know that a trooper I thought a trooper |
| 3 | had overheard what he said and I had asked him |
| 4 | about it later and they they sat across from |
| 5 | my desk behind glass and basically said just |
| 6 | don't worry about him. |
| 7 | Q What occasion was that where you |
| 8 | thought the trooper had overheard the comment? |
| 9 | What was the comment from the Governor? |
| 10 | A It was it was the first time |
| 11 | it was that I didn't get ready or didn't put |
| 12 | makeup on because it shocked me that he would |
| 13 | say that to me, but then after that, I just |
| 14 | I wasn't as surprised how he would address me |
| 15 | sometimes. |
| 16 | Q Who was the trooper who you thought |
| 17 | overheard that first occasion? |
| 18 | A I thought it was senior investigned, but I'm not |
| 19 | 100 percent sure it was senorimestic. |
| 20 | Q Have you spoken to shout that? |
| 21 | A Recently? |
| 22 | Q Yes. |
| 23 | A No. |
| 24 | Q Is there any reason you're you're |

not sure it's

| 1 | Witness 5/19/21 |
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| 2 | A It was just so long ago, I I |
| 3 | don't I don't know. |
| 4 | Q Did the Governor's comments about |
| 5 | your appearance make you change anything about |
| 6 | your appearance? |
| 7 | A I would make an effort to try to be |
| 8 | ready just in case he did show up early. I |
| 9 | always tried to be put together. I bought |
| 10 | nicer clothes that I couldn't afford. I I |
| 11 | tried. I did my best with what I could what |
| 12 | I can. |
| 13 | Q When you say put together, other |
| 14 | than nicer clothes, what do you mean? |
| 15 | A Shoes, bags, makeup, hair, jewelry. |
| 16 | Q Did the Governor ever comment on |
| 17 | your hair? |
| 18 | A Yeah, I some days I would |
| 19 | literally would be getting out of the shower |
| 20 | and it would just be on a wet bun on my head |
| 21 | and that was like I didn't get ready and he |
| 22 | would make note of whatever it was that didn't |
| 23 | look right. |
| 24 | Q Look right from his perspective? |

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Right.

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Witness 5/19/21

Q Any other occasion, and I know you're saying it happened -- it sounds like more than a handful of times. Are there any other specific memories you have of the Governor commenting on your appearance?

A It -- it was the same situation. It would be early in the morning when he left, that happened multiple times and then it was the outfit I put together where he called me a lumberjack, just after the first time and the lumberjack, you just kind of get used to his commentary.

Q Did the Governor ever give you any gifts?

A The Governor gave out the rose to everyone on Valentine's Day. He -- I think it was Christmas, he gave out a quarter zip to -- to staff, but that was -- that was it.

They're -- the other women received perfume. I didn't. That's when he didn't like me anymore, so I wasn't on his gift list.

Q Let's start with the roses. Were the roses on Valentine's Day?

A If not Valentine's Day, the day

| 1 | Witness 5/19/21 |
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| 2 | before, whatever the working day was, yes. |
| 3 | Q And what year was that? |
| 4 | A That would have been 2017. |
| 5 | Q Everyone got the roses. What do you |
| 6 | mean by everyone? |
| 7 | A I probably should not have said |
| 8 | everyone, every or at least I thought it was |
| 9 | everyone that was on the 39th floor there that |
| 10 | was a women that I saw, it was, Annabel, |
| 11 | , Annabel Walsh, Stephanie Benton, |
| 12 | Jill DeSrosiers, Dani Lover, Staffer#6, |
| 13 | who I is Staffer #6 now. I don't know if |
| 14 | the men received one. I don't know if Andrew |
| 15 | Ball did or Alphonso. I don't know if |
| 16 | executive assistants received them. I guess |
| 17 | when I said everyone, I meant his inner circle. |
| 18 | Q The women in his inner circle? |
| 19 | A Yeah. |
| 20 | Q Who gave you the roses? |
| 21 | A I don't know. I know I don't |
| 22 | know. It was just one. |
| 23 | Q Was it one rose or one rose, |
| 24 | okay. How did you know it was from the |
| 25 | Governor? |

| 1 | Witness | 5/19/21 |
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- A Somebody I think said it. It -- I don't -- I'm not sure.
- Q Do you have any knowledge about anyone not on the 39th floor getting a rose from the Governor on that Valentine's day?
- A Lindsey, but I think she said that in her meeting.
- Q Other than reading about it, do you have any personal knowledge about anyone not on the 39th floor getting a rose on that Valentine's Day?
- A I don't recall. It is possible that someone on the 38th floor did because that was part of the executive chamber, but Lindsey was at ESD and I think she's on the 37th floor.
- Q Do you have any personal knowledge of Lindsey Boylan getting a rose on Valentine's Day 2017 from the Governor?
- A Besides what I read, I don't remember her receiving a rose. It would not -- I believe that that is true. I believe that she -- she was probably a recipient of a rose from the Governor on Valentine's Day.
 - Q And why do you believe that to be

Witness 5/19/21

true?

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Because the Governor had an interest Α in Lindsey. He -- Lindsey was not in that inner circle in the executive chamber. Lindsey worked for Howard Zemsky at ESD, but he liked Lindsey. I don't know if it was because of what she looked like or because of her skill set, but I saw the way that he would summon her to his office that was different from everyone else, the way that he interacted with her, the way that he spoke to her was different. He -he had an interest in her that was different from others and that is why I had -- I support and believe what Lindsey is saying is true. did not see him harass her, but I believe her.

Q We will come back to Lindsey a little bit later, okay. So then you said there were gifts from the Governor on Christmas. I couldn't hear you. What gift did you say you received?

A I think it was Christmas. I don't know when else it would have been, but I received a New York State Governor's office like quarter zip, sweatshirt. I believe others

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Witness 5/19/21

received them. I don't know who, but the Governor gave out very nice perfume to the women in that inner circle.

Q And by the women in the inner circle who received the perfume, who do you mean?

A He -- Staffer #6

received the perfume, Dani Lover, Annabel

Walsh, Stephanie Benton, I believe Jill

DeSrosiers did, I believe Melissa DeRosa did

and I don't recall anybody else, maybe

Q Did -- did any of the men's inner circle receive cologne?

A I don't know.

Q Did the Governor ever ask you about your relationship status?

A Yes, he did, at the beginning. I don't -- I didn't remember this at first and then as I started reading the stories and seeing the stories I remember that he did ask me about my relationship status and he did ask me if I had been with an older man. I don't remember a lot of that conversation. I just remember receiving those questions and being

| | Page 92 |
|----|---|
| 1 | Witness 5/19/21 |
| 2 | uncomfortable when he asked me. |
| 3 | Q Can you pinpoint anywhere in time |
| 4 | when those conversations happened? |
| 5 | A It was in the when he asked me |
| 6 | about my relationship status, it was when I had |
| 7 | first started. At the time, |
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| | Page 93 |
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| 1 | Witness 5/19/21 |
| 2 | |
| 3 | around |
| 4 | Valentine's Day because he had sent flowers to |
| 5 | the Governor's office for me, so I know that it |
| 6 | was in that window. |
| 7 | Q And and what do you recall the |
| 8 | Governor saying to you? |
| 9 | A He asked about my relationship |
| 10 | status |
| 11 | |
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| | |
| 1 4 | Q Was anything else said in that |
| 15 | conversation? |
| 16 | A That I think it was in that same |
| 17 | conversation that he asked me about if I had |
| 18 | been with an older man. |
| 19 | Q Did he use those words, have you |
| 20 | been with an older man? |
| 21 | A I don't remember word for word what |
| 22 | he said, but I do I do think that he did, I |
| 23 | iust I can't sav with 100 percent certainty. |

but I remember him asking that question because

I remember not knowing how to answer it and if

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Witness 5/19/21

it would impact my job because that was right after I had just talked to everybody about why he hired me and it was because of what I looked like and if I should -- that I was not going to do anything with the Governor, but if I should conduct myself in a way where I accepted his flirtation.

I don't want to say accepted, but tolerated is probably a better word to use.

And then I remember being uncomfortable and not knowing how to answer those questions.

Q Do you remember how you answered?

question I said that -- I always tried to be honest with the Governor because I am a terrible liar and I saw that other people when they're dishonest with him that he always found out and I don't understand why people would be dishonest with him because he always found out and he always got angry at them and would yell at them, so it just -- I didn't -- I was truthful. When he asked me about the mean girls, I said yeah, they're mean, they're not kind. So I think I said what my relationship

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| 1 | Witness 5/19/21 |
| 2 | status was and I think when he asked me about |
| 3 | the older man question, I said that |
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| 6 | Q When he asked you if you have been |
| 7 | with an older man, did you understand him to be |
| 8 | asking you whether you had dated an older man, |
| 9 | slept with an older man or both? |
| 10 | A I don't I don't know what I |
| 11 | thought at the time. I'm sorry. |
| 12 | Q You told him |
| 13 | |
| 14 | ? |
| 15 | A Yes. |
| 16 | Q Was that true? |
| 17 | A Yeah, yep. |
| 18 | Q Anything else you remember about |
| 19 | that conversation with the Governor? |
| 20 | A No. |
| 21 | Q You said you remember having |
| 22 | conversations about whether you should tolerate |
| 23 | the Governor's flirtation. Did the Governor |
| 24 | flirt with you? |

I don't -- if I said I had

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conversations with others about whether I should tolerate that, I -- I had those internal conversations. I don't know if I should be tolerant of that behavior and I -- I was -because I didn't want to lose my job or that salary and go back to the restaurant, but he --I think the -- I know I didn't do a good job of explaining this, but when he -- the person -the phone number, the personal phone number, I thought that that was flirtatious. I thought that was inappropriate, the way -- his tone and his -- how he looked at me and sometimes he just looks at you so intently, it's -- it's different. I don't know how to explain it.

It's just -- when somebody is interested in you, it's a different look than if they're not. At least I think so. And so there were times when he just made that eye contact with me that made me uncomfortable.

- Q Intently kind of starring at you?
- 22 A Yes.
 - Q Are there other things that the Governor did other than what you described that you consider to be flirtatious?

| 1 | Witness | 5, | /19 | /21 |
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A I -- according the definition of flirtatious, right, I don't know. The situation with the car parts and the computer, that was inappropriate. Was it flirting? I don't know. I don't know -- that's my -- I wouldn't say that's my definition of flirtatious, but it was inappropriate.

The time in Albany when he brought me into that -- the room adjacent to his office, I don't think it was flirtatious. I think that it was inappropriate and that he was close to me and made me uncomfortable. There were times in the mansion that I remember feeling uncomfortable. I just don't know if I would define them as flirtatious.

Q So just keep in mind, Kaitlin, that this transcript and our conversation today is coming on the back of us having informally met before, so when you say the car parts, what do you mean by the car parts incident?

A There was one day when we were in the New York City office. He had called me into his office to look up car parts on e-Bay and he was sitting at his desk and then he --

| 1 | Witness 5/19/21 |
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| 2 | his computer would have been right behind him |
| 3 | and so he had swivelled his chair. I was |
| 4 | between the computer and him and I was wearing |
| 5 | a skirt and heels and I was looking at car |
| 6 | parts for the Governor on e-Bay. That's |
| 7 | that was what I meant by car parts, sorry. |
| 8 | Q So on that occasion, was Ms. Benton |
| 9 | in the office? |
| 10 | A I'm doubting myself. I recognize |
| 11 | that. I just I don't I don't think so. |
| 12 | I don't I don't believe so. |
| 13 | Q And how did the Governor ask you to |
| 14 | come into his office? |
| 15 | A He just would yell. Where I sat, I |
| 16 | could hear him. So he would just tell me to |
| 17 | come in. Call my name. |
| 18 | Q And when you went into his office, |
| 19 | what did he ask you to do? |
| 20 | A To turn on the computer and pull up |
| 21 | e-Bay and I don't remember the car part he |
| 22 | asked me to search for, but it was a car part. |
| 23 | I know it was. |
| 24 | Q To your understanding, is there any |

reason why the Governor could not have done

1 Witness 5/19/21

2 that himself?

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- A I don't know why the Governor could not have done that himself unless he does not know how to turn on a computer, which I just don't think that that is true.
- Q Have you ever seen the Governor turn on a computer?
- A I have never seen the Governor send an email or turn on a computer, but he's 60 something years old. I'm sure he's turned a computer on at some point in his life.
- Q Have you ever understood that the Governor knew how to use the internet?
- A That's -- my understanding is that the Governor knows how to use the internet, yes.
- Q So the Governor asked you to look

 for -- turn on the computer and go to e-Bay and
 look for car parts. You said you don't

 remember what car parts he asked you to look

 for?
- 23 A That's correct.
- Q Okay. And when you were standing at the Governor's computer, were you facing a

front of me. I was looking up car parts on

e-Bay and he was directly behind me.

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| Witness 5 | /19/ | 2 1 |
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- know if he situated himself so he could see the computer. I don't -- I don't know. I wasn't looking at him.
- Q Was he saying anything about what you were doing on the computer while you were doing it?
 - A Not that I recall.
- Q Did he comment at all on your appearance while you were searching on the computer?
- A No.

- Q How far away from you was the Governor while you were doing this search?
 - A It's a tight space. I don't know the distance. It's not a big space. It was between the table and the desk and so it's -- the chair and my -- my person, I don't -- I don't know how big that space is. The photo --
 - Q Less than a foot?
 - A I really -- I'm not great with measurements or distances. I -- the photo shows how close that is and if you have access to the floor, you can see, I'm sure the set up was the same.

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| 1 | Witness 5/19/21 |
| 2 | Q So why don't you open on the |
| 3 | electronic exhibit binder, Exhibit 11. |
| 4 | (Whereupon document was marked |
| 5 | Exhibit 11 for identification as of this |
| 6 | date.) |
| 7 | A Yes, that's it. |
| 8 | Q Okay. So this is an article that's |
| 9 | titled "It's The Cuomo Way" from March 4th, |
| 10 | 2021 and this photograph of the Governor seated |
| 11 | at his desk. Is this the photograph you were |
| 12 | just referring to? |
| 13 | A Yep, that's that is this is |
| 14 | it, yep. |
| 15 | Q And this is the the desk where |
| 16 | you were standing behind the desk working on |
| 17 | the computer that's pictured in this |
| 18 | photograph? |
| 19 | A Yes. |
| 20 | Q And you told me earlier that you |
| 21 | considered that you were uncomfortable on |
| 22 | this occasion. Why were you uncomfortable? |
| 23 | A Because the Governor was my |
| 24 | backside was to the Governor and I was in a |

skirt and heels and I felt uncomfortable in

| 1 Witness 5 | /19/ | /21 |
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- 2 that situation.
- Q Did you print out anything for him
 4 or order any car parts?
- 5 A No.

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- Q Kaitlin, did you hear the question?
- 7 A Yeah, I said no. I'm sorry, did 8 you -- did I have audio?
 - Q I didn't hear your answer. There you go. Maybe it was just me. I didn't hear.
 - A No, I did not print out -- what -- the question was did I print out anything or order anything? No, no.
 - Q So how does this interaction end?
 - A I pulled up what he wanted and then eventually I just asked if he needed anything else and he said no and I left.
 - Q Did you tell anyone at that time about the Governor calling you into his office and having you search for car parts on e-Bay?
 - A I don't -- I don't think I would have told anybody in the office, but it's possible I did tell friends.
 - Q You told us there was another occasion in which the Governor made you

1 | Witness 5/19/21

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uncomfortable when you said he got you alone in the room adjacent to his office. Tell us about that incident.

That was in the capitol building in Albany. It was the second floor. His office is the corner office. He -- I don't know why we were in Albany, but he had brought me back to show me the -- his office and the different things that were in there from previous Governors and his father and then you come in through the main door, but then on the other side there is, I believe, a bathroom and then the door to go into the next room. He had brought me into that next room and was showing I mean I don't think that there was any -- it wasn't set up for anything. If there was furniture in there, it was in the corner. It -- it wasn't like a statue or anything monumental in there, but I remember there was something about the walls or the ceiling that he was showing me, but we were very close and it was very cold and I was shaking and I was uncomfortable and it was dimly lit and it was just odd. I don't know why we were there and

| Witness 5/19 | /21 |
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then we had left. I don't remember exactly how it ended, but it was uncomfortable.

Q When the Governor showed you some of the memorabilia in his office, did he point out a cigar box?

A Maybe. Maybe, I -- I don't remember. I'm sorry.

Q Do you remember, maybe this will help, a cigar box that was gifted to him by President Bill Clinton?

A Yeah, I saw that in Lindsay's media piece, it -- it's possible that that was there. I don't remember every specific thing that was in his office. I -- the things that I remember were things of his father's. He just -- he adores his father and so everything that I remember him pointing out was -- was his dad and then the -- I know I should know this, the Governor who was in the wheelchair, I remember him saying certain things about him and things in the office that were related to him. I can't remember that Governor's name, sorry.

Q And then you went through the bathroom and into the room that was adjacent.

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Witness 5/19/21

Does the room that you were in, that you described as dimly lit, have a name?

We walked by the bathroom. The bathroom was just over there before you left. I believe the room was the war room, but I don't know. It -- it was -- it's whatever room that connects from his office, whatever room is right over there in that corner.

Q Let's just call it the war room for now. When you were in the war room, you said you were shaking. Why were you shaking?

there was no reason for me to be given this tour, for me to be in that room. Like I had been in the office before. It was an odd situation and then that room was very cold and he was close to me, standing next to me and it's a big space. I don't -- there was not a reason why he needed to be that close or why we needed to be in there. It was weird.

Q How close was he to you?

A I don't remember him touching me, not that close, but he was very close, like --

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- 2 and I would say in my personal space.
- 3 Q Were you afraid?

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- A I wouldn't say I was afraid that he was going to do something to me. Did I think that something could happen? Yes. I wasn't afraid. Nervous, maybe. Uncomfortable, but I wouldn't say I was afraid.
- 9 O How did it end?
- A I don't -- he just left. I don't -
 I don't know -- I don't know why -- I don't

 remember the details of why we walked out of

 the room.
 - Q Anything else you remember about that occasion? Do you remember what -- what month that was?
- A No, I'm sorry.
- Q What year?
- 19 A I would have to -- it had to have 20 been 2017.
- Q Why do you say it had to have been 22 2017?
- A Because I mean when I started was
 the end of 2016 and then at the end of my time
 in the Governor's office, he probably knew I

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didn't like him at the time. I was not shy to be -- at that time, I just was kind of over it. I didn't -- I didn't care anymore. I just wanted to be out of there and I think I had had the conversation with Jill that I was eventually going to be gone, so I -- that would have been 2018. So it had to have been that year.

9/21

Q We'll come back to your leaving and how your experience in the chamber changed.

But you said there were occasions in which you were in the executive mansion with the Governor and you were uncomfortable. Can you tell us about those?

A We were -- we would be at the mansion for any number of reasons, but then there were evenings and afternoons that we would go to the pool house for dinner or something or drinks or gathering. I don't know what you would call it. And I always just felt uncomfortable over there. It was more of a relaxed environment, with just that inner circle. Sometimes some other folks from Albany, yeah, I guess you can say were in the

Witness 5/19/21

inner circle. But it just -- it -- I didn't -it was uncomfortable to be over there. I don't
know.

Q Can you tell us more about -- was there anything that the Governor did at the executive mansion that made you uncomfortable being there?

A Just how he interacted, with not only myself but others, how close he was to some of the women. I just -- it didn't feel right. It just -- I didn't like being over there.

Q What do you mean by how close he was to some of the other women?

A There were, people like -- the words

I want to describe this. It was -- they were

like jealous of each other. Everybody was

competing for his attention. Everybody wanted

the Governor to like them and pay attention to

them and there were times when some women would

just be very casual and close to him, sitting

closely on like the couch or with their arm

around him. It just to me I felt -- it felt

inappropriate and cult-ish and -- that those

| 1 | Witness 5/19/21 |
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| 2 | were the expectations for people in that group |
| 3 | and I didn't I didn't want to be there. |
| 4 | Q Which women did you see sitting |
| 5 | close to the Governor or with their arms around |
| 6 | the Governor? |
| 7 | A It I would say not just at the |
| 8 | mansion, but throughout my time it would have |
| 9 | been Senior Staffer #3 , Senior Staffer #2 , Senior Staffer #1 |
| 10 | Senior Staffer #1, something or other, I |
| 11 | don't know how to say her last name and then |
| 12 | I can't think of other names right now, but I |
| 13 | can always let Zoe know who else who else I |
| 14 | think of. |
| 15 | Q Did you ever see the Governor kiss |
| 16 | any of those women? |
| 17 | A I have never seen the Governor kiss |
| 18 | anybody on the lips. If he would have been |
| 19 | like the the side, Italian greeting. I |
| 20 | don't know what you call that. |
| 21 | Q Did you ever see yeah. The |
| 22 | double kiss. Did you ever see the Governor |
| 23 | touch any of those women in a way that you felt |
| 24 | was not appropriate for the work environment? |

They were -- they were just close.

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Witness 5/19/21

It -- he had -- like -- would he put his arm around any one of those women, probably, yeah. I don't recall a specific instance right now where I saw him. I have seen Senior Staffer #8 hang on him at a bar, at Dorrian's, at Super Bowl.

There was one evening there was a storm, him and Senior Station went out for drinks, I think downstairs at Dock's or a place on 42nd, I don't remember which one, but they had dinner and drinks and they came back late and they were walking around barefoot in his office and I had to sit there until they got back, until he told me I could leave and it was just the two of them barefoot in his office. I think that was inappropriate. If I think of other instances, then I will let Zoe know, but I'm sorry.

Q It's okay. You said you saw Senior Staffer #3

Senior Staffer #3

hanging on the Governor at Dorrian's at

the Super Bowl party. What specifically did

you see?

A She had been drinking and she had her arms around him, was kind of hanging on him.

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- 2
- Q So both of her arms around him?
- 3
 - Yeah, like around two (indicating), Α

that was inappropriate.

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- like grabbed him like how you would grab your partner or your spouse or, very casually, not a way I would ever grab the Governor. I thought
- Did -- on that occasion, did you see Q Senior Staffer #3 sit on the Governor's lap?
- I don't know. I think I heard that, Α but I don't -- I don't recall seeing it. I -if it happened -- if that was said that it happened I believe that it could be true. I would believe that.
 - Q Who did you hear that from?
- Α Maybe • I mean there were several phone conversations between the old staff just reminiscing on some of these -- like do you remember -- can you -- do you -- are you in contact with this person, but I don't -- I don't know. It could have been . It could have been , but I -- I believe that if it -- if they said that it happened, I believe that it could be true.
 - Q And when you say there were several

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Witness 5/19/21

conversations among former staff members, were those conversations after December 2020?

A That would have been in January probably, yeah.

Q Okay. We'll come back to those.

Circling back to your experience with the

Governor, are there any other occasions on

which the Governor made you feel uncomfortable?

A I mean I was uncomfortable in the way he spoke -- uncomfortable -- can you just provide more clarity on that, like was it -- uncomfortable because --

Q Is there anything the Governor said or did that you haven't told me about that made you feel uncomfortable?

A He was -- he made me uncomfortable in how he spoke to me, but it wasn't -- I don't consider -- it was because of how aggressive he could be. I was always uncomfortable and afraid that I was going to do something wrong, I was going to blink incorrectly around him and get in trouble.

I believe I told you about the situations where the room, the computer, the

| 1 | Witness | _ | /10 | 121 |
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car, what he commented on me -- on my attire, what I look like. He wanted me to email commissioners one time asking if they -- more than once, asking if they liked their job and wanted to keep their job because they did something that he didn't like or didn't follow his directions and that made me uncomfortable. The way I had to communicate some of his messages made me uncomfortable to others.

Q And just to be clear, the communications of those messages, it was the aggressive tone about them?

A Yeah, I would never ask the commissioners if they liked their job and wanted to keep their job. I don't agree with that.

Q Did the Governor ever yell at you?

A Yes.

Q Tell us about that.

A They're -- I mean, it was on more than one occasion, so I also felt uncomfortable here. He -- there was -- there were -- the phones would stick and so sometimes the calls couldn't -- wouldn't transfer and they would

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Witness 5/19/21

drop or -- and he would -- he had said that if I couldn't figure out the fucking phones, he would end my career. If photos got into the thank you note process or pile that he didn't look good in or you could see his bald spot or something was wrong, I would get yelled at.

If we couldn't get somebody -- if he wanted to speak to somebody on the phone, he would say get so and so. If he couldn't get them in a timely manner maybe because they weren't available, I would get yelled at.

It just depended on the day and the mood he was in, but it -- it was not uncommon for me to get in trouble for something ridiculous, in my opinion.

Q Did the Governor ever say anything to you that you found to be belittling other than calling you a sponge?

I -- telling me he would end my career over transferring the phone is belittling, I think.

The whole -- how I got the job and came on board and worked in the executive chamber is belittling to me. They're -- I -- there was no

| 1 | Witness 5/19/21 |
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| 2 | doubt in my mind that I was hired based on what |
| 3 | I look like. I think that was belittling. |
| 4 | I I don't I don't I don't know. Can |
| 5 | we take a break? |
| 6 | Q Yes. We can. Why don't we go off |
| 7 | the record, please. |
| 8 | THE VIDEOGRAPHER: Standby. We are |
| 9 | now off the record. The time is 11:41 |
| 10 | a.m. |
| 11 | (Brief recess taken.) |
| 12 | THE VIDEOGRAPHER: We are now on the |
| 13 | record. The time is 11:55 a.m. back from |
| 1 4 | break. |
| 15 | BY MS. PARK: |
| 16 | Q A while ago, Kaitlin, you told us |
| 17 | that at some point the mean girls were treating |
| 18 | you meanly and you told the Governor that. How |
| 19 | were the mean girls treating you? |
| 20 | A They were dismissive, short. They |
| 21 | weren't helpful. They would they there |
| 22 | was no like office comradery to help each other |
| 23 | or to do your job. They didn't call me names. |
| 2 4 | They just dismissed me, like I didn't exist. |

Was it all of the mean girls or did

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Witness 5/19/21

you have different experiences with different members of that group?

A It was Stephanie Benton, Annabel Walsh, Melissa DeRosa and Andrew Ball. Jill DeSrosiers I wouldn't bucket into that, but she just -- I wouldn't say that she like went above and beyond to try and be helpful. She just didn't play into those games, I would say.

Q And so you -- you described that group of the mean girls minus Jill as being dismissive. Did anyone in that group ever yell at you?

A They used aggressive tones with me.

I wouldn't say like yelled at me like how the

Governor would yell at me. Maybe Andrew Ball,

but I wouldn't say -- I wouldn't classify it as

yelling, but they got aggressive in their tone.

Q Can you remember any specific occasions in which the members of the Governor's senior staff that kind of stick out in your mind as an exemplar of them being dismissive with you or aggressive with you?

A The one time with Andrew, I rode out in the motorcade with the Governor to a press

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Witness 5/19/21

conference out on Long Island. I left my purse in the motorcade because I assumed I would be riding back with the Governor, after the press conference. I don't know what happened outside, but Andrew yelled at me because my purse was in there and the Governor was leaving and that I wasn't going back with him. I -- I yelled back at Andrew that time, but that was after him treating me poorly prior to that too.

There would be times when I would try to ask Stephanie questions about how to do my job or how to do anything that any number of things that the Governor had asked me to do where she wouldn't look up from her computer or acknowledge my presence. She had to be very short and not give a detailed response.

Annabel and Melissa would do similar things.

It was -- it wasn't uncommon, so I mean it seemed like every day there for a little while that's just what life was, but there were sometimes that I was more aggressive than previous, like the Long Island incident and then -- I can't think of any other specific event right now, but that was the norm.

| | Page 119 |
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| 1 | Witness 5/19/21 |
| 2 | Q Did your role in the executive |
| 3 | chamber change at any point? |
| 4 | A It did. |
| 5 | Q When and how did it change? |
| 6 | A When was sometime after the State of |
| 7 | the State in 2017 no, I'm sorry, the budget |
| 8 | in 2017. And I he they had wanted me to |
| 9 | report to instead of the Governor and |
| 10 | when I had the conversation with the Governor |
| 11 | and I asked him why, had I done something |
| 12 | wrong? He tried to say that it was because he |
| 13 | wanted me to learn from, but it they |
| L 4 | just didn't like me anymore. |
| 15 | Q And and when you say |
| 16 | who? |
| 17 | A Sorry, . |
| 18 | Q And how was your role going to |
| 19 | change from going from reporting to the |
| 20 | Governor versus reporting to ? |
| 21 | A It wasn't clear. I had no idea what |
| 22 | I was supposed to be doing for . She I |
| 23 | don't think she knew what I was supposed to be |
| 2.4 | doing for her. It was just he was done with me |

, but there was

and pushed me over to

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Witness 5/19/21

still times when I had to staff the Governor 2 3 and sit there, so it was -- I was on call for whatever he wanted. So then there were times 5 when I would leave on the weekends, sorry, I 6 would go upstate or do something different, I 7 would be in New York, and they would ask me to come into the office and I wouldn't be there 8 9 and then I would get yelled at for not being 10 available for the Governor.

Q This is when you were reporting to

A This was throughout the whole time, but I felt like I was -- I had more liberty to leave when I was working for _____, but I didn't -- I was supposed to be wherever the Governor was or in New York.

Q And you said it was your understanding that you were being moved between roles because they didn't like you. Who is they and how did you come to that understanding?

A They would be that same inner circle, Andrew, Melissa, Stephanie, Annabel, the Governor. I don't think Jill cared one way

| 1 | Witness | 5/ | 19, | /21 |
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- or the other. I think she just did what she was told. And I came to the understanding because of what I had experienced in how he treats other people and how he pushes them aside when he's done, how they do that, how they talk about people behind their backs and then I went to Staffer #5 a lot to ask questions about his past experience in and workplace knowledge and history about how people operated and would -- based on his feedback or response came to that conclusion as well.
- Q When was the State of the State in 2017?
 - A The State of the State is in January. It was -- it was after the budget, yeah.
 - Q Okay. That's in April. Okay. And what had changed about the way the Governor was interacting with you?
 - A He just -- I was -- I wasn't going on as many trips with him. I wasn't staffing him like I used to. I wasn't in meetings.

 Something happened where I upset somebody. I

| 1 | Witness 5/19/21 |
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| 2 | did something and that was that was it. |
| 3 | I had to leave for one weekend |
| 4 | during budget season in Albany because a |
| 5 | |
| 6 | |
| 7 | they like didn't want me to go. I didn't think |
| 8 | I was actually going to be able to go at first |
| 9 | and it was after all of that. |
| 10 | Q But you did go? |
| 11 | A Yeah no yeah, I went, yes. |
| 12 | Q And what do you recall discussing |
| 13 | with Staffer #5 about your change in role? |
| 14 | A I just I don't recall a specific |
| 15 | conversation. Staffer #5, I have had many |
| 16 | conversations with Staffer #5 throughout my time in |
| 17 | the Governor's office about how one person |
| 18 | operates or does something and got his opinion |
| 19 | or advice or guidance on things. He's a he |
| 20 | is a very knowledgeable guy and knows how the |
| 21 | whole office operates. |
| 22 | Q When you began reporting to |
| 23 | , did your physical desk location |
| 24 | change? |

I went around the corner and I

Α

Yes.

| 1 | Witness 5/19/21 |
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| 2 | sat in the same perimeter office with Staffer #6 |
| 3 | Staffer #6 and . |
| 4 | Q So how many doors down from the |
| 5 | Governor were you at that point? |
| 6 | A When you come up the stairs to the |
| 7 | 39th floor, right when you walk up, there is |
| 8 | the wall with all the offices. He's in that |
| 9 | corner, so if you were to turn that corner, I |
| 10 | was right around the corner, not halfway down, |
| 11 | so seven doors, I don't know, that's a quick |
| 12 | guess. I can spend more time to try to count |
| 13 | that if you would like. |
| 14 | Q Okay. When you were reporting to |
| 15 | what work were you doing? |
| 16 | A That was when I went and asked Kelly |
| 17 | Cummings if she had something that I could do. |
| 18 | That's when I asked if he had |
| 19 | something I could do. That was the thank you |
| 20 | notes. I had assumed that a larger role |
| 21 | with those. And then whenever the Governor |
| 22 | needed to be staffed, that's what I would do. |
| 23 | I don't recall a task that |
| 24 | gave me. I don't think she was being unkind or |
| 25 | demeaning or anything in that. I just don't |

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think she expected that or knew what to do.

She was more of a communications chief of staff, if you will. I think that was her role at the time. So I -- and I didn't do anything

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Q When you say thank you notes, what do you mean?

with comms, so it just didn't fit.

Α After a Governor's event, he sends a thank you note to people who attended. then if there's a photo, the photo goes with the thank you note and they all get sent out and they're drafted in Albany and sent to wherever he is to -- after the photos and the letters are matched to review and then I would review them, pass them on to Stephanie and Stephanie would give them to the Governor to review and that's where he would see a photo that he didn't like or pay attention to anyone, attendee, and either personalize the letter or the note or the photo and then send it -- give them back to Stephanie, give it to me to send out. Well, I would give them to somebody else and they would send them out.

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Q But the letters and the pictures

came to you already prepared?

- A They were -- the letters were drafted and printed and then the photos I had to select which ones to print and then match them and send them.
- Q So at some point you -- you left the executive --
- A I'm sorry, the -- the -- the regional rep. There are ten regions in New York. The regional rep in that region where the event was, they matched the photo -- the number of the photo to the person in the event and I got the matching and then I printed and matched the photos. Sorry, I misspoke.
- Q That's helpful. At some point you left the executive chamber. How did that come about?
- A That was right before the State of the State in January 2018. Jill DeSrosiers approached me and said that what they were doing was not fair to me and that -- asked if I would take a role in a state agency or authority and I said that I was looking at other jobs and that I wanted to leave and that

| 1 | Witness | 5, | /19 | /21 |
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I would -- I would look or consider if I could pick out the agency and if everything would transfer laterally.

Q Before that conversation with Jill, had you expressed to anyone in the executive chamber a desire to leave the chamber?

I would -- I would not have told anybody in the Governor's inner circle that I was looking for a job because it was well known that they would contact that employer and have them rescind their job offer.

Q How did you come to the understanding that members of the Governor's

| 1 | Witness 5/19/21 |
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| 2 | senior staff would contact someone's future |
| 3 | employer to have offers rescinded? |
| 4 | A I I think I heard it from Andrew |
| 5 | Ball and I think it was confirmed by Staffer#5 |
| 6 | Staffer #5 . It was it was one of the two or |
| 7 | both. |
| 8 | Q When you heard that from Andrew |
| 9 | Ball, did you hear that was that his |
| 10 | personal experience or was he sharing someone |
| 11 | else's experience? |
| 12 | A He didn't I don't think he said |
| 13 | it directly to I think I overheard him say |
| 14 | that to somebody outside because they would all |
| 15 | gather at my desk and talk until the |
| 16 | Governor until they went into the Governor's |
| 17 | office and when he wanted them to come. |
| 18 | I'm fairly certain that is what I |
| 19 | heard and then I am pretty sure I talked to |
| 20 | Staffer #5 about it. |
| 21 | Q And when you overheard it, was Mr. |
| 22 | Ball talking about his own experience or was he |
| 23 | talking about someone else? |
| 24 | A I don't remember. I'm sorry. |
| 25 | Q It's okay. So when Ms. DeSrosiers |

| 1 | Witness 5/19/21 |
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| 2 | said to you something along the lines of it's |
| 3 | not fair what they're doing to you, what did |
| 4 | you understand her to mean? |
| 5 | A That they had how they brought me |
| 6 | on and then pushed me off to and how I |
| 7 | didn't have a real job. |
| 8 | Q Was there anything in the |
| 9 | conversation with Jill that day or your prior |
| 10 | discussions with Jill that made you think |
| 11 | that's what she meant? |
| 12 | A I think we just both understood that |
| 13 | that was what it was and that was the situation |
| 1 4 | and I likely made a comment about how I was |
| 15 | I didn't do anything. |
| 16 | Q And when you told her that you would |
| 17 | want to I think you said pick the agency and |
| 18 | transfer everything laterally, what did she |
| 19 | say? |
| 20 | A She was open to it. She may have |
| 21 | hesitated at first, but she agreed to let me do |
| 22 | that. |
| 23 | Q Did she ask you what kind of |
| 2 4 | agencies you might be interested in or what |

type of work you might be interested in?

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| 1 | Witness 5/19/21 |
| 2 | A She may have asked about the type of |
| 3 | work, yeah, because my |
| 4 | , so I think we had the conversation |
| 5 | about where I could use my degree. But I I |
| 6 | can't say for certain if that happened. I I |
| 7 | think it did. |
| 8 | Q Do you remember in that first |
| 9 | conversation with Jill discussing any |
| 10 | particular agency? |
| 11 | A No, I'm sorry, I don't think we |
| 12 | talked discussed any in that first |
| 13 | conversation. |
| 14 | Q Why don't you open the electronic |
| 15 | exhibit binder. |
| 16 | A Mm-hm. |
| 17 | Q And look at what is marked as |
| 18 | Exhibit 7. |
| 19 | (Whereupon document was marked |
| 20 | Exhibit 7 for identification as of this |
| 21 | date.) |
| 22 | Q And this will be a little |
| 23 | complicated, Exhibit 7 has a lot of pages. |
| 24 | A Mm-hm. |
| 25 | Q And Hyatt might be able to help us, |

| 1 | Witness 5/19/21 |
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| 2 | but I want you to look at what, at least in my |
| 3 | binder is labeled page 186. It's an email from |
| 4 | Jill to you on December 27th, 2017. |
| 5 | MS. PARK: Hyatt, do you have the |
| 6 | page number of the PDF for that? |
| 7 | MS. MUSTEFA: I believe it's 187 in |
| 8 | the PDF. |
| 9 | MS. PARK: Thank you. |
| 10 | MS. MUSTEFA: But it should have the |
| 11 | page number that says 186. |
| 12 | BY MS. PARK: |
| 13 | Q And just so the record is clear, |
| 14 | we're going to mark this as Exhibit 7. |
| 15 | A Okay. |
| 16 | Q Do you remember this email chain |
| 17 | with Jill? |
| 18 | A When I found it I recalled, yes. |
| 19 | Q Okay. What do you remember about |
| 20 | this email chain? |
| 21 | A This was after we had the |
| 22 | conversation in person about this and I was |
| 23 | miserable and I just wanted to know when I |
| 24 | could when my last day was, so I could |
| 25 | leave. |

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Q And she proposes -- she says because you referenced being an area of interest, we did some looking into positions. Do you remember referencing

as an area of interest in your conversation with Jill?

Α I thought that I had done research on the agencies and asked her for the -- for the -- the three, but maybe it -- we talked about a topic, I -- I thought that I had said -- I remember looking up where the agencies were located because I didn't want to be based in Albany and I wanted to stay in New York and have something convenient and that's because it was a seven how I landed on minute walk from my apartment, but I had wanted something that was -- something to do with my degree, so I thought I had suggested and was important to me, in trying to then , so I thought I could get experience and learn something there. That's what I remember, but it's possible I'm not remembering correctly.

Okay. So at some point you think

Q

| 1 | Witness 5/19/21 |
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| 2 | you remember thinking about or conveying to |
| 3 | Jill that you would be interested in the |
| 4 | or |
| 5 | ; is that right? |
| 6 | A In where I am, yes. |
| 7 | Q In , okay. And so this email |
| 8 | she says they did some looking into |
| 9 | positions. And they have a great new president |
| 10 | and CEO. They would like to discuss it more. |
| 11 | What happens after this email? |
| 12 | A I I just waited to hear back from |
| 13 | Jill. I wasn't in the conversations between |
| 14 | the chamber and and when they were |
| 15 | when they're finding a position for me, I had |
| 16 | only spoken with Jill and then when Jill, I |
| 17 | guess, narrowed in on, she had |
| 18 | additional conversations with and then |
| 19 | eventually I went up to Albany and interviewed |
| 20 | at . |
| 21 | Q Do you remember when you interviewed |
| 22 | at ? |
| 23 | A No. I could probably find that date |
| 24 | somewhere. |
| 25 | Q Why don't you turn to the next page |

| 1 | Witness 5/19/21 |
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| 2 | in that electronic exhibit binder and we will |
| 3 | mark the email that's on the next page as |
| 4 | Exhibit 9. |
| 5 | (Whereupon document was marked |
| 6 | Exhibit 9 for identification as of this |
| 7 | date.) |
| 8 | Q It's an email from Jill, two e-mails |
| 9 | from Jill to you on January 24th. |
| 10 | A Yep. |
| 11 | Q Do you think you interviewed before |
| 12 | this email was sent? |
| 13 | A I probably did because her email |
| 14 | said that they're expecting me to start |
| 15 | tomorrow. |
| 16 | Q And tell us about who you |
| 17 | interviewed with? |
| 18 | A I went up to Albany. I took the |
| 19 | train up and interviewed with, |
| 20 | , and I believe |
| 21 | was in that interview, but maybe |
| 22 | not. |
| 23 | Q And what was the role that you were |
| 24 | interviewing for? |
| 25 | A I was going to be on the government |

| 1 | Witness 5/19/21 |
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| 2 | affairs team, reporting to . |
| 3 | Q And is that the role you eventually |
| 4 | accepted? |
| 5 | A Yes. |
| 6 | Q And any other conversations or or |
| 7 | communications you remember with Jill prior to |
| 8 | you moving over to ? |
| 9 | A We had one or two, maybe three in |
| 10 | person conversations when I would when she |
| 11 | first approached me about this, a follow up and |
| 12 | then maybe after my trip up after the |
| 13 | interview, but if it was an email |
| 14 | correspondence, I feel like I would have |
| 15 | printed it since I printed those, but I I |
| 16 | don't I don't think that I have any I |
| 17 | don't. |
| 18 | Q Do you know who Jill was speaking |
| 19 | to, to work on your transition to ? |
| 20 | A I think it was based |
| 21 | on that email and then based on a conversation |
| 22 | I had with, the current president |
| 23 | CEO, when I had first asked to speak |
| 24 | with her about what was happening with the |
| 25 | situation back in December, she said she |

| 1 | Witness 5/19/21 |
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| 2 | made a comment about how had told |
| 3 | that I had come from the chamber and was kind |
| 4 | of pushed onto, but she didn't know |
| 5 | if she knew, she didn't tell me much more than |
| 6 | that, so but was saying that as she |
| 7 | knew there was something there, so I think |
| 8 | Q Do you feel |
| 9 | A Sorry. |
| 10 | Q . That's okay. Did |
| 11 | you deal where anyone else in the executive |
| 12 | chamber as part of your transfer or transition |
| 13 | to ? |
| 14 | A If I did, it would have been |
| 15 | or I forgot the woman's name. I think |
| 16 | maybe. |
| 17 | Q |
| 18 | A Yep. She would have been involved |
| 19 | in the paperwork side of things, but just Jill. |
| 20 | THE VIDEOGRAPHER: Excuse me. |
| 21 | Q And we're at time I think, so why |
| 22 | don't we go ahead and go off the record. |
| 23 | THE VIDEOGRAPHER: Let's switch the |
| 24 | media unit out. Standby, please. Thank |

This is the end of media unit number

you.

members of the Governor's protective detail?

Why did you sent it to certain

the other was to the detail.

Q

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| 1 | Witness | 5 | /19 | /21 |
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| A The their office was across from |
|--|
| where I sat and so I had been I mean they |
| looked at me all day, so I had become friendly |
| with them and whenever I was with the Governor |
| they were always there and they were just kind |
| people as well, so they were at times the only |
| people who I could speak to or felt like I was |
| a person, I could be, I existed to somebody. |
| We we just they knew how tough that role |
| was and we became friendly. |

- Q Did any of the members of the Governor's protective detail ever offer you advice about working in the executive chamber?
 - A Yes.
- Q Okay. Who was that and what was the advice?
- A He's no longer there, but he was

 Captain . He had -- I don't remember

 everything that he wrote down, but he -- after

 an event, somewhere upstate, he tore a Wegmans

 to go box that had our lunches in it and wrote

 down things to remember or to think about or

 what to do to survive in that office.
 - I -- I thought I had saved it, but

| 1 | Witness | 5 / | /19/ | /21 |
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| _ | 11 2 31 2 3 5 | – , | , | |

I -- I didn't. It was basically -- don't say you don't know something, always make sure you will find out the answer and don't take things personally was one of them, it's not me and then some other advice, I just -- I don't recall, but it was the gesture and the kindness was meaningful.

Q Let's talk about your time at

. When you were at ______, did you

tell anyone about your experiences working for
the executive chamber and interactions with the

Governor?

A Yes, eventually. In the beginning I didn't -- and I didn't -- I don't think I ever disclosed every detail about what happened, but in the beginning it was just -- it was, I think, very clear to some people that I -- I didn't like the Governor. I thought he was an asshole. I have said -- I have likely said an asshole. And that it was a difficult time and some people would say be careful who you say that around. I refuse to go to Governor's events. I didn't want to be anywhere near him. I -- I wasn't shy about my dislike of the

2 Governor.

- Q Did you ever -- apologies, go ahead,
 Kaitlin.
- 5 A Sorry. It's just eventually, when I
- 6 was -- so I was on the government affairs team
- 7 and then eventually who was
- 8 the , I
- 9 think he's now just the chair of the
- 10 board, but he -- his team needed support, so
- 11 | they had asked me to split my time between his
- 12 team and the government affairs team,
- so I had assumed that role and -- but before I
- 14 accepted, I said that like I didn't want to
- 15 have any sort of communication with the
- 16 Governor's team.
- 17 If the Governor were to call, I
- 18 | wasn't going to answer the phone, like I
- 19 just -- there needed to be a separation. And
- 20 they didn't really understand why because I
- 21 didn't disclose everything at that time at
- 22 | first, but they were fine with it and they were
- 23 helpful and -- and understanding and then there
- 24 were a couple of occasions where we needed to
- 25 have a meeting at 633 Third Avenue, the

| 1 | Witness | 5, | /19 | /21 |
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Governor's office and I -- I didn't want to go and I refused to go prior, but then eventually I asked if we knew if the Governor was there and if he wasn't there, I would be more likely to go over there.

So after one meeting on the 38th floor, the Governor wasn't in the building, but and I stepped into the side office next to where the detail sits on the 38th floor and I -- I told them about the computer, the commentary on my outfits and what I look like, and just how toxic that environment was.

Q Why did you tell them on that occasion about your experience with the Governor and the executive chamber?

A I think it was because I was so anxious, I was shaking when we were there and then I just started crying, so we went into the room and it just came out. I -- I don't -- I don't know. Sometimes I get a little nervous and do things like that.

Q And when you say the car story, are you talking about the occasion in which the

| 1 | Witness 5/19/21 |
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| 2 | Governor had you at his computer looking on |
| 3 | eBay for car parts? |
| 4 | A Yes, that's what I meant, sorry. |
| 5 | Q And what did they say in response to |
| 6 | you telling them about your experience? |
| 7 | A They apologized. They were sorry. |
| 8 | They just they knew that he was mean and |
| 9 | difficult to work for, but they just they |
| 10 | didn't know the extent of how bad it was for |
| 11 | me. |
| 12 | Q Did they tell you anything about |
| 13 | reporting your experience? |
| 14 | A I don't I don't know. |
| 15 | Q Do you have any knowledge as to |
| 16 | whether they told anyone else at that time what |
| 17 | you had told them? |
| 18 | A No, I don't. |
| 19 | Q Is there anyone else you |
| 20 | specifically remember at before |
| 21 | December of 2020 telling the details of your |
| 22 | experience in the chamber? |
| 23 | A I I had conversations with my |
| 24 | current boss about my experience in the |
| 25 | chamber, but I don't I never went into the |

| 1 | Witness 5/19/21 |
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| 2 | details with him on certain things. I I |
| 3 | don't even know now if he knows some of the |
| 4 | stories, but he I have had conversations |
| 5 | he knows that I dislike the Governor. He's |
| 6 | aware. I don't remember everything I've told |
| 7 | him. It's possible. |
| 8 | Q Who is your current boss? |
| 9 | A . |
| 10 | Q And how did it come to be that you |
| 11 | started reporting to ? |
| 12 | A So I was splitting my time working |
| 13 | with and the government affairs team. |
| 14 | was retiring, I think in February of |
| 15 | 2019, and so the conversation was that I needed |
| 16 | to stay and get some more experience in the |
| 17 | world to help my career and that |
| 18 | if I stayed another year, he would |
| 19 | would help me find a job after and because I |
| 20 | didn't I didn't want to be there. |
| 21 | I didn't want to work for the state |
| 22 | because I didn't want to work for the Governor. |
| 23 | I was fine with . And that I would have |
| 24 | to go to a program team. I didn't want to go |
| 25 | to a program team, so we decided on was |

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team. They needed help and then the because I had that same thought about finance and make some money one day and I interviewed with each of the teams and I just -- I picked team because is a very relaxed -- he's not like a micro manager. He's pretty easy going and so I -- I kind of thought that that would best suit my needs in a boss, management.

Q Let's go to December of 2020. So how did you become aware of Lindsey Boylan's tweets about her experience in the executive chamber?

A My boyfriend and I were at the dog park and he asked if I saw the article or the news and I didn't at the time and so I had looked it up.

Q And earlier you had told us that you had seen Lindsey Boylan during your time at the executive chamber and that you had observed that the Governor had treated her differently from other people. Can you tell us more about that?

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Witness 5/19/21

A Yes. The Governor was interested
in -- so the -- it wasn't common for the
Governor to interact closely with other
agencies' staff at Lindsey's role, in her
position.

He worked closely with Howard and
Lindsey and maybe and --

and

But the -- I don't know how many agencies there are, but it was -- the relationship he had and how he called Lindsey in was very unique, like any other agency it was through the commissioner of the presidency or whoever the lead -- the head of the agency was. Lindsey was who he would go to most of the time instead of Howard and so it would be get Lindsey and so get -- and not get Howard and so when he would travel sometimes it would be Lindsey with him or Lindsey in the meetings It was -- that wasn't the norm or with him. consistent with how he did things with other agencies and he had an interest in Lindsey. Lindsey was -- is always put together. Always looks very nice and kind of fit the mold for

2 him.

Q Did you ever see the Governor engage in flirtation with Ms. Boylan?

A The definition of flirtation. This is tough for me to answer, I'm sorry. He treated her differently. I -- flirtation to me is something you do with your partner, right. It's not -- I think it's different, but he had an interest in her. He -- he -- he wanted her around him. When he had something going on, he wanted her present. He wanted her at events. He wanted her in the meetings. He -- he wanted her around.

The way he spoke to her was often in a different tone than other people. He was kinder. He had -- it seemed like more respect for her than others and maybe that's just because he was interested. It was -- it was different and I noticed that and then so I -- not having that support structure or team, comradery with the -- the mean girls, I had noticed Lindsey and had been kind to her to, you know, to try and seek guidance for other things in the office and just how to get by day

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to day. That never really came -- turned into anything. We didn't sit on the same floor and I couldn't really leave my desk, so it was just whenever she was there waiting to go into his office when we connected, but it just wasn't the norm.

Witness 5/19/21

Q Prior to Ms. Boylan's tweets in December 2020, when was the last time you had communicated with her?

I think I sent her -- yes, there was like a screen shot of my ballot for the primary when she was voting against Nadler. She was my district. I voted for Lindsey, though I just sent it to her on Twitter and then prior to that, it was when I was leaving the chamber, she connected me to who used to work -- or at , maybe in the chamber side. He was on team, so I don't know who paid him, if it was chamber or , but she connected me to him to ask him for advice and to have somebody there who kind of knew both worlds. I -- I don't think I had connected with Lindsey two times.

Q Lindsey tweets, your boyfriend

| 1 | Witness 5/19/21 |
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| 2 | pointed it out to you and then what happens? |
| 3 | |
| 3 | A I tweeted in support of I was |
| 4 | angry. I was just I believed her. I it |
| 5 | was I just got worked up and angry with the |
| 6 | Governor again and tweeted in support of |
| 7 | Lindsey saying that I believed her. |
| 8 | Q And then what happened? |
| 9 | A So I tweeted in support of Lindsey |
| 10 | and then I believe it was the next week when I |
| 11 | started noticing Linda Lacewell and Annabel |
| 12 | Walsh looking at my LinkedIn and then Staffer#6 |
| 13 | Staffer #6 had called me. I |
| 14 | missed her call. I was on a work call and then |
| 15 | she texted me saying it was her and that she |
| 16 | wanted to talk to me about my tweet. Then |
| 17 | she I spoke to Staffer #6 and she had said |
| 18 | that I played dumb on the phone with Staffer#6 |
| 19 | to try to figure out what she knows |
| 20 | Q Kaitlin, why don't you pause just |
| 21 | for a second, okay? So you you tweet in |
| 22 | support of Lindsey? |
| 23 | A (Indicating). |
| 24 | Q Right. Did you leave that tweet up? |

I deleted it. I don't -- I deleted

Α

Witness 5/19/21

it maybe when I saw Linda and Annabel looking at my LinkedIn or after Staffer #6 and I spoke. I deleted it in that timeframe because I was worried about getting fired. I deleted it. I told my boss what happened. I told

what happened. The conversation was this is what I did. I would do it again.

I don't regret it, but I -- the tweet has been deleted and I accept whatever happens because of this.

Q Can we -- can you just slow down just a little bit, okay? So you -- you deleted the tweet. Had you ever, previous to that, delete -- tweeted negative things about Governor Cuomo?

A Probably. I don't -- I don't know.

Did I -- I don't -- I don't know every single tweet. I screen shot tweets. If there was a negative one in there and it was before that, then yes. That was December. Over the summer I had issues where I lived in midtown because Covid and the situation in Midtown just got dangerous and I tried to get support from my City Council member and when I couldn't, I

| 1 | Witness | 5 | /19 | /21 |
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started tweeting at him and I think I've tagged Cuomo in some of those, but that was not related to anything to do with this. It was -- it was dangerous where I was living in midtown.

It -- there could have been other tweets that I deleted when I deleted that tweet in support of Lindsey as well, sure, probably, but I don't -- I don't know. I would tweet in support of him when I worked there. I couldn't tweet bad tweets about my boss at the time, right.

Q The Covid tweet that you're talking about or the tweets about midtown and what was going on in midtown, did anyone at ever talk to you about those?

A No, nobody ever mentioned my

Twitter. The -- the Covid tweets were after

January -- well, the -- the living situation in

midtown was over the summer of 2020 and then

there was the tweet about Lindsey in

December 2020 and then there was the tweets in

2021 that talked about how I disagreed with his

handling of Covid.

Q So between the time Lindsey Boylan

| 1 | Witness | 5 / | /19/ | /21 |
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tweets in December 2020 and the time you see -you speak to someone at about the
tweets, had you been in contact with any
lawyers? I don't know what you talked about.
I just want to know if you were in contact with
any lawyers.

A That's okay. So I had reached out to Lindsey telling her that I supported her and that if she needed anything to let me know and Lindsey had asked if I would speak to her lawyer to corroborate her story and I had a conversation with -- I don't think she -- she was actually Lindsey's lawyer at the time. I don't know. I don't know the dynamics. I know that her lawyer that represented her then is not the same person who represents her now. I don't know the details of what happened between the two.

She -- I had told -- I said that I didn't see the Governor harass Lindsey, but I could talk about my experience in his office and then whatever she does with that, she -- she does, I -- I don't -- whatever they needed from that they could do, but I didn't want my

| 1 | Witness 5/19/21 |
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| 2 | name out there and I needed to do it |
| 3 | anonymously because I still work for the state. |
| 4 | Q Do you remember the name of that |
| 5 | lawyer? |
| 6 | A It was Jean. If you want, I can |
| 7 | Google it real quick and try to pull her last |
| 8 | name, but it was Jean something. |
| 9 | Q Nope, that's okay. Did that lawyer |
| 10 | tell you how many other individuals that lawyer |
| 11 | was aware of who had similar experiences to |
| 12 | Lindsey? |
| 13 | A At that time, no, I don't think so. |
| 14 | She she was kind of being a shark. She was |
| 15 | trying to get have me use her as my |
| 16 | representation and it just wasn't I wasn't |
| 17 | doing that. I wasn't interested in that. I |
| 18 | didn't see a need for me to have representation |
| 19 | at that time. |
| 20 | Q Did she convey to you in substance |
| 21 | at all that there was a group of people who had |
| 22 | similar experiences to Lindsey? |
| 23 | A I don't I don't think so. I |
| 24 | think if she said anything and this is what |

several people had said, they said they

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wouldn't be surprised if more people started speaking up. I don't recall if she said specifically that she knew of other individuals.

Q And then you said you saw Linda
Lacewell and Annabel Walsh looking at your
LinkedIn and there was, after that, or sometime
near that time a phone call made to you from
Staffer#6 . Tell us about the phone call
from Staffer#6.

Α Yes. She called. I didn't have the number saved in my phone. I didn't answer it, but I had known that they were looking at my LinkedIn and it was an Albany number and so I was a little anxious and then Staffer #6 -- there's a text exchange, saying that she wanted to talk on the phone because of the tweet that I had sent out about Lindsey and then we got on the phone and she -- I played dumb. I said I don't -- she said that the press corps in Albany had seen the tweet and I had -- I was like I don't know how that would have happened. Nobody follows me. Nobody pays attention to what I do on Twitter.

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Eventually she said that a state senator had liked the tweet and it was put on their radar and I believe that was Alessandra Biaggi who did that and that's how they -- that connection was made. And she tried to say -- I think she tried to get me to agree that the Governor's office wasn't that bad and I was like Staffer #6 if that's your recollection, then that's what -- that's what you remember, but I didn't give her anything. I didn't try to get into the details with her.

She's like -- and I said to her that I did not -- I did not talk to the press. She asked me if I talked to the press and I said I did not talk to the press.

- Q Why didn't you give Staffer #6 any details?
- A Because she was part of that inner circle and I didn't trust Staffer #6.
- Q To your knowledge, was Staffer #6 recording that phone call?
- A To my knowledge, no. If she did record it, I was in the State of California.
 - Q What would be your reaction if Ms.

| 1 | Witness 5/19/21 |
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| 2 | Staffer #6 had recorded that phone call? |
| 3 | A That she I was in the State of |
| 4 | California and technically she can't use that |
| 5 | for anything, but I didn't say anything that I |
| 6 | would be worried about or upset if it were |
| 7 | shared. |
| 8 | Q She didn't tell you she was |
| 9 | recording it, did she? |
| 10 | A I I am not I don't the |
| 11 | thought of her recording that conversation has |
| 12 | never crossed my mind until you just asked me |
| 13 | about it, so I I don't think she told me |
| 14 | that she recorded it. No, she wouldn't have. |
| 15 | No, she didn't say that. |
| 16 | Q So after the call with Staffer #6, |
| 17 | you said you reached out to someone at . |
| 18 | Who did you reach out to? |
| 19 | A I told my boss what was happening |
| 20 | and then we had agreed that I should tell |
| 21 | , just for awareness because I didn't |
| 22 | want her to be caught off guard by the |
| 23 | executive chamber and then eventually I told |
| 24 | what was happening to get his |
| 25 | advice. |

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Witness 5/19/21

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Q Okay. So let's start with your boss

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. What did you tell him?

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A I told him about the tweet. I told

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him what I had done, what was happening with

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Linda and Annabel. And then the conversation

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with Staffer #6. And I have tried to explain to people how manipulative these individuals can

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be, like since I've left and I -- I don't think

10 11 anybody ever believed me until -- and I don't think believed me until he saw it finally

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happening, unravel with the situation because I

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had said no, this -- like they're -- they're

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working -- they're doing something in the back.

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I know they are. This is how they operate.

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This is what they do and he tried to just

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assure me that they weren't, like they don't --

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they're not paying attention to me that closely

I think he was being naive.

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and I don't have anything to worry about.

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probably thought I was being irrational and

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paranoid, which I probably was a bit, being

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Q And then you said you -- you spoke

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. Was on that call as

to

paranoid.

Witness 5/19/21

2 well?

A He was not on that first call with

So I had from -- additional

background, my -- my boyfriend worked for

and he has a very good relationship with her. They have -- and so it was -- I didn't want her to be caught off guard by chamber and I just have a lot of respect for her and my partner and I wanted to not put anybody in that situation. And so I had -- I think it -- I think the number I received was her personal number and I tried to do it all after work hours and get her on the phone and tell her what was going on.

We ended up connecting on a Friday after work and I told her what the situation was. I told her about the tweet. So I said I can tell you the same thing -- what I have said consistently, I can tell you about my experience. I don't consider it sexual harassment. And then --

Q Did you tell her about your experience? Did you give her any details?

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A It is possible I told her about something. I don't -- I did not -- I don't believe that I went into -- into details like I did with in that moment. She had called me late and I was trying to get off the phone because I had a tee time. I was at the golf course trying to go play golf and we were late, so I was -- I was trying to be quick with it and tell her what was happening and get off the phone.

Q You said you told her what you experienced, you didn't consider it to be sexual harassment. Why don't you consider what happened to you to be sexual harassment?

A Because my experience with sexual harassment is very different and so I don't think of it as sexual harassment.

Q And when you say that, and I don't want to pry into other experiences, but have you had another experience that you would consider to be sexual harassment that was worse than what this was?

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| 1 | Witness 5/19/21 |
| 2 | and |
| 3 | Q Kaitlin, can we can we stop? I |
| 4 | just want to go off the record for a second. |
| 5 | THE VIDEOGRAPHER: Standby. We are |
| 6 | now off the record at 1 p.m. |
| 7 | (Discussion held off the record.) |
| 8 | THE VIDEOGRAPHER: We are now on the |
| 9 | record. The time is 1:02 p.m. |
| 10 | BY MS. PARK: |
| 11 | Q Kaitlin, I will ask again. Why did |
| 12 | you not consider your experience with the |
| 13 | Governor to be sexual harassment? |
| L 4 | A I don't consider any of my |
| 15 | experiences to be sexual harassment or anything |
| 16 | else because I don't like that victim |
| 17 | mentality. |
| 18 | Q Do do you know what the legal |
| 19 | definition is of sexual harassment? |
| 20 | A I have been told what it is. I |
| 21 | could not recite to you what the legal |
| 22 | definition is of sexual harassment. |
| 23 | Q So in this conversation with |
| 24 | , did you say anything to her about |
| 25 | having or getting a lawyer? |

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| 1 | Witness 5/19/21 |
| 2 | A No because I could I didn't think |
| 3 | I needed one and I couldn't afford one. It was |
| 4 | never something I had entertained because I |
| 5 | I knew right away that I couldn't afford it. |
| 6 | Q Did you tell anything |
| 7 | about having spoken to Ms. Boylan's lawyers? |
| 8 | A I don't I don't think so, but I |
| 9 | don't know how else that they would have gotten |
| 10 | to that conclusion, so maybe. |
| 11 | Q And in that conversation, did |
| 12 | say anything to you about her |
| 13 | obligations to report what she had told you, |
| 14 | what you had told her? |
| 15 | A I think I brought it up and I said I |
| 16 | understand that you have to do whatever you |
| 17 | need to do on your end, but because I didn't |
| 18 | want to involve our , |
| 19 | I |
| 20 | don't know if he's in the chamber now, but he |
| 21 | was in the chamber when I was there and it's |
| 22 | not that I dislike, I just didn't |

want to put in that situation.

that call about you being protected from

www.veritext.com

And did she say anything to you on

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Witness 5/19/21

retaliation?

A She reiterated that I couldn't lose my job and I said that if the Governor wanted me gone, I would be gone. Thanks for -- for believing that that is true, but I didn't -- if he wanted me gone, I would be gone.

Q Anything else you remember about that first conversation with

A I -- I said I didn't want anything from her. I didn't -- I wasn't asking for any favors or to keep my job. I just wanted her to be aware of the situation.

Q And what happens after you speak to

We hung up and then the following week she had called me back and said that she had to report it to counsel because -- she asked if it would be okay if she connected him, and dialed him into that conversation and so I said it was fine and then he got on the phone with and they had reiterated that I cannot lose my job, I'm protected and I said I hear what you're saying. If the Governor wants me gone, I will be gone.

| 1 | Witness | 5, | /19/ | /21 |
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- I don't want anything from you guys.

 I don't need anything. I appreciate you
 calling. I don't consider it sexual
 harassment. This is -- I will tell you about
 my experience and that -- I -- like I did what
 I did and I accept responsibility for whatever
 happens because of it.
 - Q And when you're saying you did what you did, you're talking about the liking Lindsey's tweet?
 - A The tweet that I had tweeted. I liked -- I probably liked her tweet and then tweeted in support of --
 - Q I'm not a tweeter, so it sounds like you wrote a tweet, at least that's what you were referring to, okay. And then what happens after that?
 - The tweet had been deleted and so this is right before the holidays and I didn't hear anything and then so in January my boss had asked me if I had heard anything or if anything was happening with the chamber and I said no, it's been quiet, but I wouldn't be surprised if there is some other stuff

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happening that I didn't know about and he told me that Judith Mogul had reached out to him to ask about me and then he said that she asked if I had retained counsel and if I had said -- that I had told someone in chamber that I said the Governor sexually harassed me. Both we're not true.

And so I was worked up over that because those were false statements and had said that he didn't think that those were true and that he told her that and I didn't --I didn't know what to do. I don't remember if I asked him if I should talk to or if • we should talk to I don't remember how that conversation ended, but I reached out to and I told him what was going on and he said that I needed to get on the phone to clear the air and for the record and so we got -- we scheduled a call. We were on the phone and had told them what had happened with Judith and so -sorry, had also mentioned that -- he was trying to make light of it. Look, if it makes you feel better, I told her you were a good

| 1 | Witness | 5, | /19/ | /21 |
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worker, she had said that she had heard that from somebody else, so I used that as well to put together that it could have been or and I said it couldn't have been because she's at fixed has nothing to do with this. So it was one of you two and then had said that he -- that he -- that he did it, that he spoke and he could reach out to Judith to set the record straight and I said no, you've done enough and then I asked if and I

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Witness 5/19/21

could speak to Judith and sort this out because

I didn't say that and that could have ruined my

life, my career if it went around that I said

that the Governor sexually harassed me when I

never said that and we hung up.

Everybody said it was fine and then reached out to Judith. She said that she would get on the phone and I could set the record straight and I -- there was a mixup with the first call. We got disconnected and the second call -- the second -- a minute, two minutes, I don't know, later, she said that there was somebody in the room with her. heard her writing things down with a pencil or pen and a piece of paper. I don't remember who the other person was in the room with her and that I -- I apologized. She -- I said I don't know how it got -- it escalated to this. don't know where the miscommunication was. Ι felt guilty for taking everybody's time and I didn't have counsel. I didn't plan on having counsel at the time, which was true. couldn't afford it and that I never said that the Governor sexually harassed me.

| 1 | Witness | 5, | /19 | /21 |
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I never told anybody -- she said
that I told somebody in chamber that and I
never told anybody in chamber that. I never
told anybody that, so I don't know. She said
okay, if you want to drop this, we can do that.
This will all go away right now and I said I
want to drop this. I didn't say those things.
I don't have a lawyer. And yes, I said I asked
that if something were to come up again, if she
would reach out to me directly because I
honestly had no intention at that time of
retaining counsel. I couldn't afford it and
she said yes.

Q And this conversation with -- well, had Judith Mogul tried to reach out to you prior to that conversation in January?

A No and -- well, if she did, it was on a number that I didn't recognize and didn't answer, but no. But she had told that she couldn't reach out to me because she heard that I retained counsel and it would be an ethical issue.

Q But you wouldn't recognize her -- her phone number?

1 Witness 5/19/21

A No.

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- Q In the conversation you -- when you spoke to Ms. Mogul, did she tell you that it -- it didn't matter whether you wanted something to be done, that there were requirements in the state regarding reports of workplace misconduct?
 - A No, she said that if I wanted it to go away, it would go away.
 - Q Did she tell you anything about you being protected from retaliation?
 - A I -- I -- I don't even think that was a topic of that conversation. I think it was a -- I didn't say these things, I'm sorry for wasting everybody's time. These are not true and I'm -- clear the air and I want to be done with this.
 - Q Did she ask you for any information regarding your actual experience in the executive chamber, regardless of how you characterized it?
- A No. She didn't want any information from me.
 - Q And what makes you say she didn't

| 1 | | | | | Wi | tness | 5/19/21 |
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| 2 | want | any | info | rmat: | ion | from | you? |
| 3 | | A | Ιt | was | a | short | convers |

- A It was a short conversation. It was a -- no, these things aren't true. I want this to be over with. I think that she got what she needed from them.
- Q Are there any other conversations that you have had -- that you haven't told us about, after December 2020 with senior staff of the executive chamber?
- A With the executive chamber, I

 don't -- I don't think so. The Judith

 conversation, no, no. And if there is and I'm

 not remembering, I -- sorry, I don't -- I

 honestly don't think that there is, no.
- Q Did Jill DeSrosiers ever reach out to you after December 2020?
 - A No, no, no. I don't think -- no.
- Q So at some point, Kaitlin, you decided to share the details of your experience in the executive chamber with reporters; is that right?
- A Yes, yes.
- Q Why don't you tell us about that and who you spoke to?

| 1 | Witness | 5 / | /19/ | /21 |
|---|---------|-----|------|-----|
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A Yeah, Lindsey had asked if I would speak to -- no, the -- the first -- I don't know what happened first. Lindsey asked me to speak to, I believe, Rebecca Traister first and then Ronan Farrow or vice versa and then at some time -- maybe at the same time the New York Times reporter Louis -- I don't remember --

Q Luis Ferre-Sadurni?

A Yes. He had wanted to have a conversation with me as well and I spoke with him off the record on the phone. I -- and then I went forward and had -- and had a conversation with Rebecca Traister.

Q And did that -- sorry, go ahead.

A Sorry. It was -- I agreed to let Rebecca tell the story because of her story with -- when she approached me with the story, told me about her storyline. It was more about the power dynamic and it wasn't so heavily focused on sexual harassment and I -- that is why I -- I decided that it would be okay for her to do this because that is what I believed what was wrong and I didn't want it to happen

| | rage 109 |
|----|---|
| 1 | Witness 5/19/21 |
| 2 | to anybody else. |
| 3 | Q And and just to be clear, what |
| 4 | did you believe was wrong about the power |
| 5 | dynamic? |
| 6 | A How he treats people, how that |
| 7 | office operates. The the and not just |
| 8 | people in his office. People everywhere |
| 9 | that everybody is afraid of the Governor and |
| 10 | we just I I strongly believe that we |
| 11 | don't do a lot of work in New York that we |
| 12 | should be doing because of him and his ego and |
| 13 | he holds projects back because of political |
| 14 | gain. |
| 15 | Q The New York Magazine article |
| 16 | published by Rebecca Traister that we looked |
| 17 | at or maybe we haven't looked at it, but |
| 18 | there's a New York Magazine article that she |
| 19 | published and it references someone by the name |
| 20 | of Kaitlin. Are you that Kaitlin? |
| 21 | A Yes. |
| 22 | Q Are the things that are described in |
| 23 | that article about you accurate? |
| 24 | A Yes. |

When you -- can you open Exhibit 7

Yes.

25

Q

| 1 | Witness 5/19/21 |
|----|--|
| 2 | again and Hyatt perhaps can help me. I'm |
| 3 | looking at what I think is page 7 of a text |
| 4 | message chain between you and someone named |
| 5 | Rebecca from February 26th, beginning at 10:59 |
| 6 | a.m. |
| 7 | A That's Rebecca Traister. |
| 8 | Q Can you see that page? |
| 9 | A Yes. |
| 10 | Q And for the record, I'm going to |
| 11 | mark this these text messages with Rebecca |
| 12 | Traister as the next exhibit. |
| 13 | (Whereupon document was marked |
| 14 | Exhibit 10 for identification as of this |
| 15 | date.) |
| 16 | A Sorry, the the time stamp you |
| 17 | have on this text is 3:32. |
| 18 | Q Mine is 10:59 oh, at the very top |
| 19 | it says 3:32, on the left-hand corner. Is that |
| 20 | what you're looking at? |
| 21 | A Yes, yep. |
| 22 | Q Okay. If you turn to the second |
| 23 | page of that, at the top, underneath the R |
| 24 | Rebecca, it says Friday, February 26th 10:59 |

a.m.?

Witness 5/19/21

2 A Yep.

- Q Okay. So this is a text message between you and Rebecca Traister from New York Magazine and you sent her a list of 15 names.
 - A Yep.
 - Q Who are the people on this list?
- A These are the people that I identified that might have a story, that might speak to her, that would be able to speak to that dynamic or that -- speak to the story that she wanted to write, but I didn't think that a lot of these people would ever talk to her. It was just a list of people that I thought would maybe or could.
- Q Can you go through the list and tell us what you know about the individuals on this list personal experience in the executive chamber, meaning what did you observe or what did they tell you or what did you hear about?

 Start with
- A Yeah, was the -- her role -her title might have changed once while she was
 there, but she was
 from

 She had a good

| 1 | Witness 5/19/21 |
|---|-----------------------------------|
| 2 | reputation, doing good work and s |
| 3 | her in to work for the Governor. |
| 4 | role was mostly to do comms, but |
| 5 | the people who she was not in |

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work and so they pulled Governor. I think her comms, but she was one of the people who -- she was not in the inner circle right away, but Melissa had known her had felt comfortable contributing and so to conversations and I think that that made other people upset and treat her poorly, eventually treat her poorly and the Governor liked her and respected her opinions.

So the same situation and then I had heard from number four, that she had described situations to him that were not great. didn't go into the details and I didn't ask. It wasn't -- not my business. Number two --

had described Q -- sorry. to who?

had told me on the phone that Α -- so when I -- when I had spoken to , it was to think of people or that -- like this list, who might have a story or be willing to speak of who we can think of that would go public with the reality, Governor

| 1 | Witness 5/19/21 |
|----|---|
| 2 | Cuomo in his office. |
| 3 | Annabel, I didn't think she would |
| 4 | speak, but they had a weird relationship. |
| 5 | Sorry. Your other question was |
| 6 | about and . They were close and |
| 7 | had said that disclosed to him |
| 8 | situations where she was uncomfortable. I |
| 9 | didn't ask for the details, but I I could |
| 10 | see a world where that is true. |
| 11 | Annabel, I she was a scheduler |
| 12 | and I think her role changed several times too. |
| 13 | She was the the Annabel that I said had |
| 14 | drinks and was kind of hanging on him. They |
| 15 | had a they had weird interactions at that |
| 16 | bar, sometimes at the mansion. They were just |
| 17 | too close for what I thought was a |
| 18 | professional should be a professional |
| 19 | relationship. I just I thought that she had |
| 20 | a story. , she was |
| 21 | Q Can you pause there for a second, |
| 22 | Kate Kaitlin? |
| 23 | A Mm-hm. |
| 24 | Q Do you have any knowledge about |
| 25 | Senior Staffer #3 removing her dress at an event at |

1 | Witness 5/19/21

the executive mansion?

A No, no, but I heard that that happened. I don't know if it's true.

Q Who did you hear that from?

A probably, during this -- yeah.

Q what do you know about her experience with the Governor in the chamber?

the press office, they are the same to me, but when ________, number nine, left, they would pull _______ in to help staff the Governor. I don't know if she did that prior to ______, but I know that when ______ left, ______ stepped in to help.

So she would sit in that chair outside of his office and staff the Governor.

I -- I don't know why she left, but she left quickly and quietly and didn't reach out to the Governor and tell that she was leaving, she wouldn't answer their phone calls. I know that because I overheard those conversations, but I couldn't get any details about that.

Witness 5/19/21

Staffer #5 would know that, should know that. I think they were talking. But father I believe, was a trooper and so that was like the other reason why people were kind of annoyed that she didn't -- because of the role her father had.

he ran Bernie Sanders campaign. He -- I don't know who found him or how he came on board, but he eventually started working in the chamber and was one of the people who came on board who just couldn't believe like how operate -- the day-to-day of the chamber and how anything got done.

and were close and then so I had asked if I could help with anything because I had no work to do.

was an Obama staffer. Same situation. Came in, couldn't believe what was happening and we kind of commiserated at the time and he -- he helped with -- or he did the briefing books and so he would have to hand off the briefing -- he was supposed to be managing the process, I believe and then he -- the briefing books were supposed to come to me or

| Witness 5/19 | /21 |
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Stephanie to give to the Governor at the end of the day, so we were able to form a relationship and just like how absurd that whole process was and how angry the Governor would get with certain things.

while, but I never really understood her role.

It changed several times. She was an advisor,

maybe. I don't know. Then she somehow got

connected to doing something with the state

police or the investigator's office now I

think. I don't know. She was just another one

that the Governor had his eye on.

She was around, I just -- I truly didn't know what she contributed. She was nice. I just don't know what her role is, so I thought that she could -- would likely have stories because he had an interest in her too.

Q When you said he had an eye on her or had an interest in her, what do you mean?

A She would be in the room, in Albany mostly, she would be around at events and got pulled into doing -- when I was there, work with the state troopers and the storms. I just

| | Page 1// |
|----|---|
| 1 | Witness 5/19/21 |
| 2 | genuinely didn't understand her role and what |
| 3 | she contributed. I don't know. I just knew |
| 4 | I could tell that he liked her. |
| 5 | Executive Assistant #3 and |
| 6 | , they staffed the Governor's office |
| 7 | in Albany. I actually think worked |
| 8 | for maybe or or |
| 9 | both. I don't know. They were executive |
| 10 | assistants, but they were in the same little |
| 11 | wing in Albany on the second floor and had been |
| 12 | there for a long time and I just assumed that |
| 13 | they would know something or have stories. |
| 14 | , she was in the role |
| 15 | the position the desk that . My |
| 16 | understanding is she was hired based on what |
| 17 | she looked like and that people were mean to |
| 18 | her and that she left. |
| 19 | . I she probably |
| 20 | would have never talked to anybody, but she was |
| 21 | close to the Governor and could speak to the |
| 22 | power dynamic and the toxic environment and how |
| 23 | projects there did not happen more to like the |
| 24 | political side. |

I believe -- I don't

| 1 | Witness 5/19/21 |
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| 2 | remember title. , I think |
| 3 | was the . I could be |
| 4 | wrong. He was, I think, at the |
| 5 | being pulled into the |
| 6 | chamber, but they were not kind. They were |
| 7 | mean to him. They would talk behind his back |
| 8 | all the time because he would be too causal |
| 9 | around the Governor and they pushed him out. |
| 10 | So I thought maybe he would have stories to |
| 11 | tell. |
| 12 | The mansion staff, I don't remember |
| 13 | their names, but there's a woman and a man |
| 14 | there who are very kind. |
| 15 | Q Is it when you say there's a man |
| 16 | and a woman there, are you talking about |
| 17 | and ? |
| 18 | A Yeah, yep. Yeah. Thank you. I |
| 19 | couldn't remember their names. |
| 20 | , I don't know |
| 21 | story of how she first started at the chamber |
| 22 | or where she came from, but my understanding is |
| 23 | that he liked her. She was smart. She did a |
| 2 4 | good job and then the inner circle didn't |

the women didn't like her because she -- he

| 1 | Witness 5/19/21 |
|----|--|
| 2 | respected her and she was good at what she did. |
| 3 | , she was a . |
| 4 | She was a . I don't know how she |
| 5 | started. I don't know where she came from, but |
| 6 | I know that they were awful to her as well. I |
| 7 | figured she might have a story. |
| 8 | And then , I believe came |
| 9 | from the with and |
| 10 | eventually got pulled in to work in the chamber |
| 11 | and they were not kind to her at first, but it |
| 12 | seems like towards the end, before she left, |
| 13 | that things had were different for her, but |
| 14 | I guess I felt that she would have stories |
| 15 | or could speak to the power dynamic too. |
| 16 | Q Is there anyone that is not on this |
| 17 | list that you think the Governor may have |
| 18 | behaved inappropriately with? |
| 19 | A Senior Staffer #1 and Senior Staffer #2 but not in a |
| 20 | way I hate to say this. I can see a world |
| 21 | where it was mutual. |
| 22 | Q What did you observe about the |
| 23 | Governor's interactions with Senior Staffer #1 |
| 24 | that you thought was inappropriate? |
| 25 | A They were just very close in a way |

They were just very close in a way

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Witness 5/19/21

that you would be with somebody you have been intimate with, in my opinion. It just -- I didn't -- they were very close. They're very, very close.

Q And what about Senior Staffer #2; what did you observe that you believe was inappropriate between Senior Staffer #2 and the Governor?

A They both have -- I believe worked for him since he was in the AGs office, so they have been with him forever, but the way the -- they get territorial and I would say jealous of other people. Senior Staffer #2 especially it seems like there could have been something more there at some point.

I never saw anything. The only
thing I saw between Senior Staffer #1 and the Governor is
the night after the drinks with the shoes off,
but that is the impression or feeling I get or
I got or my takeaway from my time there.

Q You can put away that exhibit. So there's a number of text messages between you and Ms. Boylan. Can you describe for us after Ms. Boylan's tweets what you were communicating with her about?

| Witness | 5 | /19 | /21 |
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A There was -- I hate to pin -- she would send articles. She would check-in. She would ask if I remembered an event. She would ask if I would speak to -- there was a PR team, maybe they weren't a PR -- ask if I would speak to Ronan and Rebecca or I can't remember his name, some other guy.

She would -- I -- I think just that and then recently she let me know that Jill had a baby and then the hiring, I think she sent me recently too, who he just on boarded.

- Q Who the Governor just hired?
- A Yeah, yeah.
- Q Were you communicating with Lindsey

 Boylan only by text message? Did you ever talk

 on the phone?
- 18 A Lindsey and I spoke on the phone and 19 yes.
 - Q And was this the same general topic?
- 21 A Yes.
- Q Have you ever met Lindsey in person 23 since December 2020?
- A No, I -- I have -- I haven't been in

 New York. I was in New York, I think, for a

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Witness 5/19/21

week recently, but upstate,



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Q Do you know Charlotte Bennett?

A I know of her and I have connected with her. I wouldn't say I know her well.

Q How did you connect with her?

A I think it was Twitter. I think it was a private message on Twitter.

Q Were you -- you reached out to her or she reached out to you?

A I reached out to Charlotte and I asked to speak with her because her story, it was, to me, when I read it, very similar and she went with the sexual harassment.

I hate -- that's not the -- a great way to say that, but and I just wanted to know because people had said I think that what you experienced is sexual harassment, but I don't consider it sexual harassment, so I wanted to know since she had said that very clearly that he sexually harassed her, how similar our situation was and so I had asked to speak to her, to talk to her about that and I -- and then she reached out to her lawyer and

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Witness 5/19/21

connected me to her lawyer and then I got connected to Zoe through Debra Katz.

Q And in the conversation you had with Ms. Bennett, what did you discuss?

experience, what desk she sat at. I asked her what her salary was. I said I'm just curious because that's a thing for me. She was paid significantly less for what I think is the same role. And she talked about what her time was like and how mean the people were to her and how the -- her relationships with the inner circle changed because the Governor was kind to her and I was like yes, I know what you mean.

Q Did you tell Ms. Bennett that the Governor had asked you if you had had -- been in a relationship with someone who was older?

A I think that's when I remembered when I -- when we were talking about it and I was like oh, my god, I think I -- I think he said that to me. I think that's when it came back to me. I could be wrong, but --

Q And -- and was this conversation with Ms. Bennett after her -- she went public

| 1 | Witness 5/19/21 |
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| 2 | with her allegations? |
| 3 | A Yeah. I didn't know who she was |
| 4 | prior to that. |
| 5 | Q Have you been in touch with her |
| 6 | since then? |
| 7 | A So we spoke on the phone. There may |
| 8 | have been an exchange after that conversation |
| 9 | and she had reached out to me and I didn't |
| 10 | answer. I was told that I shouldn't be having |
| 11 | conversations with the other people. |
| 12 | Q Do you know Alessandra Biaggi? |
| 13 | A Yes. I wouldn't say I know her |
| 14 | well, but yes. |
| 15 | Q Have you been in touch with her |
| 16 | since December of 2020? |
| 17 | A Yes, I reached out to Alessandra |
| 18 | after Lindsey's tweet to see if she had a |
| 19 | similar experience and what it was like when |

The intent was for me to see if she had a similar experience and to talk to her about when she left the Governor's office and when she ran against Jeff Klein and to see how

she started -- I never connected with her on

the phone.

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| 1 | Witness 5/19/21 |
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| 2 | bad the retaliation was from his office because |
| 3 | I wanted to learn about that before I did |
| 4 | anything publicly. |
| 5 | Q Was this before the New York |
| 6 | Magazine article? |
| 7 | A Yeah. It was right after the tweet |
| 8 | in December. Scheduling calendars, holiday, we |
| 9 | never connected to talk about that, but that |
| 10 | was my intent when I reached out to her. |
| 11 | Q Do you know any of the other women |
| 12 | who have come forward publicly to make |
| 13 | allegations against the Governor? |
| 14 | A I so the I know no. |
| 15 | Q Have you been told anything about |
| 16 | who the woman is who has alleged that the |
| 17 | Governor groped her breasts in the executive |
| 18 | mansion? |
| 19 | A Have I been told anything about her, |
| 20 | like who what her name was prior? No, I |
| 21 | asked |
| 22 | Q Anything about her? |
| 23 | A No, I asked people because Ronan had |
| 2 4 | asked me and I wasn't going to give Ronan a |

story and so I was trying to be helpful and

| 1 | Witness 5/19/21 |
|----|---|
| 2 | then I saw a tweet talking about respecting |
| 3 | people's privacy and I recognize that what I |
| 4 | was doing was not right and so I had stopped |
| 5 | inquiring to try and figure out who that was. |
| 6 | Q You tried to figure out who it was |
| 7 | to give the name to Ronan? |
| 8 | A Yes. |
| 9 | Q But you never found out who it was? |
| 10 | A I think it is in the subpoena. |
| 11 | Q Other than in the subpoena, did you |
| 12 | find out who it do you know who it is |
| 13 | sitting here today? |
| 14 | A I couldn't tell you her name. I |
| 15 | think it's in the subpoena, but I I have to |
| 16 | look to see what her name was. |
| 17 | Q There's a number there's a number |
| 18 | of names in the subpoena, but other than the |
| 19 | subpoena |
| 20 | A Do you want me to pull it up? |
| 21 | Q No, it's okay. Other than the |
| 22 | subpoena, has anyone told you who that might be |
| 23 | or anything about her experience with the |
| 24 | Governor? |

and I discussed who it might

Α

| 1 | Witness 5/19/21 |
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| 2 | be, but we never figured out who she was. |
| 3 | Q Did you discuss with any |
| 4 | information he had about her experience with |
| 5 | the Governor? |
| 6 | A He was saying that it could have |
| 7 | been a fellow or it could have been I think |
| 8 | he might have said somebody else, but I think |
| 9 | he was getting his information from Alessandra |
| 10 | Biaggi and then I think he was also talking to |
| 11 | Ronan. |
| 12 | MS. PARK: Can we take maybe five |
| 13 | minutes and I think we will be able to |
| L 4 | conclude. I just want to go through my |
| 15 | notes for a few minutes, if that's okay. |
| 16 | Why don't we go off the record? |
| 17 | THE VIDEOGRAPHER: Okay. Standby, |
| 18 | please. We are now off the record at |
| 19 | 1:41 p.m. |
| 20 | (Brief recess taken.) |
| 21 | THE VIDEOGRAPHER: We are now on the |
| 22 | record. The time is 1:48 p.m. Back from |
| 23 | break. |
| 24 | BY MS. PARK: |
| 25 | Q Kaitlin, I asked you a number of |

| 1 | Witness 5/19/21 |
|----|---|
| 2 | questions about inappropriate conduct |
| 3 | conduct by the Governor. You have given us |
| 4 | lots of details about that. |
| 5 | Do you ever recall the Governor |
| 6 | making comments about the size of his hands and |
| 7 | implying what that might mean about the size of |
| 8 | his genitals? |
| 9 | A No, no. |
| 10 | Q Do you recall observing the Governor |
| 11 | ever ask someone to memorize song lyrics or |
| 12 | sing for him? |
| 13 | A No. When I started, we went to get |
| 14 | drinks at a bar on Second Avenue and I had to |
| 15 | do a toast to everybody, but I didn't have to |
| 16 | memorize a song or do that. |
| 17 | Q Who who was there for that? |
| 18 | A Oh, it was the Governor. It was |
| 19 | Melissa, Stephanie. I believe Jill DeSrosiers |
| 20 | was there. may |
| 21 | have been there. Alphonso David, maybe Rob |
| 22 | Mujica. It was just that close that close |
| 23 | circle, Andrew Ball and Andrew Ball. |
| 24 | Q How did you come to understand that |

you had to make a toast?

| 1 | | | Wit | tnes | ss ! | 5/19/ | /21 |
|---|---|------|------|------|------|-------|-------|
| 2 | A | They | told | me | at | the | table |

A They told me at the table that I had to do it.

Q And so what did you say?

A I -- I don't remember. I just know
I was put on the spot to do it and I, at that
time, didn't -- well, I probably still wouldn't
do well with that, but I didn't do well with
pressure like that to do that, to perform like
that.

Q There are a number of documents that you've produced to us that are emails where you are employed in the executive chamber and you are using your Gmail account to communicate with other people on their Gmail account.

What were the circumstances under which you would use personal email while you worked at the executive chamber?

A If it had something to do with the campaign office.

Q And how did you come to know that you needed to use personal email to work on campaign related work?

A I don't know who told me, but somebody told me. It was Stephanie or Jill and

| 1 | Witness 5/19/21 |
|----|---|
| 2 | I also knew that from when I worked for |
| 3 | , anything campaign related had to be |
| 4 | separate. |
| 5 | Q Did you volunteer to work on the |
| 6 | Cuomo campaign? |
| 7 | A You had to volunteer. I I say I |
| 8 | didn't have because I feel like everybody has a |
| 9 | choice, but I didn't have a choice. You have |
| 10 | to do the work for the for the campaign and |
| 11 | sometimes it was during work hours when I |
| 12 | should not have been doing that work. I I |
| 13 | actually think I had the conversation |
| 14 | Q Kaitlin, I don't want you to tell me |
| 15 | any more about that, okay. Thank you. Okay. |
| 16 | Does anyone, other than your lawyer, |
| 17 | know that you're meeting with us today? |
| 18 | A Yeah, yes. |
| 19 | Q Who knows you're meeting with us |
| 20 | today? |
| 21 | A , |
| 22 | · |
| 23 | The who lives in this |
| 24 | apartment. He doesn't know the details. He |
| 25 | just knows that I needed space with nobody here |

| 1 | Witness 5/19/21 |
|----|---|
| 2 | to do this. And my my New York I call |
| 3 | him . He's the manager at |
| 4 | . I have become very close with his |
| 5 | him and his wife. He knows that I'm doing this |
| 6 | today. |
| 7 | Q Is there any answer that you've |
| 8 | given today that you would like to clarify? |
| 9 | A I don't know. We've we've I |
| 10 | feel like I have given a lot of answers. |
| 11 | Nothing that comes to mind right now. |
| 12 | Q Okay. And is there any information |
| 13 | that you think that would be relevant to our |
| 14 | investigation of the allegations of sexual |
| 15 | harassment and surrounding circumstances that |
| 16 | you have that I have not asked you about today? |
| 17 | A Does this include the materials that |
| 18 | I have already sent I don't I don't think |
| 19 | I have anything additional to share based on |
| 20 | what was sent. |
| 21 | Q Can you hear me? |
| 22 | A Yes. |
| 23 | Q Okay. Sorry, my air pods died. Go |
| 24 | ahead. |

The question was is there anything

A

| | • |
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| 1 | Witness 5/19/21 |
| 2 | additional? |
| 3 | Q Yes. |
| 4 | A That we did not talk about today? |
| 5 | Q Yes. |
| 6 | A I think that I have provided |
| 7 | everything that I that I have in the |
| 8 | documents that we have talked about today. |
| 9 | Q And I meant to say this in the |
| 10 | beginning that I would offer you an opportunity |
| 11 | to make a brief statement while you're under |
| 12 | oath if you would like to. |
| 13 | Would you like to make a statement |
| 14 | while you're under oath? |
| 15 | A No, thank you. |
| 16 | Q And I before we close, I will |
| 17 | just remind you what I said at the beginning, |
| 18 | that Executive Law 63(8) makes it a misdemeanor |
| 19 | to disclose any information you obtained during |
| 20 | the course of this examination. Do you |
| 21 | understand? |
| 22 | A I understand. |
| 23 | Q Great. Kaitlin, thank you very much |
| 24 | for your time today. We appreciate it. |
| 25 | A Thank you very much. |

| 1 | Witness 5/19/21 |
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| 2 | Q We can go off the record. |
| 3 | THE VIDEOGRAPHER: Okay. Counsel, |
| 4 | should I conclude or take us off the |
| 5 | record? |
| 6 | MS. PARK: You can conclude. |
| 7 | THE VIDEOGRAPHER: Okay. Standby. |
| 8 | Thank you. We are off the record at 1:55 |
| 9 | p.m. And this concludes today's recorded |
| 10 | interview of Witness May 19th, 2021. |
| 11 | The total number of media units used |
| 12 | was three and will be retained by I'm |
| 13 | sorry. I have to open my audio. I'm |
| 14 | sorry. I apologize. Let me do that |
| 15 | again, sorry. |
| 16 | We are off the record at 1:55 p.m. |
| 17 | and this concludes today's recorded |
| 18 | interview of Witness May 19th, 2021. The |
| 19 | total number of media units used was three |
| 20 | and will be retained by Veritext New York. |
| 21 | (Time noted: 1:55 p.m.) |
| 22 | |
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| 1 | Witness 5/19/21 |
| 2 | CERTIFICATE |
| 3 | I, BRITTANY SALINE, a shorthand |
| 4 | reporter and Notary Public within and for the |
| 5 | State of New York, do hereby certify: |
| 6 | That the within proceeding is a true |
| 7 | and accurate record of the stenographic notes |
| 8 | taken by me. |
| 9 | I further certify that I am not related |
| 10 | to any of the parties to this action by blood |
| 11 | or marriage, and that I am in no way interested |
| 12 | in the outcome of this matter. |
| 13 | Buttony Jaline |
| 14 | 2, |
| 15 | BRITTANY SALINE |
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