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IN THE MATTER OF THE
INDEPENDENT INVESTIGATION UNDER
NEW YORK STATE EXECUTIVE
LAW SECTION 63(8)
----- X

June 4, 2021
1:36 p.m.

CONFIDENTIAL REMOTE VIDEOTAPED
INVESTIGATION of WITNESS 6-4-21, taken by
the New York Attorney General's Office,
pursuant to Executive Order 63(8), before
Theresa Tramondo, AOS, CLR, a Notary
Public of the State of New York.

Reported by:
THERESA TRAMONDO, AOS, CLR
JOB NO. NY4613069

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APPEARANCE OF COUNSEL:

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212-225-2000

ALSO PRESENT:

ROCCO MERCURIO, VIDEOGRAPHER, VERITEXT

LEGAL SOLUTIONS

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THE VIDEOGRAPHER: We're now going on the record. Today is Friday, June 4, 2021, and the time is approximately 1:36. This is the remote video deposition of Ana Liss in the matter of Independent Investigation under New York State Executive Law Section 63(8).

My name is Rocco Mercurio and the court reporter is Theresa Tramondo and we are from Veritext.

Will counsel please introduce yourselves and who you represent for the record.

MS. MAINOO: Good afternoon. Abena Mainoo from the Law firm of Cleary Gottlieb Steen & Hamilton, but acting as a Special Duty to the First Deputy Attorney General for the New York State Attorney General's Office.

MS. PARK: Jennifer Kennedy Park from the law firm of Cleary Gottlieb Steen Hamilton, and I'm also a Special

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Deputy to the first Deputy Attorney
General of the New York State Attorney
General's Office.

MS. TAI: And I'm Avion Tai also
from the law firm of Cleary Gottlieb
Steen Hamilton I've been designated as
Special Assistant to First Deputy
Attorney General.

THE VIDEOGRAPHER: The court
reporter will now swear in the witness
and we can now proceed.

MS. MAINOO: All parties agree
that the court reporter can
swear/affirm the witness in virtually
via Zoom as if the witness was in the
same room as the court reporter.
Unless there are any objections by any
party, say it's so stipulated.

So stipulated.

A N A L I S S, called as a witness,
having been duly sworn via Zoom by a
Notary Public, was examined and testified
as follows:

EXAMINATION BY

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MS. MAINOO:

Q. Good afternoon after, Ms. Liss.
Thank you for meeting with us today.

Before I start asking questions,
I'm going to give you some background
information and go over some ground rules.

The New York State Attorney
General has appointed the law firms Cleary
Gottlieb Steen Hamilton and Vladeck Raskin &
Clark to conduct an independent
investigation under New York Executive Law
Section 63(8) into allegations of sexual
harassment brought against Governor Andrew
Cuomo, as well as the surrounding
circumstances.

You are here today pursuant a
subpoena issued in connection with this
investigation.

I will note at the outset that
today's proceeding is being video recorded.
You are under oath. That means you must
testify fully and truthfully just as if you
were in a court of law sitting before a
judge and jury. Your testimony is subject

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2 testimony and you can consult with your
3 attorney if you have any questions about the
4 attorney-client privilege.

5 As you can see, we have a court
6 reporter present with us in the virtual
7 room, and she is to take my questions and
8 your answers to create a transcript. So
9 that the reporter can create a clean record,
10 please provide a verbal response to each
11 question. So please do not shake or nod
12 your head or give responses like um-hum. Do
13 you understand?

14 A. Yes.

15 Q. If you do not know the answer to
16 the question, please say you do not know.
17 Please allow me to finish my question before
18 you begin to answer, and I will try not to
19 speak over you so that the court reporter
20 can create a clean transcript, particularly
21 since we're not all in the same room.

22 You will not be permitted to
23 review a transcript of your testimony. If
24 at any time today you want to clarify an
25 answer you have given, please let me know.

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2 If you do not understand a question, please
3 let me know and I will try to ask the
4 question in a different way.

5 I will be asking about names and
6 dates and other specific information. Even
7 if you don't remember a specific name or
8 date, I would ask that you give me your best
9 approximate answer while indicating that
10 your answer may not be exact.

11 If you need a break at any
12 point, please let me know, but if there is a
13 question pending, please answer the question
14 first and then we can take a break. Okay?

15 A. Yes.

16 Q. Please confirm that you are
17 alone.

18 A. Yes, I am alone.

19 Q. Please confirm that you're not
20 using any technology to create a recording
21 of the proceeding on your end including
22 using screen capturing tools.

23 A. Yes, I can confirm I'm not
24 recording this using any technology.

25 Q. Please confirm that you're not

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2 allowing anyone else to listen in including
3 through any devices.

4 A. Yes, no one else is listening
5 in, I can confirm.

6 Q. And please confirm that you are
7 not and will not communicate in real-time or
8 during breaks with anyone else about the
9 substance of your testimony.

10 A. Yes, I can confirm I won't be
11 communicating that.

12 Q. Executive Law Section 63(8), a
13 provision under which this investigation is
14 being conducted, prohibits you as well as
15 your counsel from revealing anything about
16 what we ask or what you say during your
17 testimony to anyone. If anyone asks you to
18 disclose any such information, please let us
19 know, including any reason they provide for
20 seeking such information and we will discuss
21 with you whether any disclosure will be
22 permitted.

23 Please note that you are
24 protected from retaliation for participating
25 in today's testimony. We ask that you let

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2 us know if you are concerned about any
3 potential retaliation from the Executive
4 Chamber or anyone else.

5 Are you taking any medication or
6 drugs that might make it difficult for you
7 to understand my questions?

8 A. No, I am not.

9 Q. Have you had any alcohol today?

10 A. No, I have not.

11 Q. Is there any reason why you
12 would not be able to answer my questions
13 fully and truthfully?

14 A. No, there is no reason.

15 Q. Please state your name, date of
16 birth and current home and business address
17 for the record.

18 A. My name is Ana Liss, and my date
19 of birth is [REDACTED] [REDACTED]. My home
20 address is [REDACTED] [REDACTED] [REDACTED],
21 [REDACTED] [REDACTED] [REDACTED], and my business
22 address is [REDACTED] [REDACTED] [REDACTED] [REDACTED],
23 [REDACTED] [REDACTED] [REDACTED].

24 Q. Ms. Liss, have you ever given
25 testimony before?

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2 A. No, I have not.

3 Q. Other than conversations with
4 your attorney, did you do anything to
5 prepare to testify today?

6 A. No, I have not.

7 Q. Please open your electronic
8 exhibits and open Tab 2, which we will mark
9 as an exhibit.

10 (Exhibit 1, Testimony subpoena,
11 Tab 2, marked for identification, as
12 of this date.)

13 A. One moment. One second, it says
14 it sent me an e-mail -- oh, here it is. My
15 apologies.

16 Q. No worries.

17 A. I just have to activate my
18 account.

19 Q. If it's easier, you can also
20 look on the screen. We're sharing the
21 exhibit on the screen.

22 A. Okay. You said that it is Tab
23 number 2, correct?

24 Q. Correct.

25 A. All right. While I'm waiting

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2 for it to set up, I'll look on the Zoom
3 screen, if that's okay.

4 Q. Absolutely.

5 Do you recognize this document
6 as the testimony subpoena you received from
7 our office?

8 A. Yes, I did.

9 Q. Did you read the subpoena?

10 A. Yes, I did.

11 Q. And do you understand that your
12 testimony today is being taken pursuant to
13 this subpoena?

14 A. Yes, I understand.

15 Q. We can take the document off the
16 screen.

17 Ms. Liss, please take us through
18 your educational background starting with
19 college.

20 A. Yes, I attended Ithaca College,
21 the Park School of Communications, and I
22 received a bachelor of arts in journalism,
23 graduated in 2007. Subsequent to that, I
24 attended the University of Pennsylvania for
25 my master's in public administration. I

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2 graduated from that program in 2011. And I
3 also hold a certificate in graduate studies
4 from SUNY Empire State College in innovation
5 management and technology transfer, and I
6 earned that certificate in 2015.

7 Q. And please walk us through your
8 employment history following college.

9 A. Immediately following college, I
10 worked for a new station in Elmira, New York
11 WETM 18 News, the NBC affiliate, serving the
12 southern tier of New York State and the
13 northern tier of Pennsylvania, from 2007 to
14 2009.

15 Subsequent to that, I attended
16 graduate school. After graduate school, I
17 worked for the Center for Governmental
18 Research in Rochester, New York as a
19 research associate for a period of a little
20 less than a year.

21 And then I worked for Greater
22 Rochester Enterprise as a business
23 development associate for approximately two
24 years working in Economic Development, also
25 in Rochester.

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2 After that I received the Empire
3 State Fellowship to work in Albany. So from
4 2013 to 2015 I worked in Albany for the
5 Executive Chamber for Governor Cuomo in a
6 variety of different roles. Technically I
7 was an employee of New York State Homes and
8 Community Renewal; although, I sat in the
9 Executive Chamber and answered up through
10 the Economic Development chain of command
11 and ultimately to the director of state
12 operation.

13 After leaving Albany, I worked
14 for Cornell University's S.C. Johnson
15 Graduate School of Business as -- of
16 Management, excuse me, as a corporate
17 relationship manager, and then that was from
18 2000 -- that was in 2015.

19 And then I was recruited to go
20 back to Greater Rochester Enterprise, my
21 employer prior to getting the Fellowship, as
22 a managing director of business development.
23 I was there from 2015 to 2020.

24 And then in 2020, last year, I
25 joined the administration of Monroe County,

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2 New York, County Executive Adam Bello, as
3 the director of planning and economic
4 development, and in this role I am also the
5 executive director of the Monroe County
6 Industrial Development Agency and the Monroe
7 County Industrial Development Corporation.

8 Q. So we're going to focus on your
9 time at the Executive Chamber now. How did
10 you come to work in the Executive Chamber
11 starting in 2013?

12 A. I applied for the Empire State
13 Fellowship in early 2013. It was the second
14 year of the program, and per a news release,
15 the administration was recruiting a second
16 cohort. The Empire State Fellowship was
17 posited as though it was modeled after the
18 Presidential Management Fellowship Program,
19 recruiting young professionals with graduate
20 degrees to come work in state government
21 service. I applied because I was interested
22 in and passionate about upstate New York
23 economics development and revitalization and
24 wrote my essay in such a way as, you know, I
25 was seeking employment to help serve the

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2 Governor's administration in its efforts to
3 lift up the Regional Economical Development
4 Council initiative.

5 And I found out I got the
6 Fellowship in late spring, I believe, of
7 2013. And I moved to Albany in August of
8 2013 and began the Fellowship in September
9 of 2013. And before I found out that I was
10 going to be assigned to the Executive
11 Chamber on the second floor of the Capitol
12 in the Governor's Office, I attended a
13 week-long orientation program with the other
14 members of my Fellowship cohort at the
15 Rockefeller Institute of Government, part of
16 SUNY Albany, and I met the other fellows,
17 all of whom were assigned to different roles
18 in state government. Many were assigned to
19 various state agencies. A few of us were
20 assigned to the second floor.

21 On the final day and evening of
22 our orientation program, there was a
23 reception that we were invited to attend at
24 the Rockefeller Institute, and I was
25 introduced to [REDACTED] [REDACTED], who at the

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2 time was the assistant secretary for
3 Economic Development, working for Governor
4 Cuomo. I was informed that [REDACTED] [REDACTED]
5 was going to be my, quote/unquote, mentor or
6 like my boss, and the next day I was to
7 report to duty in my office in the Executive
8 Chamber and [REDACTED] was going to begin giving
9 me assignments.

10 Q. What work did you understand you
11 would be doing as an Empire State Fellowship
12 working out of the Executive Chamber?

13 A. I was told that I would be
14 helping to develop and inform policy-making
15 decisions. Given that I was assigned to the
16 Economic Development portfolio, so to speak,
17 it was my understanding that I was going to
18 help staff and administer the work of the
19 ten regional Economic Development Councils
20 and help to guide the management of that
21 initiative throughout my tenure there, and
22 all of the fellows were told that the
23 ultimate goal was for each of us to develop
24 sufficient experience and connectivity such
25 that we would become deputy secretaries.

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2 So I thought early on that I
3 might be tasked to be an assistant secretary
4 or a deputy secretary for Economic
5 Development or work in a senior leadership
6 position within an agency. So for me that
7 would have been Empire State Development
8 Corporation.

9 Q. When you found out that you had
10 been placed in the Executive Chamber, what
11 did you think about that?

12 A. At first I didn't know what it
13 meant really; however, I quickly learned in
14 conversation with the people that were
15 managing the Fellowship program at
16 Rockefeller that it was a prestigious place
17 to work and that I was very fortunate and
18 that it was exciting and it was going to be
19 high pressure and that I should be proud.
20 So I was excited and nervous.

21 Q. What was were you nervous about?

22 A. I was nervous that I
23 wasn't -- that I couldn't cut it, you know,
24 that I was nervous that I was just a young
25 person from upstate New York with no

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2 knowledge of how Albany really works and how
3 state government really functions,
4 especially from a political point of view,
5 and I thought that I would -- I thought that
6 I wasn't really cut out for it and that, you
7 know, they would get rid of me or something.
8 It was sort of an Imposter syndrome. But I
9 also felt like hat I could roll up my
10 sleeves and really try. I was committed to
11 leveling up, so to speak.

12 Q. What excited you about the
13 opportunity?

14 A. I was excited because the
15 Governor up to that point, you know, he had
16 established an agenda that was really
17 focused on upstate New York. He had rolled
18 out the Buffalo Billion and had promoted a
19 lot folks in the greater Rochester region in
20 his administration. Bob Duffy was our mayor
21 at one point and was serving at the time of
22 the Governor as Lieutenant Governor. Our
23 regional ESD office was pretty -- had a
24 pretty solid talent bench, and I thought,
25 wow, this is so exciting for Rochester and I

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2 get to serve this administration and also be
3 a companion for my hometown, and I thought,
4 you know, this is it, this is my ticket to
5 the rest of my career in public service.

6 Just the Governor had developed
7 a reputation being kind of a lion champion
8 for upstate economic development, and up to
9 that point under previous governors there
10 were a lot of dark times and feelings of
11 depression upstate through the great
12 depression -- or the Great Recession and
13 later on, and it felt like there were
14 reasons to be hopeful, and I thought, wow,
15 this is really amazing, I get to play a role
16 in this larger effort to make things better.

17 Q. I don't know if you have been
18 able to access the site yet, but we're going
19 to pull up Tab 5 and we will mark that as an
20 exhibit.

21 (Exhibit 2, announcement of 2013
22 to 2015 Class of Empire State Fellows,
23 Tab 5, marked for identification, as
24 of this date.)

25 A. Yes, I have it pulled up.

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2 Q. Tab 5 should be the announcement
3 of 2013 to 2015 Class of Empire State
4 Fellows. Do you see that?

5 A. Yes, I do.

6 Q. Do you recognize this document?

7 A. Yes, I do.

8 Q. Page 1, I'm going to put it on
9 screen. Page 1 says that in the third
10 paragraph "The Governor appointed each
11 Empire fellow to a position that matches
12 their skills with the needs of state
13 government," and then turning to page 3 it
14 includes a profile for you, it refers to
15 your background in Economic Development,
16 fiscal policy, public budgeting, local
17 government ethics and journalism?

18 A. Uh-hum.

19 Q. Do you remember the first time
20 you saw that profile?

21 A. Yeah, I don't know exactly when
22 it was. It was not long after the
23 orientation. I think it was towards the end
24 of orientation week that it was released and
25 publicized, and I remember feeling proud and

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2 I shared it with my friends and family.

3 Q. We can take that off the screen.

4 What positions did you hold when
5 you were at the Executive Chamber?

6 A. It's -- it was confusing, and
7 particularly for somebody like me, who
8 needed structure. There lacked a great deal
9 of structure. So when I started out, I was
10 working for [REDACTED] [REDACTED], and I was seated
11 in a -- the second floor. It was sort of a
12 balcony atrium area in the Lieutenant
13 Governor's Office, that was dusty and off
14 the beaten path, and I sat up there at a
15 really old computer workstation next to a
16 young woman named [REDACTED] [REDACTED], [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED] on the Regional Economic
18 Development Councils.

19 And at first I was given random
20 one-off assignments. I was asked to collect
21 mailing addresses and contact information
22 for as many commercial contractors in the
23 State of New York as possible for an event
24 that the Governor was hosting that had to do
25 with START-UP New York, I believe.

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2 I was asked to put -- the
3 Governor had gotten it into his head at one
4 point per [REDACTED] that he wanted to bring
5 back Formula 1 racing to New York State, and
6 I was asked to research the feasibility of
7 that and put a memo together.

8 Then I was asked to do sort of
9 random things having to do with the Regional
10 Council, so putting meeting materials
11 together, attending with [REDACTED] [REDACTED] and
12 with [REDACTED] and other staff members,
13 attending meetings of the Regional Councils
14 in other part of the state, which was funny.
15 You know, I got to do a little bit of
16 traveling in New York.

17 And then a couple of months into
18 it, I was asked to leverage my journalism
19 background, to put some video reels together
20 for the upcoming Regional Economic
21 Development Council awards, which was
22 happening in, I think, November of that
23 year. And I did a lot of work on that with
24 Empire State Development with their
25 multimedia crew, and I did some traveling

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2 and interviewed some people.

3 And I found out per [REDACTED]
4 after I had spent several weeks putting
5 those together with relatively little
6 supervision and relatively little feedback,
7 that the Governor had seen one of the videos
8 and hated it and wanted us to start over.
9 And this was the night before -- the day
10 before the award, so I had to work like kind
11 of through the night in the multimedia
12 studio underneath -- in the concourse of the
13 State Capitol with the communications team
14 to put everything together to repackage
15 everything so that the Governor would like
16 it.

17 And he assigned his Director of
18 State Operations at the time, Howard Glaser,
19 to supervise me. I don't know if that -- if
20 it was him that assigned it or what, but
21 Howard Glaser was put there down there with
22 me, and at the time I thought, wow, this is
23 so amazing because up until that point I was
24 sort of in this far-gone section of the
25 Executive Chamber where it was just me and a

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2 couple of people in the Lieutenant
3 Governor's Office. I really never saw
4 anyone that had any name recognition, and
5 all of a sudden I was sitting at a table
6 with Howard Glaser, whose name was mentioned
7 all the time.

8 Q. What was Howard Glaser's
9 position?

10 A. He was the Director of State
11 Operations at the time.

12 And notably he was also [REDACTED]
13 [REDACTED] [REDACTED] who was one of the other
14 accusers later on.

15 But anyhow, Howard helped work
16 with me and the other -- and the multimedia
17 crew. There's like videographers, audio
18 editors. And we put everything -- we
19 repackaged the videos so that the Governor
20 liked them. We made them like sexier and
21 more exciting, kind of like movie trailers
22 almost.

23 And then the next day I remember
24 I noticed that Howard Glaser started
25 following me on Twitter. Then I was

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2 notified later on by a gentleman by the name
3 of [REDACTED] [REDACTED], who is now a lobbyist, but
4 [REDACTED] [REDACTED] was [REDACTED] [REDACTED] [REDACTED],
5 I was notified that Howard wanted me to go
6 over and work in his office.

7 And so then I moved my stuff
8 over to Howard's office, and his office was
9 right next to the Governor's Office, so when
10 the Governor was in Albany, the Governor
11 would come through, and that's when I would
12 see him. It was a completely different
13 environment and different -- it was a lot
14 more pressure, a lot more stress.

15 And then it got increasingly
16 unclear like what I was doing in the
17 Governor's Office because [REDACTED] [REDACTED] was
18 running Economic Development, and I really
19 like doing the work, you know, staffing the
20 Regional Councils, and then all of a sudden
21 I was kind -- kind of sort of taken off of
22 that for the most part and like sat in
23 Howard's office and did random assignments
24 for Howard, while also on the fringes doing
25 random assignments for [REDACTED] So I never

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2 quite understood what I was doing there. It
3 was confusing, and I ultimately -- I tried
4 to find my way to a spot that felt more
5 productive and felt like it was more
6 structured, but, you know, ultimately what
7 made the most sense at the end of my
8 Fellowship was just to get out, and so
9 that's why I got out.

10 Q. And when you sat at your
11 original location in the Lieutenant
12 Governor's Office, where was that in
13 relation to the Governor's Office?

14 A. It was -- so the second floor of
15 the Governor's Office is like a big square,
16 and on one side of the square is the Hall of
17 Governors and that's where the Governor's
18 Office is and all of the really important
19 deputy secretaries, and on the other side
20 it's like the Hall of New York, where the
21 Lieutenant Governor's Office is and some
22 like less important assistant secretaries.

23 So I was in the Hall of New
24 York, pretty far removed, and also
25 furthermore I was up on the second floor in

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2 one of the offices, so even further removed.
3 And nobody from -- like I heard names like
4 Howard Glaser and Larry Schwartz and Melissa
5 DeRosa and Stephanie Benton. I heard the
6 names -- oh, and Joe Percoco, and these are
7 all names -- besides the Governor, I didn't
8 know who any of these people were before I
9 started in the Executive Chamber. I heard
10 the names tossed around all the time and
11 began to learn who are the important people
12 and they were sort of like nameless,
13 faceless individuals. They never came over
14 to that side of the second floor. They
15 never were visible. So it was also like
16 there was like this barrier between the two
17 worlds. It was a totally different world.
18 And then when I moved over, it unlocked the
19 reality of the Executive Chamber. It felt
20 like I was in the real Executive Chamber.

21 Q. What do you mean when you say it
22 felt like you were in the real Executive
23 Chamber?

24 A. I went from being around -- I
25 mean, I was -- my day-to-day when I was in

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2 the Lieutenant Governor's Office working for
3 [REDACTED] wasn't very stressful. You know you
4 could wear -- you had to dress up, but it
5 wasn't like you had to wear fancy clothes
6 all the time. Nobody was breathing down my
7 neck or was looking at me and monitoring my
8 every move. I felt like -- it was just less
9 stressful and more fun and relaxed.

10 And then when I went over to the
11 Hall of Governor's and I was working in
12 Howard's office and the Governor was there
13 every so often and I would see all of these
14 people and I would hear all of the yelling
15 and screaming and the stress, it felt like I
16 went from, you know, being in Parks and Rec
17 to being like in the West Wing.

18 And I was told I had to wear
19 high heels when the Governor was in the
20 office, and I felt it was just a much more
21 high pressure environment. There was a lot
22 cursing and screaming. And I began to learn
23 quickly who were our enemies and who were
24 our friends and who was important and who
25 wasn't important. It was just -- for

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2 someone with my background, I was a little
3 naive and didn't know what that world was
4 like. I had some involvement in politics up
5 until that point, you know, locally involved
6 in some small town campaigns, but I
7 didn't -- I didn't really know what I was
8 walking into. And I knew that the best --
9 the easiest way to survive and get by and
10 not get in trouble and not get a target on
11 my back was just to look nice, be nice, do
12 what I was told.

13 Q. I'll want to talk more about
14 that.

15 First, other than sitting in the
16 Lieutenant Governor's Office and then in
17 Howard Glaser's office, did you sit anywhere
18 else during the time you worked in the
19 Executive Chamber?

20 A. Yes. So after Howard -- so
21 Howard left after -- so the Governor ran for
22 his second time in 2014 and he was reelected
23 and that's when [REDACTED] [REDACTED] left and Kathy
24 Hochul joined the administration, and I
25 think Howard had promised the Governor that

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1
2 he would stick with him through that and
3 then he left to go take a lobbying job. He
4 left to go take a lobbying job. He went to
5 go work for some company that lobbied for
6 airlines or airports. And so he took off,
7 and then he was replaced in -- in a quick
8 amount of time by Jim Malatras, who was
9 young and who had been working for SUNY for
10 the SUNY Chancellor. He's now the SUNY
11 Chancellor himself. But showed up and he
12 sort of inherited me as like an accessory in
13 his office, but he didn't really have
14 anything for me to do. The only task that
15 I'd been given by Howard that kind of stuck
16 around under Jim was I was tasked with
17 overseeing and being the Executive Chamber
18 liaison to the New York State Council on the
19 Arts, which is like a really small state
20 agency.

21 And then I quickly started to
22 feel like Jim wanted me out of there. He
23 didn't really have any use for me and
24 so -- and then [REDACTED] [REDACTED] was like
25 beleaguered and hadn't been promoted to dept

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2 sec from assistant secretary and he already
3 had a special assistant person and he didn't
4 really need for anything.

5 And a gentleman by the name John
6 Maggiore, who had been serving as the chief
7 of staff to [REDACTED], was promoted, like
8 they kind of created a job for him. They
9 called him the director of policy after [REDACTED]
10 left, and they brought him over from the
11 Lieutenant Governor's Office to the -- to an
12 office across the hall from the Director of
13 State Operations Office, previously occupied
14 by [REDACTED] -- shoot, a [REDACTED] [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED], [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED], so in his office.

19 So John was had been put in that office.

20 And I had been trying to make
21 inroads with John, knowing, you know, John
22 was from Buffalo and was very policy-minded
23 and a smart person, and I thought maybe he's
24 somebody that I could align myself with,
25 maybe he has an opportunity, maybe he could

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2 use me for something. So I lobbied to get
3 in with John, and he basically put me at a
4 desk outside of his office, gave me access
5 to his e-mail and I was like a scheduler for
6 him and I helped him write op-eds and
7 speeches. I helped with the -- helped
8 writing the State of the State policy book,
9 things like that.

10 But again, it lacked a lot of
11 structure. I found out through the
12 grapevine in the Chamber that the policy
13 team under John was viewed as the "land of
14 misfit toys." It was me, a woman by the
15 name of [REDACTED], a gentleman named [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED],
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED],
20 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED]. So [REDACTED] was there and there were a
23 couple of other random people. And we
24 didn't really know what our jobs were.

25 So I started looking -- this was

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2 towards the -- like the middle of
3 2015 -- early 2015, middle of 2015, and then
4 I started actively looking for a job just to
5 get out, just like be closer to home and get
6 some semblance of structure and normalcy
7 back into my life.

8 Q. Did you have an understanding of
9 what the idea -- "the land of misfit toys"
10 meant or was meant to convey?

11 A. Yeah, it was like you guys can't
12 really cut it, you're not cut from the same
13 fabric as the other -- you know, the pit
14 bulls basically that rise to prominence in
15 Cuomoland. So you kind sit here and take
16 what they give you and do -- but no one was
17 ever really going to get fired because they
18 didn't want to let anyone go. I started to
19 learn early on they didn't want to allow
20 people to leave I think because of, you
21 know, knowledge of the inner workings, and
22 they like to protect the narrative and
23 control where you go after you work for the
24 Governor, so that you're in some sense of
25 beholden and you're not going to like be a

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2 whistleblower or something. Because I
3 remember when I got the job at Cornell and I
4 got out, people sort of murmuring, like,
5 wow, you're lucky.

6 Para but it was a lateral move.
7 I was making the exact same salary and I had
8 to move. It was not like I did it -- I
9 viewed my decision to get out and to get
10 that job, I viewed it as a personal and a
11 professional failure, like I can't cut it on
12 the second floor, I can't cut in Albany.

13 Also, I was [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED]. [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED]. [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED]. But some folks there were,
18 like, oh, you were lucky, you got out, you
19 didn't need to call in any favors, like
20 you're free kind of thing.

21 There was one story that I
22 learned of sort of early on, a young woman
23 named [REDACTED] [REDACTED], who had been working
24 for [REDACTED] [REDACTED], who at the time was the
25 [REDACTED] [REDACTED] [REDACTED], she got

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2 a job offer, I think, working for [REDACTED], like
3 a better job, better pay, and because she
4 didn't ask Joe Percoco's permission to apply
5 for the job, he like flipped out at her and
6 yelled at her, and then he called [REDACTED] and
7 had the job offer taken away. And I learned
8 of that, you know, through secondary
9 sources, but that was the first time I
10 learned that, you know, they don't let you
11 go without a fight, particularly if you have
12 spent time working on the campaign, if had
13 seen things, heard things, which was kind of
14 disconcerting, I guess.

15 Q. And when did you learn about
16 [REDACTED] [REDACTED] experience and difficulty
17 leaving to go to [REDACTED]?

18 A. How did I learn about it?

19 Q. First, when, the first time?

20 A. Oh, probably in early like 2014.
21 Sometime in 2014. And I learned of it
22 through younger staffers. There was sort of
23 a cohort in the second floor and in some of
24 the agencies of younger staffers who had
25 worked on the campaign. They called

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2 themselves "the crew." And [REDACTED] [REDACTED],
3 who was the woman I mentioned earlier, who
4 sat near me, was one of them. And then
5 there was a gentleman named [REDACTED] [REDACTED], who
6 was one of them. [REDACTED] [REDACTED], who up
7 until recently was still working for the
8 Governor, was a big part of that crew.
9 Several -- [REDACTED] [REDACTED] [REDACTED] [REDACTED].
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].
11 [REDACTED] [REDACTED] worked in the Lieutenant
12 Governor's Office. There were a bunch of
13 them. And I -- I didn't ingratiate myself
14 to them necessarily. They didn't like the
15 Fellowships. They were kind of upset when
16 the Fellowships showed up because we all
17 showed up without having volunteered on the
18 campaign and we were making more money than
19 all of them and we were kind of around the
20 same age and they didn't like that. And --
21 and because I had to work in close proximity
22 to so many of them, I used my soft skills to
23 try and just be nice and like get along with
24 them and convey to them that like, hey, I
25 don't know what the heck I'm doing here, I

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2 don't know what I'm doing here, I'm sorry, I
3 didn't realize that that was case. You
4 know, and I started to be friendly with
5 them, and I learned through them some of
6 that gossip, you know, I learned about [REDACTED]
7 and I learned about like other -- just other
8 bits of gossip.

9 Q. What other bits of gossip did
10 you learn from them?

11 A. Umm, there was a lot. Like who
12 was hooking up with who kind of thing.

13 Q. Did you learn any information
14 concerning the Governor from any members of
15 the crew?

16 A. I learned that the Governor
17 doesn't use e-mail. I learned that the
18 Governor -- I learned through them that like
19 the Governor could get like really, really
20 mad and scream and yell. I learned

21 about -- there was a gentleman named [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED] [REDACTED], and

25 I learned about the time that [REDACTED] pissed

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2 off the Governor and the Governor like got
3 up in his face with a football. And I
4 learned that the Governor likes -- the
5 Governor likes leggy women and the Governor
6 only wears Salvatore Ferragamo ties. I
7 learned about the time that he got down and,
8 you know, shoe-shined [REDACTED] [REDACTED] shoes.
9 I learned that the Governor doesn't like
10 when the guys wear anything besides white
11 dress shirts. And I learned that the
12 Governor only likes things whenever he's --
13 because [REDACTED] [REDACTED] was one of his advance
14 guys, and I learned how they would have to
15 like change the thermostat so that it was 60
16 degrees for the Governor, that kind of
17 stuff. Nothing -- nothing about like the
18 Governor having sex with people or touching
19 anybody, nothing like that on that lever.
20 Just like the Governor is a tyrant
21 basically.

22 And then in terms of like other
23 gossip, I learned that [REDACTED] [REDACTED], [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]. I
3 thought that was bizarre. I learned through
4 them that [REDACTED] [REDACTED], [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], and I
7 thought that was weird. And I learned
8 about, oh, in Albany everybody has like an
9 Albany girlfriend, like the [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED], you know, they stay out all night, and
11 I remember feeling kind of gross and seedy
12 about it.

13 And I could understand why the
14 crew developed like rapport with one
15 another. You know, they were all in like
16 their 20s and from like all over New York
17 State and like their families were like from
18 all over the place and they found family in
19 each other and solace and comfort, despite
20 all of the gross savagery.

21 Q. You mentioned that you learned
22 from the crew that the Governor doesn't use
23 e-mail. Did anyone ever discuss any reasons
24 why the Governor didn't use e-mail?

25 A. Yeah, I learned from [REDACTED]

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2 [REDACTED], who was tight with Rich Azzopardi,
3 that the Governor doesn't use e-mails
4 because he doesn't want to put stuff in
5 writing. He would only uses BlackBerry
6 messaging. And I also learned this through
7 [REDACTED] because [REDACTED] -- one thing --

8 So I'll just say this about

9 [REDACTED] When I was working under him, [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED] [REDACTED], he never -- I
12 remember he seemed sort of put off and
13 annoyed by the fact that I was chipper and
14 excited to work there, almost like he was
15 like why do you want to work here, it's the
16 worst frigging place in the world.

17 And because -- because [REDACTED]
18 was constantly on the Governor's speed dial
19 list. Like I remember hearing him on the
20 phone with the Governor, the Governor
21 yelling at him, the Governor constantly
22 Blackberry messaging him, and [REDACTED] had
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED],
24 and I could tell it was really a strain for
25 him working there, and in some of my

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2 traveling with [REDACTED] for the Regional
3 Council stuff, he would divulge stuff like
4 that, like, yeah, he doesn't e-mail, he
5 doesn't da-da-da.

6 And then just a couple of years
7 ago, I think it was 2018, I was at a
8 conference in San Francisco for my job at
9 SEMICON West, and [REDACTED] was there because
10 at the time -- you know, he got out for a
11 few years and was tasked to run the center
12 for economic growth in Albany. He's not
13 there anymore, but because he was at CEG, he
14 went to that conference, and he and I got
15 beer together and [REDACTED] [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] and he was honest with me and
17 shared a lot about how awful it was and how
18 miserable he was and how chaotic it was and
19 how the job didn't make any sense.

20 So anyways, the short answer is
21 I learned through [REDACTED] and through some
22 folks involved in the communications team
23 that the Governor doesn't put anything in
24 writing, really.

25 Q. Let's rewind to your move to

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2 Howard Glaser's office, after you worked
3 with him on these reels, at the time what
4 did you think that the move to Howard
5 Glaser's office meant?

6 A. I thought it meant that I was
7 being promoted to a higher level position
8 and that I had taken my Fellowship a step
9 further and sort of made it, and I
10 remember -- you know, those feelings you get
11 like if you get promoted or you get
12 something that other people want and you can
13 tell like people are sort of envious of you,
14 and you feel sort of ashamed, but you are
15 also sort of proud of yourself, I remember
16 feeling like with the other fellows, like
17 they were all kind of like envious, like,
18 wow, Ana gets to go over and work in
19 Howard's office.

20 And I remember [REDACTED], who
21 was [REDACTED]
22 [REDACTED]. We had professional development
23 stuff that we would do on the side. Tuesday
24 night we would go to the Rockefeller
25

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2 Institute and take classes and listen to
3 lectures with each other, and I remember [REDACTED]
4 announcing to the team, you know, everybody,
5 Ana is working in Howard Glaser's office,
6 you know, this is evidence of the fact that
7 the Fellowship really works and, you know,
8 we're unearthing talent from different
9 corners of the state and all over the place
10 and installing you in higher levels of state
11 service. So I thought it was a big deal.

12 Q. Did anyone say -- did anyone
13 else say anything to you in addition to what
14 this gentleman you just mentioned say to you
15 make you think that the move to Howard's
16 office was a big deal?

17 A. Yeah, well, when [REDACTED] [REDACTED]
18 came to my previous office space to let me
19 know that this was happening, he said
20 congratulations, you know, you caught his
21 eye. [REDACTED] [REDACTED] said congratulations,
22 [REDACTED] [REDACTED] said congratulations, like, wow,
23 somebody likes you, you know, get ready for
24 bigger and better responsibilities.

25 Q. Did you have any understanding

1 Confidential

2 of the reasons you were moved to Howard
3 Glaser's office?

4 A. I was not informed, like he
5 didn't call me into his office and say I
6 really was impressed by your work ethic and
7 your skills and I want to bring you over to
8 do X, Y and Z. I thought it was because he
9 was impressed by overseeing my efforts to
10 reconfigure the Regional Council award
11 ceremony videos and that he thought I was
12 somebody who maybe he could groom into a
13 role on his team.

14 The desk that I occupied in his
15 office had previously been occupied by a
16 gentleman named [REDACTED], who was an
17 attorney. [REDACTED]
18 [REDACTED], and so there was this open desk and
19 [REDACTED], and so there was this open desk and
20 Howard put me on it, and I was like, oh, I'm
21 not a lawyer, what does he want me to do,
22 and I never really got an answer to that.

23 Q. Did you ever talk with Howard
24 about your background?

25 A. No, he never really asked.

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2 There were certainly times when I might have
3 divulged like, oh, yeah, I used to work in
4 the news media. He knew I was from
5 Rochester and that I had worked in economic
6 development, but beyond that, I don't -- I
7 don't know what he knew.

8 I quickly -- and maybe this is
9 just an assumption, but it was an assumption
10 that was like bolstered by other people's
11 observations, and it's something like when
12 you're a woman who is attractive and you can
13 tell when people are looking at you, you can
14 tell when -- you can tell when certain
15 things are granted to you because you're
16 good looking. I felt like that was why. I
17 quickly sort of chalked it up to that. I
18 was like, well, I'm not here because they
19 think I'm like Elon Musk or something. I
20 just fit the profile and I do what I'm told.

21 Q. When did you start feeling that
22 way, that the reason for your move was
23 because they thought -- because someone
24 found you attractive?

25 A. Not long after I went over

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2 there. You know, maybe about a week or two
3 in. Because [REDACTED] [REDACTED], who was
4 [REDACTED] [REDACTED] [REDACTED], and who had
5 been working in that environment her whole
6 career, like she had been [REDACTED] [REDACTED]
7 [REDACTED], she was the secretary that
8 actually -- she told me she cleaned out
9 [REDACTED] [REDACTED] office when he left. She
10 had been there forever, she was seated in
11 that office where I was situated, she was
12 very observant, she had a good relationship
13 with the Governor's secretary and briefers
14 and everything, and she was the one who told
15 me wear high heels, look attractive, wear a
16 skirt, wear a dress, you know, do your hair,
17 all that, and she had observed --

18 Like when the Governor
19 first -- it was like my second or third day
20 in the office and the Governor was there,
21 and he came through and sort of was
22 flirtatious and, you know, friendly, and she
23 said, oh, he likes you, honey. And I was
24 told that he likes blonds, and I thought,
25 okay, well, I guess this is Mad Men.

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2 And so I thought my currency was
3 what I looked like, and I noticed that most
4 of the other women on that side of the
5 second floor were conventionally attractive
6 women and they all dressed to the nines and
7 wore stilettos and skirts and that was the
8 environment.

9 Q. What did you think when
10 [REDACTED] [REDACTED] told you, oh, he likes you,
11 honey, and, oh, that he likes blonds in
12 relation to the Governor?

13 A. I thought, oh, okay, well, that
14 means, like, he'll remember my name and
15 he'll know who I am, and I guess that's a
16 good thing. I didn't think that that means
17 the Governor is going to try and be a
18 predator. I just thought he was, like, a
19 creepy middle-aged man, but he was a really
20 powerful man, and in that environment he was
21 the center of gravity, and everywhere that
22 he was the most important place. So if he
23 looked kindly upon you, it was like the sun
24 was shining upon you.

25 Q. In what way was it like the sun

1 Confidential

2 was shining on you if the Governor looked
3 kindly upon you?

4 A. You know, that means that the
5 most powerful man in New York State likes me
6 and my job here is safe and maybe it means
7 that I will get promoted and I will earn a
8 bigger salary here and I will -- and other
9 people will begin to know my name and I will
10 have bigger responsibilities simply because
11 Andrew Cuomo thinks that I'm cute and sweet
12 and worthy of his trust.

13 Q. Did you see things play out that
14 way for anyone?

15 A. Yes.

16 Q. Who?

17 A. Melissa DeRosa, [REDACTED]
18 [REDACTED], Annabel Walsh, many of his
19 briefers. Many of his briefers, they
20 were -- his briefers were always young women
21 and they oftentimes were promoted to better
22 jobs if he liked them.

23 And certainly Stephanie Benton,
24 I mean, as an admin she was one of the most
25 powerful people on the second floor. He

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2 gave her carte blanche, you know, and she's
3 a beautiful woman who -- and then

4 [REDACTED] [REDACTED], I think is her first
5 name, [REDACTED] was another one. [REDACTED],
6 [REDACTED] [REDACTED] [REDACTED], she was the
7 [REDACTED] [REDACTED] [REDACTED] [REDACTED].

8 And I don't want to -- it's hard
9 to explain, but you know, it's Albany, it's
10 not known, it's not like it's Beverly Hills,
11 you know, and I was just -- there were just
12 so many beautiful women everywhere in that
13 immediate -- in those immediate -- in that
14 immediate vicinity. And I know that that's
15 not illegal per se, but --

16 Q. When you say "beautiful"?

17 A. -- it raised the flag.

18 Q. When you say "beautiful women,"
19 could you describe what they looked like?

20 A. Long hair, long slender legs,
21 dresses and skirts, both blond and brunette,
22 you know, cleavage and jewelry and sweet
23 smelling perfume. I felt like I kind of had
24 to step up my game there.

25 Q. What about in terms of age, was

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2 there a particular profile there?

3 A. Yeah, 20s and 30s for briefers.
4 Secretaries working under Stephanie, any of
5 the fellows that were elevated into
6 assistant secretary or deputy secretary
7 roles were younger women. And then there
8 were some older women too, like [REDACTED]
9 [REDACTED] and [REDACTED] [REDACTED] and [REDACTED]
10 [REDACTED], who were not young per se, they were
11 in their 40s, but you know, were trading in
12 the same currency.

13 And I overlapped quite a bit
14 towards the end of my Fellowship with
15 Lindsey Boylan, and I remember recalling the
16 same thing, like, oh, wow, she's so
17 beautiful and so tall, and I noticed that
18 she was always coming to Albany and meeting
19 with the Governor.

20 Q. What about racial or ethnic
21 background, did the women that you described
22 as the beautiful women, were they a
23 particular profile?

24 A. Yeah, they were white or in a
25 couple of cases Latino, but I did not see

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2 black or brown women in that type of
3 position or in that type of category or
4 profile.

5 Also, I remember there was a
6 woman named [REDACTED] [REDACTED], who -- I think she
7 was the [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] or something. I can't recall
9 exactly. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED],
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED], and I just remember that
12 Joe Percoco and the Governor, like, hated
13 [REDACTED] and they would make fun of her, and
14 ultimately they got rid of her.

15 I remember thinking like that's
16 probably not just based on her track record,
17 because she was really smart and had a lot
18 of credentials. It was probably because she
19 wasn't pleasing to the eye for them. I
20 remember that struck me as like, oh, of
21 course, they're going to throw somebody like
22 that out on the curb or make her feel so
23 unwelcome and uncomfortable here or
24 powerless here that she'll go, you know, for
25 greener pastures.

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2 Q. Do you remember what led to her
3 departure, whether she left or she was
4 dismissed?

5 A. I don't recall either way. I
6 just remember she left or she was gone.

7 Q. After your initial pride about
8 moving desks to Howard Glaser's office, how
9 did you feel about moving desks?

10 A. I felt trapped.

11 Q. What do you mean by that?

12 A. I felt like on the one hand I
13 had been given this great opportunity and
14 other fellows and other staff members in the
15 Chamber were envious and thought, wow,
16 that's so cool, Ana gets to sit there, she's
17 so lucky, but then on the other hand, I felt
18 like I was collecting dust and I wasn't
19 being given a lot of meaningful work and
20 that I felt that somehow that was my fault,
21 like I didn't -- I wasn't taking enough
22 initiative, I wasn't enough of a -- I wasn't
23 aggressive enough. Like I -- it was very
24 hollow. I wasn't being given enough work to
25 sort of fill out eight hours a day, and I

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2 wasn't being called to New York City really
3 at all. And at the time that was really the
4 seat of New York State government. The
5 Governor was in New York City all the time
6 and not really in Albany. And I was like,
7 wow, my job is a real waste of taxpayers'
8 dollars. And I also thought that it was
9 weird and ironic that, you know, I was a
10 line item in HCR's budget and I wasn't doing
11 any work that had do with housing and
12 community renewal. And I just felt like an
13 accessory kind of thing.

14 Q. When you say you "felt like an
15 accessory," what do you mean by that?

16 A. Like I was allowed to
17 participate in soirees here and there at the
18 Executive Mansion and I was allowed to play
19 functional roles and things like Regional
20 Council meetings still on a case-by-case
21 basis that were public facing, but
22 internally I wasn't a real cog in any one
23 wheel, and the Governor -- so working in the
24 Executive Chamber, you're supposed to feel
25 like, okay, I work for the Governor of the

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2 State of New York, the Governor is my boss.
3 The Governor didn't have any clue, I think,
4 what I was doing there or what my job was,
5 never asked me a question about it, and I
6 thought that was weird.

7 And I thought it was my fault,
8 like I thought I'm not smart enough to be
9 here. Even though I continuously was
10 planting seeds, I was always asking [REDACTED]
11 [REDACTED] and John Maggiore and other folks,
12 like do you need me to do anything, what can
13 I do, do you have any projects for me to
14 work on, is there anything that I do to help
15 you out.

16 And I remember wishing that I
17 had been given a less sexy and visible
18 assignment. Like I wished that I was put in
19 a desk at like the State Liquor Authority or
20 something and tasked with making a program
21 more efficient or something like that so
22 that I had a real purpose. But like I was
23 doing things like checking people in at
24 mansion parties, and it was just -- it was
25 all very like a lot of one-off assignments.

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2 And I kept track of things that
3 I was really proud of, like the work I did
4 for the Councils, the work I did with the
5 New York State Council on the Arts, helping
6 them with their budget negotiations. It was
7 all stuff that in the grand scheme of things
8 that was not seen as important at all, but
9 for me it was like this is important, this
10 is my track record. I know I'm not going to
11 be here forever, I need to like tick off the
12 list and then finish my Fellowship and then
13 I'm going to get -- go back upstate.

14 Q. I want to go back to the
15 comments you had made earlier, the
16 statements you made about [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED], and you said that Joe Percoco and
18 the Governor used to make fun of her. What
19 would the Governor say about [REDACTED] [REDACTED]?

20 A. I don't recall hearing him
21 specifically saying anything. A lot of what
22 I knew that the Governor -- a lot of the
23 opinions that I knew he held, the sort of
24 derisiveness that -- with which he would
25 treat people, I learned through secondary

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2 sources. But I knew they would call her, I
3 think it was, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
4 or something.

5 Q. Do you know if the Governor
6 called [REDACTED] [REDACTED] that?

7 A. I didn't hear of any that
8 offhand. Part of me thinks that, you know,
9 in some ways I was protected from it or like
10 I was intentionally -- there was like a
11 certain wall that was put up. But I have it
12 on good authority that the Governor shared
13 those opinions. There were certain people
14 that he was -- there was Joe Percoco, Howard
15 Glaser, Jim Malatras, certain
16 individuals -- Larry Schwartz, certain
17 individuals who were privy -- [REDACTED] [REDACTED]
18 too, that were privy to his inner thoughts
19 and discriminatory -- the labels that he
20 would place on people. So I can't speak to
21 those things directly. I just believed that
22 those were things that he may have said.

23 Q. Were there any other
24 discriminatory things that you were told the
25 Governor may have said?

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2 A. I would have to think about
3 that. I guess no. Just that the Governor
4 didn't like unattractive people unless you
5 had something else to offer, I suppose. So,
6 no, yeah, I don't know if I could speak to
7 that.

8 Q. Just continuing, completing that
9 line of questioning, are you aware of any
10 statements other than the [REDACTED] [REDACTED] [REDACTED]
11 statement by the Governor that would be
12 considered offensive regarding members of
13 the LGBTQIA community?

14 A. Not that I was privy to.

15 Q. Or anything that you heard
16 about?

17 A. No, no, I couldn't speak to it,
18 but I certainly wouldn't be surprised if
19 there was other activities taking place that
20 were discriminatory.

21 Q. And did you hear or hear about
22 any comments by the Governor that would be
23 offensive to racial or ethnic minorities?

24 A. No, no, not that I can recall.
25 The only thing I know again that

1 Confidential

2 I think is public knowledge is that, you
3 know, Andrew being the brainchild of Vote
4 for Cuomo Not for the Homo, the campaign
5 language used for his father's campaign
6 years ago, you know, so. And there
7 certainly were not -- there were people
8 across the spectrum, like racial spectrum
9 and LGBTQAI (sic) plus spectrum in
10 administration. But like at the upper,
11 upper echelon of his, you know, inner -- the
12 inner sanctum, it was by and large straight
13 and Caucasian except for Alphonso David.

14 Q. You said the Governor did not
15 have unattractive people unless they had
16 something else to offer. What did you mean
17 by unless they had something else to offer?

18 A. Like connections, money, power,
19 knowledge credentials. Like I remember
20 feeling like, wow, literally the only reason
21 why I'm sitting here right now is because
22 I'm good looking and because I
23 don't -- otherwise, I'm not serving any
24 other purpose here. So I guess it's hard to
25 elaborate more on that. It was just an

1 Confidential

2 observation, I guess.

3 Q. After Mr. Glaser left and he was
4 replaced by Mr. Malatras, did you continue
5 to sit at the same desk in the office where
6 Mr. Glaser used to sit?

7 A. Yes, for a period of time, a
8 handful of months, I think, until I -- you
9 know, I talked to John Maggiore to move
10 over, and I think Jim Malatras talked to
11 John to make that happen, he wanted to make
12 room for another person in his office. I
13 don't know -- he didn't replace me until I
14 think after I left to go work for Cornell.
15 'Cause I continued -- when I switched work
16 spaces, I was working in the office across
17 the hall, so I still had sort of a view on
18 the office and my old work space.

19 Jim had a very different style
20 than Howard Glaser and there was a changing
21 of the guard, I guess. Like he -- like [REDACTED]
22 [REDACTED] left when Howard left and then Jim
23 brought in a gentleman by the name of
24 [REDACTED] [REDACTED] (phonetic) who was like one
25 of his assistants, I guess, at [REDACTED]. So

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2 [REDACTED] came over, and I started to feel
3 like, okay, the vibe here is different. Jim
4 is not giving me assignments, but he didn't
5 tell me I want you to go here, there. I had
6 to sort of figure out on my own where I was
7 going to go if I wanted to say.

8 Q. What kind of assignments did
9 Howard give you?

10 A. He had me -- my first assignment
11 for him was updating a presentation
12 prevention about Super Storm Sandy recovery
13 that he was going to be delivering to the
14 Crain's New York breakfast, it was like an
15 annual Crain's New York breakfast. He was
16 fed up with a woman named [REDACTED] [REDACTED], who was
17 the [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED], I don't know why, he
19 felt that she was too much of a character,
20 and he asked me -- he's like, okay, I think
21 I want you to be sort of like kind of the
22 assistant secretary for the arts. You know,
23 we don't really have a place to put the arts
24 in any one portfolio, they don't really fit
25 in Economic Development, they don't really

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2 fit anywhere else, we just need you to sort
3 of oversee them, and that became my job, but
4 it was such a small agency that never got
5 any attention or any bandwidth in the
6 perspective of Governor.

7 I thought that it was really
8 cool and important. I took that and ran
9 with it. It was like literally the only
10 thing that gave me any meaning from the time
11 that Howard gave it to me until I left. I
12 was like this is it. And I remember [REDACTED]
13 sent me like a flower bouquet when I was
14 leaving, they liked having me represent them
15 on the second floor.

16 And then beyond that, he would
17 have me wordsmith speeches and
18 presentations, he would have me take notes
19 when he was in meetings with people, he
20 would have me schedule meetings for him, he
21 would have me like get him on the phone with
22 people, so a lot of just admin stuff.

23 Q. Did you speak with anyone about
24 your issues and challenges with getting a
25 meaningful work when you were at Chamber?

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2 A. I spoke with friends. You know,
3 I shared some of my concerns with [REDACTED],
4 [REDACTED] [REDACTED] [REDACTED], expressed
5 frustrations, spoke to family, but I didn't
6 really have recourse on the second floor. I
7 talked to [REDACTED] like I said, and I talked
8 to John Maggiore just saying, you know, I
9 would like to stay here, I'm passionate
10 about helping carry forth the agenda, I'm
11 just looking for something with a job
12 description and a job title so I know that I
13 have a certain purpose here. Not --

14 Those conversations turned into
15 me essentially acting as John Maggiore's
16 admin, and then I learned that we were the
17 "land of misfit toys" and then I got out.
18 And it wasn't just because of professional
19 frustration. It was a lot of personal
20 frustration too, just feeling -- you know,
21 your job represents such a big piece of who
22 you are in our society, who -- the value
23 that you assign to yourself, and I just
24 believed at that point in time that I was a
25 big zero.

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2 And I learned the word "zero"
3 from the second floor actually. That was a
4 big -- that word that was tossed around a
5 lot by the Cuomo acolytes, "loser" and
6 "zero." And I felt if I wasn't good
7 looking, I wouldn't be sitting there and I
8 would truly be a true real zero. And a lot
9 those, you know, they're machinations in my
10 own mind, but it played out.

11 Q. When you say you felt like you
12 didn't have any recourse, what's the reason
13 you felt that you didn't have any recourse?

14 A. Well, there were no secrets
15 there. Like -- like I -- so first of all, I
16 was never briefed on the Governor's Office
17 of Employee Relations or GOER. I didn't
18 know that there was an HR function. That
19 wasn't part of my orientation process. I
20 was never introduced to anyone there. And
21 anything having to do with HR, I felt like,
22 oh, I would have to go through the New York
23 State Division of Homes and Community
24 Renewal, I don't even know anyone there, I
25 just know they sign my paychecks, and if I

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2 were to go over there and say I'm frustrated
3 with my role here, I'm looking for
4 reassignment, they would have no idea what I
5 was even talking about, so that's -- you
6 know, when I said earlier I felt trapped,
7 that's kind of why I felt trapped.

8 Like the only way that I could
9 advance in my career and get to a place
10 where I would feel satisfied and moving
11 forward was if I got out and I got a job
12 somewhere else, but the only way I could get
13 a job somewhere else is if I could show some
14 sort of value contribution and structure,
15 evidence of structure of the two years I was
16 there, which is why I took it upon myself to
17 really keep a track record.

18 And you know, and I took
19 a -- and I took a -- I made a lateral move
20 to go work at Cornell, and ultimately got my
21 career back on track, but I didn't -- none
22 of that was owing to the experiences I had
23 in Albany, except for knowing, you know, how
24 things work in Albany is a value to me in
25 the job I have today, I suppose, but it was

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2 just -- it was a -- it was not a traditional
3 workplace environment.

4 Certainly there were laws and
5 policies and rules in place that in black
6 and white were probably there to protect me
7 and to help me, but I didn't know about
8 them. And I also knew about stories, like,
9 you know, [REDACTED] [REDACTED], and like [REDACTED]
10 [REDACTED], who felt like he was trapped there,
11 and I thought, wow, well, I guess we all
12 just have to just sit here and be punished
13 until we're granted like an opportunity like
14 a parachute to get out.

15 Q. And just following up on
16 that -- well, actually, before I move on:
17 Did you feel like you could speak with
18 anyone who was part of the Fellowship
19 program about the frustration with your
20 experience at the Chamber?

21 A. Yeah, we were told that it was
22 like a resource and we were afforded
23 the -- you know, the folks at the
24 Rockefeller Institute who helped develop the
25 curriculum to help us learn about state

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2 government that supplemented our work
3 experience, and then there were a few staff
4 members with the New York State Department
5 of State, who were in charge of like
6 managing the Fellowship program and staffing
7 it. I can't recall the name of the woman
8 off the top of my head, she's no longer
9 there, but she was [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]. She was
13 supposed to be my -- like a resource, but I
14 didn't use it because I believed that I had
15 to survive and figure it out on my own and I
16 didn't think there was anything that she or
17 anybody in the Rockefeller Institute could
18 do to help me.

19 It was supposed to be my mentor,
20 it was supposed to [REDACTED] [REDACTED]. Even
21 after I was reassigned into Howard's office,
22 my mentor remained [REDACTED], and so I was
23 supposed to leverage that relationship, you
24 know, and -- so I probably could have worked
25 harder to advocate on my own behalf, but I

1 Confidential

2 was just confused and scared and uncertain.

3 Q. What's the reason for saying you
4 probably could have worked harder to
5 advocate for yourself?

6 A. Well, I was scared of
7 consequences, and there was a lot that I
8 kept to myself because I was afraid if I
9 divulged to anybody that I felt like I was
10 in a [REDACTED] [REDACTED] [REDACTED] or I felt that I
11 wasn't cut out for the job or that I wanted
12 to be reassigned, that that was going to
13 reflect poorly on me. So I was really
14 careful about how I managed that. And it
15 was a while ago, so some of it, you know,
16 it's hard to really articulate what may have
17 been going through my mind. I wasn't even
18 30 yet. And yeah, I felt like I was
19 failing, failing, failing, failing, failing,
20 and I just had to like keep up appearances
21 to make it look to the outside world like
22 everything was fine, even though I was
23 struggling in that workplace environment.

24 Q. Let's go to -- actually sticking
25 with that topic, did you speak with any of

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2 your peers about how you were experiencing
3 your time at the Chamber?

4 A. Yes, I did. There were a couple
5 of fellows that were, you know, friends of
6 mine, and we might as a group go out for a
7 drink here and there, celebrate a birthday,
8 and I remember communicating to them -- like
9 one was [REDACTED] [REDACTED], I think [REDACTED] is still
10 there, he works for the [REDACTED]
11 [REDACTED], and then [REDACTED] [REDACTED], who works
12 for the [REDACTED] [REDACTED] now, and [REDACTED]
13 [REDACTED], who had been assigned to the
14 [REDACTED] [REDACTED], I think he
15 works -- lives in [REDACTED] now. And I
16 remember just kind of expressing to them how
17 demoralizing it was and how stupid it was
18 and meaningless, how to the average person
19 in New York State -- you know, for the State
20 of the State, for instance, we would talk
21 about all these programs that we were
22 putting in place, but it was all -- a lot of
23 it was just phony. We would make a big
24 announcement and attach a number to it, and
25 then we wouldn't build any of the

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2 infrastructure to support.

3 I entered the Fellowship with
4 this Pollyanna-thinking that it was a
5 functional workplace environment and that we
6 were going to make things happen and I
7 quickly learned that that wasn't the case,
8 and I confided in some of the other fellows
9 about how frustrating and strange that was
10 and also just the fact that --

11 Because, you know, they would be
12 like, wow, look at you sitting in the State
13 Operations Director's Office, and I'd be
14 like it's a horrible place to be, not what
15 it -- I feel like I wish that I was back
16 over in the Lieutenant Governor's Office
17 sitting in that little cubbyhole doing
18 smaller assignments because that felt in
19 some ways a little bit more meaningful.

20 Q. Do you remember around what
21 month you moved to Howard Glaser's office?

22 A. Yeah, it was November of 2013.

23 Q. When you started the Fellowship,
24 did you get any kind of orientation?

25 A. Yes, there was an orientation

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2 associated with the Fellowship where we
3 learn about state government, this is how
4 the legislature is structured, this is how
5 the budget process works, this is the
6 history of the New York State Constitution,
7 this is what the Fellowship is supposed to
8 be, this is going to be your mentor, this is
9 where you're going to be assigned, but the
10 orientation didn't involve anything having
11 to do with human resources in state
12 government; you know, like helping us get
13 our badges, knowing where we were supposed
14 to sit on day one, there was no like org
15 chart or employee handbook or anything that
16 we were given. So it was kind of like a
17 higher level orientation of, you know, you
18 guys are the new New York State leaders,
19 congratulation, let's teach you all about
20 New York State government and then we'll
21 throw you into the professional -- like your
22 duties and then we will go from there, but
23 it wasn't like a practical orientation, I
24 guess, is the right way to put it.

25 Q. Did you get any policies or

1 Confidential

2 trainings on sexual harassment as part of
3 your orientation?

4 A. Yeah, yes, we did learn about
5 sexual harassment and forms of
6 discrimination.

7 Q. And separately from your
8 orientation, did you ever get any policies
9 or training on sexual harassment and forms
10 of discrimination?

11 A. I think after -- wasn't there
12 like a law passed and we had to watch a
13 video, but nothing that was really robust.
14 I remember having to watch a video and like
15 click a confirmation that I had watched a
16 video.

17 Q. Do you remember getting a
18 handbook that covered forms of
19 discrimination and sexual harassment?

20 A. No, I don't remember getting a
21 handbook.

22 Q. We're going back to the
23 exhibits, and we are going to refer to Tab 1
24 and we will mark it as an exhibit.

25 (Exhibit 3, handbook, Tab 1,

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marked for identification, as of this date.)

A. Tab 1.

Q. Tab 1.

A. Okay, I have it open.

Q. So Tab 1 should be the New York Executive Department handbook for Employees of New York State Agencies dated December 2011. Do you see that?

A. Yes.

Q. Have you seen this document before?

A. Not that I can recall. It may have been given to me in a larger packet of materials and I may have just not looked at it.

Q. Okay. We're going to turn to page 11.

A. I'm on page 11.

Q. Great. The third subheading under "SEX" says, "Sexual harassment" and it goes on to define "sexual harassment," and I can give you a couple of minutes to read that.

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2 A. Okay, I've finished reading
3 that.

4 Q. Before today have you seen that
5 definition of "sexual harassment" before?

6 A. Yeah, my attorney shared
7 the -- this language with me. Whether it
8 was from this document or from somewhere
9 else, I recall seeing it.

10 Q. And other than any discussions
11 with your attorney, have you seen this
12 definition of "sexual harassment" before?

13 A. In theory. Maybe not
14 specifically this language, but -- I
15 suppose, yes, but I don't know if it was
16 this exact language, you know, from New York
17 State law.

18 Q. And specifically do you remember
19 seeing a definition of "sexual harassment"
20 from the time when you worked in the
21 Executive Chamber?

22 A. I don't remember specifically
23 seeing a definition or being read a
24 definition. I just knew in general what it
25 was and that it wasn't lawful.

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2 Q. And as a reminder, in response
3 to any of my questions, I'm not asking you
4 for information about any communications
5 that you've had with your attorney. That is
6 protected by your attorney-client privilege.

7 A. Okay.

8 Q. We will take this exhibit off
9 and move on to discuss your interactions
10 with the Governor, but before I do that, I
11 will pause and find out if Ms. Kennedy Park
12 has any questions.

13 MS. PARK: I don't have any
14 other questions right now. Thank you,
15 Abena.

16 MS. MAINOO: We will take a
17 break.

18 THE VIDEOGRAPHER: We're now
19 going off the record. The time is
20 3:10.

21 (Recess.)

22 THE VIDEOGRAPHER: We're now
23 going back on. The time is 3:17.

24 Q. Ms. Liss, I would like to turn
25 to your interactions with the Governor.

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2 When was the first time that you met the
3 Governor?

4 A. It would have been the week that
5 I relocated to Howard Glaser's office, so
6 sometime in November of 2013.

7 Q. Please describe that first
8 meeting with the Governor.

9 A. He walked in to my office area,
10 which I shared with [REDACTED] [REDACTED] and
11 [REDACTED] [REDACTED], and I remember, you know, he
12 was very tall, he was wearing a suit and
13 like a red tie and his pin and he went over
14 and said hello to [REDACTED], he hugged her,
15 and then he came over and was like and who
16 is this young lady and -- to me, and I stood
17 up and, you know, I shook his hand, hello,
18 Governor. And he asked me like where are
19 you from, and it was one -- I don't know if
20 it was the first time that we had an
21 interaction or if it was one of the
22 subsequent occasions that, you know, he had
23 kissed my hand and asked me if I had a
24 boyfriend and kissed my cheek. I think it
25 was a subsequent interaction, but it took

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2 place in that office.

3 Q. And how would you characterize
4 that first interaction?

5 A. It felt kind of grandfatherly
6 and like he was sort of sussing me out, like
7 who are you, because it was important to the
8 Governor to know who was around him at any
9 given time, who might be observant of what
10 was going on in that office area, and so he
11 wanted my name, where am I from, who am I,
12 I'm one of the Empire State fellows, okay, I
13 said I worked for Howard. I remember he
14 called me "young lady" at that point in
15 time, and I remember feeling like he liked
16 me, he was friendly. And I remember [REDACTED]
17 observed, oh, he likes you, Ana. That was
18 when she made that comment.

19 Q. How did you interpret that
20 comment by [REDACTED] ?

21 A. Just that like I fit the profile
22 of the -- you know, my appearance was
23 attractive to the Governor, and that was a
24 good thing for my ability to survive and
25 stay there and that he was going to be

1 Confidential

2 friendly towards me and I didn't have to be
3 worried or scared that I might be a target
4 of anything negative.

5 Q. At that point had you heard
6 about anyone else being a target of any
7 negative behavior coming from the Governor?

8 A. Well, I knew about [REDACTED]
9 [REDACTED] and getting -- you know, pissing
10 off the Governor and getting summarily fired
11 or reassigned. And I had learned from
12 [REDACTED] [REDACTED] that the Governor could get
13 really angry and upset and take it out on
14 people, including [REDACTED] who had expressed
15 to me that he'd been screamed at before.
16 So, yeah, I knew that his reputation was not
17 that he was a sweet and kind man.

18 Q. And you described the Governor
19 as "grandfatherly" during that interaction.
20 What did you mean by that?

21 A. Like, you know, kind of gazing
22 into my eyes and somewhat flirtatious and
23 warm.

24 Q. What way was the Governor
25 flirtatious during that first meeting,

1 Confidential

2 somewhat flirtatious?

3 A. The way that he held my hand,
4 held onto my hand and was making eye contact
5 and was smiling at me.

6 Q. Describe your later interactions
7 with the Governor in the office; what
8 interactions did you have?

9 A. Very -- it was always in that
10 office we -- he would come through and say
11 hello to [REDACTED], sometimes he'd be singing
12 a song, whatever, and he would come over to
13 my desk, and there were playful
14 interjections. And at one point I remember
15 him asking do you -- do you have a boyfriend
16 and I remember him kissing me on the cheek
17 and kissing me on the hand. I remember him
18 asking me at one point, like, Miss Liss, do
19 you follow me on Twitter or something like
20 that. I don't know. It was never anything
21 all that substantive, but flirtatious
22 certainly.

23 Q. How did you respond when the
24 Governor asked you if you had a boyfriend?

25 A. I said not at the movement. I

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2 was kind of in between the time. I was
3 like, no, Governor, something like that.

4 Q. What did you think of the
5 Governor asking you if you had a boyfriend?

6 A. I thought it was weird, but
7 typical of him. Like if it was any other
8 workplace environment, if it had been my
9 boss here or my boss prior to the working at
10 the Governor's offices, I'd be like that's
11 disgusting, eww, but for whatever reason in
12 his office the rules were different. It was
13 just, you should view it as a compliment if
14 the Governor finds you aesthetically
15 pleasing enough, if he finds you interesting
16 enough to ask questions like that.

17 And so even though it was
18 strange and uncomfortable and technically
19 not permissible in a typical workplace
20 environment, I was in this mindset that it
21 was the twilight zone and the rules -- the
22 typical rules did not apply. It was like we
23 were in a different decade. So I didn't
24 think, oh, I'm going to go complain because
25 that would have been laughable to go

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2 complain about something like that. You
3 know, in that culture, in the office
4 culture, I would have been laughed out of
5 town.

6 Q. Who would you have complained
7 to?

8 A. I don't even know. Maybe [REDACTED]
9 [REDACTED], but [REDACTED] [REDACTED] probably would
10 have laughed at me, and I didn't know the
11 first thing about GOER and where to go to
12 talk to someone there. I just remember
13 thinking that the broader sentiment was that
14 if the Governor thought -- if you were a
15 young woman the Governor thought was
16 beautiful and thought was interesting enough
17 to ask questions like that, you should just
18 feel flattered and, you know, maybe that
19 means -- that bodes well for your career,
20 like you're not going to get fired and
21 they're not going to talk shit about you
22 behind your back and act like you're a zero
23 and a loser and, you know, they'll want to
24 keep you around because they liked having
25 you around.

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2 And for me it was like, well, I
3 need this job because I have to pay my
4 student loans down and I really am
5 interested in public service and government
6 and I'm going to white-knuckle this
7 experience, and if it means that the
8 Governor kissing me on the cheek and asking
9 if I have a boyfriend like leads to I get to
10 stay here and I get to be elevated, then so
11 be it. And it feels weird saying, but that
12 was definitely what was, you know, my mental
13 calculus at the time.

14 Q. Did anyone communicate that
15 sentiment to you, that if the Governor spoke
16 with you and asked you those kinds of
17 questions, like if you had a boyfriend, you
18 should be flattered?

19 A. Yeah, [REDACTED]. [REDACTED]
20 [REDACTED] [REDACTED] She was like, oh,
21 honey, that's good, that means he likes you.
22 You know, [REDACTED] [REDACTED]. The younger people
23 in the crew that I mentioned, it was like
24 seen as, okay, that's a feather in your cap,
25 that means that he doesn't hate you. The

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2 Governor either hates you or he likes you or
3 he doesn't -- or you're nobody to him.

4 And I knew a lot of the people
5 that worked there that were subject to his
6 abuse and ire. You know, [REDACTED] [REDACTED]
7 being one of them. [REDACTED] [REDACTED] being another
8 one. These guys that were yelled at all the
9 time and --

10 But I didn't get yelled at, and,
11 you know, Melissa didn't get yelled out.
12 Beautiful, beautiful women that were sweet
13 and docile didn't get yelled at and were
14 given fun little assignments, I suppose.

15 Q. You made a comment about how the
16 culture was from "a different decade." What
17 did you mean by that?

18 A. Well, I had just around that
19 time, like I had been -- finished watching
20 Mad Men or I was in the midst of watching
21 it, and I remember thinking like, oh, wow,
22 Stephanie Benton is just like Joan Colloway
23 (sic), and you know, all of these men in
24 this have attractive female gatekeepers,
25 kind of like in Mad Men. And when I was

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2 told I had to wear heels -- you know, I -- I
3 in my previous job prior to coming to
4 Albany, it's not like I was dressing like a
5 slob or anything, but I wore pants and flats
6 and stuff, and I didn't -- I'm not good with
7 time management. It's not like I would wake
8 up an hour before having to go work and like
9 get all dolled up, but I learned that you
10 got to kind of get dolled up, and I thought
11 that felt very Mad Men era.

12 And it was an Albany thing too,
13 so I didn't necessarily think, oh, this is
14 all just Andrew Cuomo. I think what I
15 learned is that his MO was cooked up by, I
16 think, maybe working for his dad and like
17 running the show under his dad, like Albany
18 in the '80s and '90s, and that was very
19 much -- that culture was permeated, the
20 legislature and all the different
21 legislative offices, and it just felt like,
22 wow, I'm three and a half hours away from
23 home, but I feel like I'm a hundred. -- you
24 know, I feel like I'm on the other side of
25 the country from Rochester. This is just so

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2 bizarre. Like this isn't D.C., like get
3 over yourself kind of thing.

4 But people trade in sex and
5 power and money in Albany, and that is very
6 much true on the second floor and trickles
7 down into the -- the far reaches of state
8 government, and it has been that what way
9 for a long time, I suppose.

10 Q. How did you learn that you had
11 to get dolled up for work?

12 A. From [REDACTED], from [REDACTED], and from
13 [REDACTED], [REDACTED], and from general
14 observation. You know, everybody is wearing
15 feminine attire and looks beautiful and
16 styled, and I'm not going to be the one, you
17 know, with -- I'm not going to be the one
18 not looking the part, I guess, but I knew I
19 was supposed to when he's in Albany -- and I
20 should say when he wasn't in Albany, I
21 didn't necessarily -- I didn't abide by that
22 principle, I was much more casual, but when
23 I was in Albany, I made a point to dress up
24 and to look great because I had been told
25 and I knew it was the rule.

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2 Q. How much time did he spend in
3 Albany during your time in the Executive
4 Chamber?

5 A. Maybe a couple of days a week in
6 nonbudget season. It was during budget
7 season when the LEG was in session. He was
8 there more frequently. But Albany wasn't
9 his favorite place to be at the time. He
10 was still in a relationship with [REDACTED] [REDACTED]
11 at that point in time and he was in New York
12 a lot, and I guess I just assumed it was
13 because he was at home or something. I
14 understand that more recently in recent
15 years he is in Albany a lot more because the
16 Chamber -- or the Executive Mansion, excuse
17 me, has become his primary residence.

18 Q. What did you think of the
19 Governor kissing you on the cheek and
20 kissing you on the hand?

21 A. I thought he was flirting with
22 me, that he thought that I was pretty and
23 that he can get away with stuff like that
24 because he's the Governor. And I thought it
25 was like Italian. And then in hindsight,

1 Confidential

2 you know, when I spoke up about all of this,
3 I did so by and large because the other
4 young women that had come forward with more
5 egregious allegations weren't being believed
6 and I believed them and I wanted to share an
7 account that was less egregious and spoke to
8 the broader culture that allowed for the
9 things that happened to them to happen to
10 them. The tolerance for those
11 micro flirtations, I guess, that would allow
12 for him to act a certain way behind closed
13 doors with women in more serious manners.

14 You know, I didn't observe
15 anything that -- I didn't observe any of
16 those instances, but I believed that I
17 wanted to tell the truth about what I had
18 experienced because people needed to
19 understand that it's not just Andrew Cuomo
20 closing a door and grabbing someone's
21 breast. It was a whole army of women that
22 were being, you know, subject to smaller,
23 less serious physical interactions and that
24 that's evidence to the larger -- provides
25 more evidence to the more serious stuff

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2 that's happening, I guess.

3 So I can understand, you know,
4 when people -- when I tell this story and
5 people listen to me, like that's not that
6 big of a deal, you didn't complain about it,
7 but really I didn't complain about it
8 because I didn't think that I could. I
9 didn't think anyone would believe me and I
10 thought that would be a fool's errand to
11 complain about it, like I probably would
12 have lost my job, and I needed my job.

13 And also it was like -- like I
14 said, like the twilight zone, different
15 rules that were normalized, that were baked
16 into the environment that made it possible
17 for the Governor and other senior officials
18 in his administration to abuse women in a
19 more nefarious way.

20 So I sort of went off on a
21 tangent on that one. I apologize.

22 Q. No need to apologize.

23 So you referred to "rules"
24 several times. What do you mean when you
25 use the term "rules"?

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2 A. Standards, like mores, if that's
3 the right term. You know, different
4 workplace environments have different
5 cultures. You know, some office
6 environments are really stiff and, you know,
7 bucks and teats get here at 8 o'clock, talk
8 about the weather, others are more friendly
9 and relaxed and more casual.

10 That workplace environment had
11 its own set of standards and mores that were
12 unique to the administration and you had to
13 learn them and play the game to get along.
14 So they weren't necessarily rules that were
15 written down. Like the rule to wear high
16 heels wasn't in some handbook that I was
17 given. It was just murmurs and whispers and
18 observations.

19 Q. And that's going to be my next
20 question. How did you become aware of the
21 rules that applied at the Executive Chamber?

22 A. Through conversations with
23 the -- the young folks that were part of
24 that group, the crew, through [REDACTED]
25 [REDACTED], through observing interactions

1 Confidential

2 between senior staffers and how --
3 particularly how women interacted with the
4 Governor.

5 Q. What did you observe about how
6 women interacted with the Governor?

7 A. Obedience, ebullient, like
8 smiley and friendly where appropriate,
9 physically put together when around him, at
10 his beck and call, following him around
11 constantly, anticipating what he wanted,
12 needed before he asked for things, and quick
13 witted. He liked women that were witty and
14 knew what to say and when to say it, I
15 guess.

16 Q. Which women did you see interact
17 with the Governor in the ways that you
18 described?

19 A. Melissa DeRosa, Stephanie
20 Benton, his briefers. You know, I observed
21 Lindsey Boylan with him on a couple of
22 occasions and she fit that bill. [REDACTED]
23 too. You know, [REDACTED] was older, but she
24 knew how to handle him and make him happy.
25 So those are just a few.

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2 Q. Did you observe anything in
3 terms of how the Governor interacted with
4 men?

5 A. Yes. It was different. It was
6 more tense, loud, volatile, the use of curse
7 words. So, yeah, it was markedly different.

8 But certainly the women
9 observed -- observed it, were around it. It
10 was not like he was hiding that behavior
11 from senior women in his administration. I
12 was just -- and it wasn't just men. It was
13 like if you didn't fit the bill of -- you
14 know, I think [REDACTED] was one of -- I think she
15 was treated the same way as some of the men.
16 And [REDACTED], I can't remember her last name,
17 she was like [REDACTED] [REDACTED]. She was privy
18 to some of that type of vitriol.

19 Q. You said privy to it. Was she
20 subject to any of it?

21 A. I think so. She kind of
22 traveled in that kind of cohort of people,
23 so I would -- I would have -- and she wasn't
24 there for a long time, so I wouldn't be
25 surprised if she was treated differently

1 Confidential

2 than some of the other women, but that would
3 be just speculation.

4 Q. How did the Governor address you
5 when he spoke to you?

6 A. He called me "sweetheart" or
7 like "darling." I don't recall him ever
8 uttering my name. I think maybe he called
9 me Miss Liss like once.

10 Q. And what did you think about the
11 way that the Governor addressed you?

12 A. It was demeaning, but I also
13 felt that I wasn't worthy of his respect.
14 Like I didn't think, oh, he should be
15 calling me "Ana" and I'm going to go
16 complain. I thought I was like a nobody
17 anyways, and I thought, well, you should be
18 so fortunate that at least he thinks you're
19 cute enough to kiss you on the cheek and
20 like he wanted to be photographed with you
21 and stuff like that.

22 Q. What is the reason he thought
23 you were a nobody?

24 A. Because of the types of
25 assignments I was being granted, because I

1 Confidential

2 was from Rochester and everybody there
3 seemed to be from like Downstate, and I
4 remember hearing people making fun of [REDACTED]
5 [REDACTED] accent and people making -- it was
6 pretty clear to me after entering the
7 administration that like even though on the
8 outside it was like let's make upstate
9 thrive again or whatever, internally it
10 was -- upstate residents were seen as
11 "nobodies," like not a source of power or
12 wealth or not to be taken seriously
13 necessarily, unless you were one of the five
14 billionaires from upstate New York.

15 So I believed I was -- I got
16 where I was by the hair of my
17 chinny-chin-chin, like I was just a good
18 looking young woman, who just happened to be
19 articulate enough to make it into that
20 Fellowship program and articulate enough
21 like get noticed and get elevated to that
22 office and I better sit tight and shut up
23 and survive so that I could keep my job or
24 else they'll find out that I'm just like
25 middle-class person from Rochester, New

1 Confidential

2 York.

3 And maybe that was my own
4 preconceived notions, but I certainly picked
5 up -- you know, the zeitgeist there
6 was -- you know, you knew who was important
7 by who was getting meetings with the
8 Governor and which lobbyists got attention,
9 and it was all representatives with special
10 interests in Manhattan, real estate, like
11 the Real Estate Board of New York, banks,
12 you know, hospital systems. Any way that
13 was connected to money and power,
14 particularly from New York, was getting an
15 audience there. And so I -- by my own
16 estimations and those observations, I was
17 like, well, don't -- don't let on who you
18 are, Ana, because they don't need you here.

19 Q. Did you ever have any
20 discussions with the Governor about the work
21 you were doing at the Chamber?

22 A. No.

23 Q. Did you have any discussions
24 with the Governor about your professional
25 background?

1 Confidential

2 A. No, never. It was very clear
3 that unless he asked you a question, you
4 weren't to like volunteer information.

5 Q. How was that clear?

6 A. I don't know that it was
7 expressly communicated to me by anybody
8 besides [REDACTED], but, you know, you just
9 don't walk up to Governor Cuomo and say,
10 hey, how it's going? You let him come to
11 you, ask you questions and then go on his
12 merry way. I wasn't about to be like
13 Governor, Governor, do you have a second, I
14 want to talk you about my background and
15 what I'm doing here and I have this idea.
16 That was not a welcome -- that was not a
17 welcome gesture. I would not have
18 been -- that would not have been greeted
19 with warmth or approval.

20 Q. Did you have any views of how
21 the Governor perceived you?

22 A. Yes. I felt that the Governor
23 thought that I was an attractive young blond
24 woman who was, you know, sweet. That's all
25 that I believed he -- like that was his

1 Confidential

2 estimation of me.

3 Q. What is the reason you felt that
4 was the Governor's estimation of you?

5 A. Because our interactions were
6 more on the grandfatherly flirtatious side
7 of things, and because he at the 2014 budget
8 celebration party at the mansion, he came
9 over to me and gestured, he brought his
10 photographer over, and he put his hand
11 around my waist and kissed me on the cheek
12 and had a photo taken with me. And then
13 people, you know, were talking about it the
14 next day, like, oh, I heard about the
15 Governor and the photo.

16 And I remember like when like
17 [REDACTED] [REDACTED] was handing out the photos a
18 couple of days later, everybody wanted to
19 like look at the picture of me and the
20 Governor. And like that's not something
21 that he would ordinarily do with anybody on
22 my level 'cause I was just like basically
23 checking people's coats at that party, and
24 he came right over to me, and, you know, it
25 was, again, like wherever the Governor goes,

1 Confidential

2 that's where all the eyeballs are, and then
3 all of a sudden the eyeballs were on me and
4 I felt special and important, but I felt
5 special and important because the Governor
6 thought I was food.

7 Q. Do you need a minute?

8 A. Do I need a minute?

9 Q. Yes.

10 A. Umm, I'm okay.

11 Q. Okay. Did you have any
12 work-related interactions with the Governor?

13 A. No -- well, one very small one.
14 When I -- when Howard Glaser had me at his
15 PowerPoint presentation for the Crain's
16 New York business breakfast in late -- I
17 think it was -- maybe it was early 2014, the
18 Governor wanted to give it final sign-off,
19 and he said something to Stephanie, like I
20 need a copy of this presentation, and then
21 Stephanie said it to [REDACTED] and then
22 [REDACTED] said it to me, and then I had to
23 present it off for the Governor and then I
24 had to hand it to him, and I remember
25 handing it to him in his -- like the

1 Confidential

2 conference room that's attached to his
3 office, and I remember he said thank you and
4 he looked me up and down, and I remember I
5 had a run in my pantyhose and he looked
6 right at my run in my pantyhose and thought
7 that that was because -- I thought it was
8 like, oh, my God, I'm such a slob, I had a
9 run in my pantyhose and the Governor noticed
10 it. That was literally the one time.

11 Other than like staffing mansion
12 parties or staffing events where the
13 Governor was speaking, like the State of the
14 State or whatever and like playing kind of
15 generic roles there. But the only time I
16 ever directly had a professional interaction
17 with the Governor was like handing him a
18 PowerPoint presentation printout.

19 Q. How did he look at you?

20 A. Like he was just sizing me up,
21 like up and down. He was in serious mode,
22 so he wasn't like in flirtatious mode at
23 that moment in time much, I remember. He
24 was just looking me up and down. I made eye
25 contact, and I remember he looked at the

1 Confidential

2 little snag, run in my -- I was wearing
3 black tights and -- and then he looked at
4 me, and I remember, oh, crap, he looked
5 at -- he noticed my run in my pantyhose.

6 Q. You used the phrase
7 "grandfatherly flirtatious" at least a
8 couple of times. What do you mean by that?

9 A. I mean by that -- I mean that I
10 didn't take it as a sexual come-on, but it
11 was very clear that he thought that I was
12 cute and attractive and that I would welcome
13 a smooch on the hand or the cheek or a slip
14 of the hand around the waist. I call it
15 "grandfatherly" because I didn't look at the
16 Governor as a sexual being, but I believe,
17 you know, he saw me as a sexual being. And
18 maybe "grandfatherly" is a way for me to
19 describe -- like I had creepy, older men
20 treat me that in other aspects of my life;
21 like, oh, hello, sweetheart, hi, honey.
22 It's a generational thing, I guess. So
23 that's why I call it "grandfatherly
24 flirtation."

25 Q. Let's talk about your

1 Confidential

2 interactions with the Governor outside the
3 office. You've mentioned the budget party.
4 Did you have any other interactions with the
5 Governor outside the office?

6 A. Just at those parties. Not in
7 any informal setting.

8 Q. Which parties are you referring
9 to?

10 A. They were -- the budget
11 celebrations, there was the pinning ceremony
12 that I participated in, there was a Father's
13 Day party that took place on his father's
14 birthday, the year that Mario passed away,
15 that was at the mansion, there was a Puerto
16 Rican association in New York State that had
17 a political party at the mansion that he
18 attended. So official soirees like that.
19 Most of them at the mansion, a couple of
20 them happening like -- like the Regional
21 Economic Development Council post reception
22 happened somewhere near The Egg in Albany,
23 so --

24 Q. Did you --

25 A. Yeah, sorry.

1 Confidential

2 Q. No, please go ahead.

3 A. No, that was it. That was it.

4 Q. Did you ever travel with the
5 Governor?

6 A. No.

7 Q. Who invited you to the soirees
8 and events that you just described?

9 A. I don't really know. I
10 just -- somehow my name would land on lists
11 for specific things, and then I would get an
12 official e-mail invitation and an RSVP, and
13 only certain people would get them for
14 certain parties and functions. I think it
15 was the Governor's advance team and they
16 received direction from certain people on
17 the Governor's team, whether Stephanie or
18 Joe or someone at the time, and they would
19 say, this person, this person, this person,
20 this person, and some of them I got invited
21 to, you know, other fellows weren't there,
22 some of them I did and like all the fellows
23 were there.

24 Q. Did you have any understand of
25 the reasons why you were invited to those

1 Confidential

2 parties and events?

3 A. No.

4 Q. Setting aside the budget party,
5 did you ever have any physical contact with
6 the Governor at these events and soirees?

7 A. Yeah, where -- whenever he would
8 greet me, he would hug and kiss me. And a
9 couple of instances that was on -- that was
10 captured in photographs, which I -- my
11 attorneys shared with you guys.

12 Q. And where would he kiss you?

13 A. On the cheek.

14 Q. Would the Governor say anything
15 to you at these events and soirees where he
16 would hug and kiss you on the cheek?

17 A. Just exchange pleasantries, how
18 are you this evening, you look lovely, stuff
19 like that. Nothing of any substance.

20 Q. How did he address you?

21 A. Just "darling" or "sweetheart."
22 He didn't -- I don't know if he knew or
23 remembered my name.

24 Q. Turning back to the budget party
25 before -- when was the budget party that you

1 Confidential

2 mentioned earlier?

3 A. It was like late March 2014.
4 The budget had passed on time, I think,
5 prior to the April 1st deadline, which is
6 why there was a party.

7 Q. You just said "March." Is that
8 correct, was the party in March 2014?

9 A. Yes, I believe so. The date
10 stamp on the photo says the date on it.
11 There's a record of the party. It was
12 called the "Grand Slam" because they had
13 passed four consecutive on-time budgets and
14 they were having a party to commemorate that
15 that budget had passed on time and it was
16 the fourth.

17 Q. And when did the budget pass?

18 A. Before the April 1st deadline
19 that year. I don't know what day
20 specifically.

21 Q. But the party happened in March?

22 A. I believe so, yeah. I can -- I
23 have the photo with me. I can look at the
24 date stamp on the back.

25 Q. Why don't you do that.

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A. Okay. This is the photo (indicating).

Q. Okay.

MS. PARK: Abena, if we have a copy of the photo in the binder, can we mark it as an exhibit?

MS. MAINOO: Yes.

A. The date says -- oh, I apologize. I'm sorry. It says May 8, 2014.

Q. Okay. And so this is Tab 7, and it's also in your electronic exhibits, and we will mark it as an exhibit and put it up.

A. Great.

(Exhibit 4, photograph, Tab 7, marked for identification, as of this date.)

A. Yeah, so the budget passed on time that year, and they must -- they had a party in early May to celebrate that the budget passed and that it was the fourth consecutive.

Q. Before the May 2014 party, had you ever taken a picture with the Governor?

A. No.

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2 Q. Had you wanted to take a picture
3 with the Governor before that time?

4 A. I mean, yes, I guess that
5 would -- I wanted there to be evidence that
6 I wasn't just saying that I worked for the
7 Governor's Office. There's visible evidence
8 that I worked there.

9 Q. So do you recognize this exhibit
10 as the photo you took with the Governor at
11 the May 2014 budget party?

12 A. Um-hum.

13 Q. I think --

14 A. And he has his hand on my waist
15 too. You can see lower down, umm --

16 Q. His hand?

17 A. Yeah.

18 Q. Okay. And you still have this
19 picture, right?

20 A. Um-hum.

21 Q. What does the picture mean to
22 you?

23 A. Well, it meant something -- it
24 meant something else up until like March of
25 this year, I guess. It was like evidence

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2 that I worked for the Governor's Office,
3 that I didn't just -- I wasn't just there
4 pushing paper working for someone else, but
5 that I actually was in his -- that I was
6 around him and adjacent to him, and I was
7 proud of that. But [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] and it was very
11 much because of my job.

12 And it wasn't until some of this
13 broader dialogue started percolating from
14 other women about their time working there
15 and how toxic it was, and I decided to give
16 oxygen to some of like what I had
17 experienced, and the picture took on a
18 different meaning.

19 Like when I spoke to the Wall
20 Street Journal, I wasn't expecting for them
21 to like want to talk about that or ask about
22 it, and then all of a sudden it became like
23 this centerpiece to the story. So it's
24 complicated. You know, I still have it.
25 You know, I'm not going to burn it or

1 Confidential

2 anything, but -- and I don't think that the
3 Governor was trying to like rape me in that
4 picture, that he was like grasping a breast
5 or something. But he came up to me, he
6 wanted that picture taken, it got a lot of
7 attention from senior staff and officials,
8 and I remember feeling special in that
9 moment and then subsequent to that moment.

10 Q. What meaning did the picture
11 take on after March of 2021?

12 A. It became embarrassing, like a
13 piece of evidence. I treated it up until
14 that point like it was almost as important
15 as one of my diplomas hanging in my office.
16 I have it sitting next to my certificate of
17 completion for my Fellowship, the
18 Rockefeller Institute Fellowship Program,
19 and then all of a sudden it became like on
20 Twitter. All these people were reacting to
21 it, like, well, if you felt like you were
22 being abused and targeted by the Governor,
23 then why do you still have a framed photo of
24 him in your office? Which was offensive. I
25 also -- you know, it's a reminder that even

1 Confidential

2 though that chapter of my life meant a great
3 deal to me, it was also a really awful time
4 for me.

5 And I'm sure the Governor
6 doesn't remember taking that picture. The
7 Governor doesn't remember who I am, you
8 know.

9 I don't know, I feel like -- I
10 feel kind of torn, like I should probably
11 recycle it or put it in a box somewhere, but
12 I also am not at a point in my life where
13 I'm willing to discount the two years I
14 spent working there because I still ascribe
15 value to it. I don't know. It's
16 complicated.

17 Q. And you pointed out that the
18 Governor's hand was around your waist in
19 that picture. What's the reason you pointed
20 that out?

21 A. A guy that I was dating at the
22 time, I remember I showed it to him, and was
23 like, wow, hey, look at this, and he's like
24 that's crazy what is his hand doing there,
25 that's weird. And I was like, oh, yeah.

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2 And, you know, that was -- I remember
3 feeling his hand there on my, you know,
4 lower waist. You know, typically an
5 appropriate gesture would be put your hand
6 on someone's back. So it's -- it appears
7 sexual, I guess, in a way.

8 And also when I spoke to Jimmy
9 at the Wall Street Journal and I showed him
10 the picture, his eyes went right there too.
11 And I wish instead of looking right there,
12 you know, you're like, oh, wow, look how
13 important Ana is, she's with the Governor,
14 but it's like it looks a little bit more
15 familiar than that. You know, it looks less
16 professional and more intimate.

17 Q. And you mentioned that
18 colleagues spoke about the picture
19 afterwards. What did they say?

20 A. I remember [REDACTED] came up to me
21 the next day, [REDACTED] [REDACTED], and was like I
22 heard about your moment with the Governor
23 last night, you know, people are talking
24 about it. And [REDACTED] said something like,
25 oh, we know he likes you, something like

1 Confidential

2 that. You know, I can't recall exactly what
3 people said. Just that I felt like, you
4 know, how you -- like something happens that
5 becomes the subject of some idle gossip and
6 you're a part of it and then become fodder
7 for other people's conversations. I felt
8 like I was being talked about by people that
9 I didn't know.

10 Q. And how did you feel about that?

11 A. Like sort of icky because it
12 sucked that I was nominally there on this
13 Fellowship that was supposed to be
14 recognizing my intellect and my credentials
15 and I was supposed to be influencing policy
16 according to this Fellowship program, but
17 then like in practice, I was eye candy, and
18 the only significant thing that had happened
19 thus far while I was there that was worthy
20 of anyone's attention was that the Governor
21 thought I was cute and took a picture of me
22 at the mansion. I just remember thinking
23 like ehh. But I didn't feel icky enough
24 where I was going to trash the photo. I
25 remember making it my LinkedIn picture at

1 Confidential

2 one point because I was proud.

3 Q. Talk about other communications
4 with the Governor. Did the Governor ever
5 yell at you?

6 A. No.

7 Q. Did you the Governor ever curse
8 at you?

9 A. No.

10 Q. Did the Governor ever comment on
11 your appearance?

12 A. Yes.

13 Q. What did he say?

14 A. He said that -- that I -- that I
15 looked lovely, you look lovely today,
16 something along those lines.

17 Q. Where did that happen?

18 A. In the office, and then, you
19 know, at the Father's Day party, I think he
20 said something. He introduced me to [REDACTED]
21 [REDACTED] at the Father's Day party.

22 Q. How did he introduce you?

23 A. I had to kind of intro -- he --
24 I -- I don't know exactly how, like if he
25 used my name or what. But I remember

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2 telling [REDACTED] that I worked with [REDACTED]
3 [REDACTED], and I remember him saying something
4 like -- because I was wearing a dress, a
5 pretty dress, and he was like you look
6 lovely or something like that.

7 Q. And did he say that in front of

8 [REDACTED] [REDACTED]?

9 A. Yeah, I think so. Like

10 you -- or maybe it was like you look nice.
11 It didn't feel like he was coming on to me
12 or like it was overtly sexual. Like it
13 didn't feel like it was inappropriate for
14 him to say it in front of someone that he
15 was in a romantic relationship with. Like
16 he was talking to me like I was a little
17 girl almost.

18 Q. And do you remember if you

19 approached the Governor and [REDACTED] [REDACTED] or
20 they approached you or how that interaction
21 came about?

22 A. He approached me with [REDACTED]. I

23 was positioned -- I was kind of ushering
24 party attendees from like the cocktail area
25 over to a tent where folks are supposed to

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2 be seated for -- there was going to be like
3 a video that was commemorating Mario Cuomo's
4 life and his time as Governor, and that was
5 when the Governor approached, when I was in
6 that -- I was supposed to -- I was like near
7 a set a stairs, and I was like, you know,
8 please, please, this way, this way, have a
9 seat, you know, one of those types of roles.

10 Q. Did the Governor ever ask you to
11 sing a song or jingle?

12 A. He -- he didn't ask me,
13 but -- well, he would sing the song for
14 Riunite on ice, and I think he asked if I
15 knew the rest of the words or something, and
16 I remember looking it up and writing it down
17 so that if it came up again I would know the
18 words. It's like a malt beverage.

19 Q. Other than that, do you ever
20 remember any instances where you would sing
21 with the Governor or be invited to sing with
22 the Governor?

23 A. Besides Riunite on ice, not
24 really, no.

25 Q. Did you sing that song with the

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Governor?

A. I think I said a few bars, but that was it, yeah. I really didn't want to embarrass myself necessarily.

Q. Did you ever hear or hear about the Governor telling jokes of a sexual nature?

A. Umm. I have to think about that for one second. Umm, jokes of a sexual nature? No, I don't know -- I don't have direct knowledge that he made jokes that were sexual in nature. I just knew that -- that they were known -- he and the men that were in his immediate surroundings and some of the women too, that that was commonplace, you know, that they would speak on people's appearances. So I wouldn't be surprised if there was jokes -- there were jokes being made of a sexual nature. I just didn't hear them directly.

Q. Did you ever hear or hear about the Governor making comments about the size of his hands?

A. No, but I knew he did do that.

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2 I heard that through -- you know, prior to
3 the allegations that were made by one of the
4 other accusers. I learned something about
5 that through members of the crew. Like he
6 had made a comment to like one of the
7 briefers or something that he likes the fact
8 that he had big hands. So when I read about
9 it recently, I wasn't surprised, but I never
10 heard him speak to that.

11 Q. When did you hear about that
12 prior to the allegations?

13 A. It would have been in like 2014
14 or 2015.

15 Q. Did you ever hear or hear about
16 the Governor talking about sex?

17 A. No.

18 Q. Did the Governor ever
19 proposition you for sex?

20 A. No.

21 Q. Earlier you had talked about how
22 you thought your currency was what you
23 looked like. Did you adjust your behavior
24 or do anything based on your thought that
25 your currency was what you looked like?

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2 my understanding that by being good looking
3 I could advance in my career there, and I
4 didn't want to go in the opposite direction
5 necessarily. It just felt like the price of
6 admission. Like you want to succeed here,
7 you want to succeed here, you want to thrive
8 here and survive, you need to look the part.

9 Q. What did you mean when you said
10 you didn't want to go the opposite way?

11 A. You know, by chopping my hair
12 off or wearing flats and pants, and -- you
13 know -- you know, there's some part of me
14 that, you know, even though it's
15 uncomfortable to dress up every day, and it
16 takes time, I felt that it was the price of
17 admission.

18 And it also gave me some
19 confidence, like people's eyes are on me
20 because I look good, and when their eyes on
21 me because I look good, then I will be given
22 assignments and work to do that is of some
23 import and I will be placed in -- like
24 because it worked with -- early on with
25 Howard and it would continue -- it worked

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2 getting me invited to parties and getting me
3 invited to things where I could represent
4 the Governor's Office in public events, you
5 know, taking people to their seats at the
6 State of the State, stuff like that. Like I
7 wasn't passed over for stuff, I was noticed.

8 Q. Was the thinking that looking
9 good would ultimately lead to more
10 responsibilities and more substantive work?

11 A. Yeah, that was my calculus in my
12 head.

13 Q. What was that calculus based on?

14 A. Based on what I saw around me,
15 women that had risen up through the ranks.
16 You know, it wasn't because they had some
17 prestigious law degree or something. It was
18 because they were beautiful. They were
19 beautiful and also had other complimentary
20 qualities and characteristics that the
21 Governor found attractive, that quick
22 wittedness and smarts.

23 Q. Earlier you mentioned you knew a
24 lot of people who were subject to the
25 Governor's abuse. What did you mean by

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2 that?

3 A. I meant that I knew secondarily
4 through colleagues that the Governor had a
5 volatile, angry, short-tempered side to him
6 and that he would take out his frustrations
7 and his anger on certain people,
8 particularly men, and he was known to be in
9 contact with some of these staff members at
10 all hours. He could be verbally abusive, I
11 believe. I don't know anybody that had
12 risen through the ranks that, you know,
13 thought the Governor was like a nice, kind
14 man. Everybody seemed to be afraid of him,
15 and I was afraid of him too, but he -- I
16 wasn't subject to that. I just observed the
17 dynamic and I heard about it through the
18 office grapevine.

19 Q. How did you interpret the
20 Governor's expectation that certain people
21 would be available to him at all hours?

22 A. I observed it first and foremost
23 through [REDACTED] [REDACTED]. [REDACTED] made it
24 clear that, you know, he slept with his
25 BlackBerry. He was always at work. He made

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2 references to -- you know, like when I had
3 these friendly interactions with the
4 Governor, and I would be like, oh, you know,
5 yeah, he's so nice or he was so friendly,
6 like [REDACTED] kind of making comments, like,
7 yeah, that's what he wants you to think or
8 something. I remember hearing his voice
9 projecting on speakerphone in Howard
10 Glaser's office, like loud yelling at
11 people. So I knew that there was this
12 predominant side of him that was mean and
13 angry and mistrusting and calculating.

14 And the work of the office was
15 being done by these trusted people that were
16 subject to his abuse and his tirades, you
17 know, in exchange for the knowledge that
18 like they would get plum jobs afterwards.
19 You know, like [REDACTED] got to run Center for
20 Economic Growth and some people had got some
21 pretty sweet lobbying gigs and working for
22 tech companies and big fat salaries because
23 of their connections working for [REDACTED] So
24 -- so you put
25 up -- put up with the abuse knowing that you

1 Confidential

2 have a golden ticket.

3 Q. How did you understand that
4 people would put up with the abuse with the
5 expectation that they would have this golden
6 ticket?

7 A. How did I interpret it or --

8 Q. How did you know that?

9 A. Just observations like seeing,
10 you know, through the time that I was there,
11 people would leave when the time was right,
12 when they had like asked permission, been
13 granted a certain opportunity. Like, for
14 instance, when Howard Glaser left to get a
15 nice gig, you know, lobbying, [REDACTED] [REDACTED]
16 got a similar fat salary doing a
17 lobbying -- getting a lobbying job because,
18 you know, they had done their time. I
19 learned through -- like [REDACTED] [REDACTED] was
20 very much a loose cannon and would talk shop
21 all the time in the office about kind of how
22 things work around here. You know, I
23 learned that [REDACTED] [REDACTED] story early
24 on. I knew that [REDACTED] had a long game that
25 he was playing and he wasn't planning on

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killing himself working there his whole career. He was like in his late 30s, and you know, I knew that he was angling for something and there was a carrot dangling for him at some point.

There was a good deal of, you know, turnover that started happening, you know, early, middle the second term and has continued to this day. And a lot of the turnover was, you know, people getting better jobs, leveraging their time there to get better jobs, and then him replacing him with other people who could be put through the meat grinder. A lot of the people that I worked with when I was there are no longer there.

Q. Did you know about anyone getting tech jobs after their time -- doing their time at the Chamber?

A. I think [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] or
something, and -- yeah, he's [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]. He got that

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2 job through those guys, through that team.
3 [REDACTED] was a big collector of Cuomo people
4 because like the fight that they had to
5 engage in to get approval in upstate
6 New York. And I know there's -- most of the
7 people that were there that were high up
8 when I was there are not really there
9 anymore.

10 Q. Do you know if the
11 administration had a hand in these former
12 Chamber employees' ability to secure
13 positions after they left the Chamber?

14 A. Oh, yes, yeah.

15 Q. How so, how did the Chamber have
16 a hand in that?

17 A. They could make calls -- when I
18 was there, Joe Percoco was very much an
19 arbiter of that quid pro quo. They could
20 make a call and get you a job if you
21 were -- if you -- if you had served your
22 time. Like Josh Vlasto is one of them, who
23 was chief of staff to the Governor for a
24 while, and now he has a fat job in corporate
25 communications. Annabel Walsh was like a

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2 glorified secretary, and she's in some
3 health tech gig now.

4 [REDACTED] [REDACTED] got a job working
5 for the Governor through his parents. He
6 became like one of the Governor's body men
7 and he was sort of a gossip collector. He
8 was like -- I remember I learned through [REDACTED]
9 and some other people that [REDACTED] would
10 skulk around the Chamber and get gossip on
11 who's doing what to whom, who's dating whom,
12 because the Governor liked hearing the
13 gossip. And now [REDACTED] is in the tech
14 industry. He's a public affairs job and
15 it's for a tech company. All pretty much
16 based in New York City.

17 And it was -- you know, it was
18 clear, you stick it out and you can get a
19 really great parachute six figure job. And
20 I opted to take a different route because I
21 couldn't -- for my own sanity, I couldn't
22 stay there anymore.

23 Q. You used the term "quid pro quo"
24 when you were talking about Joe Percoco
25 acting as an arbiter. What did you mean by

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2 that?

3 A. Well, it was -- it was an
4 unspoken rule that you can't just -- you
5 can't just leave on your own accord, you
6 have to do your time and whenever they're
7 done with you, you can -- at what time like
8 that you feel comfort -- like you feel that
9 you've done your time, you could have a
10 conversation and see what they could do for
11 you.

12 And the first that I learned of
13 that dynamic was through the [REDACTED]
14 [REDACTED] situation, and I just remember
15 hearing through the grapevine like, you
16 know, if you wanted to get out and go do X,
17 Y or Z, you got to go talk to him.

18 And I don't know who replaced
19 him in the chain of command after he was
20 like arrested and everything, but -- that
21 was just -- it was common knowledge that
22 that was -- that was rule. You put up with
23 it and then they will find -- they will find
24 a place for you when the time is right.

25 And that happened with [REDACTED]

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2 [REDACTED], that happened with, you know, [REDACTED]
3 [REDACTED] and with many of the briefers. You
4 know, they go through two years of really
5 grueling work and they might get like a
6 nice, plush gig somewhere.

7 Q. Did you know if any of those
8 former Chamber employees maintained their
9 ties or relationships to the Chamber after
10 they left?

11 A. Oh, yeah, definitely. Like I
12 know, for instance, Sr. Staffer #3, she bore
13 witness to things that no one will ever find
14 out about that very much probably were
15 illegal and she'll never talk about it
16 because she has a great job and she got that
17 job through the Governor's Office. And I
18 know through -- I know through -- because
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 he divulged to me that [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 involving the Governor. And I know that
23 she's been pursued by the news media and she
24 won't speak out. And that's just one
25 example. But, you know, a lot of these

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2 people they just have great jobs and they're
3 going to lose their job or they might lose
4 their job if they speak out against the
5 Governor.

6 I didn't think -- early on I
7 thought I was doing the right thing and like
8 I was speaking truth to power and speaking
9 out in support of other women that made a
10 brave decision, and then I started even in
11 my job to pay a professional price. Like
12 I'm no longer invited to functions in the
13 Rochester area that involve the Governor's
14 Office, even though my job is very much
15 pertinent to that.

16 Like Monroe County has
17 incentivized projects that also received
18 economic incentives from the State, and
19 there have been a couple of occasions with
20 like ribbon cuttings or tours or whatnot,
21 after March of this year where I spoke out,
22 where I would have ordinarily been invited,
23 and I have not been invited. I'm not --
24 I've not been directly communicated with by
25 [REDACTED] [REDACTED] or anybody in the Governor's

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2 Office or anybody at Empire State
3 Development. And it's my understanding
4 having worked in the Governor's Office, like
5 they do -- they do ice people out. There
6 are people that the Governor refuses to -
7 not only himself to be in the same room with
8 or be adjacent to at all, but like anybody
9 that is anywhere adjacent to him. So if
10 like Kathy Hochul comes to Rochester, I
11 won't get invited now.

12 So if I'm paying a professional
13 price, you know, not having gotten my job
14 through the Governor's Office, I can imagine
15 that there are individuals that have these
16 great jobs that they got through the second
17 floor connections, you know, and they're
18 worried if they were to say something, they
19 would lose their job or pay other prices.

20 There was a time in the last
21 couple of months where I thought I might
22 have to move to another state.

23 Q. What is the reason you might
24 have to move to another state?

25 A. Because the Governor remained so

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2 powerful here and he's not -- he's gone so
3 far as to not only just hang onto his
4 position and, you know, not walk away, but
5 he's completely denied that any of this
6 stuff has happened, and I wouldn't be
7 surprised if like none of this amounts to
8 anything, and there are no term limits on
9 his office, and, you know, he could remain
10 in power for a very long time.

11 And I intentionally got into an
12 economic development career. Economic
13 development is very tied in with local and
14 state government and with politics. My job
15 right now that I have is somewhat political
16 in nature, and it could all go to shit
17 if -- pardon my French, if, you know, he
18 continues to remain powerful and rise up in
19 positions of power. And, you know, I
20 just -- I'm scared.

21 So I've started recently trying
22 to -- I'm pursuing a professional
23 certification in economic development just
24 in case like I do have to get a job
25 somewhere else someday, like a credential

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2 that can get me a job anywhere in the
3 country in Economic Development and I'm not
4 just beholden to my professional connections
5 in New York State because that could go
6 away, poof.

7 So all that being said, as
8 someone not coming out that the Governor
9 grabbed my breast or propositioned me for
10 sex, as someone who is not in a job that I
11 got through the second floor, I myself am
12 experiencing what I have determined to be
13 some professional consequences, so I can
14 only imagine what somebody like someone like
15 an [REDACTED] [REDACTED] or an Senior Staffer #3 [REDACTED] or a [REDACTED]
16 [REDACTED], what they would be subject to, like
17 what consequences they would be subject to
18 if they were to say anything.

19 But they were all part of the
20 problem, I think, so I don't know that any
21 of them would ever feel like they had to say
22 anything. They all witnessed things that
23 were certainly problematic, but they were
24 all part of the problem in propagating that
25 environment, the bullying and the ad

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2 hominem, the packs and stuff like that.

3 Q. Are there other ways in which
4 you have paid a professional price for
5 speaking out in addition to what you've
6 described?

7 A. Well, you know, if you Google my
8 name now, it's inevitably all about Andrew
9 Cuomo now, and people have been, you know,
10 looking at my LinkedIn profile from all
11 corners of the earth. So I think
12 reputationally (sic) it has been
13 problematic. I suppose that's an indirect
14 consequence. And just harassment on social
15 media. People calling me a liar, that I'm
16 looking for attention and that I'm -- I'm
17 doing this to raise my own profile or
18 whatever. And I view those as negative.
19 Whether they're true or not, there are folks
20 in the world that will believe those claims
21 to be true, and -- but, you know, I sort
22 of -- I knew going into this whole
23 experience that that might be an outcome.

24 But by and large the
25 professional price that I paid is before

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2 March of this year I was asked to attend
3 ribbon cutting ceremonies and facility tours
4 and groundbreaking ceremonies and meetings
5 having to do with the Governor's Office and
6 Empire State Development, and now I'm being
7 iced out. And I've been keeping some record
8 of some of that just knowing when certain
9 things are happening.

10 Like, for instance, the most
11 recent Executive Committee session of the
12 Finger Lakes Regional Economic Development
13 Council, like I'm part of that group, but I
14 was asked not to appear on camera or like
15 not be part of the Zoom, but just like watch
16 it like I was a webinar attendee. And I was
17 informed by [REDACTED] [REDACTED] office that
18 they were asking a few other people to do
19 that. But I was like but why me, though.
20 It just felt like I'm being -- it feels like
21 I'm being singled out.

22 Q. Is that who asked you to
23 participate by webinar, [REDACTED] [REDACTED]
24 office?

25 A. Yes, it was [REDACTED] [REDACTED] [REDACTED]

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2 [REDACTED]. And I remember almost drafting an
3 e-mail like asking him why have you selected
4 me to be one of these people, can you
5 explain. And I almost like in a fit of
6 paranoia I was going to ask him is it
7 because the thing with the Governor, but I
8 didn't.

9 And then, you know, there was
10 another event where the State has given a
11 bunch of money to the Rochester area for a
12 riverfront revitalization initiative that
13 involves one of our museums and some hotels,
14 and a good chunk of the project my team
15 helped support through some tax incentives,
16 and they had this big, exciting
17 ribbon-cutting ceremony, and everybody
18 involved in the economic development
19 community was there, and Kathy Hochul went
20 and spoke, and I was not invited.

21 And Kathy Hochul came to town
22 and did a tour at Bausch & Lomb's
23 manufacturing facility, another project that
24 we were involved in involving our
25 Congressman Joe Morelle, who's very plugged

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2 in still with Andrew Cuomo's Office, and I
3 was not included.

4 And I haven't said anything to
5 my boss. You know, I'm still scared that if
6 I continue to make noise, it will just make
7 it worse.

8 Q. What is the reason you're scared
9 that if you keep making noise, it will keep
10 getting worse?

11 A. Because the people in positions
12 of power here in this region are still by
13 and large very much connected to the power
14 structure that Andrew Cuomo has created. So
15 when he became Governor, you know, Joe
16 Morelle, who is very powerful here, rose to
17 prominence in the Assembly and became the
18 Assembly speaker, and members of Joe
19 Morelle's staff were elevated and hired to
20 work for Andrew Cuomo, one of them being
21 [REDACTED] [REDACTED], [REDACTED] [REDACTED] was one of
22 them, and then my boss, Adam Bello, who is
23 our County Executive, he was an acolyte of
24 Joe Morelle and thus connected to that whole
25 house of cards.

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2 And it's like the bread crumb
3 trail always leads back to him, and Andrew
4 Cuomo is known as like a kingmaker, and I
5 knew that I did the right thing by speaking
6 out and telling the truth about what was a
7 very dangerous place for me to work at the
8 time and what was problematic, and I felt
9 that the evidence that I was -- the story
10 that I was sharing, which is true, provided
11 some evidence to bolster the cases that were
12 being shared by other women.

13 You know, I wouldn't go back and
14 not do that. I wanted to fall on that side
15 of history, but in hindsight I didn't -- I
16 guess I expected in the wake of like ME2 and
17 everything, I expected there to be more
18 solidarity with the power structure. You
19 know, there were people that out of one side
20 of their mouth they called on the Governor
21 to resign, and on the other side of the
22 mouth they were still meeting with him and
23 supporting his agenda. So I guess I'm still
24 afraid, but again, I wouldn't have done
25 anything differently.

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2 Q. Earlier when you were talking
3 about people being in the Chamber and got
4 plush -- plum positions, you mentioned

5 Senior Staffer #3 [REDACTED], and you said [REDACTED]
6 divulged something to you about and Sr. Staffer #3
7 [REDACTED] What did [REDACTED] [REDACTED] divulge to you?

8 A. [REDACTED] told me that there was a
9 time he picked her up. So [REDACTED] was part of,
10 like I said, the younger crew. And so there
11 was a party at the Executive Mansion that I
12 think he staffed from like an operational
13 standpoint, and she was also there, and [REDACTED]
14 left at the appointed time when like most
15 people were leaving, but then there were
16 other people -- like I learned from [REDACTED]
17 there were pool parties that like the higher
18 level staff, the people like Sr. Staffer #3 or like
19 Sr. Staffer #1, you know, they got to stick around
20 and late night and they got to crash at the
21 mansion on occasion.

22 And [REDACTED] told me that there was
23 at least one occasion where he had to pick
24 her up from the Chamber -- or from the
25 Executive Mansion in the wee hours, at like

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2 2 a.m. or something, and that [REDACTED] [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED] [REDACTED] and I remember
5 being like, oh, my God, that's appalling,
6 you know, why don't more people know about
7 that crap. I don't think [REDACTED] [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED] but I don't have any
9 reason to believe that [REDACTED] made that up.

10 Q. When did [REDACTED] tell you about
11 that?

12 A. He told me like last year.
13 We've stayed in touch. He works in [REDACTED]
14 for like -- I think he works in the [REDACTED]
15 [REDACTED] [REDACTED], but he's originally from
16 [REDACTED], so we'll get together every few
17 months, you know, for a drink or something,
18 and I remember him telling me that story and
19 being like, oh, my God.

20 Q. Did he tell you that story
21 before or after the public allegations
22 started coming out?

23 A. It was after -- I think it was
24 around like the holidays because it was
25 after Lindsey first posted like a Tweet,

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Lindsey Boylan, and we were all sort of talking about, oh, my God, what is she talking about, what is she referring to. And then there were murmurs in like the community of alumni of, oh, did you hear about this, did you hear about that or did you hear about this, and that was one of the the "oh, yeah, there were pool parties."

And I wasn't part of -- there was like a cast system almost, and I wasn't in that upper echelon of like staffers that would have been invited, like come party at the mansion until 2 o'clock in the morning. I was in a lower level.

Q. Did [REDACTED] say anything about what he thought happened with Sr. Staffer #3 that night?

A. He thinks that she got -- he said that she was like angry at him and like she wouldn't answer questions or something and that that was -- maybe that was one of

[REDACTED],
[REDACTED]
[REDACTED].

Q. So --

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2 A. But based on what has been
3 divulged from young women publicly
4 who -- based on my experience working there,
5 we're working in the same environment, in
6 the same office where Senior Staffer #3 was, I
7 wouldn't be surprised if there were
8 similar -- there was a similar scenario.
9 She looked like those women.

10 When I was there and she was
11 there, I remember learning through [REDACTED]
12 that like she was like being groomed to be
13 the next Stephanie Benton or something, and
14 so she was in that office that was right
15 attached to the Governor's office. She
16 traveled with the Governor. She was with
17 him all the time.

18 Q. To be clear, [REDACTED] said he picked
19 Sr. Staffer #3 up from the mansion and not from any
20 other location?

21 A. Yes.

22 Q. When you were in the Chamber,
23 did you hear or hear about the Governor
24 threatening anyone?

25 A. Threatening anyone? Umm, well,

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2 yeah, I mean, I remember him -- I remember
3 learning through senior staff that he
4 threatened the mayor of Syracuse at the
5 time, Stephanie Miner, like he was going to
6 withhold infrastructure dollars or something
7 because she was political, you know, she had
8 been calling him out, and that was very much
9 a threat.

10 And then I just -- I can speak
11 in general terms to the fact that like
12 favors were traded back and forth based on,
13 I don't know, like -- threats were
14 commonplace in that environment, and the
15 Governor could determine a municipality's
16 fortunes or an individual politician's
17 fortunes on a whim, but I wasn't -- I never
18 was in a room with him and he was directly
19 threatening someone or something. I can
20 only speak to that.

21 It was a very public thing that
22 ultimately ended up unfolding with the City
23 of Syracuse, but I remember hearing about it
24 and learning about it and being privy to
25 some of it before it became very public.

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Q. Other than what you've talked about, were you aware when you were at the Chamber of any incidents of harassment, bullying or other hostile or aggressive behavior by the Governor?

A. Well, okay, so I know about in the case of [REDACTED] [REDACTED] that he behaved hostile towards him and did threaten bodily harm to [REDACTED] when he like put the football in his face, and the question was, you know -- can you repeat the question again, was I aware of any hostile behavior?

Q. Yes, it's says incidents of harassment, bullying or other hostile or aggressive behavior.

A. Yeah, yes. Towards [REDACTED] [REDACTED] in particular and towards members of the legislature.

Q. And what behavior are you aware of?

A. Yelling and name calling, withholding support, like withholding of certain gestures, but again, I wasn't in the room with him when he was like throwing

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2 names or barbs at anybody or anything in
3 particular.

4 Q. Earlier when you were describing
5 the reasons you spoke up, you said the
6 Chamber was a dangerous place for you. What
7 did you mean by that?

8 A. I was a woman in my 20s who
9 didn't have family connections in the Albany
10 area or, you know, a network of friends. I
11 was really -- I moved there for the job
12 opportunity, and I -- so I felt like I
13 was -- I was somewhat vulnerable. I was,
14 you know, early/mid-career and naive and I
15 was -- I survived by -- I just have to think
16 about my response for a second. It was very
17 clear to me that being a young woman, being
18 an attractive young woman there meant two
19 things: It meant that I was a target for
20 unwanted communication and gestures and
21 attention and that I could also hitch my
22 fortunes to being an attractive woman and
23 get a better job out of it. Any
24 professional attention that I got there was
25 really I could assign it to what I looked

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like.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] It felt like it wasn't a place that was for the faint of heart, and particularly if you are the type of person who wants to enter a career in public service and follow an

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ethical rule book and go off your own
credentials, Albany is not a place for you
to really succeed, and that's why I said it
was a dangerous place for young women.

Q. You mentioned being -- you used
██████████ Did
you talk to anyone about that?

A. No, no. ██████████
██████████
██████████
██████████.

Q. ██████████

A. ██████████

Q. ██████████?

A. ██████████ ;
██████████.

Q. What about ██████████, did
anyone know about what ██████████ was
doing?

A. ██████████
██████████
██████████
██████████
██████████ I remember him

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looking out for myself. And the way that I
got out of -- the way I got away from it was
by [REDACTED]
[REDACTED].

Q. [REDACTED]
[REDACTED]
[REDACTED]

A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q. [REDACTED]
[REDACTED]

A. Yes and no. I only shared a
little bit with [REDACTED], [REDACTED]
[REDACTED] was sort of part
of that social network of the crew, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

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[REDACTED]

And then, of course, later on [REDACTED]

[REDACTED]
[REDACTED], and then I
was just glad by that point that I was back

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in Rochester and out of that world.

Q. [REDACTED]

[REDACTED]

A. [REDACTED]

[REDACTED], [REDACTED]

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Q.

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A.

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[REDACTED]

[REDACTED]

[REDACTED]

But the fear in the workplace about your value here is only as good as like your reputation as a human being, knowing that [REDACTED] is out there collecting gossip about everyone's personal lives and your merit in the workplace, it doesn't just speak for itself. Like you're -- it's hard to explain.

[REDACTED]

Q. When you worked at the Executive

Confidential

1 Chamber, what impact did you think your
2 personal life and what happened in your
3 personal life could have on your
4 professional life and professional
5 experience?
6

7 A. Well, at first I didn't think it
8 would have any relevance, but I quickly
9 learned that you -- who you hang out with,
10 who you're romantically involved with is all
11 very -- it's all very much part of how
12 you're viewed in the workplace, and

13 [REDACTED] -- [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED], [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]

4 And I had some of the fellows
5 too, but it really -- it's hard to explain.
6 I didn't really -- I wasn't really
7 socializing with them as much.

8 Q. Is there a reason you were not
9 socializing with the fellows as much?

10 A. Well, I think once I got pushed
11 over to that other side of the second floor,
12 I was made to feel as though I was like
13 running in a different circle, and I noticed
14 that they all started hanging out, weren't
15 telling me when they were having
16 get-togethers, and then I felt like they
17 didn't really want to hang out with me,
18 maybe because they thought that I thought
19 that I was better than them or something.
20 It was one of those weird social
21 machinations, I guess, but I wished -- I
22 wished that I would have viewed them as more
23 of like a support network.

24 Q. Earlier you said the easiest way
25 to survive, you were describing another

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2 survival mechanism, was not to get in
3 trouble, to look nice, be nice and do what I
4 was told. What did you mean by that?

5 A. The only way you would get in
6 trouble and that your professional situation
7 might be under threat is if you attract
8 negative attention to yourself. You attract
9 negative attention to yourself there by
10 screwing up or by being a slob, and so by
11 being docile, doing what I was told, not
12 speaking out of turn, not speaking unless
13 spoken to and also looking the part, the
14 only attention that I might attract to
15 myself is, oh, she's a nice, attractive
16 young lady and I wasn't going to get slammed
17 or screamed at or punished.

18 Q. You weren't going to get slammed
19 or screamed at or punished by who?

20 A. By -- well, at the time Joe
21 Percoco was like the punisher. I wasn't at
22 the level where the Governor himself might
23 have words with me that were punitive in
24 nature, but I just knew just working there
25 that like it wasn't that hard to screw up.

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2 You might be seen out and about
3 consorting with some staffer from some
4 legislator's office or you might -- it
5 might -- the Governor might catch wind that
6 you're talking about something that he
7 doesn't want you to talk about or, you know,
8 and I just didn't want to be -- I didn't
9 want to have any sort of target on my back.

10 Q. When you worked in the Executive
11 Chamber and you had the interactions that
12 you described with the Governor, including
13 where he would call you sweetheart or kiss
14 you on the cheeks or kiss your hand, did you
15 have any views at the time whether the
16 Governor's conduct was appropriate?

17 A. I knew and I believed that it
18 was technically not appropriate for a
19 workplace environment; however, I also knew
20 that we were working in a political
21 environment where certain rules just didn't
22 apply and I knew that --

23 I remember telling people at
24 home that, you know, wow, I didn't realize
25 that in order to like effectively govern the

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2 State of New York, you have to like skirt
3 the law all the time, you have to make sure
4 that certain things aren't in writing and
5 ignore certain bureaucratic processes and
6 push things through just to govern the State
7 of New York, and just in the way that you
8 sort of have to skirt the law to govern, you
9 skirt the law to be a politician of his ilk.

10 Like even though on the face of
11 it, sexual harassment is illegal, like you
12 saw how the Governor reacted to the claims
13 in recent months and weeks. He laughed it
14 off, and I know that is how senior members
15 of the administration would have treated it
16 too. You know, granted, this was pre-Harvey
17 Weinstein and everything, but, you know,
18 like that's why even the whole [REDACTED] [REDACTED]
19 stuff, I'm like, ugh, what a creepy, gross
20 old man, but I never thought to report it.

21 Q. And just so I understand, what's
22 the connection you're drawing between not
23 thinking to report the [REDACTED] [REDACTED] stuff and
24 the Governor's conduct?

25 A. Just that even though I knew

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2 that it's not appropriate and it's
3 tantamount to harassment that the Governor
4 asked me if I have a boyfriend, that [REDACTED]
5 [REDACTED] asked me about my love life, that
6 the Governor kisses me on the cheek, that
7 [REDACTED] [REDACTED] kisses me on the cheek, the
8 culture and standards at the time
9 were like I would have been seen like sort
10 of a Gloria -- or like an Uber-feminist to
11 speak up even in 2014, 2015.

12 Q. When is the first time that
13 you -- sorry, I missed --

14 A. Oh, sorry, I just -- like I
15 would have been laughed at.

16 Q. When is the first time you spoke
17 with anyone about how the Governor
18 interacted with you during your time in the
19 Executive Chamber?

20 A. I spoke to my family at home,
21 not -- like probably the day that he first
22 interacted with me in his office, just
23 saying like that, wow, the Governor he came
24 right up to me, and I remember telling them
25 about how he behaved at that party, but I

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2 didn't characterize it like the Governor
3 finds me sexually attractive. It was just
4 like the Governor is kind of like flirty and
5 whatever, you know. He's a -- he's an old
6 Italian man from New York City, da, da, da.

7 Q. When is the first time you
8 characterized the Governor's conduct towards
9 you during your time in the Executive
10 Chamber in a different way?

11 A. Like in negative way?

12 Q. In a negative way or differently
13 from how you characterized it previously.

14 A. A few months into the
15 experience, as I started to feel more and
16 more like it was grating to work there, and
17 like I remember not long after [REDACTED] told
18 me about the high heels rule, thinking like
19 that's so bizarre and that's so backwards,
20 and I remember telling -- I think it was
21 like at Christmas that year when I was home
22 telling some of my cousins about it and
23 people in my family. Like my [REDACTED] [REDACTED],
24 [REDACTED] [REDACTED] are kind of like old-school
25 feminists from like the '70s, and I remember

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2 telling them about it, and they were like,
3 oh, my God, and that was sort of -- but I
4 remember like saying it as, though, yeah,
5 it's super screwed up and it's so backwards,
6 but that's just how the guy is and that's
7 how things are and whatever, whatever.

8 And then so later on this past
9 year, when I went public, I recall, you
10 know, several of those members of my family,
11 people in my friend network reached out and
12 were like, wow, Ana, I remember you telling
13 me about that, I remember you telling me
14 about that, and that was validating to me
15 like, yeah, I wasn't -- it wasn't like I was
16 just blind thinking like this is all
17 hunky-dory. I was open about the fact that
18 it was not appropriate.

19 Q. Did any of the family members or
20 friends in your network, who said they
21 remembered you telling them about your
22 experiences, did any of that happen by text,
23 e-mail or otherwise in writing?

24 A. No, not that -- not that I have
25 record of. I probably have like G-Chats

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2 with [REDACTED] [REDACTED] about certain things. I
3 remember like G-Chatting with him in my
4 office, but he would put those chats on
5 private or whatever. There was some
6 security setting. But those stories that I
7 would share with my family and friends were
8 all like verbal interaction.

9 Q. What about later this year when
10 they said I remember you telling me about
11 it, did that all happen orally?

12 A. Oh, well, I remember my [REDACTED]
13 [REDACTED] [REDACTED] posted it on my Facebook
14 account, so I do have that record. I posted
15 a link to Rebecca Traister's piece that she
16 had written in New York Magazine that
17 included some of my account just because I
18 felt she did a good job of capturing really
19 what I was trying to convey, and she plugged
20 that into the broader culture using other
21 people's stories. So I felt like it was an
22 appropriate thing for me to share with my
23 friend network. And, yeah, my [REDACTED] [REDACTED]
24 posted, wow, that's crazy, I remember you
25 telling us about that.

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2 Q. Based on your experiences from
3 your time working in the Executive Chamber,
4 how do you see the Governor as a man?

5 A. I see the Governor as cowardly,
6 megalomaniac and a narcissist. [REDACTED]
7 [REDACTED] and that's helped me kind of
8 articulate some of that. Like I see
9 narcissistic tendencies in his behavior. He
10 believes that rules that apply to the
11 broader populus don't apply to him. I go
12 back to like the way that they were so quick
13 to decry [REDACTED] [REDACTED] and say [REDACTED],
14 you better resign, and then the Governor is
15 accused of doing just the same stuff, and
16 he's standing his ground. And so I see him
17 as a disingenuous, narcissist, an abuser,
18 abuse of power and abuse of vulnerable young
19 women's bodies.

20 Q. Based on your experiences, how
21 do you think the Governor views women in the
22 workplace?

23 A. I think he views all people in
24 the workplace as a means to an end. I think
25 he views women in the workplace as both a

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2 means to an end and a pool from which to
3 enjoy eye candy and entertain some of his
4 sexual proclivities and fantasies, much the
5 way you see it depicted in popular culture,
6 hire beautiful women to flank you all over
7 the place and you're constantly surrounded
8 with beautiful things to look at and women
9 to flirt with, especially when you're the
10 most powerful person in the room and the
11 most powerful person in the office. Nobody
12 can say boo about it. You could be the
13 Hunchback of Notre Dame, but they're going
14 to talk to you.

15 Q. When you worked in the Executive
16 Chamber, did you see or hear about the
17 Governor touching anybody else?

18 A. Not when I worked there. I just
19 knew that the same way that he behaved with
20 me, he behaved with many other women. So I
21 knew that he was touching and flirtatious,
22 but I didn't know that -- I couldn't have
23 imagined at the time that the Governor might
24 overtly sexually abuse a woman's body or
25 proposition a woman.

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2 Q. Did you hear about that kind of
3 conduct after you left the Executive Chamber
4 and separate from the public allegations?

5 A. I heard about -- this past year
6 after I spoke up, Lindsey Boylan divulged
7 some things to me that I did not know to be
8 true at the time, but she divulged that the
9 Governor was -- had [REDACTED] [REDACTED] with
10 female staffers, including, she named,
11 Sr. Staffer #1 [REDACTED], Senior Staffer #3 and [REDACTED].

12 And I remember thinking that
13 that was so disgusting and I couldn't even
14 imagine, because when I was there, he was
15 still dating [REDACTED] [REDACTED] and in public they
16 were kind of physically affectionate towards
17 one other, and I guess I just thought that
18 even though he likes to flirt with young
19 women, he wasn't having sex with people that
20 worked for him.

21 So it was through a secondary
22 source and it was after the public
23 allegations came out, but it was like
24 something that Lindsey said to me that I
25 don't think she said to any public, like,

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2 media outlet and what not.

3 Q. Did Lindsey tell you what her
4 source was?

5 A. She said -- yeah, I would have
6 to look through my text messages, but she
7 observed some of it and I think she knew
8 through her own network. She didn't tell me
9 any names like so and so told me that this
10 happened.

11 Q. Did you ever see anyone sitting
12 in the Governor's lap?

13 A. No.

14 Q. Have you ever heard about
15 someone sitting in the Governor's lap?

16 A. Yes.

17 Q. What did you hear?

18 A. I think there were -- there were
19 allusions to it in some of the public
20 allegations that came out this year.

21 Q. Other than what's in the public
22 allegations, did you hear about anyone
23 sitting in the Governor's lap?

24 A. No. I don't think I can answer
25 that question with any -- like I don't

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1 remember anything specifically about that.

2 Q. Did you ever hear anything about
3 Senior Staffer #3 [REDACTED] sitting in the Governor's lap?
4

5 A. No. I just heard about the pool
6 parties and Sr. Staffer #3 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 and then, you know, Lindsey's claim that [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED] with the Governor.

9 Q. Did you ever see or hear about
10 the Governor hiring a woman after meeting
11 her at an event?

12 A. Yes.

13 Q. What did you see or hear about?

14 A. I saw and heard about it from
15 the public allegations in the media.

16 Q. But other than what's in the
17 public allegations, you didn't hear about
18 the Governor hiring a woman after meeting
19 her at an event?

20 A. No.

21 Q. When you were in the Executive
22 Chamber, did you hear any rumors about the
23 Governor having [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] with any members of the staff?

25 A. I remember hearing through the

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2 rumor mill that like he had [REDACTED] [REDACTED]
3 Senior Staffer #2 [REDACTED] [REDACTED], but I didn't
4 take it seriously because I thought --
5 again, I was probably naive, but I thought
6 he was in a happy relationship with [REDACTED]
7 [REDACTED] and I thought that like people were just
8 making things up.

9 Q. When you were in the Chamber,
10 did you hear anybody say that the Governor
11 made her or him uncomfortable?

12 A. Yes.

13 Q. Who did you hear say that?

14 A. [REDACTED] [REDACTED], [REDACTED] [REDACTED]. I
15 never -- women didn't really talk about it.
16 I can only speak to like men talking, you
17 know, [REDACTED] [REDACTED] too, about like, oh, God,
18 he's in rare form today. And like -- like
19 not like, oh, the Governor touched me and it
20 made me uncomfortable. It was more just
21 like, oh, God, just had the worst meeting, I
22 got berated for 45 minutes, stuff like that.

23 MS. MAINOO: Before we move to
24 the next topic, I will just pause and
25 find out if Ms. Kennedy Park has any

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questions.

MS. PARK: I apologize, Ms. Liss, if I'm going to ask this and I missed it, but on any occasion when the Governor touched you, did he ask permission to touch you?

THE WITNESS: No.

MS. PARK: On any occasion in which you witnessed him touch someone else, who was a staff member in the Executive Chamber, did you hear him ask permission to touch them?

THE WITNESS: No.

MS. PARK: Is there a difference in the way that you saw him touch women in the Chamber versus men in the Chamber?

THE WITNESS: Yes.

MS. PARK: What's the difference?

THE WITNESS: He didn't touch men in the Chamber, and he was gruff and kind of aggressive with men, and he was flirtatious and -- flirtatious

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and silly, I guess, with women. He would always just -- he was very much like an alpha male, I suppose, in his interactions. It seemed like --

MS. PARK: Did the Governor -- apologies. Go ahead, Ms. Liss.

THE WITNESS: I was going to say, it seemed like for the most part the men who worked for him that were doing a lot of like the heavy lifting there really hated working there and really hated working for him, and a lot of the women, they weren't subject to the same sort of verbal abuse. It was just a different type of -- it was like -- they was sexualized and that wasn't pleasant, but at least they weren't getting verbally harassed and -- but I know that wasn't true for every -- every woman.

MS. PARK: If the Governor had asked your permission to kiss you, what would you have said?

THE WITNESS: Probably, sure. I

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mean, he's the Governor.

MS. PARK: Why is that; why would you say "sure"?

THE WITNESS: Because -- well, first of all, I wouldn't view it as like -- I mean, if he asked to kiss me on the lips or something, no way, but I wouldn't have viewed it as a violation of my personal space, but also he's the Governor and I'm not going say no to the Governor.

MS. PARK: And why don't you say no to the Governor?

THE WITNESS: You don't say no to that Governor because you might black -- get blackballed. With Governor Cuomo, if you're asked to do something and then you fail at that task, you might never get asked to do anything ever again. You might get reassigned somewhere else.

MS. PARK: Is that what you mean by "blackballed"?

THE WITNESS: Um-hum.

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2 MS. PARK: That's all I have.

3 MS. MAINOO: Thank you.

4 BY MS. MAINOO:

5 Q. Miss Liss, did you ever observe
6 anyone say no to the Governor during your
7 time at the Executive Chamber?

8 A. No.

9 Q. Did you ever hear about anyone
10 saying no to the Governor?

11 A. Only political adversaries.

12 Q. Are there examples that come to
13 mind?

14 A. Well, his fight with De Blasio
15 about, you know, the New York City schools
16 and issues on that level, but there was no
17 tasks big or small that you would say no to
18 that the Governor asked you to do no matter
19 how important or unimportant you were.

20 Q. What's the reason for that?

21 A. Because he's the most powerful
22 person in that environment. If you say no,
23 then you risk losing your job or being
24 reassigned.

25 I guess to more accurately

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2 answer your first question, specifically I
3 don't have an example, but I believe that
4 Howard Glaser said no to the Governor and
5 disagreed with the Governor on a couple of
6 important matters and they thus had some
7 sort of a falling out, which is what
8 pressed -- which is what led to Howard
9 leaving to go work elsewhere in 2014 -- in
10 2015 after the Governor was reelected, and I
11 remember seeing that as sort of, wow, that
12 was brave on Howard's part. I think they
13 disagreed on certain higher level political
14 or policy matters and had somewhat of a
15 professional falling out. They went in
16 different directions.

17 Q. What did you know about the
18 falling out?

19 A. I just remember observing the
20 frequency with which they met dissipating
21 significantly in the months leading up to
22 his election and then immediately thereafter
23 the re-election and the second term, and I
24 remember hearing through the grapevine just
25 that like they're not getting along, Howard

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2 wants out or something.

3 I remember also thinking
4 selfishly what does that mean for me if
5 Howard is leaving, and of course, that meant
6 Jim Malatras came and I had to start to make
7 some moves.

8 Q. Did you have a sense of whether
9 Howard's attitude toward the Governor
10 changed or the Governor's attitude toward
11 Howard changed or both after Howard
12 disagreed with the Governor?

13 A. I think -- I think it was both,
14 but I observed more so Howard's dynamic,
15 that like he didn't take the Governor as
16 seriously and that he was pretty fed up
17 with the circumstances, which was
18 demoralizing for me too because I was like
19 I'm here every day, I work for you, you hate
20 your job, what does that mean for me, where
21 am I going to go.

22 I took Howard to be, you know, a
23 bit of an intellectual, and I don't know
24 what specifically was driving his
25 frustrations, but it's probably a lot of

1 Confidential

2 things. He had been with the Governor since
3 the Governor was HUD secretary.

4 Q. You referred several times to
5 the culture in the Executive Chamber. How
6 would you describe it from the time when you
7 worked there?

8 A. Cutthroat, hostile, hyper image
9 focused and -- you know, it was all about
10 like power and connections.

11 Q. In what way was it all about
12 power and connections?

13 A. How many people you knew and
14 what types of people they were and
15 how -- you know, like for instance, Melissa
16 DeRosa's [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], and
17 there were folks that were related to high
18 level officials in New York City, are
19 connected to powerful wealthy families, and
20 there was a lot of, like, oh, don't you know
21 who his or her dad is or his or her uncle
22 and, oh, so and so got their job because
23 of -- they're related to this person or they
24 know this person, which exacerbated some of
25 my own insecurities about, like, I'm not

1 Confidential

2 really related to anybody and I don't really
3 know anybody. So there was that. And, you
4 know, you don't get an audience with the
5 Governor unless you have something to offer
6 him.

7 Q. What was the work environment
8 like in the Chamber?

9 A. It was chaotic and it was
10 depressing and it was all consuming.

11 Q. How was it chaotic?

12 A. There was just no -- nothing was
13 really systematic, like your job was
14 different on any given day. There was no
15 consistency. It was always just like
16 putting out fires, being part of a crew that
17 was putting out fires. In that Rebecca
18 Traister piece, somebody described it as
19 like policy-making paint by numbers, and I
20 thought that kind of nailed it. It was like
21 we were just figuring out as we went along
22 day to day what the matters -- like what
23 were the priorities on any given day.

24 Q. What did you think were the
25 reasons for that?

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2 A. Hanging onto power. You know,
3 survival was everything, and there was a lot
4 of energy paid to snuffing threats, a lot
5 of -- the communications team was really the
6 most important team anywhere, and their
7 whole focus -- like they ran like a newsroom
8 that was constantly turning out press
9 releases, announcements, announcements,
10 announcements, and then planting negative
11 words and narratives about enemies of the
12 Governor.

13 When I began to learn that it
14 was all about PR and communications and less
15 so about policy making, I remember feeling a
16 little alarmed by that, but then also like,
17 well, I suppose it's not that much of a
18 surprise because that's just how things are
19 nowadays, I guess. And I used to work in
20 the journalism world, and I understand the
21 importance of press announcements and stuff
22 like that.

23 Q. How did you learn it was all
24 about PR and communications?

25 A. Well, I really -- I really

1 Confidential

2 figured it out or got a heavy dose of it
3 when I was given that early assignment to
4 put the Regional Economic Development
5 Council videos together, and what I learned
6 was like he watched like 30 seconds of my
7 Long Island video, and we had done an
8 interview with somebody who -- there was
9 like a fishery project that got some
10 financing through the State, like a
11 restoration of a fishery, and the Governor
12 watched, and he was like I don't know who
13 the fuck these people are. And then he made
14 us redo the whole thing to be like bigger,
15 splashier, sexier, and we reproduced all of
16 them to focus on projects, many projects
17 that didn't even have anything to do the
18 Regional Economic Development Councils.

19 And that was my first
20 realization that it was a dog and pony show
21 or it was like the Wizard of Oz hip, like
22 don't pay attention to the man behind the
23 curtain, like watch the flashy show, and I
24 felt a little foolish from that.

25 I also learned in my Fellowship

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1
2 orientation [REDACTED] [REDACTED] was invited to
3 come -- [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED] were invited to come
5 and speak to the fellows. And [REDACTED] had
6 worked for [REDACTED] [REDACTED] [REDACTED], I think
7 it's Channel 6. A lot of the communication
8 shops -- like Channel 6 was almost like a
9 feeder to that crew. And he told us that
10 the Governor's Office treats -- like the
11 communications team is a news organization
12 and they have newsroom meetings every
13 morning and they're constantly -- you know,
14 they're constantly monitoring the news
15 cycle, and the Governor is constantly
16 getting these press clippings sent to his
17 BlackBerry, and that's like everything that
18 he pays attention to. So I learned really
19 early on it was the most important thing.

20 Q. How did people -- how did staff
21 treat each other in the Chamber?

22 A. It was a sort of mixed bag.
23 There was hostility and mistrust,
24 particularly like young women, I think. And
25 then there was anger and yelling, and then

1 Confidential

2 there was some camaraderie. There was some
3 Stockholm syndrome. You know, I think like
4 particularly that group of young people,
5 that crew, they took some solace in each
6 other, drinking.

7 Q. You referred to hostility and
8 mistrust particularly with young women.
9 What did -- can you elaborate on that?

10 A. Yeah, I just remember like mean
11 girl culture and being looked at sideways
12 and treated with sort of like -- especially
13 people like Melissa, Melissa always
14 definitely treated me like that, like you
15 felt kind of like nothing. Just disrespect.
16 Women at that level looked down upon women
17 that were at a lower level and didn't treat
18 them like -- really like human beings.

19 Q. And other than Melissa, who are
20 the other women at the higher level that you
21 just referred to?

22 A. Stephanie Benton was definitely
23 one of them, and Jill DesRosiers was one as
24 well. She was quieter. I didn't really get
25 a read on her really much, but that was

1 Confidential

2 definitely like a trifecta.

3 Q. What was Melissa DeRosa's
4 position at the time?

5 A. She was director of
6 communications or she was in whatever role
7 she was just prior to being director of
8 communications. It wasn't long
9 after -- like she had come from
10 Schneiderman's office to go work there, and
11 she certainly like wasn't secretary to the
12 Governor or anything like that. She was
13 working in the communications shop.

14 Q. Do you remember where she sat?

15 A. Yeah, she was in the
16 communications office, which was -- like if
17 I was here (indicating), the Governor's
18 Office was like this suite (indicating) and
19 then the communication -- then like the red
20 room was there (indicating) and then like
21 around the corner from the red room was the
22 communications office. It was all attached
23 by an internal corridor that went through
24 each office so you didn't have to go out in
25 the main hallway.

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2 Q. And you referred to "mean girl
3 culture" just now. What did you mean by
4 that?

5 A. Like -- I mean, it's one of
6 those things Melissa DeRosa didn't have to
7 look at me square in the eye and say, well,
8 I think you're a stupid little bitch, you
9 know. People can make you feel like you're
10 nothing and nobody just by not acknowledging
11 your presence and never knowing your name or
12 looking and glancing your direction, and
13 that's how it was.

14 Like I saw her and Stephanie
15 almost every day when they were in the
16 office, and I don't think either one of them
17 ever uttered my name or glanced in my
18 direction. I was certainly on e-mails with
19 them a bunch, but -- and I learned obviously
20 later on that was true across the board.
21 They were made to feel they were the chosen
22 ones, that they were really important, they
23 were the Governor's main women, and then we
24 were all seen as sort of like wannabees, I
25 guess, but they didn't really know that I

1 Confidential

2 didn't want to be them.

3 Q. What's the reason you didn't
4 want to be them?

5 A. Because I wanted to go home and
6 just have a regular job and not have to -- I
7 didn't want my whole professional -- I
8 didn't want to feel defined by this man and
9 his legacy and his administration. I was
10 like -- I learned in a few short months that
11 it was a pretty meaningless existence, and I
12 realized that I could probably do more good
13 in my career by getting out of there and
14 working at the -- in a lower level somewhere
15 else.

16 Q. You mentioned I think at the
17 beginning of our interview that Cuomo
18 acolytes use terms like "loser" and "zero."
19 How did they use those terms and who did you
20 mean by "Cuomo acolytes"?

21 A. Well, I just remember -- so [REDACTED]
22 [REDACTED] is someone who has been around that
23 world since his campaign for his first term
24 and had ingratiated himself to Howard, and
25 Howard was really tight to the Governor for

1 Confidential

2 a really long time, and I picked up on their
3 language really quickly, and they
4 were -- [REDACTED] [REDACTED] was -- like I said, he
5 had kind of loose lips, and he would talk
6 about, oh, this person, he's fucking zero,
7 he's a loser, and I guess I took some of his
8 language -- and I remember hearing Howard
9 using the same language, [REDACTED] picking it up
10 from Howard, and I learned like maybe this
11 is like the dictionary according to the
12 Cuomo administration. I remember [REDACTED]
13 talking about women like they're smoke shows
14 and she's a 10.

15 Q. What is a "smoke show"?

16 A. I didn't know what it was then,
17 up until that point, but like a hot women, a
18 beautiful woman, a smoke show.

19 And [REDACTED] and Howard would smoke
20 cigars in Howard's office, and I remember
21 thinking smoke cigar, it's illegal to smoke
22 inside the State office building, so
23 whatever, and using those kind of
24 language -- that kind of language, and I
25 took that to mean that this is like

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2 Cuomo-ese, I guess, "smoke shows" and
3 "zeros" and "losers" and "fuckups" and stuff
4 like that.

5 Q. Were you ever privy to the
6 Governor's use of that type of language?

7 A. No. I did hear him use the
8 F-bomb. Like "what the fuck is this," you
9 know, stuff like that, but never -- I don't
10 think I ever heard him call someone a name
11 outright, but I didn't -- there were very,
12 very few occasions when I might have been in
13 that vicinity where I might pick up on
14 something like that. I could tell that
15 there was some isolation that took place.
16 Like when the Governor is ready to have one
17 of those types of conversations, the doors
18 are closed and there is only certain people
19 in the room, so...

20 Q. And who were the people who
21 would be in the room under those
22 circumstances?

23 A. [REDACTED]; Jim Malatras;
24 [REDACTED], depending on the subject;
25 Joe Percoco; [REDACTED], when he was

1 Confidential

2 alive; Larry Schwartz; Stephanie; Melissa;
3 Josh Vlasto, when he was there; [REDACTED] [REDACTED],
4 when he was there; like those guys, like the
5 inner -- [REDACTED] [REDACTED]; the inner circle, the
6 circle of trust, so to speak, I guess.

7 Q. How much overlap did you have
8 with Josh Vlasto?

9 A. Very small amount. He left not
10 long after I came onboard. I remember
11 seeing him come through a bunch of times and
12 then he disappeared, and now he's working, I
13 think, at one of those blue chip, whether
14 it's a tech company or something. He's in
15 the private sector.

16 Q. What position did he hold when
17 you overlapped?

18 A. He was chief of staff, I
19 believe.

20 Q. Did you observe how he
21 interacted with people in the Executive
22 Chamber?

23 A. Yeah, he was [REDACTED]. Sorry.
24 He was just a jerk.

25 Q. How so?

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1

2

A. In the same manner that like

3

Melissa -- [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

4

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

5

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

6

[REDACTED] [REDACTED] [REDACTED].

7

Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

8

[REDACTED]

9

A. Yeah, he saw me -- I think he

10

and I interacted like in passing on a couple

11

of occasions, one being the regional council

12

award ceremony that first year, and then,

13

you know, when he observed me in Howard

14

Glaser's office and kind of glanced --

15

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

16

Q. Earlier you referred to people

17

breathing down my neck and monitoring your

18

every move after you moved over to Howard

19

Glaser's office. Who was breathing down

20

your neck and monitoring your moves?

21

A. I guess I should amend that

22

statement because I felt like I was in a

23

fish bowl and that people were looking at me

24

constantly and like they knew I was there,

25

but the people weren't really monitoring

Confidential

1
2 what I was working on. It was just
3 what -- that I was there, that I was sitting
4 at my computer, what I was wearing. I felt
5 like I was being -- you can feel watched and
6 you don't necessarily feel like -- like it's
7 not like they were monitoring my attendance
8 and what time I got there and when did I
9 leave. It was I felt like I was on display.

10 Q. Were there any individual people
11 who made you feel like you were on display?

12 A. No. I guess I don't really know
13 how to answer that question. Just, you
14 know, there were a lot of the same people
15 that came in and out of that office that
16 were very important people, whether they
17 were going to meet with the Governor or with
18 Howard, and when they would come into that
19 room, you know, they would observe
20 who's -- who is around, and I felt observed
21 or seen by those people, and there was some
22 pressure associated with that, I guess.

23 Q. You referred several times to

24 [REDACTED]
25 [REDACTED]

[REDACTED]

1

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2

[REDACTED]

3

[REDACTED]

1 Confidential

2 Q. How long was the Fellowship
3 slated to be?

4 A. Two years.

5 Q. When was it supposed to end?

6 A. The summer of 2015.

7 Q. When did you start looking for
8 your next job after the Chamber?

9 A. The spring of 2015.

10 Q. What led to your decision to
11 look for a new job?

12 A. Escapism. I wanted to just get
13 out and I wanted -- I found it really
14 appealing like any job that has structure
15 and is not political. I was sort of lusting
16 after the idea that like I could maybe
17 leverage the experience as a golden ticket,
18 so to speak, and get a job somewhere that
19 was more normal, but I couldn't do so in the
20 traditional way that others were doing
21 because I didn't have -- I couldn't say
22 like, oh, use the Governor as a reference,
23 like that wasn't -- I couldn't tell anybody
24 that I was looking for a job.

25 Q. What's the reason you couldn't

1 Confidential

2 tell anybody that you were looking for a
3 job?

4 A. Because, again, that [REDACTED]
5 [REDACTED] example that -- it was common
6 knowledge that, you know, you stick it out,
7 you stick around until a member of the
8 administration identifies an opportunity for
9 you or something opens up within the circle
10 of influence that's tied to the State, and
11 that just wasn't going to happen for me. I
12 couldn't really envision it.

13 Q. Did you ever speak with anyone
14 about opportunities for a position as a
15 deputy secretary for Economic Development or
16 other work in leadership within --

17 A. Yeah, I -- I thought that that
18 might be in the cards for me, but [REDACTED]
19 [REDACTED] sort of laughed it off the couple of
20 times that I brought it up because he had
21 been looked over for the deputy secretary
22 position. He had been functioning for a few
23 years being paid as an assistant secretary
24 functioning as the deputy secretary and the
25 assistant secretary, and I was informed

1 Confidential

2 that, like, the Governor was looking for a
3 name, you know, some splashy sort of a brand
4 name, like person to appoint, and as long as
5 [REDACTED] was in the assistant deputy role,
6 that wasn't in the cards.

7 So I thought maybe a job at
8 Empire State Development, and I talked to a
9 woman named [REDACTED] [REDACTED] [REDACTED] there, I can't
10 remember her title, but I had helped worked
11 on the Global New York policy language, and
12 I thought -- I worked, I collaborated at ESD
13 on that. I thought could there be a
14 position with Global New York, and they
15 didn't really have anything.

16 And she was like, well, what do
17 you think about moving into New York City.
18 I don't think I -- I'll think about it, but
19 nothing materialized. There were just a lot
20 of fits and starts.

21 Q. Looking back, how do you assess
22 your time in the Executive Chamber?

23 A. Survival and really an expensive
24 lesson, expensive lessons learned about my
25 personal and professional tenacity and about

1 Confidential

2 how the State of New York is governed and
3 how politics functions in the State of New
4 York.

5 Q. What are those expensive lessons
6 that you learned?

7 A. I learned that I'm not cut from
8 the kind of aggressive fabric that -- like
9 I'm not the type of person that wants to cut
10 other people down, I don't have like a
11 fiercely competitive spirit, and so I don't
12 believe that I could be successful rising
13 through the ranks of a political operation,
14 like what Andrew Cuomo operates as Governor,
15 and I learned that -- like I said earlier,
16 it seems like the only way to govern the
17 State of New York in such a way that people
18 think you're actually doing your job and
19 getting things done is to break the law and
20 find shortcuts around legal processes, find
21 shortcuts around legislative processes.

22 And, you know, it was an
23 expensive lesson learned because it was two
24 years of my life. I didn't really save any
25 money. You know, I learned a lot of lessons

1 Confidential

2 and I made some solid, good-lasting
3 connections, but not -- not necessarily what
4 I thought was going to come out of it in
5 terms of my network and in terms of my
6 professional work experiences.

7 Q. You referred a couple of times
8 to legality or breaking the law. Did you
9 observe or hear about the Governor or anyone
10 in the Executive Chamber breaking the law
11 during your time in the Chamber?

12 A. Well, yeah. I mean, I knew and
13 was privy to what -- you know, that [REDACTED]
14 [REDACTED] [REDACTED] calling [REDACTED] [REDACTED] and
15 complaining that [REDACTED] wasn't being paid
16 enough money, and so then [REDACTED] [REDACTED] got
17 [REDACTED] another job and got him more money,
18 and that was one of the things that ended up
19 landing [REDACTED] in jail, and I remember like
20 knowing about it and understanding that it
21 was problematic.

22 And I remember learning about
23 the Governor not putting anything in
24 writing, not even a text message, and
25 understanding there is a reason for that

1 Confidential

2 because there is no paper trail for certain
3 conversations and certain things.

4 Yeah, like just witnessing
5 nepotism and favoritism, knowing that it's
6 not legal, knowing also people were -- there
7 was a lot of blending between personal and
8 professional life and drinking on the job
9 and stuff like that, and I knew that that
10 wasn't legal, but certainly --

11 I don't know if I can give you a
12 specific example, but I know from working
13 there that the whole goal was to push
14 through the Governor's agenda, avoiding at
15 all costs any influence on the part of
16 members of the State legislature. It had to
17 be his budget, his policies, and a lot of
18 that involved wheeling and dealing, I think,
19 outside of the law.

20 Q. In what way was there
21 blending -- let me start again.

22 In what ways was there blending
23 between the personal and professional in the
24 Chamber?

25 A. Well, like I told you, you know,

1 Confidential

2 that crew of young friends and
3 everybody -- everybody there, it seemed like
4 their whole entire social life was their
5 work colleagues and it was like a cult or a
6 religion. When you weren't there, you were
7 drinking with the people that you worked
8 with. The parties at the Executive Mansion
9 and the after parties, you know, those were
10 all colleagues drinking together, and it
11 was -- it was that type of a place where it
12 was just 24/7 grind.

13 Q. Any things that you're proud of
14 during your time working in the Chamber?

15 A. Yes, yup. I'm --

16 Q. What?

17 A. I'm proud that I wordsmithed and
18 helped to develop a lot of the language that
19 was used in the 2014 and 2015 State of the
20 State policy books.

21 I advocated for the New York
22 State Council on the Arts, and I got him a
23 \$5 million budget increase one of those
24 years. It was their first in a very long
25 time. And I participated in budget

1 Confidential

2 negotiations with the legislature for the
3 Council on the Arts.

4 And I was proud of the network
5 that I cultivated and some of the
6 educational skills that I was able to
7 develop on the road, working through the
8 Regional Economic Development Council
9 process.

10 MS. MAINOO: Before we move to
11 the next topic, I will pause to give
12 Ms. Kennedy Park a chance to ask any
13 additional questions.

14 MS. PARK: I don't have any
15 questions on that topic. Thank you,
16 Abena.

17 THE VIDEOGRAPHER: We're now
18 going off the record. The time is
19 6:07.

20 (Recess.)

21 THE VIDEOGRAPHER: We are now
22 going back on. The time is now 6:20.

23 BY MS. MAINOO:

24 Q. Ms. Liss, I want to just go back
25 to the May 2014 budget party. Can you

1 Confidential

2 describe any physical contact that you had
3 with the Governor then?

4 A. Yes, he came over to me and
5 embraced me and kissed me on the cheek, and
6 when he gestured to the photographer to take
7 our photos, he slipped -- he slipped his
8 hand around my waist.

9 Q. So since leaving the Executive
10 Chamber in 2015 and before going public with
11 your allegations against the Governor, have
12 you said anything publicly about the
13 Governor?

14 A. No. I mean -- well, yes, I've
15 posted social media, like on Twitter, you
16 know, reTweeting or saying, you know,
17 complimentary things like, wow, great job,
18 Governor, things like that.

19 Q. What kind of things have you
20 said complimentary things about the Governor
21 regarding?

22 A. Like about some policy things,
23 like, oh -- like how he handled COVID, you
24 know, when he was really popular during the
25 COVID briefings and everybody was watching

1 Confidential

2 him. I think I publicly commended him and I
3 had wished him -- I remember posting
4 something about it -- happy birthday.

5 Because, you know, it's
6 important -- I want to clarify that to me up
7 until very recently the Governor was
8 infallible, just -- even though I felt like
9 I -- I felt awful working there, I never
10 could have foreseen the Governor ever
11 being -- ever having a public fall from
12 grace, just knowing how he func -- how he
13 operates his office. He's just -- you can't
14 bring the man down. So it's more out of
15 survival and in order to maintain your
16 dignity, you stay in his good graces;
17 otherwise, you become a nobody.

18 Q. Even after --

19 A. Sorry.

20 Q. Even after you had left the
21 Executive Chamber, was that the way you
22 felt?

23 A. Yes.

24 Q. What's the reason for that,
25 given that you no longer worked for the

1 Confidential

2 Governor?

3 A. Well, I believed that even
4 though it was a personal and professional
5 failure that I couldn't survive there and
6 stick around there, and I didn't want to, I
7 didn't feel that I had what it took. I
8 needed to maintain a public semblance that
9 it was a valuable and honorable use of my
10 time, and I maintained bragging rights that
11 I worked there, I survived there, I have
12 this photograph, look at me.

13 It was more beneficial for me to
14 couch it that it was a valuable experience
15 than for me to say, oh, yeah, that was a
16 massive waste of my time, that guy is a
17 total dick. Publicly at least. Privately I
18 would be honest with people that it was a
19 total waste of my time and [REDACTED]
20 [REDACTED] but publicly I have a job that still
21 kind of -- the stuff that I do now is
22 germane to stuff that I did then, so...

23 Q. What do you mean when you say
24 stuff you do now is germane to what you did
25 then?

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2 A. I still work in economic
3 development and I work for a unit of local
4 government in the State of New York. In
5 fact, my boss was one of the men that was
6 one of the county executives that was
7 directly called by Larry Schwartz.

8 In light of the vaccine
9 distribution, you may know that there
10 was -- that Larry was calling around to
11 county executives and engaging their
12 loyalty, you know, perhaps in exchange for
13 vaccines, and I know that Adam Bello was one
14 of those county executives.

15 Q. How did you feel about the
16 statements that you made that were
17 complimentary about the Governor?

18 A. Like I never deleted them or
19 anything. I just -- I suppose I was being
20 like a public sycophant, I guess, in a way.
21 I'm not going to be somebody who goes on
22 Twitter and says the Governor [REDACTED]
23 at least at that point in time.

24 Q. What did you think OF how the
25 Governor seemed to be managing COVID?

1 Confidential

2 and it was again governing by PR versus
3 actually doing something.

4 And, of course, I knew that
5 somewhere along the way behind the scenes
6 stuff is not right and there are inequities
7 and certainly special treatment is being
8 doled out to certain people as it always is,
9 so I wasn't surprised when, of course, we
10 learned about nursing homes and we learned
11 about members of the family and high-level
12 staffers getting access to testing and
13 vaccines and stuff like that.

14 And I knew too with the book
15 situation, when I was there, he was on the
16 tail end of writing his last book, which was
17 kind of a flop, and he had members of the
18 staff working on that, like his
19 communications team especially. I remember
20 him being followed around by like a
21 ghostwriter. And so when that whole thing
22 came out, I wasn't surprised, of course, he
23 had people on his staff working on the book.

24 He's obsessed with his own
25 public persona and public profile and his

1 Confidential

2 polling numbers and his media, how much time
3 is being dedicated to him in the news, and
4 it was true back then, it was even more so
5 true these last several months, so none of
6 it was surprising to me.

7 Q. Given your current position, did
8 you feel free to post Tweets that were
9 critical of the Governor before March 2021?

10 A. No. In fact, prior to joining
11 the administration and getting that
12 Fellowship, when I was still in Rochester, I
13 was involved with a local organization, the
14 Monroe County Young Democrats, and I helped
15 them with their e-mail newsletters and with
16 their social media and I helped set up a
17 Twitter account.

18 And I remember one year like
19 Tweeting, live Tweeting the Governor's State
20 of the State, and I can't recall what I
21 posted that was critical, but something in
22 regards to young people and, you know, our
23 policy that -- that the young democrats have
24 taken a stance, I don't recall what it was,
25 but I remember the next day I was at the gym

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2 and I got a phone call from one my fellow
3 volunteers that he had gotten a phone call
4 from the Governor's regional director at the
5 time telling us to take the Tweet down.

6 And I remember thinking we are
7 just these little peon young democrats of
8 Monroe County, I think we maybe have like 50
9 Twitter followers, and the Governor himself
10 apparently, or somebody is paying attention
11 to what we were Tweeting, and I remember
12 from that point forward knowing you don't go
13 public with anything critical of the
14 Governor if you ever want to be in his good
15 graces or be on the receiving end of his
16 powers as Governor.

17 So I knew when I spoke out in
18 March that that was it.

19 Q. Have you had any contact with
20 current or former members of -- well, let's
21 start again.

22 Have you had any contact with
23 current members of the executive Chamber
24 since Lindsey Boylan's allegations became
25 public in December 2020?

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2 why Rich or anyone else would have thought
3 to contact you?

4 A. Yeah, I thought it was because
5 maybe they saw the Governor flirted with me
6 on occasion and they thought that I might be
7 somebody who would feel emboldened to speak
8 up, and maybe they thought Lindsey is going
9 to try to -- maybe Lindsey is going to
10 cultivate a network of other women who had
11 similar experiences, and they want to
12 neutralize that threat because that's what
13 they do, that's their MO.

14 It certainly wasn't like -- he
15 wasn't trying to reach out and say, oh, you
16 know, we're trying to collect women who used
17 to work here who have good things to say
18 about the Governor, because I remember that
19 was out there, that was a narrative, like
20 that they were trying to -- and maybe they
21 were. I just -- that was not the nature or
22 the tone and tenor of the call. It was like
23 he was trying to figure out has Lindsey
24 contacted me, have I spoken to Lindsey, and
25 I thought that was weird because, you know,

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2 I felt like a lot of what I had experienced
3 was kind of invisible there. You know, I
4 wasn't -- it wasn't like I was special, like
5 I was the only person that was special that
6 was being kissed on the cheek, and
7 I didn't -- when I looked back on the
8 experience, I didn't characterize the whole
9 thing like that was two years of me being
10 sexually harassed by the Governor, that
11 wasn't it. I didn't think that that was a
12 defining thing, so it felt strange that Rich
13 would have observed something or somebody
14 else would have and said to him to call me.

15 And that -- I remember because I
16 was with [REDACTED] at the time, we were on
17 [REDACTED], and it was like that's weird
18 the Governor's office just called me and
19 they asked me if -- I remember he thought it
20 was weird.

21 Q. When was it -- when did Rich
22 call you?

23 A. In December 2020. So I got
24 [REDACTED]
25 [REDACTED], and then it was

1 Confidential

2 like Monday the 21st, I think, in the
3 morning.

4 Q. Did Rich call you on your cell
5 phone?

6 A. Uh-hum.

7 Q. Had Rich ever called you before?

8 A. No.

9 Q. Did you ever speak with Rich
10 after that?

11 A. No.

12 Q. Did you ever communicate in any
13 other way with Rich after that call?

14 A. No.

15 Q. Did any other current Chamber
16 staff reach out to you after December 1,
17 2020?

18 A. No.

19 Q. How about former Chamber staff?

20 A. Actually -- yes, yeah. [REDACTED]

21 [REDACTED] reached out to me, [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED], and [REDACTED] [REDACTED] reached out to me.

23 Q. What did [REDACTED] have to say?

24 A. Well, at first [REDACTED] -- because

25 I spoke on background to -- to Gothamist,

1 Confidential

2 and when that story hit, he reached out. He
3 was like are you -- I think the code name
4 they gave me was Sara. He goes, are you
5 Sara. All these people are asking me if you
6 are Sara. And I lied and I said no.

7 And then I decided to just
8 attach my name to it because I just had a
9 change of heart and I thought I don't care,
10 I don't have much to lose really, and it's
11 more powerful to attach my identity. I just
12 know because I have a journalism background,
13 I studied journalism, when you -- interviews
14 that you give on background are valuable,
15 but it's better when you can identify a real
16 source. That lends credibility to the
17 story. So I felt it was a public service.
18 So then I outed myself, and then he sent me
19 some mean text messages like you liar.

20 And then [REDACTED] reached out and
21 just was like, hey, I'm thinking of you, you
22 know, that was really brave, he like called
23 me.

24 Q. Did [REDACTED] say anything else
25 other than what you've already described?

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2 A. No, not really. He goes -- I
3 think he said something like lose my number
4 or whatever. I just blocked him. I should
5 have had him blocked anyways.

6 He had been like let go from his
7 position in the [REDACTED] [REDACTED] [REDACTED] last
8 year, I think, so he's [REDACTED] [REDACTED] [REDACTED], I
9 believe, but -- so he was -- was with the
10 Chamber recently as of last year, but not
11 this year.

12 Q. Did [REDACTED] ever try to discourage
13 you from talking about your experience in
14 the Chamber?

15 A. Well, when he -- well, I guess
16 when years ago he made it clear to me like
17 that anybody that speaks out against the
18 Governor like loses his shirt basically, but
19 when he texted me about like, oh, are you
20 Sara, he was like -- and I had said no, he
21 was like, well, good, because whoever that
22 is like -- kind of I think he alluded to
23 something like they were just trying to get
24 attention or something disparaging.

25 Q. I know earlier you said that you

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2 know Lindsey Boylan. Do you know any of the
3 other women who have made allegations of
4 sexual harassment by the Governor?

5 A. Not personally, and I didn't
6 overlap with any of them professionally.

7 Q. Have you spoken with Lindsey
8 about any of your respective interactions
9 with the Governor?

10 A. Not in detail. I -- she didn't
11 ask me questions about it, and I didn't ask
12 her questions about her experience.
13 We -- when she contacted me, it was just
14 kind of to say like, wow, you know, thank
15 you for speaking up and I've got your back
16 kind of thing.

17 Q. When did you speak?

18 A. It was not long after the Wall
19 Street Journal article came out. I think it
20 was right after that.

21 Q. Before the Wall Street Journal
22 article came out, had you communicated with
23 Lindsey about experiences with the Governor?

24 A. No, but -- well, so she
25 contacted me not long after her blog post

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2 she had me in her Rolodex of people to reach
3 out to.

4 Q. Have you spoken with any of the
5 other complainants about your respective
6 experiences with the Governor?

7 A. No.

8 Q. You mentioned that when you
9 spoke with Rebecca Traister was sort of one
10 of the first times you spoke with anyone
11 about that. What did you mean by that?

12 A. It was the first time that I had
13 ever answered pointed and detailed
14 questions, like informed questions about the
15 toxic workplace environment and felt
16 validated that I wasn't crazy, that it
17 wasn't -- it wasn't that I couldn't hack it.
18 It was just a bad place to wok.

19 Rebecca shared some of the
20 anecdotes that had been shared with her by
21 other interviewees, and New York Magazine
22 had a team of fact-checkers. So it wasn't
23 as though these were made up stories, and a
24 lot of them were like really eerily
25 identical to what I had been talking about,

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2 and it felt kind of therapeutic in a way.

3 She is a writer who had
4 written -- she has written books about this
5 type subject matter and had a unique level
6 of expertise on it beyond your typical
7 journalist that's seeking a sound bite. So
8 it was cathartic, I think, to talk to her.

9 MS. MAINOO: Before I wrap up,
10 Jen, do you have any questions?

11 MS. PARK: Yes. Thanks, Abena.

12 Since you've have gone public,
13 are you aware of any efforts by staff
14 of the Executive Chamber to try to
15 discredit you or impugn your
16 character?

17 THE WITNESS: No, not at this
18 time. Immediately after I spoke out
19 through the Wall Street Journal, you
20 know, the Governor was asked about my
21 account and he did not deny it;
22 however, later on, more recently he
23 has categorically denied everything,
24 but nobody came out and tried to
25 malign my character. I was expecting

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that that was a possibility.

I was bothered when it was brought up that like they had like a dossier about Lindsey. I remember thinking, well, gosh, I didn't even know what -- who my HR contact was. I had nobody giving me performance evaluations in any regularity, I had nobody monitoring where I was at any given time, I didn't even have a formal way to put in for vacation, so who was keeping a dossier on Lindsey? Was somebody keeping a dossier on me? Can somebody make something up about me, like did they make up whatever the allegations were against her. So I was afraid of that.

And certainly that's the style of their communications operation is, you know, deny, deny, deny, character assassinate. So I was fully expecting that. So when I spoke out, I was clear to those journalists that, listen, if they try to call me a

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2 nobody and say that I didn't have any
3 influence and I didn't have access,
4 they're right, I didn't have any
5 influence, I didn't have any access.
6 These are the things that happened.
7 This was on film. These are the
8 things I can attach date stamps to.

9 I made sure that like I wasn't
10 speaking in platitudes about, well, I
11 felt it was like this, and -- I was
12 very careful, because I knew they
13 could come out and say Ana is a loser
14 and she's making it up for attention.

15 MS. PARK: I know you said that,
16 you know, they haven't publicly tried
17 to malign you or discredit you. Are
18 you aware of them privately trying to
19 do that?

20 THE WITNESS: I can only
21 speculate based on the fact that like
22 I know how they deal with event
23 management and control who can be in
24 the room and who shouldn't be invited,
25 and I haven't been included in things,

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so...

MS. PARK: You're talking about at your current job?

THE WITNESS: Yeah, since -- since this came out, you know, any -- anything in my official capacity in this job I would have -- I would interface with State level officials, and where the Executive Chamber would be involved, I have not been included where I otherwise would have been included and was up until March of this year in other events.

MS. PARK: What about information from reporters, have any reporters told you that they have heard information about you that is negative?

THE WITNESS: Not that I know of. Nobody has said anything to me, I haven't really talked to any reporters since -- I mean, I've had reporters follow up with me asking me about the investigation and stuff like that, but

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nobody has divulged anything to me. I wouldn't be surprised, though, if there was some campaign.

MS. PARK: I think, you know, you've said that there are things about your current job have changed since you've gone public. Has anyone at current job told you that you're protected from retaliation for disclosing your claim?

THE WITNESS: Yes, my boss, the County Executive, said that he has my back. Our [REDACTED] [REDACTED] and the [REDACTED] [REDACTED] [REDACTED] both also said that they have my back and I should not be afraid that -- of anything.

MS. PARK: Have you raised any of your concerns about your change in how you're being treated at your current job to any of those individuals who told you you were protected from retaliation?

THE WITNESS: Not yet.

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MS. PARK: You a few moments ago mentioned that when you first came out, the Governor did not deny what you had said, but more recently has done that. Are you referring to the Governor more recently saying he didn't do anything wrong?

THE WITNESS: Yes.

MS. PARK: And what's your reaction to Governor Cuomo saying he didn't do anything wrong?

THE WITNESS: It's not up to him to determine whether his actions were right or wrong. It's up to the individual that was subject to the actions. And if I came out and said it was wrong or inappropriate for him to touch and kiss and ask personal questions of a young female staffer without asking permission, then it's not okay and it's inappropriate.

MS. PARK: And a while ago you mentioned that in your current role supporting a county executive you were

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aware of an allegation that members of the Governor's senior staff made phone calls to county executives related to support for the Governor. Is your knowledge of that entirely based on what you've read in the press or do you have any personal knowledge about those phone calls?

THE WITNESS: No, the County Executive told me. I have personal knowledge.

MS. PARK: What did the County Executive tell you?

THE WITNESS: He told me Larry Schwartz called him and was gauging, you know, his level of support for the Governor and was referencing the vaccine supply, and Adam was acknowledging that reports in the media were accurate, and that he was one of the folks that was called, and he alluded to like -- he thought it was strange because he thought maybe he was being targeted because I was

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one of the people that spoke out and I'm very publicly working for Adam Bello.

MS. PARK: Did Mr. Bello connect the two, did he connect support -- did he convey to you that Mr. Schwartz was connecting support for the Governor to vaccine supply?

THE WITNESS: Yeah -- well, he said that that was what it felt like and that was very clear to him that that was the nature of the call.

MS. PARK: What did you say to Mr. Bello?

THE WITNESS: I was just like, wow, I'm not surprised, that's crazy. I was like I'm sorry, you know, I put you on the spot. He was like, no, don't apologize. He's been very gracious about the whole thing.

I thought before I spoke out publicly, before I attached my name to it, that I would certainly be losing my job or whatever. So before I

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2 decided I'm going to identify myself,
3 I spoke to Adam, I spoke to the [REDACTED]
4 [REDACTED] [REDACTED], and I said, listen,
5 I'm thinking about doing this, this is
6 what I experienced, what are your
7 thoughts?

8 And then they said, wow, they
9 were really sensitive and gracious
10 about the whole thing, and he said
11 we've got your back, you know, you do
12 what you need to do.

13 MS. PARK: Did Mr. Bello tell
14 you he was going to do anything about
15 the call from Mr. Schwartz?

16 THE WITNESS: No, he just sort
17 of -- like it was an eye-roll type of
18 a situation. Adam had had a few
19 interactions with Larry Schwartz about
20 the vaccine effort because Larry was
21 kind of running the show from the
22 stateside, and Adam was really
23 beleaguered from like -- you know, he
24 runs the county health department and
25 is being publicly held accountable for

1 Confidential

2 vaccine distribution in Monroe County,
3 and yet so much of it was outside of
4 his control and being arbitrarily
5 determined by the Governor's Office,
6 and, you know, he's a first-term
7 county executive and dealing with this
8 stuff for the first time. I mean,
9 obviously everybody was dealing with
10 COVID for the first time, but he
11 already had a bad taste in his mouth
12 about the administration, about Larry
13 and how they were -- how they were
14 operating the whole thing in a chaotic
15 way, and this was just another thing,
16 it was par for the course,
17 politicizing -- politicizing it,
18 politicizing vaccine distribution and
19 politicizing the pandemic.

20 MS. PARK: Abena, I don't have
21 anything else.

22 MS. MAINOO: Thank you.

23 THE VIDEOGRAPHER: Anybody else?

24 MS. MAINOO: Yes, a few more
25 questions.

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2 BY MS. MAINOO:

3 Q. Ms. Liss, you may have already
4 spoken to this so I apologize if I'm
5 repeating myself, but I want to make sure to
6 cover this.

7 At the time when you were in the
8 Executive Chamber and you had physical
9 contact with the Governor, how did you feel
10 about that?

11 A. I felt objectified and I felt
12 like I was attractive to the Governor. In
13 some ways I felt special, not like, oh, wow,
14 look at me, the Governor -- but I felt like
15 it was a differentiating factor that
16 separated me from other rank and file
17 members of the staff, like he saw me.

18 Q. Did you feel comfortable with
19 the physical contact you had with the
20 Governor?

21 A. I didn't feel threatened by it.
22 I didn't feel comfortable, but I didn't feel
23 uncomfortable -- or uncomfortable. It was
24 sort of in between.

25 MS. PARK: Was the physical

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contact from the Governor welcome?

THE WITNESS: When you say "welcome," like do you think -- are you asking like did I invite it, did I want it?

MS. PARK: Yes, let's take that definition. Did you want it?

THE WITNESS: No.

MS. PARK: And the comments that the Governor made about using terms of endearment for you, "sweetheart," "darling," did you want him to do that?

THE WITNESS: No. I wanted him to use my name.

MS. PARK: And the comments -- Sorry, I didn't mean to cut you off. You said you wanted him to use your name?

THE WITNESS: Uh-hum (nodding).

MS. PARK: And the comments the Governor made about your appearance, did you want him to make those

1 Confidential

2 comments?

3 THE WITNESS: No.

4 MS. PARK: I'm done.

5 BY MS. MAINOO:

6 Q. Since you last spoke to our
7 team, have you spoken to anyone about your
8 interactions with the Governor?

9 A. No.

10 Q. Have you spoken to anyone about
11 our investigation?

12 A. No, just that I am having this
13 conversation today. I had indicated that
14 that's what I'm doing on Friday night.

15 Q. Who did you indicate that to?

16 A. My husband, my parents.

17 I had been contacted a while ago
18 by the media like -- and I let them know,
19 yes, I'm speaking, yes, it's happening, but
20 I didn't divulge anything like what -- who
21 I'm talking to, et cetera, et cetera. And I
22 told my boss as well, sorry. I shared the
23 subpoena with my boss.

24 Q. What was the reason for sharing
25 the subpoena with your boss?

1 Confidential

2 A. So that he knew that on Friday
3 afternoon I would be engaged in this
4 conversation and not available.

5 Q. Is there anything you would like
6 to add or any answers you wish to clarify
7 before we finish?

8 A. No, I think I'm all set.

9 Q. Is there anything else that you
10 can think of that's relevant to our
11 investigation?

12 A. Not at this time.

13 Q. If you would like to make a
14 brief sworn statement, you may do so now.

15 A. I'm all set. I don't need to
16 say anything.

17 MS. MAINOO: We're going to
18 conclude our examination.

19 Thank you very much for speaking
20 with us today.

21 THE WITNESS: Thank you all. I
22 appreciate your time.

23 MS. MAINOO: And I'll
24 take -- before we go off the record,
25 I'll take this opportunity to remind

1 Confidential

2 you that you have continuing
3 obligations under our document
4 subpoena and our subpoena for
5 testimony. If we need you to come
6 back to answer additional questions,
7 we will contact you, and if you have
8 documents that are responsive to our
9 document subpoena, you are still under
10 the obligation to produce them to us.

11 THE WITNESS: Okay. Thank you.

12 MS. PARK: Ms. Liss, let me just
13 add this too as well: As Abena told
14 you at the beginning, under Executive
15 Law 63(8), you may not share
16 what -- your testimony here today with
17 anyone. Do you understand?

18 THE WITNESS: Yes, I understand.

19 MS. PARK: Thank you.

20 MS. MAINOO: Thank you.

21 THE VIDEOGRAPHER: This ends
22 today's deposition. The time is 7:01
23 and we're now off the record.

24 (Time noted: 7:01 p.m.)
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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, THERESA TRAMONDO, a Notary Public within and for the State of New York, do hereby certify:

That ANA LISS, the witness whose testimony is hereinbefore set forth, was duly sworn by me and that such testimony is a true record of the testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of June, 2021.



THERESA TRAMONDO