	Page 1
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21
2	
3	
	x
4	The Matter of Independent Investigation
	Under New York State Executive Law
5	Section 63(8)
	x
6	
7	VIDEOTAPE DEPOSITION VIA ZOOM OF:
8	WITNESS 7/7/21
9	WEDNESDAY, JULY 7, 2021
10	9:42 a.m.
11	
12	VIRTUAL ZOOM INVESTIGATION before
13	SILVIA P. WAGE, a Certified Shorthand Reporter,
14	Certified Realtime Reporter, Registered
15	Professional Reporter, and Notary Public for the
16	States of New Jersey, New York and Pennsylvania.
17	
18	
19	
20	
21	
22	
23	
24	
25	

		Page 6
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	THE VIDEOGRAPHER: Good morning. We	09:03:47
3	are going on the video record at, approximately,	09:42:23
4	9:42 a.m., on July 7th, 2021.	09:42:26
5	Audio and video recording will	09:42:31
6	continue to take place unless all parties agree	09:42:33
7	to go off the video record.	09:42:35
8	This is the video recorded deposition	09:42:37
9	of witness 7/7/21 in the matter of Independent	09:42:39
10	Investigation under New York State Executive Law	09:42:44
11	Section 63(8). This deposition is being held	09:42:48
12	remotely via Zoom.	09:42:53
13	My name is Michael Pellegrino. I'm	09:42:54
14	the Videographer. The Court Reporter is Silvia Wage.	09:42:56
15	Appearances will be notated on the	09:43:01
16	stenographic record.	09:43:03
17	Will the Reporter please swear in the	09:43:04
18	witness.	09:43:04
19	WITNESS 7/7/21,	09:43:04
20	After having been duly sworn, was examined	09:43:04
21	and testified as follows:	09:43:13
22	THE STENOGRAPHER: Thank you.	09:43:13
23	You may proceed.	09:43:14
24	EXAMINATION BY MS. KENNEDY-PARK:	09:43:17
25	Q. FIRST NAME, is it okay if I call you	09:43:17

		Page 7
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	FIRST NAME today?	09:43:21
3	A. Yes.	09:43:21
4	Q. So thank you for meeting with us. As	09:43:21
5	you know, my name is Jennifer Kennedy-Park. I'm	09:43:23
6	with the law firm Cleary Gottlieb Steen &	09:43:25
7	Hamilton.	09:43:25
8	But for today's purposes, I've been	09:43:27
9	appointed Special Deputy to the First Deputy	09:43:29
10	Attorney General of the New York Attorney	09:43:32
11	General's Office. And we at Cleary Gottlieb	09:43:34
12	along with the law firm of Vladeck Raskin & Clark	09:43:37
13	have been appointed to conduct an independent	09:43:39
14	investigation under Executive Law 63(8) into	09:43:41
15	allegations of sexual harassment against Governor	09:43:45
16	Cuomo and the surrounding circumstances.	09:43:50
17	You're here today pursuant to a	09:43:51
18	subpoena that we issued in connection with that	09:43:53
19	investigation.	09:43:55
20	Do you understand that?	09:43:56
21	A. (No response.)	09:43:57
22	Q. You just have speak louder into the	09:43:58
23	microphone.	09:44:00
24	A. Yes.	09:44:00
25	Q. And you understand you're being video	09:44:01

	Page 8
HIGHLY CONFIDENTIAL - WITNESS 7/7/21	-
recorded today?	09:44:02
A. Yes.	09:44:03
Q. You understand you're under oath?	09:44:03
A. Yes.	09:44:05
Q. And that that means that you must	09:44:05
testify fully and truthfully, as if you were	09:44:07
sitting before a judge and jury.	09:44:10
Do you understand that?	09:44:12
A. Yes.	09:44:12
Q. If you'd like to make a brief sworn	09:44:13
statement at the conclusion of my questions, you	09:44:15
can do so, okay, and I'll remind you of that at	09:44:18
the end.	09:44:21
Although this is a civil	09:44:22
investigation, the New York Attorney General's	09:44:24
Office has criminal enforcement authority. That	09:44:26
means that you have the right to refuse any	09:44:29
question I ask you on the grounds that it would	09:44:31
incriminate you. However, your failure to answer	09:44:34
can be used against you in a civil proceeding.	09:44:36
Do you understand that?	09:44:40
A. Yes.	09:44:40
Q. Okay. You have your attorneys	09:44:41
present today, but this is not a deposition. So	09:44:44
	A. Yes.  Q. You understand you're under oath?  A. Yes.  Q. And that that means that you must testify fully and truthfully, as if you were sitting before a judge and jury.  Do you understand that?  A. Yes.  Q. If you'd like to make a brief sworn statement at the conclusion of my questions, you can do so, okay, and I'll remind you of that at the end.  Although this is a civil investigation, the New York Attorney General's Office has criminal enforcement authority. That means that you have the right to refuse any question I ask you on the grounds that it would incriminate you. However, your failure to answer can be used against you in a civil proceeding.  Do you understand that?  A. Yes.  Q. Okay. You have your attorneys

		Page 9
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	your attorneys are not here to object. But to	09:44:46
3	the extent that they have concerns about	09:44:48
4	privilege, we can address those with your	09:44:50
5	lawyers.	09:44:53
6	Do you understand?	09:44:53
7	A. Yes.	09:44:54
8	Q. Okay. We've got a Court Reporter	09:44:54
9	present virtually. So, when you're answering my	09:44:56
10	questions, you can't nod or say uh-huh. You have	09:45:01
11	to give a verbal answer.	09:45:03
12	Do you understand?	09:45:04
13	A. Yes.	09:45:06
14	Q. If you don't understand my question,	09:45:06
15	I want you to tell me and I'll ask I better one,	09:45:07
16	alright?	09:45:11
17	A. Okay.	09:45:11
18	Q. And if at any point you want to	09:45:11
19	clarify an answer you've previously given me, you	09:45:12
20	should just let me know and we'll clarify on the	09:45:15
21	record.	09:45:17
22	A. Okay.	09:45:18
23	Q. I'll be asking you about some names	09:45:19
24	and some dates and specific information. If you	09:45:21
25	don't remember a name or you don't remember a	09:45:25

		Page 10
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	date but you have a general memory or an	09:45:27
3	approximation, you should tell me that, okay,	09:45:29
4	because the purpose of today is to do a fact	09:45:33
5	finding investigation.	09:45:35
6	Do you understand?	09:45:35
7	A. Yes.	09:45:37
8	Q. If you want a break at any point, you	09:45:37
9	should just let me know. If I asked a question,	09:45:40
10	I am going to want you to answer that question	09:45:43
11	first and then we'll take a break, okay?	09:45:45
12	A. Okay.	09:45:47
13	MS. KENNEDY-PARK: If you could if	09:45:47
14	your Counsel could just confirm that none of you	09:45:48
15	are recording this proceeding surreptitiously in	09:45:51
16	any way?	
17	(NO RESPONSE.)	
18	MS. KENNEDY-PARK: Okay.	
19	THE STENOGRAPHER: I didn't get any	
20	response.	
21	MS. KENNEDY-PARK: And that you're	09:45:57
22	not going to communicate in realtime about the	09:45:58
23	substance of the testimony with anyone?	09:45:59
24	MR. SANDICK: That is correct.	09:46:00
25	Q. Okay. So, as I think we informed you	09:46:05

		Page 11
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	by e-mail, but I'll remind you on the record,	09:46:08
3	Executive Law Section 63(8) prohibits you and	09:46:11
4	makes it a misdemeanor if you do reveal the	09:46:14
5	contents of your testimony today to anyone.	09:46:17
6	Do you understand that?	09:46:19
7	A. Yes.	09:46:20
8	Q. And that covers your Counsel as well.	09:46:20
9	MS. KENNEDY-PARK: Does Counsel	09:46:22
10	understand?	09:46:23
11	THE STENOGRAPHER: I'm not getting a	09:46:23
12	response from Counsel.	09:46:23
13	MS. KENNEDY-PARK: Okay.	09:46:23
14	Q. Are you taking any substance or drugs	09:46:23
15	that might make it difficult for you to	09:46:27
16	understand my questions today?	09:46:29
17	A. No.	09:46:30
18	Q. Have you had any alcohol today?	09:46:31
19	A. No.	09:46:32
20	Q. Will you state your name, your date	09:46:32
21	of birth and your current home and business	09:46:34
22	address.	09:46:36
23	A. My name is WITNESS born	09:46:37
24	. Home address is	09:46:43
25	. Business address is	09:46:47

		Page 12
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	,	09:46:52
3		09:46:56
4	Q. Have you ever given testimony before?	09:46:56
5	A. No.	09:46:58
6	Q. Okay. Other than the conversations	09:46:58
7	you've had with your Counsel, which today I don't	09:47:01
8	want to know about so any question I ask if	09:47:03
9	the answer is you learned it from your Counsel or	09:47:05
10	you talked to your Counsel about that, that's not	09:47:08
11	the information I want.	09:47:10
12	Do you understand?	09:47:11
13	A. (No response.)	09:47:11
14	Q. But other than taking to them, what	09:47:12
15	did you do to prepare for today?	09:47:12
16	A. Nothing.	09:47:15
17	THE STENOGRAPHER: I can't hear him.	09:47:19
18	I can't hear him. I can't hear him.	09:47:19
19	Q. She can't hear you. So you just have	09:47:19
20	to talk a little louder.	09:47:22
21	A. Okay.	09:47:23
22	Q. Okay.	09:47:23
23	A. Which part couldn't they hear?	09:47:23
24	MS. KENNEDY-PARK: Which part did you	09:47:34
25	miss, Silvia?	

good?

25

09:48:06

		Page 14
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Yes.	09:48:07
3	A. My name is WITNESS, born	09:48:07
4	. Home address is	09:48:11
5	. Business address is	09:48:15
6		09:48:19
7		09:48:23
8	Q. And you've never given testimony	09:48:24
9	before; is that right?	09:48:25
10	A. No.	09:48:26
11	Q. Okay. And other than the	09:48:26
12	conversations with your lawyers, you haven't done	09:48:29
13	anything to prepare for your testimony today; is	09:48:30
14	that right?	09:48:33
15	A. No, that's right.	09:48:33
16	Q. Okay. Did you speak to	09:48:34
17	to prepare for your testimony today?	09:48:36
18	A. No.	09:48:38
19	Q. When was the last time you spoke to	09:48:38
20	about the allegations of sexual	09:48:40
21	harassment against Governor Cuomo?	09:48:43
22	A. Well, I mean, we've talked about	09:48:47
23	having to do this but, like, not about questions	09:48:49
24	and not about what's going on. Like, we don't	09:48:51
25	really talk about. We're not supposed to talk	09:48:53

		Page 15
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	about it to each other, you know, so we don't	09:48:56
3	really talk about what's going on.	09:48:58
4	Q. You don't talk about the substance?	09:49:00
5	A. No.	09:49:01
6	Q. Does know that you're	09:49:02
7	testifying today?	09:49:04
8	A. Yes.	09:49:04
9	Q. Who else knows that you're testifying	09:49:05
10	today?	09:49:07
11	A. My dad.	09:49:07
12	Q. Anyone else?	09:49:07
13	A. My boss.	09:49:09
14	Q. Anyone else?	09:49:12
15	A. That's it.	09:49:13
16	Q. Okay. There's a binder to your	09:49:14
17	right. I want you to open up that binder.	09:49:17
18	A. Sure.	09:49:19
19	Q. I want you to turn Tab 1 of the	09:49:29
20	binder and we'll mark this as the first exhibit.	09:49:32
21	(Deposition Exhibit 1, testimony	09:49:32
22	Subpoena Ad Testificandum to WITNESS, was marked	09:49:32
23	for identification.)	09:49:40
24	Q. You should take a moment to review it	09:49:40
25	and when you've reviewed it, why don't you look	09:49:42

		Page 16
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	up.	09:49:44
3	A. Okay.	09:50:01
4	Q. Is this the testimony subpoena that	09:50:01
5	you received from the New York Attorney General's	09:50:03
6	Office?	09:50:05
7	A. Yeah.	09:50:08
8	Q. Did you read this before today?	09:50:09
9	A. No.	09:50:12
10	Q. Do you understand that you're	09:50:13
11	testifying pursuant to this subpoena today?	09:50:15
12	A. Yes.	09:50:18
13	Q. Let's look at Tab 2. And we'll mark	09:50:19
14	this as the next exhibit.	09:50:23
15	(Deposition Exhibit 2, documents	09:50:23
16	Subpoena Ad Testificandum to WITNESS, was marked	09:50:23
17	for identification.)	09:51:20
18	A. Okay.	09:53:09
19	Q. Do you recognize this as the subpoena	09:53:10
20	for documents that you received from the New York	09:53:12
21	Attorney General's Office?	09:53:14
22	A. Yes.	09:53:16
23	Q. Had you read this subpoena before	09:53:19
24	today?	09:53:20
25	A. No.	09:53:20

		Page 17
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. If you hadn't read it before today,	09:53:22
3	what did you do to comply with this subpoena?	09:53:25
4	A. Whatever my lawyers advised me to do.	09:53:28
5	Q. Okay. What devices did you give your	09:53:30
6	lawyers access to to respond to this subpoena?	09:53:32
7	A. My cell phone.	09:53:34
8	Q. Okay. Anything else?	09:53:35
9	A. That's it.	09:53:37
10	Q. Do you have personal computers?	09:53:38
11	A. Yes.	09:53:40
12	Q. What kind of personal computers?	09:53:41
13	A. It's a laptop.	09:53:43
14	Q. Okay. Does that laptop have any	09:53:44
15	information on it from your time in the Executive	09:53:46
16	Chamber?	09:53:48
17	A. No, not that I'm aware of.	09:53:48
18	Q. Did you give your lawyers access to	09:53:51
19	your personal e-mail?	09:53:52
20	A. No, I don't think so.	09:53:55
21	Q. Is there anything in your personal	09:54:03
22	e-mail that you think is related to this	09:54:05
23	investigation?	09:54:06
24	A. No, not that I'm aware of.	09:54:07
25	Q. Did you communicate with	09:54:08

		Page 18
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	using your personal e-mail?	09:54:11
3	A. No.	09:54:12
4	Q. Did you communicate with anyone who	09:54:16
5	is a staff member of the Executive Chamber	09:54:18
6	current or former using your personal e-mail?	09:54:20
7	A. In the past, yes, but since this, no.	09:54:22
8	Q. Okay. In the past, who did you	09:54:25
9	communicate with using who from the Executive	09:54:27
10	Chamber did you communicate with using your	09:54:31
11	personal e-mail?	09:54:32
12	A. Sometimes Stephanie, sometimes	09:54:35
13	Annabelle.	09:54:38
14	Q. Okay. Have you looked in your	09:54:38
15	personal e-mail to see if any of those e-mails	09:54:41
16	with Ms. Benton or Ms. Walsh are still there?	09:54:43
17	A. No.	09:54:46
18	Q. How many personal e-mail accounts do	09:54:48
19	you have?	09:54:51
20	A. Two but one that I only use once for	09:54:53
21	like spam e-mails.	09:54:56
22	Q. Okay. And what are the two accounts?	09:54:57
23	A. One is @Gmail and	09:54:58
24	I think the other one is like Gmail. I	09:55:06
25	think that's it.	09:55:11

		Page 19
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Is the second one the one you use for	09:55:12
3	spam?	09:55:14
4	A. Yeah.	09:55:14
5	Q. Okay. Do you have any social media	09:55:14
6	accounts?	09:55:17
7	A. I have a Twitter.	09:55:18
8	Q. Okay. Did you search your for	09:55:19
9	Twitter for information relevant information	09:55:21
10	that might be responsive to this subpoena?	09:55:25
11	A. What do you mean, like, "responsive"	09:55:26
12	to that? I'm not sure, like	09:55:28
13	Q. Sure. Did you give your Counsel	09:55:29
14	access to Twitter?	09:55:31
15	A. No.	09:55:33
16	Q. Okay. Do you use Twitter for DMs?	09:55:33
17	A. No.	09:55:37
18	Q. Never?	09:55:38
19	A. Never.	09:55:39
20	Q. Do you have any hardcopy documents	09:55:45
21	from your time in the Executive Chamber?	09:55:47
22	A. No.	09:55:48
23	Q. Can you tell us your educational	09:55:57
24	history?	09:55:59
25	A. Sure.	09:55:59

		Page 20
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Starting with university.	09:56:00
3	A. Sure. I went to St. John's	09:56:01
4	University and I graduated in government politics	09:56:04
5	and then I also have a Master's degree from St.	09:56:07
6	John's University in public administration.	09:56:11
7	Q. When did you get your Master's	09:56:12
8	degree?	09:56:13
9	A. I did it part-time. I started, I	09:56:14
10	believe, it was 2013 and finished in 2016.	09:56:16
11	Q. And can you take us through your	09:56:21
12	employment history starting with after your	09:56:23
13	graduation from St. John's with your	09:56:26
14	undergraduate degree?	09:56:28
15	A. Sure. So I started as an intern on	09:56:29
16	the Cuomo campaign. I think it was probably 2011	09:56:32
17	or 2012, somewhere around that time. And I was	09:56:37
18	an intern and I did that for couple of years.	09:56:40
19	And then I got a job at the Workers' Compensation	09:56:44
20	Board of New York and I did that for about a year	09:56:48
21	and a half. And then after that I went and	09:56:52
22	worked for the Executive Chamber. I think it was	09:56:59
23	like in March of 2015 I started there. And then	09:57:01
24	I left the Executive Chamber in June of 2019 and	09:57:08
25	started working at the Port Authority of New York	09:57:12

		Page 21
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	New Jersey.	09:57:15
3	Q. How did you get the job at the	09:57:15
4	Workers' Compensation Board?	09:57:17
5	A. So, when I was at the campaign, I	09:57:18
6	told him I wanted to work for the State and, I	09:57:21
7	guess, they helped to put me in touch with	09:57:24
8	somebody from like the appointments office to get	09:57:26
9	a job working for the State.	09:57:28
10	Q. And when you say "they," who is they?	09:57:29
11	A. It was like , I think,	09:57:31
12	was the name at the time.	09:57:34
13	Q. And who did put you in	09:57:36
14	touch with in the appointments office?	09:57:39
15	A. I think was the name.	09:57:42
16	Q. And when you say, "appointments	09:57:50
17	office," you mean Appointments Office of the	09:57:52
18	Executive Chamber?	09:57:54
19	A. Yeah.	09:57:55
20	Q. Okay. Was the position that you held	09:57:55
21	at the Board of Workers' Compensation an	09:58:00
22	appointment?	09:58:00
23	A. Yeah.	09:58:01
24	Q. And how did it come about that you	09:58:03
25	moved from the Workers' Compensation Board to the	09:58:05

		Page 22
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Executive Chamber?	09:58:07
3	A. So, I guess, in 2015 was right after	09:58:09
4	the election and the campaign office reached out	09:58:12
5	to me and said, hey, you know, there is an	09:58:19
6	opening in the Chamber, if you're interested in	09:58:21
7	doing it, would you want to do it.	09:58:23
8	And I said, yeah, I would love to,	09:58:25
9	and then I went and interviewed at the Chamber	09:58:27
10	for the position.	09:58:29
11	Q. And what was the position that they	09:58:29
12	reached out to you about?	09:58:31
13	A. Special Assistant.	09:58:32
14	Q. What does Special Assistant do?	09:58:33
15	A. It's a lot of administration work	09:58:36
16	but, like, sometimes you have like a little bit	09:58:38
17	more responsibility, you know, it's like in my	09:58:41
18	case, it was, you know, events and stuff like	09:58:44
19	that, like, I could plan logistics, you know.	09:58:46
20	Q. And a Special Assistant to whom?	09:58:49
21	A. It was to the Executive Deputy	09:58:51
22	Secretary to the Governor.	09:58:55
23	Q. And in March of 2015, who was the	09:58:57
24	Executive Deputy Secretary to the Governor?	09:58:59
25	A. Joe Percoco.	09:59:02

		Page 23
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Who did you interview with for the	09:59:05
3	role of Special Assistant?	09:59:07
4	A. Joe Percoco.	09:59:08
5	Q. Anyone else?	09:59:09
6	A. That's it.	09:59:11
7	Q. And how long did your on-boarding	09:59:13
8	process take?	09:59:16
9	A. Maybe two weeks, maybe three weeks,	09:59:20
10	something like that.	09:59:26
11	Q. Maybe I should be clear by what I	09:59:28
12	meant by "on-boarding."	09:59:31
13	How long between the time you	09:59:32
14	interviewed and the time you started working?	09:59:33
15	A. That's what I thought you meant,	09:59:36
16	yeah. It's like two to three weeks, yeah.	09:59:38
17	Q. Had you already gone through a	09:59:40
18	background process to work for the Workers'	09:59:42
19	Compensation Board?	09:59:44
20	A. Yes.	09:59:44
21	Q. When you started in March of 2015 as	09:59:47
22	a Special Assistant, where were you sitting?	09:59:49
23	A. The 39th floor.	09:59:56
24	Q. Of what address?	09:59:57
25	A. 633 Third Avenue.	09:59:59

		Page 24
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Who was your office nearest to, who	10:00:04
3	sat to your right, left and across from you?	10:00:07
4	A. There was an office behind me for	10:00:09
5	someone named . That was the	10:00:11
6	closest.	10:00:14
7	Q. Did you share your office with	10:00:16
8	anyone?	10:00:17
9	A. I didn't have an office.	10:00:18
10	Q. Did you have a cubicle?	10:00:19
11	A. I had a cubicle.	10:00:20
12	Q. Okay. Was your cubicle outside of	10:00:21
13	Mr. Percoco's office?	10:00:24
14	A. No. It was outside of 's	10:00:26
15	office.	10:00:28
16	Q. Okay. And where was your office in	10:00:28
17	relation to Mr. Percoco's office?	10:00:31
18	A. I didn't have an office.	10:00:32
19	Q. I'm sorry, your cubicle. I	10:00:34
20	apologize.	10:00:35
21	A. My cubicle. So, I guess, if you were	10:00:36
22	coming out of his office, you would have had to	10:00:39
23	have had made a left and gone passed another	10:00:41
24	office to get to my cubicle.	10:00:45
25	Q. And where was your cubicle in	10:00:46

		Page 25
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	relation to where the Governor's office was?	10:00:48
3	A. Where it was to the right of Joe's	10:00:51
4	office. So it was about two offices down from	10:00:54
5	me, two office door lengths down from me.	10:00:56
6	Q. And at the time that you started as a	10:00:59
7	Special Assistant, who was sitting outside the	10:01:03
8	Governor's office?	10:01:05
9	A. I'm trying to remember because when I	10:01:15
10	started, I believe, they were in Albany for	10:01:18
11	session. So I can't really remember who was	10:01:20
12	sitting there. I think maybe Annabelle had it	10:01:22
13	when I was there, I think.	10:01:28
14	Q. And did that change over time?	10:01:31
15	A. Yes.	10:01:33
16	Q. Okay. And who else occupied that	10:01:33
17	position after Ms. Walsh?	10:01:35
18	A. There was	10:01:41
19	, Kaitlin , me. That's all I can	10:01:52
20	think of.	10:02:13
21	Q. And Ms. Walsh,	10:02:14
22	and Kaitlin and you, where did you sit in	10:02:18
23	relation when you occupied that seat, where	10:02:20
24	did you seat in relation to Stephanie Benton?	10:02:22
25	A. So she sat in the office right	10:02:24

		Page 26
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	behind, so the cubicle was outside of her office.	10:02:27
3	She sat at a desk in an office behind the	10:02:29
4	cubicle.	10:02:34
5	Q. Okay. So, if you were sitting in the	10:02:34
6	cubicle outside of the Governor's office, are you	10:02:36
7	in shouting distance of him?	10:02:39
8	A. If he shouted loud enough.	10:02:42
9	Q. How did it come to be that you went	10:02:45
10	from sitting in the cubicle that you described	10:02:47
11	that was further down from the Governor's	10:02:50
12	Office's to occupying a role in support of the	10:02:52
13	Governor?	10:02:55
14	A. So, I believe, that it was Kaitlin	10:02:56
15	that had the desk before me and she was moved off	10:03:00
16	that desk and then, I believe, they tapped me to	10:03:05
17	sit there just to help out while they were	10:03:09
18	looking for other people to fill that role.	10:03:11
19	Q. What do you know about why Kaitlin	10:03:15
20	was moved outs of that role?	10:03:18
21	A. Only what she told me.	10:03:20
22	Q. Okay. And what did Kaitlin tell	10:03:22
23	you?	10:03:25
24	A. That she said that the Governor told	10:03:25
25	her that she was too smart to do the job and that	10:03:27

	1	Page 27
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	she should go she would be moving to, like, do	10:03:30
3	something, you know, more challenging for her.	10:03:32
4	Q. How did you feel about that comment	10:03:37
5	given that you were being asked to do the job?	10:03:40
6	A. I thought it was a little	10:03:41
7	condescending to me. She said it in a tone that	10:03:45
8	was bragging so	10:03:47
9	Q. Just be careful with the mike.	10:03:48
10	Can you just repeat what you said?	10:03:49
11	A. I said, she said it in a tone that	10:03:49
12	was bragging.	10:03:51
13	Q. How did your responsibilities change	10:03:56
14	when you started sitting in support of the	10:03:59
15	Governor?	10:04:02
16	A. Well, you would have to be earlier,	10:04:03
17	you know. You have to prepare a little bit more	10:04:09
18	for your day. You have to prepare to be at that	10:04:13
19	desk for most of the day. You can't really leave	10:04:17
20	to take a break, you know. You just have to be	10:04:19
21	more responsive to, you know, when they want you	10:04:25
22	around.	10:04:27
23	Q. Is that role, essentially, serving as	10:04:29
24	an Executive Assistant to the Governor?	10:04:31
25	A. Pretty much, yeah.	10:04:34

		Page 28
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. And supporting Ms. Benton in her role	10:04:34
3	as Executive Assistant to the Governor?	10:04:37
4	A. Correct.	10:04:39
5	Q. Who did you talk to about	10:04:41
6	transitioning into that role?	10:04:44
7	A. I don't know that I ever talked to	10:04:48
8	anybody about it, because I was never under the	10:04:51
9	impression that it was a long-term position for	10:04:53
10	me.	10:04:55
11	Q. But when you were asked to transition	10:04:55
12	into the role, who asked you?	10:04:58
13	A. I believe Stephanie came over and	10:05:01
14	asked me to sit there.	10:05:04
15	Q. And I said "asked."	10:05:05
16	Were you asked or were you told?	10:05:08
17	A. I can't remember how I came to be	10:05:11
18	there.	10:05:15
19	Q. Did you raise any concerns about	10:05:16
20	making the transition?	10:05:18
21	A. I think like after the first week	10:05:25
22	that I sat there, I went and talked to Jill about	10:05:27
23	leaving to go to the MTA because I was of a	10:05:30
24	suspicion like, I knew I could do the job and	10:05:35
25	I knew I could do it well and I think that's the	10:05:37

		Page 29
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	attitude you have to go into when you go do	10:05:40
3	anything. But I talked to her about leaving to	10:05:42
4	do like something at the MTA, to do like intergov	10:05:45
5	there.	10:05:45
6	Q. And when you say, "Jill," do you mean	10:05:49
7	Ms. DesRosiers?	10:05:52
8	A. Yes.	10:05:52
9	Q. And why did you go to Jill?	10:05:52
10	A. She was my supervisor.	10:05:54
11	Q. Okay. And the role was being so	10:05:55
12	I'm going to call it staffing the Governor.	10:05:57
13	An we call it staffing the Governor?	10:06:00
14	A. Yes.	10:06:01
15	Q. So, as a person who staffed the	10:06:02
16	Governor, you reported to Jill DesRosiers?	10:06:04
17	A. Correct.	10:06:05
18	Q. Okay. And why did you want to leave	10:06:06
19	to go to the MTA at that point?	10:06:07
20	A. I guess, by the time that I got to	10:06:15
21	sit at the desk with the Governor, I was bored at	10:06:16
22	my role and I wanted to leave and I was a little	10:06:19
23	frustrated with working there and I wanted to go	10:06:24
24	and try and challenge myself a little bit more.	10:06:26
25	Q. Can you tell us what made you	10:06:30

		Page 30
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	"frustrated" about working there?	10:06:33
3	A. You know, it's dealing with a lot of,	10:06:41
4	you know, complicated people. There's a lot of	10:06:44
5	things that change daily, you know. It's a	10:06:48
6	stressful place where things can flip on a dime.	10:06:54
7	You can have an event that just pops up out of	10:06:58
8	nowhere that you have to work with, you know, and	10:07:02
9	it's just complicated to deal with, you know,	10:07:05
10	senior staff sometimes. They can be difficult to	10:07:08
11	work with.	10:07:11
12	Q. And when you say they're "complicated	10:07:14
13	people" or "difficult to work with," can you give	10:07:17
14	us some examples of what that means?	10:07:19
15	A. I mean, I guess, things changed a	10:07:23
16	lot. You may not be in the know of what's	10:07:27
17	changing at that time and, you know, whoever your	10:07:29
18	principal is at that point may want something	10:07:32
19	from you and you may not have a full	10:07:35
20	understanding of what they're asking you to do	10:07:37
21	and, you know, it's kind of hard for you to piece	10:07:39
22	together what's going on. And as you do, you	10:07:41
23	know, it could be difficult to get help from them	10:07:44
24	as to what they really need.	10:07:47
25	Q. When was the first time you met	10:07:50

		Page 31
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Governor Cuomo?	10:07:53
3	A. I guess when I sat there I mean,	10:08:05
4	what like, when I saw him in the office or	10:08:09
5	when he actually spoke to me or, you know, when	10:08:12
6	he said, hi, how are you? Like, I don't know	10:08:13
7	what "met" really means.	10:08:17
8	Q. Good point.	10:08:18
9	So the first time you interacted with	10:08:19
10	him, not just saw him.	10:08:21
11	A. I think when I sat there is really	10:08:29
12	when I interacted with him.	10:08:31
13	Q. So, when you worked on the campaign,	10:08:33
14	you didn't ever meet or interact with Governor	10:08:35
15	Cuomo?	10:08:38
16	A. No.	10:08:38
17	Q. Tell us what it's like to work for	10:08:38
18	Governor Cuomo.	10:08:41
19	A. It's a hard job. There is really no	10:08:45
20	normal day there. Some days can start at 5:30.	10:08:50
21	Some days can, you know, can start a little bit	10:08:56
22	later than that. Some days can end at 5, some	10:08:59
23	days end at 8, some days end at 11. There is	10:09:01
24	really no schedule to it, demanding and, yeah,	10:09:06
25	just a really tough and demanding job.	10:09:19

		Page 32
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. So I was asking, specifically, about	10:09:22
3	Governor Cuomo and how he treated you.	10:09:24
4	Was he tough and demanding?	10:09:27
5	A. (UNINTELLIGIBLE.)	10:09:29
6	THE STENOGRAPHER: I'm sorry. I	10:09:32
7	didn't catch that. I'm sorry, I didn't catch	10:09:32
8	that.	10:09:34
9	Q. Did you ever see how he interacted	10:09:34
10	with Kaitlin ?	10:09:36
11	A. Sorry, which part do I need to	10:09:37
12	repeat?	10:09:38
13	STENOGRAPHER: Was he tough and	10:09:38
14	demanding, I didn't get a response.	10:09:42
15	A. Yes.	10:09:44
16	Q. Did you observe the Governor interact	10:09:47
17	with Kaitlin ??	10:09:49
18	A. Not really. Like, we we staffed	10:09:55
19	him together. There was a brief period where I	10:09:58
20	would sit at the cubicle outside and she would	10:10:00
21	sit in the back office, like, when Stephanie	10:10:03
22	wasn't there and, like, we would staff him	10:10:05
23	together. But I didn't really see how they	10:10:08
24	interacted because I kind of my back was to	10:10:11
25	me, you know. So I didn't really see how they	10:10:14

		Page 33
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	were. But I know that, you know, we staffed him	10:10:16
3	together at once.	10:10:19
4	Q. Did she ever talk to you about how	10:10:20
5	the Governor treated her?	10:10:21
6	A. I mean, I'm trying to like,	10:10:25
7	nothing specific, like, just sometimes, like, he	10:10:35
8	was mean to her, you know, stuff like that's	10:10:37
9	the only thing I can really recall just saying	10:10:40
10	that, you know, he was mean to her sometimes.	10:10:42
11	Q. Did she give you anymore details by	10:10:44
12	what she meant by "he was mean to her"?	10:10:47
13	A. Not that I can really recall, no.	10:10:48
14	Q. Did you ever see Kaitlin interact	10:10:52
15	with the members of the Governor's senior staff?	10:10:55
16	A. Not really.	10:11:03
17	Q. Generally?	10:11:08
18	A. I mean, walking to and from their	10:11:08
19	offices, you know, that would be the only thing	10:11:10
20	that not really anything else that I can	10:11:12
21	really recall.	10:11:15
22	Q. Did Kaitlin ever speak to you about	10:11:16
23	her interactions with the Governor's senior	10:11:20
24	staff?	10:11:23
25	A. I mean, I don't really recall that I	10:11:24

		Page 34
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	can recall specifics of it, you know. Like, I	10:11:27
3	don't think she was a fan, you know, of a lot of	10:11:30
4	them. But there's nothing really specific that I	10:11:32
5	can recall to kind of pinpoint that, you know,	10:11:34
6	it's just a general sense that I had.	10:11:37
7	Q. And you can't call to your mind how	10:11:39
8	you got that "general sense" that she was not	10:11:42
9	happy with how they treated her?	10:11:44
10	A. No, I really can't.	10:11:46
11	Q. Did you ever hear anyone refer to	10:11:48
12	Kaitlin as "Sponge"?	10:11:50
13	A. No.	10:11:52
14	Q. Never heard any of the senior staff	10:11:53
15	refer to her as "Sponge"?	10:11:55
16	A. No.	10:11:57
17	Q. Did the Governor refer to her as	10:11:58
18	"Sponge"?	10:12:00
19	A. No.	10:12:00
20	Q. You seemed surprised by that.	10:12:01
21	A. I never heard that before.	10:12:03
22	Q. Have you heard the Governor have	10:12:04
23	nicknames for other people?	10:12:07
24	A. Yeah, Annabelle.	10:12:12
25	Q. What was her nickname?	10:12:13

		Page 35
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Anna May Belle.	10:12:15
3	Q. Anybody else?	10:12:17
4	A. That I can think of, no.	10:12:20
5	Q. Did you ever hear the Governor or any	10:12:23
6	member of his senior staff refer to someone as	10:12:24
7	"the Man"?	10:12:27
8	A. No, but I no.	10:12:33
9	Q. You seem like you paused there.	10:12:36
10	A. No, I don't think I ever heard that	10:12:41
11	one before.	10:12:42
12	Q. Are there other ones that you had	10:12:42
13	heard?	10:12:44
14	A. Not that I can recall, no.	10:12:44
15	Q. Okay. Did the Governor ever yell at	10:12:45
16	you?	10:12:50
17	A. Yes.	10:12:50
18	Q. How often?	10:12:51
19	A. I don't I wouldn't say it was that	10:12:55
20	often. Usually, on stressful days when there was	10:12:58
21	a lot going on, maybe a handful of times, six	10:13:04
22	times or so maybe, if I had to guess.	10:13:07
23	Q. And what was your reaction to the	10:13:10
24	Governor yelling at you?	10:13:12
25	A. Well, I would usually kind of just	10:13:18

		Page 36
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	pause and try to take a break and, you know, fix	10:13:20
3	whatever it was that the problem was, you know,	10:13:24
4	and that was generally how I tried to approach it	10:13:27
5	whenever he was mad.	10:13:31
6	Q. Did any of the senior staff observe	10:13:32
7	you being yelled at by the Governor?	10:13:34
8	A. Not that I can recall, maybe	10:13:40
9	Stephanie.	10:13:42
10	Q. Did the Governor ever curse at you?	10:13:44
11	A. Not that I can recall.	10:13:50
12	Q. Did he ever threaten you?	10:13:53
13	A. No.	10:13:57
14	Q. Did he ever throw anything at you?	10:13:58
15	A. No.	10:14:02
16	Q. Has the Governor ever hugged you?	10:14:05
17	A. No.	10:14:08
18	Q. Has he ever kissed you?	10:14:09
19	A. No.	10:14:11
20	Q. Have you ever been to an event at the	10:14:15
21	Executive Mansion?	10:14:17
22	A. No. Well, I'm sorry, let me take	10:14:18
23	when I first started, there was a pinning	10:14:23
24	ceremony in 2015. That was the only time that I	10:14:25
25	went to the Executive Mansion, I believe.	10:14:29

		Page 37
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. And at that pinning ceremony, did you	10:14:30
3	go swimming?	10:14:33
4	A. No.	10:14:34
5	Q. Has the Governor ever commented on	10:14:38
6	your appearance?	10:14:40
7	A. Yeah.	10:14:42
8	Q. Tell us about that.	10:14:43
9	A. He made a remark about the haircut	10:14:45
10	that I got one time. I can't remember when it	10:14:48
11	was. But he it's different than the style I	10:14:52
12	have now. But he looked at me and he was like,	10:14:57
13	you know, it's quite a style that you chose or	10:14:59
14	something along those lines.	10:15:01
15	And, you know, I kind of laughed it	10:15:03
16	off.	10:15:08
17	Q. Were you uncomfortable with the	10:15:08
18	Governor commenting on your appearance?	10:15:10
19	A. No.	10:15:11
20	Q. Any other occasions in which the	10:15:12
21	Governor commented on your appearance?	10:15:14
22	A. Not that I can recall, no.	10:15:16
23	Q. Did the Governor ever comment on your	10:15:18
24	clothing?	10:15:20
25	A. No, I don't think so.	10:15:22

		Page 38
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you ever hear the Governor make	10:15:24
3	jokes that had a sexual content or section nature	10:15:26
4	to them?	10:15:29
5	A. No, I don't recall.	10:15:30
6	Q. Did you ever hear the Governor talk	10:15:33
7	about the size of his hands?	10:15:34
8	A. No.	10:15:36
9	Q. Did the Governor ever ask you about	10:15:41
10	your personal relationships?	10:15:42
11	A. No, he didn't.	10:15:44
12	Q. Did he ever ask you about your sex	10:15:46
13	life?	10:15:48
14	A. No, he didn't.	10:15:48
15	Q. Did he ever send you flowers?	10:15:50
16	A. No.	10:15:52
17	Q. Did he ever ask you to sing a song	10:15:53
18	for him?	10:15:56
19	A. No.	10:15:56
20	Q. Did you ever hear the Governor asking	10:16:02
21	about strike that.	10:16:05
22	Did the Governor ever ask you about	10:16:06
23	any tattoos you might have?	10:16:07
24	A. No.	10:16:10
25	Q. Did the Governor ever call you by a	10:16:10

			Page 39
1	HIGHL	Y CONFIDENTIAL - WITNESS 7/7/21	
2	term of end	earment like honey or sweetheart or	10:16:13
3	darling or	dear?	10:16:16
4	А.	No.	10:16:18
5	Q.	Did he ever speak Italian to you?	10:16:19
6	Α.	Yes.	10:16:24
7	Q.	Do you speak Italian?	10:16:25
8	А.	A little.	10:16:27
9	Q.	Okay. Did you understand what he was	10:16:27
10	saying to y	ou?	10:16:29
11	Α.	Yes.	10:16:29
12	Q.	What did he say?	10:16:29
13	Α.	He said, let's go, let's go. In	10:16:30
14	Italian it	would be like "andiamo."	10:16:34
15	Q.	I was going to say that.	10:16:36
16	А.	Yeah.	10:16:38
17	Q.	Alright.	10:16:38
18	А.	You know, "Vieni qua," which means	10:16:40
19	come here s	0	10:16:42
20		But that was pretty much the extent	10:16:44
21	of it.		10:16:46
22	Q.	That's it?	10:16:47
23	Α.	Yeah, that's all.	10:16:48
24	Q.	Did he ever use Italian terms of	10:16:50
25	endearment	to refer to you?	10:16:54

		Page 40
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	10:16:55
3	Q. You kind of laughed at that.	10:16:56
4	Why did you laugh at that?	10:16:58
5	A. I thought of some of the ones in my	10:16:59
6	head the ones that I know, just made me laugh for	10:17:01
7	a second.	10:17:04
8	Q. Did the Governor ever ask you to do	10:17:04
9	pushups with him?	10:17:07
10	A. No.	10:17:08
11	Q. Or for him?	10:17:08
12	A. No.	10:17:09
13	Q. Why did you decide to leave the	10:17:12
14	Executive Chamber?	10:17:15
15	A. Well, I wanted to leave for a while.	10:17:21
16	And I felt as if I had reached, you know, the	10:17:26
17	extent of what the challenge would be for me and	10:17:30
18	I wanted to kind of expand my career and do	10:17:33
19	something a little bit different.	10:17:37
20	Q. You said you had "wanted to leave for	10:17:38
21	a while."	10:17:40
22	Why had it been for "a while"?	10:17:41
23	A. Well, I think, as I told you, I	10:17:43
24	wanted to leave right when I started sitting at	10:17:45
25	that desk. And then, I think, I did another two	10:17:48

		Page 41
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	years on top of that.	10:17:52
3	Q. And why did it take so long for you	10:17:54
4	to leave?	10:17:57
5	A. I think because they liked me and	10:18:01
6	they thought I did a good job and didn't want me	10:18:05
7	to go.	10:18:08
8	Q. And what do you mean by that?	10:18:08
9	A. That they liked having me there and	10:18:11
10	they didn't want to see me leave.	10:18:13
11	Q. And what did they do to ensure that	10:18:16
12	you weren't leaving?	10:18:19
13	A. Well, I had would periodically	10:18:21
14	check in to see, you know, where we were because	10:18:25
15	they said that they would move me out of the	10:18:29
16	Chamber to a job at the MTA. They would set me	10:18:31
17	up with an interview. And they did. And that	10:18:35
18	was about a year in. But the offer was for less	10:18:38
19	than I was making at the time.	10:18:41
20	So we started over and, you know,	10:18:43
21	they said, what else would you like to do.	10:18:47
22	And I decided on the Port Authority	10:18:49
23	where I am now and I think about another year I	10:18:51
24	want to say went by and I would periodically	10:18:55
25	check in to see what was going on, you know, how	10:18:58

		Page 42
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	much longer it would be.	10:19:01
3	And at a certain point I just got	10:19:06
4	frustrated and took an interview on my own and	10:19:09
5	gave them two weeks notice.	10:19:13
6	Q. Okay. And when you say, "they," they	10:19:15
7	or the person you were checking in with, who	10:19:19
8	were you checking in with?	10:19:21
9	A. Jill.	10:19:23
10	Q. Jill DesRosiers?	10:19:23
11	A. Yes.	10:19:24
12	Q. Okay. And the job that you took and	10:19:24
13	gave two weeks notice on, where was that?	10:19:26
14	A. It was at a consulting firm. It was	10:19:28
15	called Geto & de Milly.	10:19:31
16	Q. And did you end up going there?	10:19:33
17	A. No.	10:19:35
18	Q. And why not?	10:19:36
19	A. When I put in my two weeks notice, I	10:19:40
20	told them, I'm ready to leave; however, I want to	10:19:44
21	stay with the State. I like working for the	10:19:48
22	State. And if you guys can come through on the	10:19:51
23	offer, I will happily stay with the State and,	10:19:54
24	you know, rescind my acceptance to Geto & de	10:19:57
25	Milly.	10:19:57

		Page 43
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	And they said, yes. And, yeah.	10:20:00
3	Q. Did you tell them where the other	10:20:04
4	offer was from?	10:20:06
5	A. No.	10:20:07
6	Q. And why not?	10:20:08
7	A. I didn't want to tell them.	10:20:11
8	Q. Why not?	10:20:12
9	A. I didn't want them to know where it	10:20:16
10	was to maybe call and stop them stop the offer	10:20:20
11	at Geto & de Milly and, you know, from being	10:20:25
12	offered to me.	10:20:27
13	Q. And why did you think someone from	10:20:28
14	the Executive Chamber might call and stop your	10:20:30
15	offer from another employer?	10:20:32
16	A. Well, I think, that was something	10:20:34
17	that was wildly rumored to have happened there.	10:20:35
18	I think some of it came out during the Percoco	10:20:40
19	trial as well too. So it was always of a	10:20:43
20	suspicion that that might happen.	10:20:45
21	Q. Were there particular people that you	10:20:47
22	heard those rumors about or that you observed	10:20:50
23	that about by paying attention to the Percoco	10:20:53
24	trial?	10:20:57
25	A. Not that I can really remember, no.	10:21:00

		Page 44
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. And so, after you told Ms. DesRosiers	10:21:07
3	that you had another job offer and you were	10:21:10
4	giving your two weeks notice, what happened?	10:21:12
5	A. So they said they were going to work	10:21:17
6	to get me at the Port Authority and about a week	10:21:23
7	and a half in I stayed with like the two-week	10:21:28
8	timeline. About a week and a half in, they	10:21:33
9	didn't have anyone to replace me and they had set	10:21:35
10	me up with an interview and it was a sign of good	10:21:38
11	faith for me. So I said, I'll stay third week,	10:21:41
12	and then I went on the interview.	10:21:44
13	Q. And did you get the job?	10:21:48
14	A. Yes.	10:21:49
15	Q. And how long after the interview did	10:21:50
16	you get the job?	10:21:52
17	A. I took I'm trying to think how	10:21:54
18	long. I took three weeks paid vacation off, so	10:21:58
19	right after that.	10:22:01
20	Q. Did anyone ask you to stay from	10:22:04
21	the Executive Chamber ask you to stay longer	10:22:07
22	after that?	10:22:08
23	A. No.	10:22:09
24	Q. And who was your replacement?	10:22:11
25	A. It was Charlotte Bennett.	10:22:13

		Page 45
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you talk to the Governor about	10:22:20
3	leaving?	10:22:23
4	A. No.	10:22:24
5	Q. Do you have any idea how the Governor	10:22:27
6	came to know that you were leaving the Executive	10:22:29
7	Chamber?	10:22:32
8	A. I assume Stephanie told him.	10:22:32
9	Q. Did he say good-bye to you?	10:22:34
10	A. No.	10:22:36
11	Q. What was your last interaction with	10:22:37
12	Governor Cuomo?	10:22:42
13	A. I don't even know the last time I saw	10:22:42
14	him. I don't even think that he was there the	10:22:45
15	last week that I was there either; so probably a	10:22:48
16	week before I left.	10:22:51
17	Q. Nothing memorable?	10:22:51
18	A. No.	10:22:52
19	Q. Did you ever work out of the Albany	10:22:54
20	office?	10:22:56
21	A. While staffing the Governor, no.	10:23:01
22	Q. I guess in any role that you had, did	10:23:03
23	you ever work out of the Executive Chamber office	10:23:06
24	in Albany?	10:23:08
25	A. I went there for two or three days	10:23:09

		Page 46
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	once in 2015, but that was the extent of my time	10:23:12
3	there.	10:23:15
4	Q. And when you went there for two or	10:23:15
5	three days in 2015, was that in your role as	10:23:18
6	Special Assistant to Joe Percoco?	10:23:21
7	A. Yes.	10:23:22
8	Q. Have you ever heard the nickname	10:23:35
9	"Mean Girls" used to describe anyone in the	10:23:38
10	Executive Chamber?	10:23:40
11	A. Yes.	10:23:42
12	Q. Okay. Who does it describe?	10:23:42
13	A. Melissa, Annabelle, Stephanie, Dani,	10:23:47
14	I think, too. I think that's all of them.	10:23:58
15	Q. So Melissa DeRosa?	10:24:01
16	A. Yes.	10:24:02
17	Q. Annabelle Walsh, Stephanie Benton	10:24:03
18	A. Yes.	10:24:05
19	Q and Dani Lever?	10:24:05
20	A. Yes.	10:24:06
21	Q. Okay. And who did you hear use that	10:24:07
22	term?	10:24:09
23	A. I don't know where I heard that from.	10:24:15
24	It might have been some something that was just	10:24:17
25	like said around the office about them.	10:24:20

		Page 47
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you ever hear the Governor use	10:24:23
3	that term?	10:24:24
4	A. No, not that I can recall.	10:24:26
5	Q. Was it just used amongst junior staff	10:24:29
6	or did you ever hear the senior staff use it to	10:24:31
7	describe themselves?	10:24:36
8	A. I think, mostly, just amongst junior	10:24:36
9	staff, as far as I can remember.	10:24:40
10	Q. And what did it mean to you?	10:24:42
11	A. I don't know. I don't know. I don't	10:24:49
12	know what that means. Just that they were, you	10:24:50
13	know, I guess, popular like in the movie, you	10:24:57
14	know, popular girls.	10:25:00
15	Q. Did it mean that they were mean?	10:25:01
16	A. That too, yeah.	10:25:05
17	Q. Were they mean to you?	10:25:06
18	A. Sometimes but, no, they were pretty	10:25:12
19	good with me for the most part.	10:25:16
20	Q. Okay. And when you say, "sometimes,"	10:25:18
21	can you give us an example of that?	10:25:20
22	A. Well, like, sometimes Melissa would	10:25:23
23	be short with you when you're trying to figure	10:25:26
24	something out, you know. She was just difficult	10:25:28
25	to deal with sometimes, you know. She would kind	10:25:34

		Page 48
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	of bark a lot of things that she wanted to get	10:25:37
3	done at once and you would have to kind of, you	10:25:39
4	know, triage them in your head, you know. She	10:25:41
5	was difficult in that regard.	10:25:43
6	Q. Did Melissa DeRosa ever curse at you?	10:25:45
7	A. Not that I can recall.	10:25:52
8	Q. Did she ever say anything to you that	10:25:53
9	you felt was belittling or degrading?	10:25:56
10	A. Not that I can recall.	10:26:03
11	Q. Okay. Can you compare your	10:26:04
12	experience working now at the Port Authority with	10:26:08
13	your experience working in the Executive Chamber?	10:26:10
14	A. Well, it's definitely, you know, more	10:26:17
15	regimental approach to the day. You know, I	10:26:19
16	would go in start at nine and if you want it	10:26:22
17	could end by five. You know, it's almost like	10:26:24
18	apples and oranges just because I'm also doing a	10:26:27
19	different job there. So, I mean, I've got a	10:26:30
20	little bit more freedom to take meetings and to	10:26:35
21	kind of go out and take lunch. It's also a	10:26:39
22	slower pace. There's deadlines that, you know,	10:26:44
23	are a little bit different. There were some	10:26:46
24	could be a week as opposed to having something	10:26:49
25	being an hour, like, in the Executive Chamber.	10:26:52

		Page 49
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	It's definitely, like, just a more regimental	10:26:58
3	approach, you know. You can kind of if your	10:27:06
4	calendar is one thing, it's pretty much going to	10:27:08
5	stay that way.	10:27:12
6	Q. Let's talk about Charlotte Bennett.	10:27:14
7	So, when was the first time you met	10:27:16
8	Ms. Bennett?	10:27:22
9	A. I mean, I may have seen her around	10:27:27
10	when she started. But I think the first time	10:27:28
11	that she and I actually spoke when she was coming	10:27:31
12	that the desk.	10:27:35
13	Q. When you say, "that desk," you mean	10:27:36
14	the	10:27:37
15	A. The one outside the Governor's	10:27:37
16	office.	10:27:41
17	Q. The one outside the Governor's, okay.	10:27:41
18	And were you supposed to be training	10:27:44
19	Ms. Bennett?	10:27:47
20	A. Yes.	10:27:48
21	Q. To take over your role?	10:27:48
22	A. Yes.	10:27:49
23	Q. And what did you do to train Ms.	10:27:49
24	Bennet?	10:27:49
25	A. So she like when the Governor was	10:27:56

		Page 50
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	in I remember there was a day that like we	10:27:58
3	split the desk. So she took one side of it and I	10:27:59
4	had the other side of it. And she was kind of	10:28:00
5	there to watch what I was doing and, you know,	10:28:02
6	ask a question.	10:28:06
7	And then I would kind of fill her,	10:28:07
8	this is why I do this, this is why I do that and	10:28:09
9	then like show her the phones.	10:28:12
10	And then the days that he wasn't in,	10:28:12
11	I asked her if she wanted to sit at the cube,	10:28:15
12	which is the outside of the Governor's office and	10:28:18
13	I sat in the back. And I said, get comfortable	10:28:20
14	with your surroundings. You know, if anything	10:28:22
15	pops into your head, you can just kind of pop	10:28:23
16	back here and we can talk, you know, stuff like	10:28:25
17	that.	10:28:27
18	Q. What did you tell Ms. Bennett about	10:28:27
19	interacting with the Governor?	10:28:31
20	A. I don't know. I don't remember what	10:28:34
21	I told her.	10:28:36
22	Q. Do you remember generally what you	10:28:37
23	told her?	10:28:39
24	A. Probably what I would tell anybody	10:28:41
25	when interacting with him. Don't lie to him, you	10:28:43

	1	Page 51
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	know. If you don't know the answer to something,	10:28:46
3	say I don't know; always call him "Governor."	10:28:48
4	Q. Any occasion on which you lied to the	10:28:54
5	Governor?	10:28:57
6	A. I don't think so no.	10:28:59
7	Q. Why were you giving that advice?	10:29:00
8	A. Cause I was always of the mind frame	10:29:03
9	that it's just better to tell him the truth, even	10:29:06
10	if it's an answer he doesn't like, because I	10:29:10
11	it was one it's like one of those things he	10:29:15
12	always knew if he knew you were lying or you	10:29:18
13	always get that impression if you were lying. So	10:29:21
14	it was always just better to tell him the truth,	10:29:23
15	you know, or even just to tell him, I don't know,	10:29:26
16	even if that's the answer he didn't want to hear.	10:29:29
17	Q. What happens if you tell the Governor	10:29:31
18	something he doesn't want to hear?	10:29:33
19	A. I mean, he'd get mad.	10:29:36
20	Q. Did the Governor ever get mad at you?	10:29:39
21	A. Sometimes, yeah.	10:29:42
22	Q. And what does that look like?	10:29:43
23	A. I mean, he would kind of just ask,	10:29:50
24	you know, do you even know what you're doing, you	10:29:52
25	know, stuff like that, you know.	10:29:57

		Page 52
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. What did you tell Ms. Bennett about	10:30:02
3	interacting with the Governor's senior staff?	10:30:07
4	A. I don't know what I told her. I	10:30:13
5	think for Stephanie, I probably would have told	10:30:15
6	her, you know, like, you know, treat this job as	10:30:18
7	if you're Stephanie's assistant first and then	10:30:21
8	the Governor's, cause that's kind of how it felt	10:30:23
9	when I was there so	10:30:27
10	But, as far as anybody I don't	10:30:29
11	know that I told her about anybody else, because	10:30:31
12	I don't know that I had a lot of hands-on with	10:30:34
13	them.	10:30:37
14	Q. Do you think looking at some of your	10:30:37
15	text messages might refresh your recollection?	10:30:39
16	A. Yeah.	10:30:41
17	Q. Why don't we take a break and we can	10:30:41
18	look at some documents.	10:30:43
19	MS. KENNEDY-PARK: We can go off the	10:30:44
20	record.	10:30:45
21	THE VIDEOGRAPHER: Okay. Everyone	10:30:46
22	the time is, approximately, 10:30. We are going	10:30:47
23	off the video record.	10:30:50
24	(Recess taken 10:30 to 10:43 a.m.)	10:41:17
25	THE VIDEOGRAPHER: Okay. The time is	10:43:15

		Page 53
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	approximately, 10:43. We are back on the video	10:43:16
3	record.	10:43:20
4	Q. Before the break, we were talking	10:43:21
5	about your interactions with the Governor and the	10:43:23
6	senior staff. I want to talk to you about things	10:43:26
7	that you observed.	10:43:29
8	A. Uh-huh.	10:43:29
9	Q. So did you ever observe the Governor	10:43:30
10	cursing at anyone else other than	10:43:33
11	A. Not that I can remember.	10:43:41
12	Q. Did you ever hear the Governor	10:43:44
13	threaten anyone?	10:43:46
14	A. Not that I can remember.	10:43:52
15	Q. Say something like, I'll end you, or	10:43:54
16	job's over, anything like that?	10:43:57
17	A. Not that I can really remember, no.	10:44:02
18	Q. Okay. Ever see the Governor throw	10:44:04
19	anything at anyone?	10:44:07
20	A. No, not that I can remember.	10:44:14
21	Q. Have you ever heard about the	10:44:18
22	Governor ever throwing something at someone?	10:44:20
23	A. Not that I can remember, no.	10:44:28
24	Q. Have you ever witnessed the Governor	10:44:30
25	kiss anyone?	10:44:31

		Page 54
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Maybe Steph on the cheek when she was	10:44:41
3	leaving to go home maybe, I think.	10:44:45
4	Q. Did you ever see the Governor kiss	10:44:47
5	anyone on the lips?	10:44:50
6	A. No, I don't think so.	10:44:51
7	Q. Did you ever hear about the Governor	10:44:52
8	about kissing anyone on the lips?	10:44:55
9	A. No, I don't think so.	10:44:58
10	Q. Have you ever observed anyone sitting	10:45:00
11	on the Governor's lap?	10:45:03
12	A. No.	10:45:05
13	Q. Have you ever heard about anyone from	10:45:06
14	the staff sitting on the Governor's lap?	10:45:08
15	A. No, I don't think so.	10:45:12
16	Q. Have you ever heard about ever	10:45:13
17	seen or heard about the Governor putting his head	10:45:25
18	in someone's lap?	10:45:27
19	A. No.	10:45:30
20	Q. Have you ever heard about or seen	10:45:33
21	someone that was part of the Executive Mansion	10:45:37
22	not fully clothed?	10:45:39
23	A. No.	10:45:42
24	Q. Have you ever heard or heard about	10:45:54
25	the Governor making jokes of a sexual nature or	10:45:55

		Page 55
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	sexual content in front of someone else?	10:45:58
3	A. No.	10:46:02
4	Q. Is there anything you ever witness	10:46:03
5	the Governor do that you thought was concerning?	10:46:05
6	A. What do you mean by "concerning"?	10:46:12
7	What does that mean, like?	10:46:14
8	Q. Why don't you tell me.	10:46:15
9	Is there something that you saw that	10:46:17
10	you observed that made you feel uncomfortable for	10:46:18
11	the person that it was happening to?	10:46:21
12	A. Nothing specific that I can think of,	10:46:25
13	no.	10:46:27
14	Q. Did you ever see the Governor speak	10:46:28
15	Italian to other people?	10:46:37
16	A. Yeah.	10:46:38
17	Q. And did you know what he was saying?	10:46:39
18	A. Yeah.	10:46:41
19	Q. Did he ever use Italian terms of	10:46:43
20	endearment or make comments in Italian that were	10:46:46
21	of a sexual nature?	10:46:48
22	A. No, it was more like, "chow chow,"	10:46:50
23	you know, when he was walking in and out of the	10:46:52
24	office.	10:46:54
25	Q. Never heard him call someone "bella"?	10:46:55

		Page 56
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Maybe, yeah. That sounds like	10:46:58
3	yeah, I may have heard that, yeah.	10:47:01
4	Q. Do you remember who he was saying it	10:47:03
5	to you?	10:47:05
6	A. No, I don't. I'm sorry.	10:47:05
7	Q. Did he call other women in the	10:47:09
8	Executive Chamber by terms of endearment?	10:47:11
9	A. Like what?	10:47:14
10	Q. Dear, honey, sweetheart, darling.	10:47:15
11	A. Yeah, I think, maybe Steph a couple	10:47:23
12	times, like, okay, dear, you know, have a safe	10:47:24
13	trip home.	10:47:27
14	Q. Did you ever observe the Governor	10:47:30
15	ever asking anyone to sing for him?	10:47:33
16	A. No.	10:47:39
17	Q. Did you ever hear about the Governor	10:47:40
18	asking someone to sing for him?	10:47:43
19	A. Yes.	10:47:45
20	Q. And what did you hear about that?	10:47:45
21	A. That was Charlotte that said she had	10:47:47
22	to sing for him.	10:47:51
23	Q. Okay. And what did Ms. Bennett tell	10:47:52
24	you about singing for the Governor?	10:47:55
25	A. If I remember correctly, I think, she	10:47:57

		Page 57
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	had to sing "Bohemian Rhapsody" for him.	10:48:00
3	Q. Do you remember her telling you	10:48:06
4	anything else about that?	10:48:08
5	A. Not really, no.	10:48:11
6	Q. There is a time period after you	10:48:12
7	or when Ms. Bennett began and shortly after you	10:48:16
8	left where you and she were texting; is that	10:48:19
9	right?	10:48:22
10	A. (No response.)	10:48:22
11	Q. And during the time period after you	10:48:23
12	left the Executive Chamber, was text your only	10:48:25
13	form of communication with Ms. Bennett?	10:48:27
14	A. Yes.	10:48:29
15	Q. Did you talk to her on the phone?	10:48:30
16	A. I don't think I ever talked to her on	10:48:32
17	the phone.	10:48:34
18	Q. After you left the Executive Chamber.	10:48:34
19	A. Correct.	10:48:37
20	Q. Okay. And so the content of the text	10:48:37
21	messages is all you know about her experience in	10:48:39
22	the Executive Chamber?	10:48:41
23	A. Yes.	10:48:41
24	Q. Okay. Why don't we you open your	10:48:42
25	binder, which you have in front of you. And	10:48:46

		Page 58
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	let's start with Tab 6, which we'll mark as the	10:48:55
3	next exhibit.	10:49:02
4	A. Okay.	10:49:06
5	(Deposition Exhibit 3, 5/8/19 text	10:49:06
6	message chain between Bennett and Witness, was	10:49:06
7	marked for identification.)	10:49:06
8	Q. This is a text message between you	10:49:06
9	and Ms. Bennett from May 8th, 2019.	10:49:06
10	At this point was Ms. Bennett working	10:49:11
11	in the Executive Chamber?	10:49:15
12	A. Yes.	10:49:19
13	Q. Were you still working in the	10:49:20
14	Executive Chamber?	10:49:21
15	A. Yes.	10:49:22
16	Q. And if you look at the beginning of	10:49:25
17	this text message, you say she says,	10:49:26
18	"Charlotte."	10:49:33
19	And then you write, "First thing's	10:49:33
20	first. Breathe it's going to be okay."	10:49:35
21	Do you remember something happened to	10:49:40
22	Ms. Bennett that caused you to text this to her?	10:49:42
23	A. Well, I think, this is when she was	10:49:45
24	first brought up to, like, staff him and it's	10:49:48
25	kind of like it could be, like, a daunting	10:49:52

		Page 59
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	thing. So I was just, like, telling her it's	10:49:55
3	going to be fine, you know, like this just	10:49:57
4	breathe.	10:50:00
5	Q. And you wrote back, "It's going to be	10:50:00
6	okay."	10:50:04
7	A. Uh-huh.	10:50:04
8	Q. And then she said, "Do you think it	10:50:04
9	was a mistake to agree to this? Some people on	10:50:07
10	38 you can guess were kind of making me feel like	10:50:08
11	it was or at least that I should clarify some	10:50:11
12	things beforehand."	10:50:15
13	What did you understand her to mean	10:50:16
14	by that?	10:50:18
15	A. That people were going to jealous of	10:50:19
16	her when she was moved up to staff the Governor.	10:50:21
17	Q. And what did you understand were the	10:50:24
18	things that she "should clarify"? Because you	10:50:26
19	wrote back, "you should absolutely clarify with	10:50:31
20	them."	10:50:33
21	A. I don't really I don't know what I	10:50:38
22	mean. Like, I don't can't really remember	10:50:40
23	what we were talking about to "clarify."	10:50:52
24	Q. And what was your understanding of	10:50:54
25	who the people she was referring to on 38 were?	10:50:56

		Page 60
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. I believe it was the other briefer	10:51:01
3	that she worked with.	10:51:04
4	Q. And who was that?	10:51:05
5	A. It was a woman named	10:51:06
6	Q. Can you flip to the next page.	10:51:11
7	A. Yeah.	10:51:13
8	Q. Okay. At the bottom of that page you	10:51:14
9	say, "It can be the most frustrating thing you'll	10:51:17
10	ever do maybe ever."	10:51:20
11	What did you mean by that?	10:51:22
12	A. Working there.	10:51:37
13	Q. And what did you mean was	10:51:39
14	"frustrating" about working there? In fact, I	10:51:41
15	think, you said, "it was the most frustrating	10:51:43
16	thing you'll do maybe ever."	10:51:45
17	Why was working in the Executive	10:51:47
18	Chamber the "most frustrating thing" you might do	10:51:48
19	ever?	10:51:52
20	A. I mean, I think, we've talked about	10:51:52
21	it. There are early mornings. There are late	10:51:54
22	nights. There's no real thank you's to anything	10:51:56
23	you do. When you're at that desk, you can't	10:52:00
24	really leave ever for the day. There's you	10:52:03
25	know, it's like bring your lunch type of thing.	10:52:07

		Page 61
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	And just the way that the place moved, it's a	10:52:11
3	very fast moving place and it's really really	10:52:13
4	hard to keep that adrenaline rush every day that	10:52:17
5	you're in there.	10:52:21
6	Q. When you say, "there are no thank	10:52:22
7	you's," what do you mean?	10:52:24
8	A. There are no thank you's for doing	10:52:25
9	your job.	10:52:28
10	Q. Did any of the senior staff ever	10:52:29
11	thank you for anything you did?	10:52:31
12	A. I don't know. It's tough for me to	10:52:42
13	recall. I don't know that I was necessarily	10:52:45
14	looking for thank you's or paying attention to	10:52:46
15	that, you know. I can't remember being thanked.	10:52:50
16	Q. Do you think working in the Executive	10:52:51
17	Chamber was a respectful work environment?	10:52:53
18	A. I don't know.	10:53:01
19	Q. I'm going to ask you a different	10:53:02
20	question.	10:53:04
21	How would you describe the culture of	10:53:04
22	the Executive Chamber, not the job demands but	10:53:07
23	the culture? How did people treat you?	10:53:11
24	A. I'm I mean, it's a strange thing	10:53:20
25	because they're friendly to you. Like, it's a	10:53:27

		Page 62
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	friendly place. You make a lot of friendships.	10:53:30
3	But it's also you can be meant to feel stupid	10:53:32
4	sometimes.	10:53:36
5	Q. Can you give me an example of how you	10:53:38
6	were made "to feel stupid"?	10:53:41
7	A. I don't know. Just I don't know.	10:53:50
8	I'm trying to think. I can't come up with an	10:53:55
9	example. I just remember feeling stupid	10:53:58
10	sometimes.	10:54:01
11	Q. Did anything anyone in the Executive	10:54:01
12	Chamber did to you leave you in tears?	10:54:02
13	A. No. There were days where, I think,	10:54:09
14	I probably would have wanted to cry, but I don't	10:54:11
15	know that I ever cried at work.	10:54:14
16	Q. And the days where you can kind of	10:54:16
17	"wanted to cry," can you describe to us what's	10:54:18
18	that day like?	10:54:21
19	A. It's usually the third or fourth day	10:54:21
20	in the row of getting to the office by 5:30 and	10:54:23
21	getting home by like 8 o'clock at night and just	10:54:26
22	being really tired.	10:54:29
23	Q. Not having to do with anything to do	10:54:30
24	with the way someone treated you?	10:54:32
25	A. I don't know. I can't recall a	10:54:37

		Page 63
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	specific thing of being treated that way.	10:54:44
3	Q. Okay. I asked you just a few moments	10:54:46
4	ago that you thought that the culture of the	10:54:48
5	Executive Chamber when you were there was	10:54:50
6	respectful. You said you couldn't answer that	10:54:52
7	question.	10:54:54
8	Why can't you say it was respectful?	10:54:55
9	A. Well, I mean, "respectful" of what	10:54:59
10	your time? Because if that's the case, it's not	10:55:01
11	respectful of your time. There is a demand for	10:55:04
12	weekends and, you know, if it's respect you	10:55:06
13	know, like, you know I don't know. I don't	10:55:09
14	know.	10:55:18
15	Q. How about respectful of you as a	10:55:19
16	person?	10:55:21
17	A. Not always.	10:55:24
18	Q. And can you remember any occasions in	10:55:26
19	which you felt disrespected?	10:55:29
20	A. When I asked to leave to go to	10:55:31
21	another job and it took about two years to do	10:55:33
22	that and it felt like it was a my own doing to	10:55:35
23	finally get them to do it.	10:55:40
24	Q. Any other occasions?	10:55:41
25	A. Having to threaten to resign the day	10:55:42

		Page 64
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	of to get a raise.	10:55:48
3	Q. Any other occasions?	10:55:50
4	A. It's all I can think of.	10:55:51
5	Q. Do you want to take a break?	10:55:53
6	A. Yeah.	10:55:54
7	Q. Okay, let's take a break. Okay.	10:55:55
8	MS. CHUN: Mike, we're going off the	10:56:04
9	record. We're going to take a break.	10:56:06
10	THE VIDEOGRAPHER: The time is,	10:56:06
11	approximately, 10:56. We're going off the video	10:56:07
12	record.	10:56:10
13	(Recess taken 10:56 to 11:22 a.m.)	11:22:30
14	THE VIDEOGRAPHER: Okay. The time	11:22:30
15	is, approximately, 11:22. We're back on the	11:22:31
16	video record.	11:22:34
17	Q. Thanks for coming back after a break.	11:22:34
18	We've been talking about the culture	11:22:37
19	of the Executive Chamber and, specifically, sort	11:22:39
20	of was it a respectful environment or not. I	11:22:40
21	understand you're not comfortable necessarily	11:22:44
22	answering that question or putting that word on	11:22:48
23	it.	11:22:50
24	But can you describe for me in your	11:22:50
25	own experience, not what you observed from	11:22:54

		Page 65
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	others, but in your own experience whether there	11:22:56
3	were occasions in which you were told that your	11:22:58
4	work wasn't up to standard?	11:23:02
5	A. Well, I don't know that it was said	11:23:10
6	that it was up to standard. But most of what I	11:23:13
7	would pick that was kind of dismissive to me was,	11:23:16
8	like, you would get a look, like, okay, really,	11:23:18
9	you know, it was mostly body language and type	11:23:21
10	looks that you could just foresee it as, you	11:23:23
11	know, you've let me down on this one, you know.	11:23:26
12	And those were things that would kind of really	11:23:29
13	eat at you.	11:23:32
14	Q. So, when people were not happy with	11:23:32
15	your work performance, they conveyed that to you	11:23:36
16	using body language or looks?	11:23:39
17	A. Yeah. For instance, if I was going	11:23:40
18	to give Stephanie something, you know, I would	11:23:41
19	hand it to her and she would be like, really, you	11:23:44
20	know, something like that, you know. So not	11:23:46
21	actually saying something but the body language	11:23:49
22	is perceived to be, like, you know, this isn't	11:23:51
23	great.	11:23:54
24	Q. And were there ever occasions in	11:23:54
25	which you got more than that in terms of feedback	11:23:56

		Page 66
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	on your work product, more than a look or more	11:23:59
3	than sort of a dismissive gesture?	11:24:02
4	A. Not really because my work product it	11:24:04
5	was mostly like scheduling meetings. So it was,	11:24:07
6	you know, if I couldn't get the person on the	11:24:10
7	phone, when, you know it's like come on, figure	11:24:12
8	it out, where is he, what's going on here, you	11:24:13
9	know, which was frustrating because I can't	11:24:15
10	control the other person's phone, you know. So	11:24:16
11	things like that that were just like you really	11:24:18
12	need to find this person, you really need to do	11:24:19
13	this, you really need to do that.	11:24:22
14	Q. Were there times you felt like you	11:24:24
15	were being blamed or your work performance were	11:24:26
16	being judged on things that were out of your	11:24:29
17	control?	11:24:31
18	A. Yes, but I don't know that I remember	11:24:36
19	something specific to that. But I do remember	11:24:39
20	thinking like, you know, what the heck, you know,	11:24:41
21	this isn't my fault but, yes.	11:24:42
22	Q. And what about observing other	11:24:44
23	people, did you have the Governor give feedback	11:24:46
24	to people on their work?	11:24:49
25	A. Well, they would have well, the	11:24:54

		Page 67
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Governor and senior staff would have like these	11:24:56
3	scheduling-type event type meetings and they	11:24:59
4	would come to him and present to him the event	11:25:02
5	they come up with and, you know, everything of	11:25:04
6	it. And it wouldn't be uncommon for senior staff	11:25:06
7	to exit that meeting, you know, with like	11:25:09
8	shoulders hunched over, you know, like heavy	11:25:12
9	exhaling, you know, going back to their offices	11:25:16
10	and slamming the door, stuff like that after a	11:25:18
11	bad meeting.	11:25:21
12	Q. So leaving his office upset,	11:25:22
13	essentially?	11:25:24
14	A. Right.	11:25:24
15	Q. Okay. And how often did you see	11:25:25
16	people in the Executive Chamber upset?	11:25:26
17	A. I don't know how often. I don't know	11:25:34
18	if I could tell you how often it was. I mean,	11:25:35
19	you know, when the days where there were, you	11:25:38
20	know, events flying and you had to do this,	11:25:43
21	people would get upset because it's lot of work	11:25:46
22	to turn around in a really quick time. I don't	11:25:49
23	know how often it is, though.	11:25:52
24	Q. Did you have to not have to.	11:25:54
25	But did you ever comfort someone who	11:25:55

		Page 68
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	was crying?	11:25:57
3	A. I can't remember comforting anybody	11:26:06
4	that was crying.	11:26:08
5	Q. Can you talk to us a little bit about	11:26:08
6	what your describing, is there a dynamic that is	11:26:12
7	everyone in the Executive Chamber sort of being	11:26:14
8	having these moments or is it the way the	11:26:17
9	senior staff treats the junior staff?	11:26:19
10	A. You mean I'm sorry. You mean, you	11:26:26
11	know, does senior staff have bad moments too and	11:26:29
12	junior staff?	11:26:31
13	Q. Does senior staff have moments like	11:26:32
14	that with each other that you observed, right, or	11:26:34
15	is the kind of looks that you described or the	11:26:36
16	body language that you described is that more	11:26:39
17	from your observation directed at the junior	11:26:41
18	staff?	11:26:44
19	A. I would say mostly at the junior	11:26:44
20	staff.	11:26:46
21	Q. Okay. You talked about the nature of	11:26:46
22	the work being, I think, you said the words were	11:26:58
23	24/7; is that right?	11:27:00
24	A. I don't remember if I said "24/7,"	11:27:01
25	but that's close to being accurate.	11:27:04

		Page 69
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Okay. And how did you know when you	11:27:05
3	had to be in the office, when you were staffing	11:27:08
4	the Governor?	11:27:11
5	A. I would get a pin alert that would go	11:27:13
6	off to my phone letting me know that, you know,	11:27:16
7	he was leaving or likely to leave soon.	11:27:19
8	Q. And what's the earliest you think a	11:27:21
9	pin alert like that ever came?	11:27:25
10	A. Three or four in the morning.	11:27:31
11	Q. When you get the pin alert, what does	11:27:32
12	it mean to you as someone who is staffing the	11:27:36
13	Governor?	11:27:39
14	A. I immediately got up and got ready	11:27:39
15	for work and got to the office.	11:27:41
16	Q. Did you have to get to the office	11:27:41
17	before the Governor got to the office?	11:27:43
18	A. Normally, that was the rule. When it	11:27:44
19	was earlier like that, there was kind of some	11:27:46
20	flex time that was allowed for that.	11:27:49
21	Q. Any occasion in which you were ever	11:27:53
22	perceived as being late to the office?	11:27:55
23	A. I don't think so. I really do not	11:28:00
24	like being late. I still don't like being late	11:28:02
25	to this day so	11:28:05
22 23 24	perceived as being late to the office?  A. I don't think so. I really do not like being late. I still don't like being late	11:27:55 11:28:00 11:28:02

		Page 70
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Ever observe anyone that was	11:28:05
3	perceived as being late and saw what happened?	11:28:08
4	A. Yes.	11:28:11
5	Q. And who was that?	11:28:11
6	A. Kaitlin .	11:28:15
7	Q. And what happened?	11:28:15
8	A. I remember she would come in late	11:28:16
9	quite often. And, I think, sometimes, when she	11:28:19
10	was depending on how late she got in, like,	11:28:25
11	they would pull somebody for a second to sit	11:28:30
12	there, like, they may have pulled me for like a	11:28:32
13	second to sit there until she got there. But I	11:28:36
14	don't really know what happens after that. I can	11:28:40
15	just guess that Stephanie is probably very	11:28:43
16	annoyed.	11:28:46
17	Q. Did you ever observe feedback	11:28:46
18	Kaitlin getting any feedback about being late?	11:28:50
19	A. Not that I can recall.	11:28:54
20	Q. How do you think the demands of	11:29:06
21	working in the Executive Chamber personally	11:29:08
22	affected you?	11:29:10
23	A. Well, I lost a lot of friends in my	11:29:13
24	personal life. You know, you can't really see	11:29:16
25	them, you know. So you're always working.	11:29:18

		Page 71
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	You're always at work. You're always blowing off	11:29:20
3	everything, you know. So it takes a toll on your	11:29:23
4	personal life. That's for sure so	11:29:26
5	Q. Were you able to reconnect with those	11:29:28
6	folks after you left the Executive Chamber?	11:29:30
7	A. No.	11:29:32
8	Q. Any other aspects of it of working	11:29:34
9	at the Executive Chamber that took a toll on your	11:29:36
10	personal life?	11:29:39
11	A. Just all of your personal time.	11:29:51
12	Q. Were there any occasions on which you	11:29:53
13	were taking personal time and someone from the	11:29:55
14	Executive Chamber was being invasive about that?	11:29:57
15	A. Yes.	11:30:00
16	Q. Can you tell us about that?	11:30:00
17	A. So it was at and I	11:30:09
18	just remember sorry.	11:30:11
19	Q. It's okay. Why don't I feed it to	11:30:18
20	you, okay.	11:30:21
21	Were you at ?	11:30:21
22	A. Yeah.	11:30:23
23	Q. Did you tell people at the Executive	11:30:23
24	Chamber that you were at?	11:30:26
25	A. I told Stephanie.	11:30:28

		Page 72
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Ms. Benton?	11:30:29
3	A. Yes.	11:30:30
4	Q. And while you were at	11:30:30
5	, were people from the Executive Chamber	11:30:31
6	trying to reach you?	11:30:32
7	A. Yes.	11:30:33
8	Q. Persistently?	11:30:33
9	A. Yes.	11:30:35
10	Q. Did you answer them eventually?	11:30:35
11	A. Yes.	11:30:37
12	Q. And told them you were at	11:30:38
13	?	11:30:40
14	A. Yes.	11:30:41
15	Q. Did that stop them from trying to	11:30:41
16	contact you?	11:30:43
17	A. Yes.	11:30:43
18	Q. Okay. You want to take a break?	11:30:44
19	A. I'm sorry.	11:30:47
20	Q. It's okay.	11:30:47
21	MS. KENNEDY-PARK: Just go off the	11:30:48
22	video please.	11:30:49
23	THE VIDEOGRAPHER: Okay. The time	11:30:51
24	is, approximately, 11:30. We're going off the	11:30:52
25	video record.	11:30:55

		Page 73
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	(Recess taken 11:30 to 11:33 a.m.)	11:33:01
3	THE VIDEOGRAPHER: Okay. The time	11:33:01
4	is, approximately, 11:33. We are back on the	11:33:02
5	video record.	11:33:05
6	Q. Okay. If you could turn to the	11:33:06
7	binder in front of you and what is at Tab 7.	11:33:09
8	(Deposition Exhibit 4, 5/10/19 text	11:33:09
9	message chain between Walsh and Witness, was	11:33:09
10	marked for identification.)	11:33:20
11	Q. We'll, mark this as the next exhibit.	11:33:20
12	This is a text message chain between you and	11:33:22
13	Annabelle Walsh on May 10th, 2019.	11:33:26
14	As of May 10th, 2019, what was	11:33:30
15	Annabelle Walsh's role in the Executive Chamber?	11:33:33
16	A. I'm sorry. What was the date again,	11:33:35
17	as of what year?	11:33:37
18	Q. May 10th, 2020.	11:33:37
19	A. She was the scheduler.	11:33:38
20	Q. Okay. And so, as the scheduler, did	11:33:39
21	you report to her?	11:33:42
22	A. Well, I still reported to Jill at	11:33:46
23	that point, like, on paper. But, like, yes, I	11:33:48
24	mean, Annabelle would tell me things to do and I	11:33:51
25	would do it.	11:33:54

	1	Page 74
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Okay. And did Ms. Bennett report to	11:33:54
3	Ms. Walsh?	11:33:59
4	A. You know, I don't know who they	11:34:00
5	reported I don't know who she reported to at	11:34:02
6	that point. She may have.	11:34:04
7	Q. Okay. Let me step back from the	11:34:05
8	document for a second.	11:34:07
9	A. Sure.	11:34:08
10	Q. In the Executive Chamber, was there	11:34:08
11	an org chart of any sort?	11:34:10
12	A. Maybe, not one that I was ever given,	11:34:13
13	you know.	11:34:15
14	Q. And if you were you going to find out	11:34:16
15	sort of what your reporting lines were, who would	11:34:19
16	you go talk to?	11:34:23
17	A. Probably me personally, I would	11:34:25
18	have gone and talk to Jill, who, like, to who I	11:34:27
19	reported to.	11:34:29
20	Q. Okay. And was there an HR function	11:34:29
21	in the Executive Chamber?	11:34:32
22	A. Well, I mean, like, there was an HR	11:34:36
23	rep, I believe, in Albany. It was like Lauren	11:34:41
24	Grasso, I think, who handled a lot of that stuff.	11:34:44
25	But, like, if I had questions about like vacation	11:34:47

		Page 75
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	time or, you know, sick policy or anything like,	11:34:50
3	it would usually be that I would	11:34:52
4	reach out to in the office.	11:34:55
5	Q. And if you had, let's say, a	11:34:57
6	workplace complaint, let's say your you had	11:34:59
7	experienced violation in the workplace, who would	11:35:06
8	you go to?	11:35:09
9	A. I would have gone to Jill.	11:35:10
10	Q. Okay. Do you know what "GOER" is?	11:35:11
11	A. Governor's Office's of Employee	11:35:13
12	Relations, I believe.	11:35:16
13	Q. And what did you understand the	11:35:16
14	purpose of GOER was?	11:35:18
15	A. I don't I don't know that I ever	11:35:20
16	dealt with GOER so	11:35:23
17	But, I think, it's supposed to be	11:35:24
18	like HR-type office.	11:35:26
19	Q. Did you get any training or had any	11:35:28
20	training that talked about GOER and what GOER was	11:35:31
21	there for?	11:35:33
22	A. I don't know if GOER did like the	11:35:33
23	SLMS training that the State does. I don't know	11:35:36
24	if they were in charge of that. If they were	11:35:39
25	then, yes. But, you know, that would be the	11:35:41

		Page 76
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	extent of it.	11:35:43
3	Q. And what is "SLMS training"?	11:35:44
4	A. I think it stands for Statewide	11:35:45
5	Learning Management System, which is where you	11:35:47
6	take like, you know, your cyber security training	11:35:50
7	or sexual harassment trainings online.	11:35:51
8	Q. While we're talking sexual	11:35:54
9	harassment, when you were staff member of the	11:35:56
10	Executive Chamber, did you do sexual harassment	11:35:58
11	training?	11:35:59
12	A. Yes.	11:36:00
13	Q. And was it online?	11:36:00
14	A. Yes.	11:36:01
15	Q. Did you do it every year?	11:36:01
16	A. Yes.	11:36:03
17	Q. And, as part of that training, did	11:36:04
18	you learn that reports of sexual harassment would	11:36:06
19	ultimately go to GOER?	11:36:09
20	A. Not that I can recall.	11:36:11
21	Q. Okay. Did you ever observe anyone in	11:36:12
22	the senior staff do their sexual harassment	11:36:17
23	training?	11:36:20
24	A. Well, I can tell you that when I was	11:36:21
25	staffing Jill, I would give her the binder	11:36:24

	1	Page 77
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	cutout. It was like a printed version of it and	11:36:27
3	she would receive that and it would have a signed	11:36:30
4	where you can sign on it. So I would give her	11:36:32
5	the printed versions of those to read and sign.	11:36:34
6	Q. Okay. Did you observe Ms. DesRosiers	11:36:37
7	actually reading the trainings?	11:36:39
8	A. No.	11:36:41
9	Q. Do you know if she did or didn't?	11:36:41
10	A. I don't know.	11:36:43
11	Q. Did she sign the forms on the	11:36:43
12	occasions in which you gave her the binder and	11:36:45
13	the form	11:36:47
14	A. Right.	11:36:47
15	Q did you sign the form?	11:36:48
16	A. Yes.	11:36:49
17	Q. And who did you get the binder from?	11:36:49
18	A. I believe it was	11:36:51
19	Q. And did you have to return the signed	11:36:54
20	form to ?	11:36:56
21	A. Yeah, would normally come	11:36:58
22	around. I think there was a deadline where the	11:37:00
23	whole, like, Chamber had to be in compliance by a	11:37:03
24	certain point. So there reminders. And I think	11:37:05
25	there was a deadline of which the compliance date	11:37:06

		Page 78
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	was.	11:37:08
3	Q. Do you remember what time of year	11:37:08
4	that compliance deadline was?	11:37:09
5	A. I don't.	11:37:11
6	Q. At the end of the year?	11:37:12
7	A. Maybe. Like, it's complete guess on	11:37:17
8	my part, but I feel like in October time frame	11:37:20
9	area.	11:37:22
10	Q. Okay. Anyone else that you gave the	11:37:23
11	binder of hardcopy trainings to?	11:37:25
12	A. I think Jill was the only one.	11:37:28
13	Q. Okay. Did you ever observe the	11:37:30
14	Governor receiving a binder of those trainings?	11:37:32
15	A. No.	11:37:34
16	Q. Okay. Alright. Why don't we go back	11:37:35
17	to the text message.	11:37:38
18	A. Sure.	11:37:39
19	Q. So this is a text message, like I	11:37:40
20	said, between you and Ms. Walsh, who you aid said	11:37:42
21	at the time was the Director of Scheduling.	11:37:45
22	A. Uh-huh.	11:37:47
23	Q. And you say, "He told me to go and	11:37:48
24	keep Charlotte here. I put gift in his car.	11:37:52
25	Charlotte is good." Out of you correct	11:37:56

		Page 79
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	yourself, "out of my hands now."	11:37:59
3	And why were you updating Ms. Walsh	11:38:01
4	on what was going on?	11:38:05
5	A. It was sometimes Annabelle would	11:38:08
6	check in, but I would also let her know, like, it	11:38:10
7	was a courtesy thing of what he was doing.	11:38:13
8	Because sometimes when senior staff wasn't in the	11:38:15
9	office, they would ask, how are things going?	11:38:18
10	And then I would do it as courtesy to	11:38:21
11	her. I think this was close to when I was	11:38:23
12	leaving. So I wanted to let her know what he was	11:38:25
13	doing and, you know, that Charlotte was with him.	11:38:27
14	Q. Okay. And was Ms. Walsh someone who	11:38:28
15	was in the New York City office, that's where she	11:38:30
16	was located?	11:38:33
17	A. Yes.	11:38:34
18	Q. And then she wrote back, "Oh, Jesus."	11:38:34
19	And you wrote, "laughing out loud. I	11:38:37
20	know."	11:38:39
21	Do you know why you wrote I know in	11:38:40
22	response to her saying, "Oh, Jesus"?	11:38:43
23	A. I think because it's pretty soon to	11:38:45
24	have somebody staffing him alone.	11:38:47
25	Q. And why is it "pretty soon to have	11:38:50

		Page 80
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	somebody staffing him alone"?	11:38:53
3	A. Because when you're new there, it's a	11:38:54
4	really hard thing to do. I mean, but it's not	11:38:57
5	uncommon for him for like to have to staff alone.	11:38:59
6	Because I can remember there were instances where	11:39:03
7	Stephanie would leave and it would be a late	11:39:05
8	night and I would sit the cube and everyone would	11:39:06
9	be gone. It's like a precautionary thing, like,	11:39:09
10	Christmas Eve or like right before Christmas, I	11:39:12
11	was the only one in the office with him. He	11:39:14
12	didn't really need me anything, but it was a	11:39:16
13	precautionary thing, just in case he did need	11:39:19
14	something. So, you know, it wouldn't be weird	11:39:21
15	for him to be like, Stephanie, go home, keep	11:39:24
16	out there. I thought it was a little early thing	11:39:27
17	for him to happen, but it's not an uncommon thing	11:39:30
18	to happen.	11:39:33
19	Q. So somebody needs to be there when	11:39:33
20	the Governor is there, essentially?	11:39:35
21	A. Correct.	11:39:37
22	Q. And you don't believe unless the	11:39:37
23	Governor leaves?	11:39:39
24	A. Correct.	11:39:39
25	Q. And unless he tells you you can?	11:39:40

		Page 81
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Correct.	11:39:42
3	Q. Okay. And on those occasions	11:39:43
4	actually, are there any occasions in which you	11:39:43
5	observed that the Governor was alone in his	11:39:45
6	office with another member of the staff?	11:39:47
7	A. So you mean like just two people in	11:39:58
8	his office	11:40:00
9	Q. Yes.	11:40:01
10	A and I'm the only one staffing him?	11:40:01
11	Q. Correct.	11:40:03
12	A. Yeah. Like, Melissa would hang out	11:40:03
13	all the time after work.	11:40:05
14	Q. Okay. Anyone else?	11:40:06
15	A. Sometimes Annabelle, Steph sometimes	11:40:08
16	if it was like earlier in the week, later in the	11:40:10
17	week. She tended to go back to Albany.	11:40:13
18	Q. What about other senior staffers,	11:40:14
19	were there other senior staffers whoever had	11:40:16
20	one-on-one meetings with the Governor?	11:40:17
21	A. Robert Mujica sometimes had	11:40:24
22	one-on-one meetings. I'm trying to think. Maybe	11:40:27
23	Alfonso would want to have one-on-one meetings	11:40:41
24	sometimes too. But it from what I remember,	11:40:44
25	it was usually, the people who would hang out	11:40:46

		Page 82
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	and talk to him the most was SS #1 SS #3	11:40:48
3	and SS #2	11:40:51
4	Q. What about Lindsey Boylan, did she	11:40:52
5	ever have a one-on-one meeting that you're aware	11:40:55
6	of with the Governor?	11:40:57
7	A. I remember her coming up for	11:41:00
8	meetings, but I don't remember if they were one	11:41:01
9	on one or not.	11:41:03
10	Q. You know who she is, right?	11:41:04
11	A. Yes, I do.	11:41:06
12	Q. You said that SS #1 would come and	11:41:07
13	hang out in the Governor's office.	11:41:10
14	Did you ever see the Governor have	11:41:11
15	his hands on Senior Staffer #1;	11:41:14
16	A. No.	11:41:15
17	Q. Did you ever see them kiss?	11:41:15
18	A. No.	11:41:17
19	Q. Ever see them have any physical	11:41:17
20	interaction?	11:41:20
21	A. No.	11:41:20
22	Q. Let's go back to the text.	11:41:20
23	So can you actually look at the next	11:41:22
24	tab?	11:41:23
25	A. Which one?	11:41:24
22 23 24	Q. Let's go back to the text.  So can you actually look at the next tab?	11:41:2 11:41:2 11:41:2

		Page 83
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Which is Tab 8.	11:41:25
3	A. Okay.	11:41:26
4	(Deposition Exhibit 5, 5/10/19 text	11:41:26
5	message chain between Bennett and Witness, was	11:41:26
6	marked for identification.)	11:41:27
7	Q. Let's mark this as the next exhibit.	11:41:27
8	So this is on the same day. This is	11:41:32
9	also on May 10th, 2019 and this is between you	11:41:33
10	and Charlotte Bennett.	11:41:36
11	Do you see that?	11:41:39
12	A. Uh-huh.	11:41:40
13	Q. So this looks like to me you are	11:41:40
14	checking on Charlotte Bennett while she was alone	11:41:42
15	staffing the Governor; is that right?	11:41:45
16	A. Yeah, yeah, I think so.	11:41:52
17	Q. Okay. And so let's start at the top.	11:41:54
18	It says she says, "You're right. Everyone	11:41:56
19	knows."	11:41:59
20	And you say, "Told you. Don't make	11:41:59
21	that mistake again."	11:42:01
22	Do you remember what that's in	11:42:02
23	reference to.	11:42:04
24	A. Yeah. I think about her sitting up	11:42:04
25	there and, like, that she would be the one to	11:42:06

		Page 84
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	replace me.	11:42:08
3	Q. Meaning, she's saying everyone knows	11:42:10
4	that she's replacing you?	11:42:13
5	A. Yeah.	11:42:14
6	Q. And why do you say, "Don't make that	11:42:15
7	mistake again"?	11:42:17
8	A. Because, I think, if I'm remembering	11:42:17
9	it correctly, I had told her the best way, like,	11:42:19
10	to approach this job is to do it humbly. So	11:42:21
11	and, like, if you go out from what I've seen,	11:42:24
12	when you approach this job and you're I don't	11:42:27
13	know the right word for it, but if you're too	11:42:31
14	cocky about it, you know, it has a way of kind of	11:42:34
15	working against you, if you're too cocky for it.	11:42:37
16	So, I think, I was telling her to,	11:42:40
17	like, approach the job humbly and stay humble	11:42:42
18	while you're doing it. Cause it's, like, an	11:42:45
19	important job, you know, and you're the closest	11:42:46
20	to the principal, you know. So it's something	11:42:48
21	that, you know, especially, being elevated, you	11:42:51
22	get jealous over it. You have people who get	11:42:53
23	jealous over it. So I would say, just remain	11:42:55
24	humble.	11:42:57
25	Q. Is the reason to be "humble" so that	11:42:57

1	Page 85
HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
other people are not getting jealous; is that the	11:42:59
reason?	11:43:01
A. Yeah, pretty much.	11:43:01
Q. Okay. And then the text message	11:43:02
continues but now, it's going this is like two	11:43:03
days later. Do you see that? It goes to	11:43:06
May 12th?	11:43:07
A. Sure.	11:43:08
Q. As of May 12th, had you left the	11:43:08
Executive Chamber?	11:43:11
A. I think so. I mean well, I was on	11:43:13
the paid vacation time for three weeks. So I may	11:43:18
have left the Chamber, but I'm still technically	11:43:21
on payroll at that point, but I think so.	11:43:24
Q. Okay. And she says, "Going well. So	11:43:26
far no issues. He's in the office with his mom.	11:43:28
Just finished pressor." She talks about having a	11:43:31
meal.	11:43:35
And you write, "No yelling."	11:43:35
And she writes, "Nothing yet at	11:43:37
least."	11:43:39
Why did you write, "no yelling"?	11:43:39
A. I was just checking in to see if she	11:43:41
had gotten, you know, reprimanded for anything	11:43:44
	other people are not getting jealous; is that the reason?  A. Yeah, pretty much.  Q. Okay. And then the text message continues but now, it's going this is like two days later. Do you see that? It goes to May 12th?  A. Sure.  Q. As of May 12th, had you left the Executive Chamber?  A. I think so. I mean well, I was on the paid vacation time for three weeks. So I may have left the Chamber, but I'm still technically on payroll at that point, but I think so.  Q. Okay. And she says, "Going well. So far no issues. He's in the office with his mom. Just finished pressor." She talks about having a meal.  And you write, "No yelling."  And she writes, "Nothing yet at least."  Why did you write, "no yelling"?  A. I was just checking in to see if she

	1	Page 86
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	yet.	11:43:48
3	Q. And was it your expectation that she	11:43:48
4	would get "reprimanded"?	11:43:51
5	A. No, I don't know that you can ever	11:43:52
6	really expect to get reprimanded for something.	11:43:54
7	You know, it just kind of happens in a way. You	11:43:56
8	know, she was new and I only had been there for a	11:43:58
9	week and a half, so if she had make a mistake	11:44:01
10	about anything, you know.	11:44:03
11	Q. And, in your experience in the	11:44:03
12	Chamber, if you make a mistake, do you get yelled	11:44:05
13	at?	11:44:08
14	A. Sometimes.	11:44:08
15	Q. When you first started taking the	11:44:09
16	role of staffing the Governor, did you make a lot	11:44:10
17	of mistakes?	11:44:11
18	A. Not staying humbly to say, I think, I	11:44:16
19	was pretty good I had spent a lot of time seeing	11:44:20
20	what people do wrong when they do that job. And	11:44:24
21	I had also spent a lot of time getting to know	11:44:28
22	people there. So, you know, when you come into	11:44:32
23	that job, it's very hard because you have to know	11:44:34
24	who people are and figure out how to get them and	11:44:36
25	it's hard thing to do if you're new. So I think	11:44:39

		Page 87
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	I did it pretty well when I started.	11:44:42
3	Q. What were the things you had observed	11:44:45
4	that people didn't do well when they did that	11:44:47
5	role?	11:44:50
6	A. It was usually not showing up on	11:44:50
7	time. It was not being by the phones. It was	11:44:55
8	letting the phones ring. That's a right there	11:44:57
9	you get yelled at. You know, if you walk away	11:45:00
10	from the desk, there was, at least, a call	11:45:03
11	forwarding button. If you hit the call	11:45:05
12	forwarding button, it was better than nothing.	11:45:08
13	Those were the biggest things. The phones was	11:45:10
14	kind of drilled into you. You always have to be	11:45:14
15	there for the phones.	11:45:16
16	Q. Okay. So why don't we turn to the	11:45:18
17	next document, which is on the same day. We'll	11:45:20
18	mark this as the next exhibit.	11:45:23
19	A. Is this nine?	11:45:25
20	Q. So this is nine.	11:45:26
21	(Deposition Exhibit 6, 5/12/19 text	11:45:26
22	message chain between Bennett and Witness, was	11:45:26
23	marked for identification.)	11:45:32
24	Q. This is, again, between you and Ms.	11:45:32
25	Bennett and at 7:48 p.m. UTC time. So this is	11:45:34

		Page 88
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	the times are off.	11:45:40
3	You write she writes, "Yeah what's	11:45:41
4	the ALB" Albany "stuff. mentioned it	11:45:45
5	too but I haven't heard anything about it."	11:45:49
6	And then you wrote, "I imagine you	11:45:51
7	don't want" to "want to do." You corrected	11:45:53
8	it, "go." And then you said, "but did Annabelle	11:45:57
9	mention it to you?"	11:46:00
10	And she said, "Nope. No word from	11:46:00
11	you."	11:46:02
12	What are you talking about in this	11:46:03
13	text message?	11:46:04
14	A. I'm trying to remember. I don't know	11:46:06
15	if there was like, if it was I don't know.	11:46:08
16	This is not the start of session. And I think I	11:46:13
17	was still here. So, just to go back and correct	11:46:17
18	that, if I was asking her to come up and sit with	11:46:17
19	me a while, I was still in the office.	11:46:19
20	Q. So you're not on paid vacation?	11:46:19
21	A. No. Because if I asked her to come	11:46:20
22	hang upstairs for a bit, you know, I was still in	11:46:22
23	the office at that time.	11:46:24
24	Q. Yeah.	11:46:25
25	A. I don't I don't know what was	11:46:28

		Page 89
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	going on, but there was something in Albany that	11:46:31
3	you could either go to or not go to, but I can't	11:46:33
4	remember what it was. And I was asking her if	11:46:36
5	you were going to go to it or not. I don't know	11:46:37
6	if it was a cabinet meeting. You would have to	11:46:42
7	check the public schedule and see what aligned	11:46:42
8	with that day at the Capital building.	11:46:44
9	Q. And who is " ?	11:46:45
10	A	11:46:47
11	Q. And what was seemed 's role?	11:46:48
12	A. She worked on the scheduling team.	11:46:50
13	Q. Did you ever observe her interact	11:46:52
14	with the Governor?	11:46:54
15	A. She's been about I remember	11:46:56
16	bringing her into like one or two meetings with	11:46:58
17	me, like, but they were event prep meetings, but	11:47:01
18	I think that was the only time that she	11:47:03
19	interacted. She might have sat there once or	11:47:05
20	twice, but I think she only interacted.	11:47:07
21	Q. Did you ever observe the Governor	11:47:09
22	treat her disrespectfully?	11:47:11
23	A. No.	11:47:13
24	Q. Did she ever tell you anything about	11:47:13
25	her interactions with the Governor?	11:47:15

		Page 90
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	11:47:17
3	Q. And you said about this event in	11:47:20
4	Albany, "I imagine you don't want to go."	11:47:22
5	Do you remember why you said, "I	11:47:25
6	imagine you don't want to go"?	11:47:27
7	A. Who wants to go to Albany?	11:47:28
8	Q. Duly noted for the record.	11:47:31
9	Alright. The text message actually	11:47:33
10	continues, so if you flip to Tab 10. And we'll	11:47:38
11	mark this as the next exhibit.	11:47:45
12	(Deposition Exhibit 7, 5/12/19 text	11:47:45
13	message chain between Bennett and Witness, was	11:47:45
14	marked for identification.)	11:47:49
15	Q. And Charlotte asks you a question.	11:47:49
16	"You go in at nine off days?"	11:47:50
17	What are "off days" in the Executive	11:47:53
18	Chamber?	11:47:57
19	A. The days where he's up in Albany.	11:47:57
20	Q. Okay. So days in he's in Albany,	11:48:01
21	there is a different schedule?	11:48:02
22	A. Yeah. Well, it's still the same	11:48:04
23	schedule. You're supposed to be there by, like,	11:48:06
24	nine. Some people really don't adhere to that.	11:48:08
25	I think I always did.	11:48:11

		Page 91
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. When I say, "different schedule," I	11:48:12
3	mean, if the Governor is going to be in the New	11:48:14
4	York office, you need to be in the New York	11:48:17
5	office when he gets there or around the time he	11:48:18
6	gets there, right?	11:48:20
7	A. Yeah.	11:48:20
8	Q. And that could be before nine?	11:48:21
9	A. Right.	11:48:23
10	Q. But if the Governor is not going to	11:48:23
11	be in the New York City office, there is a	11:48:24
12	different time, potentially?	11:48:26
13	A. It's more casual.	11:48:26
14	Q. Okay.	11:48:26
15	THE VIDEOGRAPHER: Pardon the	11:48:26
16	interruption	11:48:28
17	Q. If the Governor is not in the New	11:48:28
18	York office, is it also more	11:48:32
19	THE VIDEOGRAPHER: Sorry. Can I ask	11:48:35
20	the witness to just adjust the microphone a	11:48:36
21	little bit. Thank you so much.	11:48:39
22	THE WITNESS: Can you hear me?	11:48:41
23	THE VIDEOGRAPHER: Yes. It's just	11:48:42
24	when you turn your head away from the microphone,	11:48:43
25	it does not pick up so	11:48:46

		Page 92
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Sorry for the interruption.	11:48:49
3	A. This way I can't or which way?	11:48:49
4	THE VIDEOGRAPHER: Whatever way	11:48:50
5	you're generally facing.	11:48:51
6	Q. Turn your whole bad towards me.	11:48:53
7	A. Okay, sorry.	11:48:55
8	Q. I told you this was going to be	11:48:56
9	complicated.	11:48:59
10	A. Yeah.	11:48:59
11	Q. I think we're good now.	11:48:59
12	A. It's okay now.	11:49:02
13	THE VIDEOGRAPHER: Pardon my	11:49:02
14	interruption. Thank you.	11:49:04
15	Q. Alright. I think we're good now.	11:49:04
16	That's good. That's what I was asking before.	11:49:07
17	So, when you were in the New York	11:49:10
18	City office and the Governor wasn't there, what	11:49:11
19	would you wear to work?	11:49:13
20	A. Sometimes I would wear like, you	11:49:15
21	know, just a button down T-shirt and pair of	11:49:18
22	slacks, you know, maybe a pair of, you know, more	11:49:21
23	comfortable shoes, pullover vest, something like	11:49:23
24	that, if he wasn't there.	11:49:26
25	Q. And when the Governor is in the New	11:49:26

		Page 93
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	York City office, how do you dress?	11:49:29
3	A. Suit and tie.	11:49:30
4	Q. How did you come to understand you	11:49:31
5	had needed to be in a suit and tie if the	11:49:33
6	Governor was in the office?	11:49:35
7	A. Well, I kind of inferred it from when	11:49:36
8	I was going to be working there that it seemed	11:49:38
9	like a suit and tie place. But, you know, I	11:49:40
10	believe there was an instance where I think it	11:49:42
11	was, I guess, a staffer said, like, we're a real	11:49:44
12	suit and tie place, you know, remarking that. So	11:49:48
13	it was kind of expected.	11:49:51
14	Q. And were you part of any discussions	11:49:52
15	where any of the women staff of the Executive	11:49:55
16	Chamber talked about their views on the dress	11:49:57
17	code for them?	11:49:59
18	A. Not that I can recall no.	11:50:00
19	Q. Did you ever hear any woman in the	11:50:02
20	office talk about an expectation to wear high	11:50:04
21	heels?	11:50:08
22	A. Not that I can recall, no.	11:50:09
23	Q. And going back you said you had never	11:50:12
24	observed the Governor comment on a woman's	11:50:14
25	appearance, I think, you said, right?	11:50:18

		Page 94
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Not that I can recall. Yeah, no, I	11:50:20
3	don't recall him saying that.	11:50:23
4	Q. Do you ever remember the Governor	11:50:24
5	asking a woman to twirl around in a dress,	11:50:26
6	wearing a dress and he said, twirl around for me?	11:50:28
7	A. No, I don't know that I can remember	11:50:35
8	that. I I mean, there were times where, you	11:50:37
9	know, for a late event, senior staffers would	11:50:41
10	change into dresses. So but I don't ever	11:50:45
11	remember him asking to twirl around or anything.	11:50:48
12	Q. Did you ever remember hearing the	11:50:50
13	Governor comment on or telling a woman she should	11:50:51
14	show more leg or show leg?	11:50:55
15	A. No.	11:50:56
16	Q. Okay. We can go back to the text	11:50:57
17	messages.	11:51:00
18	A. Sure.	11:51:00
19	Q. So you send Ms. Bennett a Twitter	11:51:01
20	link. And if you turn to the next page, that	11:51:07
21	Twitter link is a posting of a New York Post	11:51:10
22	story about Governor Cuomo living apart from Ms.	11:51:14
23	Lee.	11:51:18
24	Do you see that?	11:51:19
25	A. I do.	11:51:20

		Page 95
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Okay. And why did you send that to	11:51:20
3	Ms. Bennett?	11:51:22
4	A. Just to give her a heads up what it	11:51:31
5	would be like in the office. And I think I	11:51:34
6	talked about all the events would be pulled down.	11:51:36
7	Plus she worked for the guy. She should probably	11:51:38
8	see it herself too but, yeah.	11:51:41
9	Q. Sorry. I don't think they could hear	11:51:42
10	that last thing you said.	11:51:43
11	A. Well, just she was working for the	11:51:43
12	guy. So it's something that she should know and,	11:51:45
13	like, start piecing together how things work.	11:51:47
14	You know, like a story came out and, like, you	11:51:47
15	know, he pulled down an event, you know, stuff	11:51:51
16	like that.	11:51:52
17	Q. When you say, "pull down an event,"	11:51:53
18	what do you mean?	11:51:54
19	A. Do not have any event anymore.	11:51:55
20	Q. And so there was some event where the	11:51:57
21	Governor after this article pulled out of events?	11:52:00
22	A. I think so.	11:52:01
23	Q. Is that what you're saying?	11:52:02
24	A. I think so, yeah.	11:52:03
25	Q. Can you turn to the next tab. We'll	11:52:06

		Page 96
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	mark this as the next exhibit.	11:52:09
3	(Deposition Exhibit 8, 5/14/19 text	11:52:09
4	message chain between Bennett and Witness, was	11:52:09
5	marked for identification.)	11:52:13
6	Q. This is a set of text messages two	11:52:13
7	days later between you and Ms. Bennett. And	11:52:15
8	there's nothing that comes before it, but the	11:52:18
9	first line you text is, "Whatever feelings you	11:52:21
10	have bury them except for anger. You'll need	11:52:23
11	that."	11:52:26
12	A. Yeah.	11:52:26
13	Q. Why did you say that to Ms. Bennett?	11:52:27
14	A. To let her know how I kind of	11:52:32
15	motivated myself to get through it, you know,	11:52:34
16	just bury everything else, kind of push through	11:52:36
17	it until you get out. So that was my two cents	11:52:39
18	of how you could deal with it. Don't let them,	11:52:41
19	you know, don't let the situation ever get the	11:52:45
20	best of you, kind of push through.	11:52:46
21	Q. Meaning, don't let them get to you?	11:52:48
22	A. Yeah.	11:52:50
23	Q. And the "anger" part what did you	11:52:51
24	mean by that?	11:52:53
25	A. If you get frustrated, like, turn the	11:52:55

		Page 97
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	you know, if you're going to get sad or	11:52:59
3	something, just turn into anger. It's an	11:53:00
4	incredible motivator sometimes. I got through	11:53:03
5	two years working there. So, you know, kind of	11:53:05
6	use that. Don't get upset, kind of push yourself	11:53:08
7	through it.	11:53:11
8	Q. And then she expressed that she has a	11:53:12
9	"high tolerance."	11:53:15
10	And you wrote, "You'll do." And then	11:53:17
11	you said, "Now all you need is friends to make	11:53:19
12	yourself valuable and hard to move and in the	11:53:23
13	gossip. That's your currency now."	11:53:25
14	What do you mean by that?	11:53:27
15	A. Well, just that it's a lot easier to	11:53:28
16	get along and last with if you have a rapport	11:53:31
17	with people, you know. You kind of want to know	11:53:36
18	like, it's easier to call just Staffer X for	11:53:39
19	whatever reason and say, hey, can you come over	11:53:42
20	and help me with this, and they know you already,	11:53:43
21	you know, and you want to do that. It's just	11:53:46
22	make friends. I always found it to be very	11:53:47
23	helpful thing for me when I was there.	11:53:50
24	Q. And then the part about the "gossip"	11:53:52
25	and the gossip "that's currency now," what did	11:53:54

		Page 98
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	you mean that?	11:53:56
3	A. I don't know that it was, actually,	11:53:57
4	"currency." But it's just a good way of, you	11:53:58
5	know, making friends and talking to friends and	11:54:01
6	keeping friends, you know, just keep your ear to	11:54:03
7	the ground about what's going on, you know.	11:54:05
8	Q. Did the Governor like to be told what	11:54:07
9	was going on amongst the junior staff?	11:54:09
10	A. I believe so.	11:54:12
11	Q. And what is the basis for that	11:54:14
12	belief?	11:54:16
13	A. I can't remember if somebody	11:54:16
14	somebody was telling me, oh, yeah, he loves the	11:54:18
15	gossip, but I can't remember who it was.	11:54:21
16	Q. Did the Governor ever ask you for the	11:54:23
17	gossip or what was going on with the junior	11:54:24
18	staff?	11:54:26
19	A. No, he didn't.	11:54:26
20	Q. Did he ever ask you whether there	11:54:27
21	were junior staffers who were dating?	11:54:30
22	A. No, he didn't.	11:54:32
23	Q. Why don't we turn to the next tab and	11:54:48
24	we'll mark this as the next exhibit.	11:54:50
25	A. Sure.	11:54:53

		Page 99
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. This is another text message chain	11:54:53
3	between you and Ms. Bennett. This is from two	11:54:56
4	days later. So now we're on the 16th of May.	11:54:58
5	(Deposition Exhibit 9, 5/16/19 text	11:54:58
6	message chain between Bennett and Witness, was	11:54:58
7	marked for identification.)	11:55:01
8	Q. And you wrote to her and said, "Just	11:55:01
9	remember the little you see of how they treat	11:55:03
10	me."	11:55:06
11	What did you mean by that?	11:55:07
12	A. I don't I can't say for certain.	11:55:10
13	I mean, I don't know. I I don't know what I	11:55:13
14	was talking to. Something that bothered me, I	11:55:29
15	guess, I don't know.	11:55:31
16	Q. In the next text message you wrote,	11:55:32
17	"They won't always be nice to you."	11:55:34
18	Did you observe the senior staff was	11:55:37
19	being nice to Ms. Bennett at the beginning of her	11:55:38
20	time staffing the Governor?	11:55:41
21	A. I must have, yeah, if I said that	11:55:42
22	but	11:55:44
23	Q. Do you remember observing that?	11:55:44
24	A. Not that I can remember, no.	11:55:49
25	Q. And you wrote, "You'll learn to	11:55:51

	F	Page 100
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	protect yourself."	11:55:52
3	What did you mean by that?	11:55:53
4	A. I don't know. I don't really know	11:55:56
5	what I meant like that. I don't know. I'm	11:56:01
6	trying to think. I don't really remember what I	11:56:06
7	meant by that.	11:56:11
8	Q. Are there things that you did in the	11:56:12
9	Executive Chamber to protect yourself?	11:56:14
10	A. I mean, I think, they came back to	11:56:19
11	having a lot of friends and a good rapport with	11:56:21
12	people, like, just being kind of a polite and	11:56:24
13	genuinely liked person. At least, I like to	11:56:26
14	think I was, you know. And I always felt the	11:56:29
15	more that people liked you, the better off you	11:56:32
16	were.	11:56:35
17	Q. Later on in the text you say that,	11:56:35
18	"You have to learn every day and not make the	11:56:37
19	same mistakes twice."	11:56:39
20	A. Yeah.	11:56:41
21	Q. What happens if you make the same	11:56:41
22	mistake twice?	11:56:44
23	A. I don't I don't know if I can	11:56:50
24	recall anything specific about making the same	11:56:54
25	mistake twice. But, I think, it's generally just	11:56:56

	Pa	age 101
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	a good rule to adhere to, try not to make the	11:56:59
3	same mistake twice. I don't remember that I	11:57:03
4	could remember anything specific about this.	11:57:04
5	Q. Do you ever remember making the same	11:57:06
6	mistake twice?	11:57:10
7	A. I don't know; not that I can think	11:57:12
8	of.	11:57:18
9	Q. And while the parade goes by outside	11:57:21
10	with bagpipes, why don't we turn to the next tab.	11:57:23
11	This is Tab 13. We'll mark this as	11:57:27
12	the next exhibit.	11:57:30
13	(Deposition Exhibit 10, 5/17/19 text	11:57:30
14	message chain between Bennett and Witness, was	11:57:30
15	marked for identification.)	11:57:34
16	Q. This is from May 17th. So this is	11:57:34
17	the next day. And you're clearly having a	11:57:37
18	meeting of some sort with Jill.	11:57:43
19	Do you remember the meeting you had	11:57:45
20	with Jill?	11:57:46
21	A. I do.	11:57:47
22	Q. And tell us about that meeting.	11:57:47
23	A. This was my like good-bye meeting	11:57:54
24	with Jill on my last day, so which it was	11:57:56
25	actually a good meeting. She actually cried when	11:58:00

	P	age 102
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	I was leaving so	11:58:03
3	Q. And there is a discussion. You said	11:58:04
4	where you said, "I told her what's going on	11:58:06
5	with people where morale is at, who is upset and	11:58:08
6	looking to leave."	11:58:11
7	What did you tell Jill?	11:58:12
8	A. Just that some people were upset	11:58:14
9	hadn't received their raises yet, you know. Some	11:58:18
10	of the new staff who I thought were good, like,	11:58:23
11	oh, I think this person is really good, just	11:58:27
12	stuff like that.	11:58:29
13	Q. And what did you tell her about	11:58:30
14	"morale"?	11:58:34
15	A. I don't remember what I told her	11:58:34
16	about "morale."	11:58:36
17	Q. Do you remember what your feeling or	11:58:39
18	perspective was on "morale" in the Executive	11:58:41
19	Chamber when you were leaving?	11:58:43
20	A. Not a hundred percent positive. I	11:58:52
21	think it was low. I'm not a hundred percent	11:58:54
22	positive.	11:58:56
23	Q. Do you remember why you thought "it	11:58:57
24	was low"?	11:58:59
25	A. No. I'm struggling to try and	11:59:02

	F	Page 103
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	remember, but I just I don't think it was at	11:59:05
3	that point, but I don't really know why.	11:59:07
4	Q. Is there a lot of turnover in the	11:59:10
5	Executive Chamber?	11:59:12
6	A. Yes.	11:59:12
7	Q. And tell us about that.	11:59:13
8	A. What, specifically, about that?	11:59:14
9	Q. What's the turnover rate, like, how	11:59:16
10	long do people stay? Are you an anomaly for	11:59:19
11	staying for four years?	11:59:22
12	A. Probably.	11:59:23
13	Q. What do you think is the average	11:59:25
14	tenure of someone on the junior staff of the	11:59:26
15	Executive Chamber?	11:59:29
16	A. Probably about a year, you know, six	11:59:34
17	months to a year.	11:59:36
18	Q. And what's your impression of why the	11:59:37
19	people stay six months to a year?	11:59:40
20	A. Well, I think, it's kind of twofold.	11:59:45
21	I sometimes don't think that it's the right fit	11:59:48
22	for the type of office. But I also don't think	11:59:51
23	that's very much training as to how to get you	11:59:54
24	know, how to get started when you're there. So I	11:59:56
25	think it's kind of a twofold thing.	11:59:59

	Р	age 104
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. A little bit sink or swim?	12:00:01
3	A. Yeah, I'd a say.	12:00:03
4	Q. The beginning of this text message,	12:00:05
5	Ms. Bennett referred to "Jill/Black Sheep."	12:00:07
6	Was that a nickname for Ms.	12:00:11
7	DesRosiers?	12:00:12
8	A. No. That was my favorite bar that	12:00:12
9	she was asking me how was Jill/Black Sheep, how's	12:00:15
10	the Black Sheep.	12:00:20
11	Q. Meaning, you went to the Black Sheep	12:00:21
12	with Jill?	12:00:22
13	A. No. I met Jill in her office. She	12:00:22
14	was asking me how was my meeting Jill, and then	12:00:23
15	how was the bar you went to later the Black	12:00:25
16	Sheep.	12:00:28
17	Q. So Ms. DesRosiers' nickname was not	12:00:28
18	"Black Sheep"?	12:00:31
19	A. Not that I had for her, no.	12:00:31
20	Q. Oh, you never know.	12:00:34
21	When we talked about who the "Mean	12:00:36
22	Girls" you didn't include Ms. DesRosiers, right?	12:00:39
23	A. Maybe I don't know, maybe I did or	12:00:42
24	didn't. Did I not?	12:00:45
25	Q. You didn't.	12:00:46

		Page 105
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Okay.	12:00:47
3	Q. Do you remember Ms. DesRosiers being	12:00:47
4	someone who people discussed as being part of the	12:00:49
5	"Mean Girls"?	12:00:52
6	A. Yeah, I think that people would have	12:00:55
7	included her too.	12:00:56
8	Q. And why is that?	12:00:57
9	A. Just cause she was friends with all	12:00:59
10	of, like, Melissa, Annabelle, Stephanie, Dani.	12:01:01
11	They were, like, all friends.	12:01:07
12	Q. Do you think Ms. DesRosiers treated	12:01:08
13	people similarly to those parts of those other	12:01:11
14	people in that group? So, for example, did you	12:01:14
15	treat people the same way Ms. DesRosiers treated	12:01:17
16	people from your perspective?	12:01:20
17	A. No. I don't think that they were	12:01:23
18	I don't they Melissa and Jill were the same in	12:01:25
19	that regard.	12:01:28
20	Q. Okay. Can you tell us from your	12:01:29
21	perspective what the difference was?	12:01:30
22	A. First off, I think, Jill was much	12:01:33
23	more approachable. She had a much more, like,	12:01:35
24	welcoming nature to her. If you needed to talk	12:01:37
25	to her I'm not saying it was easy to get a	12:01:40

	1	Page 106
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	meeting scheduled with her, but it's	12:01:44
3	significantly easier than having Melissa to talk	12:01:45
4	to. And, you know, I only think back towards the	12:01:47
5	end, you know, just interactions with her. She	12:01:59
6	was very kind to me on my way out, you know.	12:02:01
7	Q. Did Ms. DesRosiers ever talk to you	12:02:03
8	about the expression "Mean Girls" and her view on	12:02:05
9	that expression?	12:02:07
10	A. No.	12:02:08
11	Q. Did you ever say words or in	12:02:08
12	substance, I'm not a "mean girl"?	12:02:11
13	A. Not that I can remember, no.	12:02:14
14	Q. Did you ever actually have any	12:02:16
15	one-on-one interactions with Ms. DesRosiers?	12:02:18
16	A. I think so. Like, if he went down to	12:02:24
17	docks like it would be mostly on the weekends,	12:02:27
18	because she would sometimes come in if he was	12:02:30
19	there and I would, obviously, be there and like	12:02:33
20	if he was down to docks and if he's coming back,	12:02:35
21	she would sometimes hang out on the couch in	12:02:37
22	Stephanie's office and we would talk, but other	12:02:39
23	than that, not too many, no.	12:02:41
24	Q. Meaning, they would include you in	12:02:43
25	their conversation?	12:02:44

	1	Page 108
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Do you know if she's still in the	12:03:46
3	Executive Chamber?	12:03:48
4	A. I don't know if she is.	12:03:48
5	Q. Let's turn to the next tab, which is	12:03:50
6	Tab 14. And we'll mark this as the next exhibit.	12:03:54
7	(Deposition Exhibit 11, 5/19/19 text	12:03:54
8	message chain between Bennett and Witness, was	12:03:54
9	marked for identification.)	12:04:02
10	Q. And this is from May 19th and	12:04:02
11	May 20th. It seems like now you were on paid	12:04:05
12	vacation.	12:04:08
13	A. Right.	12:04:08
14	Q. You're talking about spending a lot	12:04:09
15	of time laying in the sun.	12:04:11
16	And then you asked Ms. Bennett, "How	12:04:12
17	is the indentured servitude life?"	12:04:15
18	What did you mean by that?	12:04:18
19	A. I think I was trying to be funny.	12:04:20
20	But I don't know exactly what I was thinking at	12:04:22
21	that point.	12:04:24
22	Q. And are you describing what an	12:04:25
23	"indentured servitude life" is working in the	12:04:28
24	Executive Chamber?	12:04:31
25	A. Well, I don't know that I know the	12:04:32

	Pa	age 109
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	exact definition of it. So I think I was just	12:04:34
3	trying to be funny of "indentured servitude." I	12:04:36
4	don't know if I know the exact definition of	12:04:40
5	"indentured servitude."	12:04:42
6	Q. But Ms. Bennett at that time was	12:04:42
7	working in the Executive Chamber?	12:04:45
8	A. Yes.	12:04:46
9	Q. Okay. And she was staffing the	12:04:46
10	Governor?	12:04:48
11	A. Yes.	12:04:48
12	Q. And so your words about "indentured	12:04:48
13	servitude," whatever they mean, were about being	12:04:51
14	a staff member in the Executive Chamber?	12:04:52
15	A. Yes.	12:04:54
16	Q. Why don't we turn to the next tab.	12:04:59
17	And we'll mark this as the next exhibit. This is	12:05:04
18	Tab 15.	12:05:07
19	(Deposition Exhibit 12, 5/21/19 text	12:05:07
20	message chain between Bennett and Witness, was	12:05:07
21	marked for identification.)	12:05:08
22	Q. This is from the next day. So you're	12:05:08
23	still on paid vacation.	12:05:10
24	And Ms. Bennett writes, "They seem	12:05:15
25	nervous FOR ME, which is not helpful."	12:05:16

		Page 110
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	And you wrote, "Who?"	12:05:21
3	And she wrote, " and ."	12:05:22
4	And you told me "is "is	12:05:26
5	?	12:05:29
6	A. I'm sorry.	12:05:29
7	Q. I'm sorry. Are we not tab 15.	12:05:30
8	A. Oh, I'm sorry.	12:05:33
9	Q. You want me to start over?	12:05:34
10	A. Yeah.	12:05:35
11	Q. So this is a text message when you're	12:05:35
12	still paid vacation between you and Ms. Bennett.	12:05:37
13	And she writes, "they seem nervous FOR me, which	12:05:39
14	is not helpful."	12:05:44
15	You asked, "Who?"	12:05:45
16	And she wrote, " and ."	12:05:45
17	Is that ??	12:05:47
18	A. Yes.	12:05:50
19	Q. Is that ?	12:05:51
20	A. Yes.	12:05:51
21	Q. And you wrote, "Oh, well they are	12:05:52
22	scaredy cats."	12:05:54
23	Why don't you look over the rest of	12:05:55
24	the text message and tell me what you remember	12:05:57
25	about this communication.	12:05:58

	I	Page 111
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Everything after that on?	12:06:00
3	Q. Yeah. It goes on for a bit.	12:06:03
4	A. Okay.	12:06:32
5	Q. Having reviewed the text message, do	12:06:33
6	you remember anything about this communication?	12:06:35
7	A. Well, I think just that I was trying	12:06:39
8	to like motivate her into doing the job and I	12:06:41
9	think other people were nervous for her just	12:06:44
10	because like, the way I remember it, I don't	12:06:46
11	think they ever had really done it with him. So,	12:06:50
12	like, I was trying to tell her, what do you	12:06:54
13	worried about what they think. They've never	12:06:55
14	done it. You're already doing it.	12:06:55
15	Q. Did you have a perspective on why it	12:06:56
16	is that and and had not	12:06:58
17	been asked to staff the Governor?	12:07:00
18	A. No, I think, I told you that	12:07:03
19	did once or twice. But, no, I don't know why.	12:07:05
20	Q. And then you wrote if you look at	12:07:09
21	second page of the text message.	12:07:10
22	A. Yep.	12:07:13
23	Q. You wrote, "You have had more face	12:07:14
24	time with him already than they have."	12:07:16
25	What did you mean by that?	12:07:18

		Page 112
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. That you had seen him more.	12:07:20
3	Q. And that's because she was sitting	12:07:22
4	outside his office?	12:07:24
5	A. Yes.	12:07:25
6	Q. Where did sit?	12:07:26
7	A. Way around the corner, if you went	12:07:31
8	straight out of his office and made aright, half	12:07:34
9	way up. And so out of eyesight from his office.	12:07:37
10	Q. Out of eyesight of the Governor's	12:07:38
11	office?	12:07:39
12	A. Yes.	12:07:39
13	Q. And Charlotte's desk?	12:07:39
14	A. Yes.	12:07:40
15	Q. And what about ?	12:07:41
16	A. Same area as . It was like the	12:07:43
17	scheduling area.	12:07:45
18	Q. And if you go to the fifth page, it	12:07:46
19	starts at the top, "It's simple." It should be	12:07:50
20	on your right-hand side.	12:07:53
21	A. Uh-huh.	12:07:54
22	Q. And you wrote, "Be like them or be	12:07:55
23	better than them."	12:07:57
24	Who is the "them" you were referring	12:07:58
25	to?	12:07:58

		Page 114
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Uh-huh.	12:08:49
3	Q. Do you remember seeing this tweet	12:08:49
4	when it happened?	12:08:51
5	A. I don't know that I remember it, but	12:08:54
6	I probably did.	12:08:56
7	Q. Prior to December of 2020, did you	12:08:57
8	talk to anybody about this tweet?	12:08:59
9	A. Not that I can remember. I mean, I	12:09:03
10	don't know.	12:09:05
11	Q. Do you have any knowledge as to	12:09:07
12	whether Ms. Boylan was the only mother of young	12:09:09
13	children on the senior staff of the Executive	12:09:12
14	Chamber?	12:09:21
15	A. I have to think. I think so.	12:09:21
16	Q. And then she described it as a "toxic	12:09:30
17	and demoralizing experience."	12:09:34
18	Have you ever used the word "toxic"	12:09:36
19	to describe your experience with the Executive	12:09:39
20	Chamber or the environment of the Executive	12:09:41
21	Chamber?	12:09:43
22	A. No, I don't think I have.	12:09:43
23	Q. Do you disagree or agree or have no	12:09:46
24	perspective I'll offer you an out on Ms.	12:09:49
25	Boylan's use of the word "toxic" to describe the	12:09:53

	P	age 115
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	•
2	Executive Chamber?	12:09:55
3	A. I have no opinion on it, no opinion.	12:09:57
4	Q. No opinion?	12:09:59
5	A. No opinion.	12:10:00
6	Q. Turn to the next tab. This is	12:10:05
7	Tab 17. This is another text message between you	12:10:08
8	and Ms. Bennett and this is the day after the	12:10:10
9	Boylan tweets.	12:10:14
10	(Deposition Exhibit 14, 5/22/19 text	12:10:14
11	message chain between Bennett and Witness, was	12:10:14
12	marked for identification.)	12:10:16
13	Q. And Ms. Bennett says, "laughing out	12:10:16
14	loud going to be alone with him."	12:10:19
15	And you wrote, "What??"	12:10:20
16	Do you remember having any concerns	12:10:23
17	about Ms. Bennett being alone with the Governor	12:10:25
18	when she first started staffing him?	12:10:27
19	A. I don't know if it was "concerns."	12:10:34
20	It just seemed awfully fast for someone new to be	12:10:36
21	doing that.	12:10:40
22	Q. And why is that?	12:10:41
23	A. Just because there's a lot that you	12:10:44
24	need to learn about doing that job and, you know,	12:10:46
25	maybe it was part of me that, you know, I was	12:10:49

	P	age 117
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. And then you went on to say at the	12:11:42
3	bottom of the page, "Don't slack on the little	12:11:44
4	things."	12:11:46
5	What did you mean by that?	12:11:46
6	A. Well, like, we were talking about	12:11:48
7	before. Like, it may seem a little stupid, but	12:11:50
8	the phones, like, you can get the hang of there.	12:11:53
9	You can be the best assistant he ever had, but if	12:11:56
10	the phones go unanswered, it doesn't matter how	12:11:56
11	good you are, you know, that's, like, the big	12:12:00
12	thing. That seems like a little thing when I say	12:12:01
13	it to you, but it's, like, a big think and some	12:12:04
14	people forget that when they sit there.	12:12:06
15	Q. Did you ever let the phones go	12:12:07
16	unanswered?	12:12:09
17	A. No, I don't think I ever did.	12:12:10
18	Q. Did you ever observe someone else who	12:12:11
19	sat in that seat let the phones go unanswered?	12:12:14
20	A. Yes.	12:12:16
21	Q. And who was that?	12:12:16
22	A. It was a couple of people, Kaitlin	12:12:18
23	and .	12:12:23
24	Q. And tell us about the occasion on	12:12:24
25	which you observed Kaitlin let the phones go	12:12:27

		Page 118
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	unanswered.	12:12:31
3	A. I just I just remember Stephanie	12:12:31
4	coming out and being, like, where she is, you	12:12:34
5	know. That's what I remember and then being,	12:12:36
6	like, okay, it's probably a good question.	12:12:38
7	Q. And did you ever see any interaction	12:12:41
8	between Ms. Benton and Kaitlin on that	12:12:42
9	occasion?	12:12:45
10	A. No, not that I can recall, no.	12:12:46
11	Q. And what about the occasion with	12:12:48
12	?	12:12:52
13	A. I think it was pretty much the same	12:12:53
14	thing where Stephanie was, like, where is she,	12:12:55
15	where do these people go?	12:12:58
16	Q. Did you see any interaction between	12:12:59
17	and Ms. Bennett?	12:13:01
18	A. Not that I can recall, no.	12:13:03
19	Q. Do you know ?	12:13:05
20	A. I mean, I knew her when she was	12:13:06
21	there.	12:13:09
22	Q. And when she was in Executive	12:13:09
23	Chamber, did you ever talk to her about her	12:13:10
24	experience?	12:13:12
25	A. Not really. I don't think she lasted	12:13:12

		Page 119
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	very long, not that I can remember.	12:13:15
3	Q. Do you ever observe how the senior	12:13:17
4	staff treated ?	12:13:18
5	A. Not that I can remember, no.	12:13:19
6	Q. Did you ever observe how the Governor	12:13:21
7	treated ?	12:13:23
8	A. No.	12:13:24
9	Q. Why don't we turn to the next tab and	12:13:27
10	we'll mark it as the next exhibit.	12:13:30
11	A. It's 19, right?	12:13:31
12	Q. 19.	12:13:32
13	(Deposition Exhibit 16, 5/22/19 text	12:13:32
14	message chain between Bennett and Witness, was	12:13:32
15	marked for identification.)	12:13:35
16	Q. This is from same day May 22nd and it	12:13:35
17	begins with Ms. Bennett saying, " $^{\mathrm{EA}}$ #2 just got	12:13:38
18	booted from the back sharing the cube with her."	12:13:42
19	And you wrote, "WTF is going on	12:13:45
20	laughing out loud."	12:13:47
21	Can you review the text message and	12:13:48
22	look up when you're done?	12:13:49
23	A. (INAUDIBLE.)	12:13:57
24	Q. Yeah. Why don't you turn to the next	12:13:59
25	tab and we'll mark it as the next exhibit.	12:14:11

		Page 120
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	(Deposition Exhibit 17, 5/22/19 text	12:14:11
3	message chain between Bennett and Witness, was	12:14:11
4	marked for identification.)	12:14:16
5	Q. And read them together.	12:14:16
6	A. Okay.	12:14:41
7	Q. Do you know who Executive Assistant #2 is?	12:14:42
8	A. Yes.	12:14:43
9	Q. Who was Executive Assistant #2?	12:14:43
10	A. She was an assistant in Albany.	12:14:44
11	Q. Okay. And do you remember anything	12:14:48
12	about this communication about EA #2 ?	12:14:50
13	A. Not really. I just read it now. I	12:14:55
14	mean, I can think of maybe why she had a hard	12:14:57
15	time using the phones but, you know.	12:15:00
16	Q. When you left the Executive Chamber,	12:15:02
17	how long had EA #2 been a staff member of	12:15:03
18	the Executive Chamber?	12:15:10
19	A. I think a couple of months.	12:15:10
20	Q. And had you she ever been to the New	12:15:11
21	York office before?	12:15:13
22	A. Yeah, I think she was down there on	12:15:13
23	her first day.	12:15:15
24	Q. And what do you remember how she	12:15:16
25	ended up in the New York office on the first day?	12:15:17

		Page 121
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. She flew on the helicopter with him	12:15:19
3	down.	12:15:21
4	Q. With the Governor, right?	12:15:21
5	A. Yes.	12:15:22
6	Q. Did she talk to you about that?	12:15:23
7	A. Not really.	12:15:25
8	Q. Did you talk to anybody else about	12:15:25
9	that?	12:15:27
10	A. Did I talk to anybody else about	12:15:28
11	that? Not that I can remember.	12:15:30
12	Q. Was there anything odd about the fact	12:15:32
13	that it was EA #2 's first day and that she	12:15:33
14	was asked to fly with the Governor to New York	12:15:36
15	City in the helicopter?	12:15:38
16	A. I mean, I don't know if it's happened	12:15:40
17	to anybody else before. I thought it was a	12:15:43
18	little odd.	12:15:45
19	Q. Can you recall anyone else that that	12:15:45
20	happened to?	12:15:47
21	A. Not that I can recall.	12:15:47
22	Q. And then this text message chain	12:15:50
23	shows that $^{\rm EA}$ #2 got sent home for making a	12:15:52
24	mistake with the phones; is that right?	12:15:55
25	A. I told you those phones. They're	12:15:56

	P	age 122
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Can you recall any other occasion in	12:15:59
3	which you observed someone getting sent home	12:16:01
4	because they made mistake with the phones?	12:16:03
5	A. No. I mean, in there's two	12:16:12
6	different at the time, I think, there were two	12:16:14
7	different systems of phones they used. So maybe	12:16:17
8	that's why. But I don't know that anybody from	12:16:20
9	Albany came dawn to staff after that. I don't	12:16:23
10	know.	12:16:25
11	Q. How many times did you see	12:16:26
12	#2 in the New York City office?	12:16:28
13	A. I really can only remember that one	12:16:30
14	time, the first time.	12:16:32
15	Q. That one occasion?	12:16:33
16	A. Yeah.	12:16:34
17	Q. When she flew on the helicopter?	12:16:35
18	A. Yes.	12:16:36
19	Q. Did you see her interact with the	12:16:36
20	Governor on that occasion?	12:16:38
21	A. Not that I can remember, no. I mean,	12:16:46
22	I don't know. I can't really remember the two of	12:16:47
23	them interacting. Because I think when she did	12:16:50
24	come down, I sat at the back desk and she sat at	12:16:53
25	the outside desk and when you're at Stephanie's	12:16:56

	P	age 123
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	desk, you deal with him a lot more.	12:16:59
3	Q. Okay. But you didn't observe their	12:17:00
4	interactions while $\frac{EA}{A}$ #2 was sitting at the	12:17:02
5	desk outside the Governor's office?	12:17:04
6	A. No, not that I can remember.	12:17:04
7	Q. Okay. Let's turn to the next exhibit	12:17:08
8	next tab, which we'll mark as the next	12:17:10
9	exhibit.	12:17:12
10	(Deposition Exhibit 18, 5/30/19 text	12:17:12
11	message chain between Bennett and Witness, was	12:17:12
12	marked for identification.)	12:17:19
13	Q. You don't have to look at the whole	12:17:19
14	thing. I'll just proffer to you that some of	12:17:21
15	this is about Ms. Bennett's relationships.	12:17:23
16	But at the beginning it says this	12:17:26
17	is May 30th. "I'm assuming you heard about	12:17:28
18	."	12:17:30
19	And you said, "Oh, boy did I."	12:17:30
20	What was this about?	12:17:32
21	A. If I remember correctly is that she	12:17:36
22	was leaving.	12:17:38
23	Q. And when you say, "Oh, boy did I,"	12:17:39
24	did you speak to?	12:17:41
25	A. Yeah, maybe.	12:17:46

	Р	age 124
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Do you remember what told	12:17:47
3	you?	12:17:49
4	A. I don't know. I don't remember if I	12:17:49
5	spoke to her or not. I do remember before I	12:17:52
6	left, she had talked about going to work for Beto	12:17:54
7	on Beto's campaign in Texas. So I think that's	12:17:58
8	what that's referring.	12:18:01
9	Q. Did you ever talk to about	12:18:02
10	her views on her experience in the Executive	12:18:04
11	Chamber?	12:18:07
12	A. Maybe. There's nothing really I can	12:18:10
13	recall about talking to her about that.	12:18:13
14	Q. Nothing specific you recall?	12:18:14
15	A. No.	12:18:16
16	Q. Do you remember her telling you	12:18:16
17	anything about whether the experience was	12:18:18
18	negative or positive?	12:18:19
19	A. No, not that I can recall.	12:18:24
20	Q. Why don't we turn to the next tab and	12:18:29
21	we'll mark this as the next exhibit.	12:18:31
22	(Deposition Exhibit 19, 6/12/19 text	12:18:31
23	message chain between Bennett and Witness, was	12:18:31
24	marked for identification.)	12:18:35
25	Q. And this is almost a month that goes	12:18:35

	F	age 125
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	by between this and the last one. So this is	12:18:40
3	June 12th. And you wrote it's kind of out of	12:18:42
4	context. So your help with the context would be	12:18:48
5	good "It's just there. Isn't really a team	12:18:51
6	there now. I talked to yesterday."	12:18:53
7	Who is ""?	12:18:55
8	A. That would be	12:18:56
9	Q. And you text, "He said in three	12:18:58
10	months, 25 people left."	12:19:01
11	Did you hear that from ?	12:19:04
12	A. I said it there, yeah.	12:19:06
13	Q. Do you remember the conversation with	12:19:07
14	?	12:19:08
15	A. I don't.	12:19:09
16	Q. Do you remember any conversation?	12:19:10
17	A. I don't, no.	12:19:16
18	Q. Okay. And when you wrote, "Just	12:19:19
19	there isn't really a team there now," what did	12:19:20
20	you mean?	12:19:22
21	A. Well, I think it was with the high	12:19:26
22	turnover rate, there wasn't a lot of hiring of	12:19:31
23	people that kid of meshed and, like, nobody was	12:19:35
24	really friends and worked together anymore. I	12:19:36
25	think that's what I meant, you know.	12:19:38

	1	Page 126
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Flip to the back page.	12:19:40
3	A. Sure.	12:19:42
4	Q. You wrote, "In the end, you'll have	12:19:42
5	massive hiring and then another exodus. It comes	12:19:44
6	in waves."	12:19:47
7	What did you mean by that?	12:19:47
8	A. Well, I think, I was one of the	12:19:49
9	people that was hired in "waves" in 2015 after	12:19:51
10	the first election. I believe that the	12:19:54
11	administration, typically, works cyclically like	12:19:56
12	that where at the end of four years, there is	12:19:59
13	always people leaving. And then I think after	12:20:01
14	the election, I'm pretty sure I think there	12:20:05
15	were a lot of people that left and a lot of	12:20:08
16	people that were hired in.	12:20:10
17	Because I had worked over four years,	12:20:11
18	so I had been through hired after the first	12:20:13
19	election, worked through the second election.	12:20:15
20	Q. And that "waves" of hiring, was	12:20:17
21	this June 2019 text, how distant was that from an	12:20:20
22	election?	12:20:24
23	A. It's three years away.	12:20:28
24	Q. So do you think this was about an	12:20:30
25	election?	12:20:32

	Pa	age 127
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Oh, wait. This is right after his	12:20:34
3	election. So it could be.	12:20:37
4	Q. This is about maybe six months,	12:20:40
5	eight months after an election, right?	12:20:43
6	A. Yeah. So it could be.	12:20:44
7	Q. You don't think it was about	12:20:45
8	something else?	12:20:47
9	A. You know, I really I can't	12:20:48
10	remember. It could be right after the election.	12:20:49
11	People agreed to stay through session, which, you	12:20:51
12	know, that would kind of make sense. I think	12:20:53
13	session runs until June so	12:20:57
14	Q. Is it true that junior staffers too?	12:20:57
15	A. What?	12:20:59
16	Q. That the junior staffer's tenure is	12:20:59
17	tied in some part in being in session or to	12:21:02
18	election cycles, or is it just senior staffers?	12:21:06
19	A. What do you mean? I'm not sure.	12:21:07
20	Q. You're saying that people come in	12:21:09
21	"waves," right?	12:21:11
22	A. Right.	12:21:11
23	Q. And that that "wave" is either tied	12:21:11
24	to typically, tied to an election or tied to a	12:21:13
25	legislative session, right?	12:21:17

		Page 128
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Uh-huh.	12:21:18
3	Q. Is that true for both senior staff	12:21:18
4	and junior staff?	12:21:20
5	A. It could be. I mean, you know,	12:21:23
6	typically, you go through one or two sessions.	12:21:26
7	And, you know, after your first and second one,	12:21:28
8	it's kind of the same thing over and over again.	12:21:30
9	So you look for something different. So it could	12:21:33
10	be.	12:21:35
11	MS. KENNEDY-PARK: Why don't we take	12:21:36
12	go off the record.	12:21:36
13	THE VIDEOGRAPHER: Stand by please.	12:21:38
14	The time is, approximately, 12:21. We are going	12:21:41
15	off the video record.	12:21:44
16	(Lunch recess taken 12:21 to 1:16	12:21:44
17	p.m.)	13:16:55
18	THE VIDEOGRAPHER: The time is,	13:16:55
19	approximately, 1:17. We are back on the video	13:17:06
20	record.	13:17:09
21	Q. Why don't you turn to Tab 27 of your	13:17:11
22	binder and we'll mark that as the next exhibit.	13:17:14
23	(Deposition Exhibit 20, 7/9/19 text	13:17:14
24	message chain between Bennett and Witness, was	13:17:14
25	marked for identification.)	13:17:22

		Page 129
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. And this is a text message between	13:17:22
3	you and Ms. Bennett from July 9th, 2019. It's	13:17:24
4	not clear what came before this. But you said,	13:17:30
5	"the Gov clearly likes you."	13:17:32
6	Do you know remember why you told Ms.	13:17:34
7	Bennett that the Gov clearly liked her?	13:17:39
8	A. I think because she was still there.	13:17:40
9	Q. Meaning, she had lasted in the	13:17:42
10	role	13:17:44
11	A. Yeah.	13:17:44
12	Q for about two months?	13:17:44
13	A. Yes.	13:17:46
14	Q. And was that uncommon for someone to	13:17:46
15	last in that role that long?	13:17:49
16	A. Well, I don't know if it was uncommon	13:17:53
17	for so long. But uncommon to be content and	13:17:55
18	still doing it, like, happy with it, you know.	13:17:58
19	Q. And did Ms. Bennett convey to you	13:18:01
20	do you remember conveying to you that she was	13:18:03
21	happy doing the role?	13:18:05
22	A. I think so, yeah. I think I remember	13:18:07
23	her saying things were going okay with him.	13:18:09
24	Q. Did you understand at the time that	13:18:12
25	Ms. Bennett was doing the staffing role for the	13:18:14

		Page 130
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Governor that she was also a briefer?	13:18:17
3	A. Yes.	13:18:18
4	Q. Okay. And then at some point she	13:18:19
5	became a senior briefer?	13:18:21
6	A. I don't know if I remember she became	13:18:23
7	a senior briefer, but I know she was doing	13:18:25
8	briefing stuff.	13:18:28
9	Q. So she had two jobs, essentially?	13:18:28
10	A. Yes.	13:18:30
11	Q. And so you wrote, "So Steph is	13:18:30
12	testing you."	13:18:33
13	Do you remember what you meant by	13:18:34
14	that?	13:18:35
15	A. Well, I think cause like we talked	13:18:40
16	about earlier, when you sat at that desk, I felt	13:18:43
17	the best way to approach that job was to be	13:18:45
18	Stephanie's assistant first and then the	13:18:48
19	Governor's assistant second and trying to	13:18:50
20	undercut Stephanie to, like, go directly to the	13:18:54
21	Governor on a lot of things, I never really	13:18:59
22	thought was a wise approach to doing that. So I	13:19:01
23	don't know if she was doing something like that	13:19:03
24	or, like, it's a good cop/bad cop routine that	13:19:05
25	the two of them had I felt like.	13:19:10

	P	age 131
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. When you say "the two of them had"	13:19:11
3	A. The Governor and Stephanie.	13:19:13
4	Q. Okay. So Governor and Stephanie had	13:19:14
5	"good cop/bad cop routine"?	13:19:16
6	A. That's what I think, yeah.	13:19:18
7	Q. And when you wrote in this text	13:19:18
8	message, "One of them always mean and one of them	13:19:20
9	is always nice," were you referring to the	13:19:22
10	Governor and Ms. Benton?	13:19:24
11	A. Yes.	13:19:24
12	Q. Can you give me an example of what	13:19:24
13	the "good cop/bad cop routine" looks like?	13:19:26
14	A. I can remember one time we were in	13:19:30
15	the office and I had the Governor made me call	13:19:34
16	somebody and, you know, like, leave a message for	13:19:38
17	him and I forgot the person's name.	13:19:42
18	So he was just, like, you know, get	13:19:44
19	angry and was just like, you know, talk to	13:19:46
20	Stephanie, learn how to make a phone call.	13:19:48
21	And Stephanie was just like, it's	13:19:50
22	okay, you know, so stuff like that.	13:19:52
23	Q. Alright. And were there occasions	13:19:55
24	where it was opposite where the Governor was	13:19:57
25	"good cop"?	13:19:59

	F	age 132
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. I don't know about "good cop." But	13:20:01
3	Stephanie would be maybe a little bit more	13:20:03
4	irritated with me and the Governor wouldn't	13:20:06
5	really bother me at that moment, you know. He	13:20:08
6	would, like you know, Stephanie would ask me	13:20:10
7	to do something and she could be irritated with	13:20:13
8	me and the Governor would understand I'm doing	13:20:15
9	something for Stephanie right now and then kind	13:20:17
10	of defer to her to do things.	13:20:20
11	Q. Let's flip To tab 34.	13:20:22
12	(Deposition Exhibit 21, 8/9/19 text	13:20:22
13	message chain between Bennett and Witness, was	13:20:22
14	marked for identification.)	13:20:38
15	Q. This is another text message between	13:20:38
16	you and Ms. Bennett on August 8th [sic], 2019.	13:20:39
17	And there's a discussion in here where she says,	13:20:44
18	what did you say, "What did she get mad at you	13:20:49
19	for?"	13:20:49
20	And she said, "The mansion print."	13:20:52
21	What is the "mansion print"?	13:20:54
22	A. I think to print the book in the	13:21:01
23	mansion reading the context of this.	13:21:04
24	Q. Say it again.	13:21:05
25	A. Print the book, which is like the	13:21:06

	F	Page 133
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	briefing book in a mansion.	13:21:08
3	Q. To print the briefing book in the	13:21:10
4	mansion	13:21:12
5	A. I think so.	13:21:12
6	Q on the computers that are in the	13:21:13
7	Executive Mansion, the Governor's Mansion?	13:21:16
8	A. Yeah, it's I think it's either	13:21:20
9	that or to drop off the book to the mansion.	13:21:23
10	Q. Do you have any understanding from	13:21:25
11	this text of what was going on, what was the	13:21:27
12	issue that had been raised about printing the	13:21:30
13	briefing book or delivering the briefing book?	13:21:33
14	A. No.	13:21:36
15	Q. Ms. Bennett said, "They also	13:21:38
16	afterwards realized I was right, that briefers do	13:21:39
17	go into the house a lot."	13:21:43
18	Based upon your experience in the	13:21:44
19	Executive Chamber, did you understand that	13:21:46
20	briefers went inside the Governor's Mansion?	13:21:48
21	A. I mean, not really again. I didn't	13:21:51
22	really go up to Albany and have to deal with the	13:21:53
23	book in Albany. So I don't if I had an	13:21:55
24	expectation of what they had to do there.	13:21:58
25	Q. Any reason to believe that Ms.	13:21:59

		Page 134
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Bennett wasn't telling the truth about that?	13:22:01
3	A. I mean, no.	13:22:03
4	Q. Are you familiar with any of the	13:22:05
5	procedures that were used regarding the	13:22:08
6	Governor's Mansion?	13:22:10
7	A. No.	13:22:11
8	Q. Including sort of who had to be	13:22:12
9	pinned about who was coming in and out of the	13:22:14
10	Governor Mansion?	13:22:17
11	A. No.	13:22:17
12	Q. Did you ever hear Ms. Benton or Ms.	13:22:18
13	DesRosiers talk about getting pinned for people	13:22:22
14	entering or exiting the Executive Mansion?	13:22:25
15	A. No.	13:22:28
16	Q. Did you ever talk to any members of	13:22:29
17	the PSU about their experience in the Executive	13:22:34
18	Chamber?	13:22:43
19	A. What do you mean, like, after we all	13:22:43
20	left or	13:22:43
21	Q. Okay. Let's start with after.	13:22:44
22	Did you ever talk to any members of	13:22:46
23	the PSU after you left about their experience in	13:22:47
24	the Executive Chamber?	13:22:49
25	A. No, not really.	13:22:50

		Page 135
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you talk to any of them before	13:22:51
3	you left about their experience in the Executive	13:22:53
4	Chamber?	13:22:56
5	A. Well, I mean, I don't know if we	13:22:56
6	talked about I mean, I guess. Like, I was	13:22:58
7	really close to the PSU guys. We were really	13:23:00
8	good friends when we were at work. But, you	13:23:04
9	know, I don't know if we you know, I don't	13:23:06
10	know how much we talked about our experiences	13:23:09
11	other than just, you know, joking around with	13:23:11
12	each other a lot.	13:23:16
13	Q. Which members of PSU were you friends	13:23:16
14	with?	13:23:17
15	A. It was Senior Investigator #2 and SI	13:23:18
16	#1 ·	13:23:20
17	Q. Did you ever talk to either Mr	13:23:22
18	I'm not going to	13:23:27
19	A. You can call him SI #2 He's	13:23:27
20	Q. I'll call him SI #2 I'll get with	13:23:28
21	the lingo.	13:23:30
22	(Continuing.) With SI #2 or SI #1	13:23:31
23	about the qualifications to be a member of PSU?	13:23:33
24	A. No, just that you had like, I	13:23:43
25	think, there is an age requirement for being a	13:23:43

		Page 127
		Page 137
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Troopers that was stationed had in uniform.	13:24:37
3	Q. Is there video surveillance in the	13:24:39
4	Executive Chamber?	13:24:42
5	A. Yes.	13:24:43
6	Q. Can you tell us what that is?	13:24:43
7	A. What do you mean what it is, like	13:24:45
8	Q. So where are the cameras and where	13:24:47
9	are the people who are watching the cameras?	13:24:49
10	A. I don't know where all the cameras	13:24:51
11	are.	13:24:53
12		13:24:57
13		13:24:59
14		13:25:02
15		13:25:05
16	Q. Do you have any knowledge of any PSU	13:25:06
17	Trooper being asked to delete video recordings?	13:25:08
18	A. No, I don't.	13:25:11
19	Q. Do you have any knowledge about the	13:25:12
20	Governor declining PSU coverage?	13:25:13
21	A. What does that mean?	13:25:16
22	Q. Saying, I don't want coverage, leave	13:25:18
23	me alone, I'm going to do something on my own?	13:25:20
24	A. No, I don't.	13:25:22
25	Q. Okay. Turn to Tab 42.	13:25:24

	I	Page 138
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	(Deposition Exhibit 22, 10/14/19 text	13:25:24
3	message chain between Bennett and Witness, was	13:25:24
4	marked for identification.)	13:25:43
5	Q. This is a text message between you	13:25:43
6	and Ms. Bennett on October 14th, 2019. And it	13:25:46
7	begins with Ms. Bennett saying, "Also as an	13:25:50
8	update, he just made me do 20 pushups."	13:25:52
9	Do you see that?	13:25:56
10	A. Yes.	13:25:57
11	Q. Did you ever communicate with Ms.	13:25:57
12	Bennett about these "pushups," other than in text	13:25:58
13	message?	13:26:01
14	A. No.	13:26:02
15	Q. When you say when you see the	13:26:03
16	word, "he," did you understand her to be	13:26:05
17	referring to the Governor?	13:26:07
18	A. Yes.	13:26:09
19	Q. Do you have any reason to believe	13:26:10
20	that Ms. Bennett was not telling you the truth	13:26:12
21	about the "pushups"?	13:26:14
22	A. No.	13:26:15
23	Q. If you turn to the second page about	13:26:23
24	halfway down well, actually, at the top, you	13:26:30
25	wrote, "I remember why I left again."	13:26:35

		Page 139
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Do you see that?	13:26:37
3	A. Uh-huh.	13:26:38
4	Q. Does that refresh your recollection	13:26:39
5	about the reasons you left the Executive Chamber?	13:26:40
6	A. Yeah, I think, I was referring to how	13:26:50
7	Columbus Day is normally a state holiday and we	13:26:53
8	had to come in and work as if it was a normal	13:26:57
9	day. But it is only like a few people. And if	13:27:02
10	he's in, I would have been one of the few people	13:27:04
11	in and it's not really a day off.	13:27:06
12	Q. So meaning sort of never having time	13:27:08
13	off; is that what you're referring to?	13:27:11
14	A. Correct.	13:27:11
15	Q. Okay. And then later on in that same	13:27:12
16	page, Charlotte says, "Also, he's been kind of	13:27:13
17	salty with me the last week or so."	13:27:18
18	And then you responded, "Yeah, it	13:27:19
19	always come. The charm offensive will wear off	13:27:21
20	and then he's a	13:27:24
21	What did you mean by that?	13:27:27
22	A. I think that I meant that he was,	13:27:29
23	like, being nice and patient with her while she	13:27:33
24	was learning to do the job and then he becomes a	13:27:35
25	little bit more expecting you to know what to do	13:27:38

	P	age 140
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	at this point.	13:27:41
3	Q. Is that how you treated your	13:27:42
4	interactions with the Governor evolved?	13:27:44
5	A. Well, I don't know that it was very	13:27:46
6	much of a "charm offensive" with me. But, yes, I	13:27:48
7	would say that most of the interactions tended to	13:27:52
8	go that way.	13:27:56
9	Q. Let me turn to Tab 43.	13:27:59
10	(Deposition Exhibit 23, 10/15/19 text	13:27:59
11	message chain between Bennett and Witness, was	13:27:59
12	marked for identification.)	13:28:07
13	Q. This is a text message chain between	13:28:07
14	you and Ms. Bennett on October 15th, 2019. And	13:28:08
15	you wrote, "You leave for one day and then the	13:28:12
16	Gov drops the N bomb."	13:28:15
17	By the "N bomb" did you mean the word	13:28:18
18	pejorative word for describing someone who is	13:28:20
19	Black?	13:28:24
20	A. I don't think so. I think this was	13:28:25
21	about something else.	13:28:27
22	Q. What was it about?	13:28:28
23	A. I am trying to remember, but I don't	13:28:29
24	think it was. I mean, it could be. I mean, I	13:28:31
25	really can't remember. But if this was	13:28:34

	Р	age 141
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	probably a public documented thing, because I was	13:28:37
3	well out of the office at that point. So	13:28:40
4	whatever happened on that date, I would have to	13:28:42
5	double-check. But I can't really remember what	13:28:44
6	this is referring to.	13:28:48
7	Q. And then Ms. Bennett said, "My jaw	13:28:50
8	dropped. Honestly, of course, he did. Of	13:28:53
9	course, he would say that. He is so out of	13:28:55
10	touch."	13:28:58
11	Do you have a view as to whether the	13:28:58
12	Governor was "out of touch"?	13:28:59
13	A. I mean, again, I can't really	13:29:02
14	remember what he said.	13:29:04
15	Q. Putting this incident aside, were	13:29:08
16	there occasions in which you were the Executive	13:29:11
17	Chamber where you felt like the Governor said	13:29:13
18	things that indicated that he was "out of touch"?	13:29:15
19	A. I don't know. Nothing specific that	13:29:22
20	I can think of.	13:29:27
21	Q. Did you ever hear the Governor use	13:29:27
22	racially offensive language?	13:29:30
23	A. No.	13:29:31
24	Q. Racially pejorative language?	13:29:32
25	A. No.	13:29:34

	P	age 143
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	transcribe your phone, you know, don't let him	13:30:38
3	look at your personal stuff, you know.	13:30:40
4	Q. Did the Governor ever do that to you?	13:30:41
5	A. Did he look at the things I did?	13:30:43
6	Q. Look at your personal phone.	13:30:45
7	A. He may have. He may have. I gave it	13:30:46
8	to him record. But I don't I mean, typically,	13:30:49
9	I took precautions not to have him so	13:30:53
10	Q. But you go on to write later down,	13:30:54
11	"And he loves to look through people's phones."	13:30:56
12	What did you mean by that?	13:30:59
13	A. I think I was talking about Dani	13:31:02
14	where he had done that with Dani Lever's once	13:31:04
15	before.	13:31:06
16	Q. And tell us about what happened with	13:31:06
17	Ms. Lever.	13:31:09
18	A. Just remembering being like, oh, stop	13:31:10
19	going through my phone, you know, like, joking	13:31:13
20	around with him. I think that's the only time I	13:31:14
21	can remember that.	13:31:17
22	Q. Did you ever witness the Governor	13:31:18
23	asking someone if he could look through their	13:31:19
24	social media accounts?	13:31:23
25	A. No.	13:31:24

		Page 144
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. To see the pictures that they had on	13:31:24
3	their phone?	13:31:26
4	A. Not that I recall, no.	13:31:26
5	Q. Let's go tab 49 and we'll mark this	13:31:44
6	as the next exhibit.	13:31:47
7	(Deposition Exhibit 25, 11/18/19 text	13:31:47
8	message chain between Bennett and Witness, was	13:31:47
9	marked for identification.)	13:31:55
10	Q. This is another text message chain	13:31:55
11	between you and Ms. Bennett on November 18th of	13:31:57
12	2019. Why don't you read through the whole thing	13:32:02
13	and look up when you're done.	13:32:05
14	Okay. At the beginning of this text	13:34:20
15	message chain on the first and second page, Ms.	13:34:21
16	Bennett describes to you an occasion in which the	13:34:25
17	Governor told her didn't like her hair when she	13:34:28
18	wore her hair in a bun; am I characterizing that	13:34:31
19	right?	13:34:35
20	A. Yes.	13:34:35
21	Q. Do you have any reason to believe	13:34:36
22	that Ms. Bennett was not telling you the truth	13:34:38
23	about what happened with the Governor?	13:34:40
24	A. No.	13:34:41
25	Q. And then on the third page, she tells	13:34:42

		Page 145
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	you, "I have spent too long dealing with abusive	13:34:48
3	assholes. The Gov has no idea what kind of web	13:34:51
4	he has stepped into LMAO."	13:34:53
5	What did you understand by saying	13:34:56
6	"the Gov has no idea what kind of web he has	13:34:58
7	stepped into"?	13:35:01
8	A. I really don't know what I thought of	13:35:01
9	that at the time.	13:35:03
10	Q. And you wrote, "good for you."	13:35:10
11	Do you remember why you wrote back,	13:35:13
12	"good for you."	13:35:15
13	A. Because she was motivating herself to	13:35:15
14	just leave, if she didn't like it. Because it's	13:35:17
15	hard place to leave if you don't like it, you	13:35:20
16	know. If you need the income, it's hard to walk	13:35:23
17	away from a job.	13:35:25
18	Q. And you wrote after that you	13:35:26
19	wrote, "I told you that you that you're better	13:35:28
20	than me. You're doing the right thing for	13:35:29
21	yourself faster than I could. Just don't tell	13:35:30
22	ANYONE what you're doing. You'd be very	13:35:33
23	surprised to see how quickly shit leaks here."	13:35:37
24	Why did you tell Ms. Bennett not to	13:35:40
25	tell "anyone" she was doing?	13:35:44

	Р	age 146
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. I believe in that same vein of	13:35:46
3	leaving. Because if you were going to leave,	13:35:47
4	again, it's that same thought process that if	13:35:49
5	you're going to go somewhere, they may find out	13:35:51
6	where you're going and try and stop you from	13:35:52
7	going there. Plus you don't want, like, the	13:35:54
8	attention of them thinking that you're leaving or	13:35:56
9	anything like that. You kind of want to do it on	13:35:58
10	your own terms. So, I think, I was talking to	13:36:01
11	her about that.	13:36:02
12	Q. Did you ever actually speak to Ms.	13:36:02
13	Bennett after this about whether she was going to	13:36:04
14	leave the Executive Chamber?	13:36:06
15	A. No. I don't think I did.	13:36:07
16	Q. Do you understand that she did not,	13:36:09
17	in fact, at that time leave the Executive	13:36:12
18	Chamber?	13:36:13
19	A. Yeah, I think so.	13:36:13
20	Q. Let's look at Tab 53 and we'll mark	13:36:18
21	this as the next exhibit.	13:36:24
22	(Deposition Exhibit 26, 1/1/20 text	13:36:24
23	message chain between Bennett and Witness, was	13:36:24
24	marked for identification.)	13:36:26
25	Q. We're into 2020. So this is New	13:36:26

	P	age 147
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Year's Day 2020. It's a text message chain	13:36:29
3	between you and Ms. Bennett.	13:36:34
4	When you're done looking at it, just	13:36:54
5	let me know.	13:36:57
6	A. Okay.	13:37:00
7	Q. And in this text message chain, Ms.	13:37:01
8	Bennett tells you that the Governor just made her	13:37:03
9	sing "Bohemian Rhapsody."	13:37:05
10	Do you see that?	13:37:07
11	A. Yes.	13:37:09
12	Q. Do you have any reason to believe	13:37:09
13	that Ms. Bennett wasn't telling you the truth	13:37:11
14	about that?	13:37:12
15	A. No.	13:37:13
16	Q. Do you remember an occasion on which	13:37:13
17	there was Ms. Bennett was asked to learn the	13:37:15
18	lyrics to "Danny Boy"?	13:37:18
19	A. Yes.	13:37:19
20	Q. And tell us about that.	13:37:20
21	A. I think it was either my last the	13:37:25
22	end of my second to last week or my last week in	13:37:28
23	the office with her. I can't remember which one	13:37:30
24	it was. I don't think he was there my last week,	13:37:32
25	so, I guess, my second to last week there. We	13:37:35

		Page 148
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	were splitting the desk.	13:37:38
3	And I remember that she had like the	13:37:39
4	lyrics to "Danny Boy" with her and she was like,	13:37:41
5	kind of mouthing them out and humming them along	13:37:44
6	trying to memorize them.	13:37:46
7	Q. And did you have any conversation	13:37:48
8	with her about the "lyrics to 'Danny Boy'" and	13:37:50
9	why she had them?	13:37:52
10	A. I really can't remember what we	13:37:53
11	talked about.	13:37:55
12	Q. Do you remember her performing "Danny	13:37:55
13	Boy" for anyone?	13:37:58
14	A. No, I really don't.	13:37:59
15	Q. But you just remember she had the	13:38:01
16	lyrics?	13:38:03
17	A. Yes, I do.	13:38:03
18	Q. And that was in you said her first	13:38:04
19	week or so?	13:38:06
20	A. I think so. Because that was the	13:38:07
21	only time that we were together.	13:38:09
22	Q. Your text messages with Ms. Bennett	13:38:19
23	appear to end on January 28, 2021.	13:38:20
24	Is there a reason why you stopped	13:38:25
25	texting with Ms. Bennett?	13:38:26

	F	age 149
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	13:38:27
3	Q. What happened?	13:38:28
4	A. Nothing happened. It just like	13:38:32
5	petered out. There is no rhyme or reason to why	13:38:32
6	we stopped talk.	13:38:35
7	Q. When was the last time you had any	13:38:36
8	communication with Charlotte Bennett?	13:38:38
9	A. Whatever this date is of the last	13:38:41
10	text message you have.	13:38:43
11	Q. Yeah, that's not the one you're	13:38:43
12	looking at	13:38:45
13	A. Oh, oh, so	13:38:45
14	Q is not the last text message we	13:38:46
15	have. I'll represent	13:38:47
16	A. Oh, okay.	13:38:47
17	Q to you the last text message we	13:38:49
18	have from you and Ms. Bennett is from January 28,	13:38:50
19	2021.	13:38:54
20	Did you speak to her after that?	13:38:55
21	A. No.	13:38:57
22	Q. Okay. When was the first time you	13:38:57
23	became aware that Ms. Bennett had an interaction	13:38:58
24	that she believed was uncomfortable with Governor	13:39:02
25	Cuomo?	13:39:04

	I	Page 150
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Whenever the news story came out.	13:39:07
3	Q. You mean the New York Times story?	13:39:10
4	A. Yeah.	13:39:12
5	Q. Did you reach out to Ms. Bennett	13:39:12
6	after that?	13:39:13
7	A. No.	13:39:14
8	Q. Did she reach out to you?	13:39:14
9	A. No.	13:39:15
10	Q. Did you discuss Ms. Bennett's	13:39:18
11	allegations that were made in that New York Times	13:39:20
12	article with anyone?	13:39:22
13	A. I think, like, and I talked	13:39:28
14	about it. I, like, to add that's pretty much	13:39:31
15	not a lot of people.	13:39:35
16	Q. Did anyone you spoke to about it give	13:39:37
17	you any information to discredit Ms. Bennett?	13:39:40
18	A. What do you mean, I'm sorry?	13:39:42
19	Q. Meaning, telling you a fact that was	13:39:44
20	inconsistent with what she reported in the New	13:39:45
21	York Times story?	13:39:48
22	A. No, not that I can recall, no.	13:39:49
23	Q. Is there anything you think that we	13:40:02
24	need to know about your communications with	13:40:04
25	Charlotte Bennett that we haven't covered today?	13:40:06

		Page 151
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	13:40:08
3	Q. Okay. Why don't we talk about	13:40:08
4	Lindsey Boylan.	13:40:12
5	Now you said you knew who she was?	13:40:13
6	A. Yes.	13:40:16
7	Q. When you met her, what was her role?	13:40:16
8	A. I'm taking a wild guess at her title,	13:40:22
9	but she worked in ESD doing Economic Development.	13:40:27
10	I think it was Senior Economic Advisor, but I'm	13:40:27
11	guessing at the title.	13:40:29
12	Q. During your time in the Chamber, was	13:40:31
13	she always working for ESD or did her role	13:40:32
14	change?	13:40:36
15	A. I think she switched to being the	13:40:36
16	Deputy Secretary of Economic Development,	13:40:38
17	something like that.	13:40:43
18	Q. And as the Deputy Secretary for	13:40:44
19	Economic Development, who she worked for the	13:40:46
20	Executive Chamber?	13:40:50
21	A. Yes.	13:40:50
22	Q. Who did she report to, if you know?	13:40:50
23	A. I don't know.	13:40:53
24	Q. Did you have interactions with Ms.	13:40:55
25	Boylan?	13:40:58

		Page 152
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Here and there. We would say hi to	13:40:58
3	each other.	13:41:00
4	Q. Anything more than that?	13:41:01
5	A. Not really.	13:41:06
6	Q. Did anyone ever express any concerns	13:41:07
7	to you about how Ms. Boylan treated them in the	13:41:09
8	workplace?	13:41:12
9	A. I heard rumors, but nobody,	13:41:15
10	specifically, told me, you know, like, they had a	13:41:17
11	bad interaction with her.	13:41:20
12	Q. And what rumors did you hear?	13:41:21
13	A. I had heard that she was very	13:41:23
14	verbally abusive to staff,	13:41:29
15		13:41:31
16	stuff like that.	13:41:35
17	Q. Who did you hear that from?	13:41:37
18	A. I really can't remember who I heard	13:41:39
19	that from.	13:41:40
20	Q. Do you remember if that's something	13:41:41
21	that you read in the newspaper or if that's	13:41:42
22	something someone told you?	13:41:45
23	A. I think it's something that I heard	13:41:51
24	when I was working there.	13:41:51
25	Q. Okay. Would you describe any of what	13:41:55

	P	age 153
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	you witnessed from the senior staff of the	13:41:57
3	Executive Chamber to be verbally abusive?	13:42:00
4	A. What do you mean, I'm sorry, like?	13:42:02
5	Q. Well, I'll ask a different question.	13:42:05
6	So, when someone told you that	13:42:08
7	Lindsey Boylan was being "verbally abusive," what	13:42:09
8	did you understand that to mean?	13:42:12
9	A. That she was yelling a lot.	13:42:13
10	Q. Okay. And are there other people	13:42:15
11	within the senior staff of the Executive Chamber	13:42:16
12	who you saw "yelling a lot"?	13:42:19
13	A. Yes.	13:42:20
14	Q. And who was that?	13:42:21
15	A. Melissa.	13:42:22
16	Q. Did there come an occasion in which	13:42:29
17	you had to deliver flowers to members of the	13:42:31
18	Executive Chamber staff?	13:42:34
19	A. Yes.	13:42:35
20	Q. Tell us about that, how that came	13:42:36
21	about.	13:42:38
22	A. So I believe it was I think it was	13:42:40
23	Valentine's Day, if not the day before, but I	13:42:43
24	think it was Valentine's Day. I was in the New	13:42:45
25	York City office sitting at the cube and	13:42:49

	P	age 154
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Stephanie called me and said, can you get some	13:42:52
3	Roses for the staffers, you know. And she said,	13:42:55
4	for every woman on the 39th floor, some of the	13:43:00
5	women on the 38th floor and Lindsey Boylan.	13:43:03
6	Q. What floor was Lindsey Boylan on?	13:43:06
7	A. I think 36 or 37.	13:43:07
8	Q. And did you understand Ms. Benton's	13:43:09
9	direction to be coming from the Governor?	13:43:12
10	A. I did.	13:43:14
11	Q. And how did you come to that	13:43:15
12	understanding?	13:43:16
13	A. Because she called and asked me to do	13:43:16
14	it and, like, saying from the Governor when they	13:43:19
15	were giving them out.	13:43:22
16	Q. And did you go buy the Roses?	13:43:23
17	A. Yes.	13:43:26
18	Q. And how much did they cost?	13:43:26
19	A. I don't know. There weren't cheap.	13:43:29
20	Q. Ballpark it 100, 200?	13:43:33
21	A. 80, \$100. I went to like a bodega on	13:43:35
22	the corner.	13:43:38
23	Q. Did you get reimbursed for them?	13:43:39
24	A. Virtually.	13:43:42
25	Q. Okay. And did you follow the	13:43:43

	1	Page 155
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	instructions that Ms. Benton had given you?	13:43:45
3	A. Yes.	13:43:47
4	Q. Do you remember who the 38 floor got	13:43:47
5	the Roses?	13:43:49
6	A. I think only person I can think of is	13:43:58
7	maybe I gave one to the receptionist on the 38th	13:44:01
8	floor, but I can't really remember who else a the	13:44:04
9	38th floor that I gave one to.	13:44:06
10	Q. Did Ms. Benton tell you specifically	13:44:08
11	who the 38th floor to give the Roses to?	13:44:10
12	A. I think the way that she said it was	13:44:13
13	just like, you know, people that have interacted	13:44:14
14	with him before, people that he's met before, if	13:44:16
15	that makes sense, like.	13:44:19
16	Q. So, to be clear, it's every woman on	13:44:20
17	the 39th floor, right?	13:44:23
18	A. Yes.	13:44:24
19	Q. Not men	13:44:25
20	A. Yes.	13:44:25
21	Q right?	13:44:26
22	And then it's certain women on the	13:44:26
23	38th floor?	13:44:28
24	A. Yes.	13:44:28
25	Q. And they were women who were say	13:44:29

	1	Page 156
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	it again.	13:44:31
3	A. Like, interacted with him or met him	13:44:31
4	or been in meetings with him before.	13:44:33
5	Q. And the 37 floor was Lindsey Boylan?	13:44:35
6	A. 37 or 36th, one of those two, yeah.	13:44:36
7	Q. Okay. And at that point in time, Ms.	13:44:39
8	Boylan, do you remember whether she was the	13:44:42
9	Deputy Secretary for Economic Development or she	13:44:43
10	still had her role at EDS?	13:44:46
11	A. I don't remember. I think EDS, but I	13:44:50
12	can't I'm not sure if that's entirely accurate	13:44:53
13	if she was there or not.	13:44:56
14	Q. Did you raise any concerns to Ms.	13:44:57
15	Benton about delivering roses to the women of the	13:44:59
16	Executive Chamber?	13:45:02
17	A. No.	13:45:02
18	Q. You just did what she asked you to	13:45:03
19	do?	13:45:05
20	A. Correct.	13:45:05
21	Q. Did you leave notes with any of the	13:45:06
22	roses?	13:45:09
23	A. I can't remember if I did. I can't	13:45:09
24	remember if I wrote like "Happy Valentine's	13:45:11
25	Day - Andrew" on it, or if I'm making that up in	13:45:14

	1	Page 157
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	my head. I can't really remember if I did.	13:45:18
3	Q. And you did, in fact, give Ms. Boylan	13:45:20
4	a rose, correct?	13:45:22
5	A. Yes.	13:45:23
6	Q. Do you remember if you gave it to her	13:45:23
7	personally or left it on her desk?	13:45:25
8	A. I believe I left it in her office.	13:45:27
9	Q. Did you see her at all after that?	13:45:29
10	A. No, I don't think so.	13:45:31
11	Q. Did you ever talk to her about having	13:45:32
12	dropped a rose from the Governor for her?	13:45:34
13	A. I think she asked where like where it	13:45:37
14	came from and I told her it's from the Governor.	13:45:40
15	Q. And that was the same day, around the	13:45:42
16	same	13:45:44
17	A. I think it was the next week, if I	13:45:45
18	remember.	13:45:47
19	Q. Not recently?	13:45:48
20	A. What do you mean?	13:45:49
21	Q. Meaning, that conversation didn't	13:45:50
22	occur recently, that's a conversation that	13:45:51
23	occurred closer in the time when the flower	13:45:54
24	A. Yeah, exactly, the week after I gave	13:45:56
25	it to her.	13:45:58

	1	Page 158
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you ever talk to anybody else	13:45:58
3	about the delivery of the flowers?	13:46:00
4	A. Not that I can recall, no.	13:46:03
5	Q. Have you ever spoken to any member of	13:46:05
6	the press	13:46:07
7	A. No.	13:46:08
8	Q about I'll finish asking a	13:46:08
9	different question.	13:46:12
10	Have you ever spoken to a member of	13:46:13
11	the press about the delivery of the flower to Ms.	13:46:15
12	Boylan?	13:46:17
13	A. No.	13:46:17
14	Q. Have you ever spoken to a member of	13:46:17
15	the press about any of the allegations of sexual	13:46:19
16	harassment against Governor Cuomo?	13:46:22
17	A. No.	13:46:23
18	Q. Okay.	13:46:24
19	A. Sorry I jumped the gun.	13:46:26
20	Q. No, that's okay.	13:46:28
21	How did you first become aware that	13:46:30
22	Ms. Boylan had made claims of sexual harassment	13:46:32
23	against Governor Cuomo?	13:46:34
24	A. I think it was the Medium article	13:46:36
25	that she released and I think it was December of	13:46:38

	Pi	age 159
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	last year.	13:46:42
3	Q. Maybe let's refresh your	13:46:43
4	recollection.	13:46:45
5	A. I think.	13:46:45
6	Q. So let's look at Tab 54.	13:46:45
7	(Deposition Exhibit 27, screen shot	13:46:45
8	of 12/5/20 tweet from Lindsey Boylan, was marked	13:46:45
9	for identification.)	13:46:51
10	A. Okay.	13:46:51
11	Q. And we'll mark this as the next	13:46:54
12	exhibit. And why don't we look at some documents	13:46:56
13	together. So let's look at 54, 55 and 58 and	13:47:04
14	we'll mark them as the consecutive next three	13:47:09
15	exhibits.	13:47:12
16	(Deposition Exhibit 28, screen shot	13:47:12
17	of 12/13/20 tweet from Lindsey Boylan, was marked	13:47:12
18	for identification.)	13:47:12
19	(Deposition Exhibit 29, DESCRIPTION,	13:47:12
20	was marked for identification.)	13:48:16
21	A. You said 55?	13:48:16
22	Q. 54, 55 and then 58.	13:48:17
23	Are you ready?	13:49:18
24	A. (No response.)	13:49:18
25	Q. Okay. So the "Medium" piece that you	13:49:19

		Page 160
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	just referenced is what is at Tab 58, correct?	13:49:20
3	A. Yes.	13:49:27
4	Q. Okay. That was dated February 24th,	13:49:28
5	2020.	13:49:33
6	What's at Tab 54 and 55 are tweets	13:49:33
7	from Ms. Boylan in December of 2020.	13:49:36
8	Do you see those?	13:49:40
9	A. Yes.	13:49:41
10	Q. Do you remember seeing the tweets	13:49:42
11	from Ms. Boylan?	13:49:44
12	A. Yes.	13:49:46
13	Q. Okay. And is that the first time	13:49:46
14	that you learned about Ms. Boylan's allegations	13:49:48
15	of sexual harassment?	13:49:50
16	A. Yes.	13:49:52
17	Q. And how did the tweets come to your	13:49:52
18	attention?	13:49:54
19	A. Well, either I saw them, you know.	13:49:57
20	I'm pretty sure I just saw them online, either	13:50:01
21	that or somebody would have sent them over.	13:50:05
22	Q. Do you follow Ms. Boylan on Twitter?	13:50:06
23	A. Yes.	13:50:08
24	Q. When did you start following Ms.	13:50:09
25	Boylan?	13:50:11

		Page 161
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. I don't know; well before this.	13:50:11
3	Q. Did you know that she had run for	13:50:14
4	Congress?	13:50:17
5	A. Yes.	13:50:18
6	Q. Did you ever speak to her about her	13:50:18
7	run for Congress?	13:50:19
8	A. No.	13:50:20
9	Q. After Ms. Boylan tweeted or you	13:50:21
10	became aware that Ms. Boylan had tweeted	13:50:29
11	allegations of sexual harassment at the Governor	, 13:50:31
12	did you ever become aware that the Executive	13:50:34
13	Chamber was preparing a letter in response to Ms	. 13:50:36
14	Boylan's allegations?	13:50:41
15	A. Yes.	13:50:41
16	Q. How did you become aware of that?	13:50:42
17	A. My girlfriend was one of the people	13:50:45
18	that was asked about the letter to sign.	13:50:47
19	Q. And who is your girlfriend?	13:50:49
20	А.	13:50:51
21	Q. And what did tell you	13:50:53
22	about the letter?	13:50:56
23	A. Just that she was asked if she would	13:50:57
24	sign it.	13:51:00
25	Q. Did she tell you what kind of letter	13:51:00

		Page 162
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	it was?	13:51:03
3	A. Kind of like a support letter for	13:51:03
4	him.	13:51:05
5	Q. Did she describe the contents for	13:51:05
6	you?	13:51:08
7	A. No.	13:51:08
8	Q. Do you understand if she was told	13:51:08
9	what the contents of the letter would be?	13:51:10
10	A. I think so. I think she, like, read	13:51:11
11	the contents, but I don't know that she ever had	13:51:13
12	it.	13:51:16
13	Q. Did you understand that the contents	13:51:17
14	you say were supportive of the Governor.	13:51:18
15	Did you understand that the contents	13:51:20
16	were about Ms. Boylan?	13:51:22
17	A. No, I wasn't part of the letter. So	13:51:28
18	I don't know what they talked about.	13:51:29
19	Q. But did ever convey to	13:51:31
20	you that the contents of the letter were about	13:51:33
21	Ms. Boylan?	13:51:35
22	A. She may have. I can't remember if	13:51:36
23	she told me that or not.	13:51:38
24	Q. Okay. Did she ever express any	13:51:39
25	concern to you about being asked to sign onto	13:51:41

		Page 163
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	that letter?	13:51:42
3	A. That I can remember.	13:51:44
4	Q. Now, did she ever tell you if she was	13:51:45
5	or wasn't going to sign onto the letter?	13:51:48
6	A. Not that I can remember. I mean, I	13:51:51
7	pretty much told her whatever you want to do, I	13:51:54
8	support you. So and kind of left it up to	13:51:57
9	her.	13:51:59
10	Q. What else do you know about	13:51:59
11	's contacts with the Executive Chamber	13:52:01
12	in December of 2020?	13:52:05
13	A. I think Steph reached out to her a	13:52:07
14	couple of times in December.	13:52:10
15	Q. And what was your understanding of	13:52:13
16	what Ms. Benton had reached out to her about?	13:52:15
17	A. I don't really know what they talked	13:52:19
18	about.	13:52:21
19	Q. Did you have any understanding that	13:52:21
20	was involved in recruiting other	13:52:24
21	individuals to sign a letter that was being	13:52:26
22	written by the Executive Chamber?	13:52:29
23	A. No, I didn't.	13:52:30
24	Q. Did you ever discuss that at all with	13:52:32
25	?	13:52:34

	Р	age 164
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. I think she had told me that there	13:52:37
3	were other people asked, but she didn't tell she	13:52:39
4	is recruiting people.	13:52:42
5	Q. Did she tell you she was asking other	13:52:43
6	people to sign it?	13:52:46
7	A. No, she didn't.	13:52:46
8	Q. Did she tell you that Ms. Benton had	13:52:48
9	asked her to ask other people to sign it?	13:52:50
10	A. No, she didn't.	13:52:52
11	Q. Do you know if ever	13:52:54
12	received a copy of the letter?	13:52:56
13	A. No, I don't think she ever did.	13:52:57
14	Q. Do you have any conversations with	13:52:59
15	in December of 2020?	13:53:04
16	A. May have.	13:53:07
17	Q. Did you have any conversations with	13:53:08
18	in December of 2020 about the	13:53:09
19	allegations of sexual harassment against Governor	13:53:12
20	Cuomo?	13:53:15
21	A. Maybe. I don't know that I can	13:53:18
22	recall a specific instance of talking to her.	13:53:20
23	Q. Are there any other members of the	13:53:23
24	staff of the Executive Chamber current or former	13:53:25
25	that you spoke to in December of 2020 about the	13:53:28

	1	Page 165
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	allegations of sexual harassment against the	13:53:31
3	Governor?	13:53:33
4	A. I think just	13:53:41
5	think he and I chatted and	13:53:44
6	Q. What do you remember about the chat	13:53:47
7	with ?	13:53:49
8	A. That he had never seen anything. And	13:53:51
9	then we talked about like a bunch of other things	13:53:54
10	too, like, we're in a fantasy football league	13:53:57
11	but	13:53:59
12	Q. "Never seen anything," what does that	13:53:59
13	mean?	13:54:02
14	A. Like, the Governor sexually	13:54:02
15	assaulting anyone. That's what I'm	13:54:04
16	Q. "Sexually assaulting anybody"?	13:54:05
17	A. Yeah.	13:54:08
18	Q. Between the tweets in December and	13:54:09
19	the Medium post, which is at Tab 58, which was	13:54:18
20	February 24th, 2020, did you have contact with	13:54:22
21	any members current or former of the Executive	13:54:25
22	Chamber other than your girlfriend?	13:54:27
23	A. I'm sorry. When did this come out	13:54:35
24	again?	13:54:37
25	Q. February 24th, 2021. I'm sorry, my	13:54:37

		Page 166
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	years are off.	13:54:41
3	A. Not that I can recall.	13:54:47
4	Q. Between December and February 24th,	13:54:49
5	did you have any contact with Stephanie Benton?	13:54:53
6	A. Yeah.	13:54:55
7	Q. About what?	13:54:56
8	A. She called me before, like, Christmas	13:54:59
9	just to kind of check in and, you know, see how I	13:55:05
10	was doing. She asked me, like, you know, have	13:55:09
11	you heard anything, what do you think of this,	13:55:11
12	you know, stuff like that.	13:55:14
13	Q. And what did you say to her?	13:55:14
14	A. Well, I told her, you know, I don't	13:55:16
15	really talk to anybody from the Chamber anymore	13:55:19
16	and, you know, I didn't know what to think of it.	13:55:24
17	I told her I was like, I've never seen him	13:55:27
18	doing anything like that. That's what I told	13:55:30
19	her.	13:55:32
20	Q. Did she ask you if you had seen	13:55:32
21	anything like Ms. Boylan had alleged?	13:55:34
22	A. Like, I can't remember. That was	13:55:38
23	like the gist of what, I think, she was asking	13:55:39
24	for. But I can't remember the exact question she	13:55:42
25	asked me. But she's like she asked me, like,	13:55:44

		Page 167
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	what did you think of that?	13:55:46
3	And I told her I was like, I had	13:55:47
4	never seen anything like that.	13:55:49
5	Q. Did she ask you if any of the press	13:55:50
6	had contacted you?	13:55:53
7	A. No.	13:55:54
8	Q. Did she ask you for names of any	13:55:54
9	other members of the staff current or former of	13:55:57
10	the Executive Chamber?	13:56:00
11	A. Yes.	13:56:00
12	Q. Okay. And did she tell you why she	13:56:01
13	wanted those names?	13:56:03
14	A. No.	13:56:04
15	Q. And what names did you give her?	13:56:06
16	A. Kaitlin , . I	13:56:14
17	think those are the only ones that I can	13:56:27
18	remember.	13:56:29
19	Q. What was the actual question that Ms.	13:56:30
20	Benton asked you?	13:56:32
21	A. I believe it was like, do you	13:56:33
22	remember if a person sat at a desk.	13:56:36
23	Q. Did she ever ask you if there was	13:56:38
24	anyone you remembered who left the Chamber	13:56:40
25	disgruntled or unhappy?	13:56:40

	P	age 168
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Yes.	13:56:44
3	Q. And what did you tell her?	13:56:45
4	A. I said Kaitlin.	13:56:48
5	Q. What did you understand about the	13:56:50
6	circumstances under which Kaitlin left the	13:56:51
7	Executive Chamber?	13:56:54
8	A. I thought that she got a new job	13:56:55
9	working for .	13:56:58
10	Q. And how did you or you told Ms.	13:56:59
11	Benton you thought she left unhappily?	13:57:03
12	A. Yes, I did.	13:57:05
13	Q. What was the basis of that	13:57:06
14	understanding?	13:57:07
15	A. She had like tweeted out a bunch of,	13:57:08
16	like, angry things about the Governor over the	13:57:11
17	summer, like, during the like the riots that were	13:57:15
18	happening in the City and, like, blaming him for	13:57:19
19	that. And so it just seemed like a strange thing	13:57:21
20	for somebody to be tweeting about him, if you	13:57:25
21	were happy with him.	13:57:27
22	Q. Did you call those tweets to Ms.	13:57:29
23	Benton's attention?	13:57:32
24	A. I don't remember if I did or if I	13:57:33
25	didn't.	13:57:33

		Page 169
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you ask her why you thought	13:57:35
3	Kaitlin had left unhappily?	13:57:38
4	A. Yes.	13:57:39
5	Q. And do you remember what you told	13:57:40
6	her?	13:57:41
7	A. I believe I told her, it was sour	13:57:41
8	grapes.	13:57:43
9	Q. And what did you mean by "sour	13:57:43
10	grapes"?	13:57:46
11	A. That she didn't have a good	13:57:46
12	experience there because she didn't work hard	13:57:48
13	enough for it and was now spiteful about that.	13:57:50
14	Q. What was the basis for that	13:57:57
15	impression that it was "sour grapes"?	13:57:58
16	A. Well, I don't think she worked very	13:58:02
17	hard when she was there and, you know, she left	13:58:05
18	and got, I believe, what she wanted working for	13:58:07
19	. So I don't really understand what the	13:58:12
20	angle would have been to be angry, unless it was	13:58:15
21	like a "sour grapes" thing.	13:58:17
22	Q. Did you read the New York Magazine	13:58:22
23	article about Governor Cuomo and the Executive	13:58:24
24	Chamber staff?	13:58:26
25	A. Yes.	13:58:26

		Page 170
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. There is a woman in there that is	13:58:26
3	only identified as "Kaitlin."	13:58:29
4	Do you understand who that is?	13:58:31
5	A. I think so.	13:58:32
6	Q. Who do you think it is?	13:58:33
7	A. I think it's Kaitlin	13:58:34
8	Q. Did you know any of the things that	13:58:36
9	are reported in that article about Kaitlin	13:58:38
10	's experience in the Executive Chamber	13:58:41
11	before you spoke to Ms. Benton?	13:58:43
12	A. Do I can you repeat that question	13:58:47
13	again?	13:58:49
14	Q. Sure, it's a loaded question.	13:58:49
15	A. Sure.	13:58:51
16	Q. Lots of words there.	13:58:51
17	There are some allegations that are	13:58:54
18	made in that article	13:58:55
19	A. Right.	13:58:55
20	Q by the woman named Kaitlin	13:58:56
21	A. Right.	13:58:58
22	Q about her experience in the	13:58:58
23	Executive Chamber.	13:59:00
24	A. Okay.	13:59:00
25	Q. Do you remember that?	13:59:01

	Pi	age 171
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Well, I am aware that the article	13:59:01
3	exists. I don't know if there is a copy here you	13:59:03
4	can show me to refresh my memory.	13:59:06
5	Q. I'll give you some examples.	13:59:07
6	A. Okay.	13:59:09
7	Q. So, in the article, the person who	13:59:10
8	identifies herself as Kaitlin says that the	13:59:12
9	Governor referred her as a "lumberjack."	13:59:14
10	Do you remember that?	13:59:17
11	A. I don't remember that but	13:59:17
12	Q. Before the conversation with Ms.	13:59:19
13	Benton, do you know did you know that Kaitlin	13:59:20
14	had described the Governor referring to her	13:59:23
15	as a "lumberjack"?	13:59:26
16	A. No, I didn't.	13:59:27
17	Q. And then you said the other name you	13:59:35
18	gave was ?	13:59:37
19	A. Yes.	13:59:39
20	Q. Okay. And what did you tell Ms.	13:59:40
21	Benton about ?	13:59:42
22	A. I don't think I told her anything. I	13:59:44
23	think I was just like listing off names and,	13:59:46
24	like, she would stop and be like, yeah, hey, what	13:59:49
25	do you think she's angry about.	13:59:50

		Page 172
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	But I don't think we said anything	13:59:53
3	about .	13:59:54
4	Q. So Ms. Benton was listing off names?	13:59:55
5	A. No, I was listing off names.	13:59:57
6	Q. You were listing off names?	13:59:59
7	A. Yeah.	14:00:00
8	Q. Okay. And was someone you	14:00:01
9	identified as having left the Chamber from your	14:00:03
10	perspective unhappy?	14:00:06
11	A. No. It was a question who sat at	14:00:07
12	that desk.	14:00:09
13	Q. Okay.	14:00:10
14	A. So it wasn't about happiness or not.	14:00:10
15	But as I would say names, she would be, oh, yeah	, 14:00:12
16	hey, what do you think is with this person.	14:00:15
17	Q. Do you remember any other person you	14:00:18
18	discussed other than Kaitlin ?	14:00:19
19	A. Not really, no.	14:00:26
20	Q. Between December the tweets between	14:00:31
21	Ms. Boylan and February 24th, which is the date	14:00:36
22	of the Medium article Ms. Boylan wrote, did you	14:00:38
23	talk to Melissa DeRosa?	14:00:41
24	A. No.	14:00:42
25	Q. Did you talk to Jill DesRosiers?	14:00:43

	P	age 173
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	14:00:45
3	Q. Did you talk to Annabelle Walsh?	14:00:46
4	A. No.	14:00:47
5	Q. Dani Lever?	14:00:49
6	A. No.	14:00:50
7	Q. Linda Lacewell?	14:00:50
8	A. No.	14:00:52
9	Q. Steve Cohen?	14:00:53
10	A. No.	14:00:53
11	Q. Any other members of the Executive	14:00:54
12	Chamber staff current or former?	14:00:57
13	A. No.	14:00:59
14	Q. After the Medium post came out on	14:01:05
15	February 24th, did you speak to any members of	14:01:08
16	the Executive Chamber staff?	14:01:10
17	A. Yes.	14:01:18
18	Q. And who did you speak to?	14:01:19
19	A. That was that was Stephanie that I	14:01:21
20	spoke to. And it was in response to after	14:01:25
21	this article if I remember the timeline right,	14:01:28
22	Lindsey reached out to me with an e-mail to chat,	14:01:33
23	which was after this article and when she did,	14:01:36
24	then I reached out to Stephanie.	14:01:39
25	Q. Okay. Let's turn to Tab 62 and we'll	14:01:41

	I	?age 174
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	mark that as the next exhibit.	14:01:44
3	(Deposition Exhibit 30, 2/26/21	14:01:44
4	message chain between Boylan and Witness, was	14:01:44
5	marked for identification.)	14:01:50
6	Q. So while you're turning the pages,	14:01:50
7	the call you had with Ms. Benton in December of	14:01:52
8	2020 about people who had sat in the seat outside	14:01:54
9	the Governor's Office, do you know if she was	14:01:58
10	recording that call?	14:02:01
11	A. I don't know.	14:02:01
12	Q. Okay. Alright. So we'll mark Tab 62	14:02:02
13	as the next exhibit.	14:02:04
14	Is this the e-mail that you were just	14:02:05
15	referring to that Ms. Boylan sent to you?	14:02:07
16	A. Yes.	14:02:09
17	Q. Okay. Now, you said this bears some	14:02:10
18	relationship to you speaking to people in the	14:02:13
19	Executive Chamber. So tell us how that came	14:02:15
20	about.	14:02:17
21	A. So, when Lindsey e-mailed me to talk,	14:02:19
22	I called the Chamber. I called Stephanie and	14:02:24
23	just said, you know, hey, I got an e-mail from	14:02:26
24	Lindsey. I don't want to get involved, you know,	14:02:29
25	just giving you a heads up, a courtesy, letting	14:02:31

	Р	age 175
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	you know what's going on.	14:02:33
3	And she said, okay, thanks. She	14:02:37
4	called me back and when she called me back, it	14:02:44
5	was on speaker phone in a room with a lot more	14:02:46
6	staff members. And she was like, we think it's	14:02:49
7	okay if you engage with her and talk to her, just	14:02:54
8	see what she wants and then just report back and	14:02:57
9	let us know.	14:03:00
10	Q. You said it was "more staff members."	14:03:02
11	Who, to your knowledge, was in that	14:03:05
12	room?	14:03:06
13	A. I believe they were all announced.	14:03:06
14	It was Linda Lacewell, Rich Azzopardi, Rob	14:03:08
15	Mujica, Beth Garvey, Judy Mogul and Stephanie.	14:03:15
16	Q. Was Melissa DeRosa there?	14:03:23
17	A. Yes, yes, she was.	14:03:24
18	Q. Anyone else?	14:03:27
19	A. I think that's it.	14:03:28
20	Q. Okay. Did they tell you what to say	14:03:29
21	when you spoke to Ms. Boylan?	14:03:34
22	A. They told me, like, just figure out,	14:03:38
23	like, what she wants to talk to you about. If	14:03:40
24	she wants to talk to you, like, she reached out	14:03:43
25	to you. It's fine that you can just see what she	14:03:45

	Р	age 176
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	wants from you and that's it, you know.	14:03:47
3	Q. In that conversation, was there any	14:03:50
4	other discussion or that's all that was said?	14:03:52
5	A. What do you mean, like?	14:03:54
6	Q. Meaning, you called, you alerted them	14:03:56
7	to the fact that you alerted Ms. Benton to the	14:03:59
8	fact that Lindsey Boylan had reached out to you,	14:04:01
9	right?	14:04:02
10	A. Right.	14:04:02
11	Q. And then Ms. Benton calls you back?	14:04:03
12	A. Right.	14:04:05
13	Q. And she's in a room with all these	14:04:05
14	people we just talked about?	14:04:07
15	A. Yes.	14:04:07
16	Q. And the conversation is them saying,	14:04:07
17	you should call her back, find out what she	14:04:09
18	wants?	14:04:11
19	A. Right.	14:04:11
20	Q. Anything else said?	14:04:12
21	A. Not that I can remember in that	14:04:16
22	conversation, but Stephanie had called me. I	14:04:18
23	called her, like, we played phone tag a couple	14:04:20
24	more times after that to continue the	14:04:22
25	conversation.	14:04:24

		Page 177
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	I believe I'm trying to remember	14:04:26
3	the order of the phone calls.	14:04:31
4	Oh, I called her back and I said, you	14:04:33
5	know, okay, I will set a call with Lindsey. Can	14:04:36
6	I have a witness for this?	14:04:40
7	And she said, let me check with the	14:04:41
8	lawyers. I'll call you right back.	14:04:43
9	And then she called me back and said,	14:04:44
10	yes, you can have a witness.	14:04:47
11	I told her, it would be	14:04:48
12	And she said, okay. And she's like,	14:04:51
13	as a matter of fact, have record it.	14:04:53
14	So I said, okay.	14:04:56
15	And then she was like, report back to	14:04:57
16	me.	14:04:57
17	Q. She's the sequence of events?	14:04:58
18	A. Right.	14:05:00
19	Q. And during that sequence of	14:05:00
20	conversations, did you understand Ms. Benton	14:05:02
21	remained in a room with all those other people?	14:05:03
22	A. No, I wasn't aware if she was in a	14:05:06
23	room with all those other people or not.	14:05:09
24	Q. Okay. In the room, I think, you said	14:05:11
25	did you say Judy Mogul was there?	14:05:13

	F	age 178
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Yes.	14:05:14
3	Q. Okay. And was Alfonso David there?	14:05:15
4	A. Not that I was aware of.	14:05:18
5	Q. He didn't announce himself then?	14:05:20
6	A. If he was, yeah.	14:05:22
7	Q. Okay. And was there any discussion	14:05:22
8	about whether recording the call would be legal?	14:05:27
9	A. Yes.	14:05:30
10	Q. Tell us about that part.	14:05:32
11	A. They said that it's one-party state.	14:05:33
12	You can report a phone call, fine.	14:05:35
13	Q. Okay. Did you ask that question, or	14:05:37
14	did they raise the question?	14:05:39
15	A. I think they raised that, that it's	14:05:41
16	one-party like, I heard them whispering	14:05:43
17	amongst themselves saying, like, it's a one-party	14:05:46
18	state, so it's fine, and then advising me to	14:05:47
19	call.	14:05:49
20	Q. And who gave you the actual advice?	14:05:49
21	A. I believe it was Judy.	14:05:51
22	Q. Do you remember Melissa DeRosa saying	14:05:55
23	anything during this discussion?	14:05:57
24	A. I think she told me, like, you know,	14:06:07
25	if Lindsey is, like, trying to dance around	14:06:10

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21 2 things, just be abrupt with her and just tell 1	
2 things, just be abrupt with her and just tell 1	
	4:06:13
3 her, like, look, you reached out to me, what do 1	4:06:16
you want from me? Like, that's the advice that 1	4:06:19
5 Melissa gave. 1	4:06:21
Q. Do you remember any advice that Linda 1	4:06:22
7 Lacewell gave?	4:06:24
8 A. No, I don't.	4:06:26
9 Q. Do you remember any advice that Rich 1	4:06:28
10 Azzopardi gave?	4:06:30
11 A. No, I don't think he said anything. 14	4:06:31
Q. Do you think Ms. Lacewell said	4:06:33
13 anything?	4:06:37
14 A. I think she was talking, but I can't 1	4:06:37
15 remember what she said.	4:06:39
Q. Other than the advice about recording 1	4:06:40
the call, what did Ms. Mogul say?	4:06:43
A. I think that was it. That's all I 1	4:06:47
19 can remember.	4:06:50
Q. What about Mr. Mujica?	4:06:51
A. I don't think he said anything.	4:06:53
Q. Did you place a call to Ms. Boylan?	4:06:58
A. No. She called me.	4:07:01
Q. How did you arrange for her to call 1	4:07:04
25 me?	4:07:04

		Page 180
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. I sent an e-mail with my number and	14:07:07
3	she called me.	14:07:09
4	Q. Why did you do it that way?	14:07:10
5	A. I think she asked. Like, we set the	14:07:11
6	time and I assumed that she had my number and I	14:07:14
7	think she called me.	14:07:16
8	Q. Okay. And did you, in fact, record	14:07:16
9	the call?	14:07:19
10	A. did but, yes.	14:07:20
11	Q. Okay. And how did you physically	14:07:21
12	arrange for that to happen?	14:07:23
13	A. Well, and she sat	14:07:24
14	next to with me with her phone and recorded it.	14:07:27
15	Q. Did you tell Ms. Boylan that you were	14:07:31
16	recording the call?	14:07:34
17	A. No.	14:07:34
18	Q. Okay.	14:07:35
19	MS. KENNEDY-PARK: Char, we able to	14:07:41
20	pull	14:07:43
21	(There is a discussion off the	14:07:43
22	record.)	14:07:45
23	MS. KENNEDY-PARK: Can we go off the	14:07:45
24	record just for a minute.	14:07:47
25	THE VIDEOGRAPHER: Stand by please.	14:07:48

P	age 181
HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
The time is, approximately, 2:07 we are going off	14:07:50
the video record.	14:07:52
(Recess taken 2:07 to 2:22 p.m.)	14:22:50
THE VIDEOGRAPHER: Okay. The time	14:22:50
is, approximately, 2:22. We are back on the	14:22:54
video record.	14:22:57
Q. So we're going to mark the next	14:22:58
exhibit, which is an audio file, and Charlotte is	14:23:01
going to play that for us. You need to put your	14:23:08
headset on.	14:23:11
(Deposition Exhibit 31, audio file,	
was marked for identification.)	
(Playing of audio recording between	
Boylan and Witness commences.)	
WITNESS 7-7-21: Hello.	
LINDSEY BOYLE: Hey. Sorry to bother	14:23:19
you. I know you got a busy life and whatnot.	14:23:20
But I appreciate you taking the time.	14:23:23
WITNESS 7-7-21: No, it's all good.	14:23:25
What's going on?	14:23:26
LINDSEY BOYLAN: Are you still are	14:23:27
you still with where did you go again, Port	14:23:28
Authority or where?	14:23:28
WITNESS 7-7-21: Yeah, yeah, I went	14:23:32
	The time is, approximately, 2:07 we are going off the video record.  (Recess taken 2:07 to 2:22 p.m.)  THE VIDEOGRAPHER: Okay. The time is, approximately, 2:22. We are back on the video record.  Q. So we're going to mark the next exhibit, which is an audio file, and Charlotte is going to play that for us. You need to put your headset on.  (Deposition Exhibit 31, audio file, was marked for identification.)  (Playing of audio recording between Boylan and Witness commences.)  WITNESS 7-7-21: Hello.  LINDSEY BOYLE: Hey. Sorry to bother you. I know you got a busy life and whatnot.  But I appreciate you taking the time.  WITNESS 7-7-21: No, it's all good.  What's going on?  LINDSEY BOYLAN: Are you still are you still with where did you go again, Port

		Page 182
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	to the Port.	14:23:32
3	LINDSEY BOYLAN: And you're still	14:23:33
4	there?	14:23:33
5	WITNESS 7-7-21: Yeah.	14:23:33
6	LINDSEY BOYLAN: Got it.	14:23:35
7	Well, I was just wondering you	14:23:37
8	know, you've, obviously, seen what I had to say	14:23:39
9	about a lot of stuff.	14:23:41
10	So I was just wondering even if like	14:23:42
11	off the record, you know, you had anything that,	14:23:45
12	you know, you could even just talk to my team or	14:23:47
13	anything on anything you saw related to this kind	14:23:51
14	of stuff, even if it's not about me. Because	14:23:53
15	there are people that are working on that. I	14:23:56
16	know it's a sensitive position, because you were	14:23:58
17	very much in the State still. But I think	14:24:01
18	there's a very limited period of time to do	14:24:04
19	something about it.	14:24:07
20	WITNESS 7-7-21: Yeah.	14:24:08
21	LINDSEY BOYLAN: Even if you know,	14:24:09
22	what I'm saying?	14:24:10
23	WITNESS 7-7-21: Yeah. Like what do	14:24:11
24	you mean, talk to them about what, like, you	14:24:12
25	know	14:24:15

## HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2	LINDSEY BOYLAN: I mean, I don't know	14:24:16
3	what you observed. I know I remember, like, you	14:24:17
4	were the one who brought me the rose. And I	14:24:20
5	would assume, like, other people who had been on	14:24:22
6	the, you know, 39th floor had seen a lot of stuff	14:24:25
7	even in just in terms of like how he is. And if	14:24:28
8	you had, I would so appreciate, you know, even	14:24:33
9	off the record in a safe way so it couldn't be	14:24:39
10	identifiable as you. There are two different	14:24:42
11	people that would love to hear that, that, you	14:24:46
12	know, they wouldn't even have to know	14:24:49
13	WITNESS 7/7/21: Yeah.	14:24:52
14	LINDSEY BOYLAN: like, who you are	14:24:53
15	per se, but it would be very helpful.	14:24:54
16	And I think something has to change	14:24:58
17	or else, you know what I experienced people	14:25:00
18	after me experienced. So I feel like I had to do	14:25:04
19	something to, at least, make it clear that that's	14:25:08
20	happening. Do you know what I mean?	14:25:10
21	WITNESS 7/7/21: Yeah, yeah, I	14:25:11
22	understand. But, you know, I never saw anything	14:25:12
23	like that, you know.	14:25:15
24	LINDSEY BOYLAN: Got it.	14:25:17
25	It's okay. I understand. Okay. I	14:25:18

1

		Page 184
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	totally get it.	14:25:22
3	WITNESS 7/7/21: So	14:25:29
4	LINDSEY BOYLAN: Okay. Well, I	14:25:29
5	really appreciate your time and I hope you're	14:25:31
6	doing well in the new job.	14:25:33
7	WITNESS 7/7/21: Yeah. Thank you	14:25:35
8	very much. So hang in there.	14:25:35
9	LINDSEY BOYLAN: No, thank you.	14:25:38
10	Thank you. Best of look, okay.	14:25:38
11	WITNESS 7/7/21: Yeah, you too.	14:25:40
12	LINDSEY BOYLE: Okay, bye.	14:25:41
13	(Playing of audio recording between	14:25:41
14	Boylan and Witness concludes.)	14:25:41
15	BY MS. KENNEDY-PARK:	14:25:48
16	Q. Is that the recording of the phone	14:25:48
17	call with Lindsey Boylan that members of the	14:25:51
18	Executive Chamber staff asked you to make?	14:25:54
19	A. Yes.	14:25:56
20	Q. And it's a true and accurate	14:25:57
21	recording?	14:25:59
22	A. Yes.	14:25:59
23	Q. Did the Executive Chamber staff tell	14:25:59
24	you to tell Ms. Boylan that you had never seen	14:26:01
25	anything like that?	14:26:04

	P	age 185
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	14:26:05
3	Q. Was that true?	14:26:05
4	A. Which part?	14:26:07
5	Q. Where you told her, I've never seen	14:26:08
6	anything like that?	14:26:12
7	A. Yes.	14:26:12
8	Q. She asked you about giving her the	14:26:12
9	flower?	14:26:15
10	A. Yes.	14:26:16
11	Q. Is there a reason you didn't confirm	14:26:16
12	that that was true to her?	14:26:18
13	A. She didn't ask me to confirm it.	14:26:21
14	Q. She didn't ask you, specifically,	14:26:24
15	about that?	14:26:26
16	A. Correct.	14:26:26
17	Q. So when you said, I didn't see	14:26:27
18	anything like that, you were excluding the flower	14:26:29
19	from that?	14:26:30
20	A. Yes.	14:26:30
21	Q. So what did you mean by that?	14:26:30
22	A. Like, sexually harassing somebody.	14:26:32
23	That's what I took it to mean.	14:26:35
24	Q. Let's turn well, I guess, after	14:26:37
25	you recorded this phone call, what did you do	14:26:40

		Page 186
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	with the recording?	14:26:44
3	A. Sent it to Steph.	14:26:44
4	Q. Just Ms. Benton?	14:26:46
5	A. Yes.	14:26:47
6	Q. Did you share it with anyone else?	14:26:47
7	A. No.	14:26:49
8	Q. Is the only other	14:26:49
9	person that, to your knowledge, heard this	14:26:52
10	recording?	14:26:54
11	A. To my knowledge, yes.	14:26:55
12	Q. Okay. Do you know if Ms. Benton sent	14:26:56
13	it to anyone else?	14:26:58
14	A. I don't.	14:26:59
15	Q. Did you ever ask her that?	14:27:00
16	A. I didn't.	14:27:01
17	Q. Okay. After you sent the recording	14:27:02
18	to Ms. Benton, did anyone from the Executive	14:27:11
19	Chamber reach out to you?	14:27:14
20	A. After this? No.	14:27:16
21	Q. Okay. Let's go back and look at	14:27:17
22	Tab 60.	14:27:24
23	(Deposition Exhibit 32, 2/26/21 text	14:27:24
24	message chain between , and and	14:27:24
25	Witness 00757 to 00842, was marked for	14:27:24

	Pa	age 187
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	identification.)	14:27:32
3	Q. Oh, boy.	14:27:32
4	Unfortunately, these text messages	14:27:35
5	print on single pages, so you'll have to flip	14:27:39
6	through a bunch of pages. We'll mark this as the	14:27:43
7	next exhibit.	14:27:46
8	Did you look through the whole thing?	14:30:06
9	A. Yeah.	14:30:08
10	Q. This is a text message chain on	14:30:08
11	February 26th between you, and	14:30:11
12		14:30:15
13	This was in advance of you recording	14:30:15
14	the call with Ms. Boylan; is that right?	14:30:17
15	A. Yes.	14:30:20
16	Q. Okay. Why was involved	14:30:20
17	in this discussion about the outreach from Ms.	14:30:24
18	Boylan?	14:30:27
19	A. Well, like, , , and I are	14:30:29
20	friends. So I didn't find it weird that	14:30:32
21	would be talking to me about this.	14:30:37
22	Q. So you told about the	14:30:38
23	outreach from Ms. Boylan?	14:30:41
24	A. Yeah.	14:30:42
25	Q. And you told her were you going to	14:30:42

	Р	age 188
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	contact the Executive Chamber about it?	14:30:44
3	A. Yes.	14:30:45
4	Q. Okay. Did you want to reach out to	14:30:50
5	Ms. Boylan?	14:30:52
6	A. No, I didn't.	14:30:53
7	Q. Why did you do it?	14:30:55
8	A. Because it was an employer that was	14:31:03
9	good to me at a certain point. It helped advance	14:31:07
10	my career and, you know, it felt like I was	14:31:10
11	helping them at a time when they wanted some	14:31:17
12	help.	14:31:20
13	Q. Did it ever cross your mind that if	14:31:20
14	you said no, that they could do things that would	14:31:22
15	be detrimental to your career?	14:31:25
16	A. I don't know that it ever crossed my	14:31:26
17	mind.	14:31:29
18	Q. Did you ever talk to anybody about	14:31:29
19	that?	14:31:30
20	A. About what, that they would do	14:31:31
21	something to me?	14:31:33
22	Q. A concern that if you did not return	14:31:34
23	the call as they've had asked you to and record	14:31:36
24	the call that they would do something that would	14:31:39
25	be detrimental to your career?	14:31:41

	P	age 189
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	14:31:43
3	Q. Did you want to record the call?	14:31:47
4	A. Not really.	14:31:55
5	Q. How did the idea come about again	14:32:00
6	that would record the call?	14:32:03
7	A. Cause talked to me about	14:32:05
8	being a witness for the phone call. So I called	14:32:08
9	Stephanie and said, could I have a witness, and I	14:32:10
10	told her it would be	14:32:14
11	And she said, okay, fine. And then	14:32:15
12	she actually said, as a matter of fact, you	14:32:16
13	should have record the phone call too.	14:32:18
14	Q. Was there any discussion with Ms.	14:32:21
15	Benton or other members of the Executive Chamber	14:32:22
16	staff as to whether or you would	14:32:27
17	record the call?	14:32:28
18	A. I think she told to do it	14:32:29
19	while I was having the phone call.	14:32:32
20	Q. And before you decided on,	14:32:34
21	was there any discussion over whether you or she	14:32:36
22	should do it?	14:32:39
23	A. Not that I can remember.	14:32:40
24	Q. Was there any discussion about	14:32:41
25	whether if you recorded the call, you wouldn't be	14:32:43

		Page 190
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	able to tell Ms. Boylan that you were not	14:32:45
3	recording the call, if she asked?	14:32:47
4	A. Yeah, that was in the text message	14:32:48
5	you saw.	14:32:49
6	Q. But did that discussion happen with	14:32:50
7	the Executive Chamber?	14:32:52
8	A. No, it didn't.	14:32:53
9	Q. That was just between you and	14:32:54
10	and ?	14:32:56
11	A. Correct.	14:32:57
12	Q. And on the page that's	14:32:58
13	Bate stamped 761 at the bottom, she says, "Steph	14:33:02
14	called and talked him off the ledge a bit."	14:33:11
15	You're the "him," right?	14:33:13
16	A. Correct.	14:33:15
17	Q. What was your understanding of why	14:33:16
18	was saying were you on the "ledge"	14:33:19
19	and had to be talked off?	14:33:20
20	A. Because I didn't want to get involved	14:33:22
21	in this.	14:33:24
22	Q. Why didn't you want to get involved?	14:33:24
23	A. Well, I don't know. I just don't	14:33:27
24	like being involved in big media things, you	14:33:31
25	know, big media stories. I didn't want to get	14:33:33

		Page 191
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	involved.	14:33:36
3	Q. If you turn to the page that's Bate	14:33:37
4	stamped at the bottom 774. You wrote, "It will	14:33:40
5	be the first time they're hearing about this.	14:33:50
6	She said this is the first time anyone has	14:33:53
7	alerted her to this."	14:33:55
8	Is the "her" and the "she" that's	14:33:58
9	being described here Ms. Benton?	14:34:01
10	A. Yes.	14:34:10
11	Q. Okay. And what do you remember Ms.	14:34:10
12	Benton told you about this being the first time	14:34:12
13	anyone had alerted her to this?	14:34:15
14	A. Let her know that Lindsey had reached	14:34:18
15	out to them.	14:34:21
16	Q. But she told you, to her knowledge,	14:34:22
17	Lindsey Boylan had not reached out to anybody	14:34:24
18	else that was a former staff of the Executive	14:34:26
19	Chamber?	14:34:29
20	A. No, that's not what I mean is that	14:34:29
21	it was, you know, any former staffer that Lindsey	14:34:35
22	reached out to, let Stephanie know. And she	14:34:40
23	said, nobody else that was a former staffer let	14:34:43
24	Stephanie know that anybody reached out, if that	14:34:48
25	makes what I'm trying to say.	14:34:50

		Page 192
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. It does make sense.	14:34:51
3	A. Okay.	14:34:51
4	Q. Did you leave believe her?	14:34:52
5	A. Yes.	14:34:54
6	Q. And then you wrote on 776, "But that	14:34:57
7	that they suspected it."	14:35:00
8	What did Ms. Benton say about	14:35:02
9	"suspecting" it?	14:35:04
10	A. I think that they suspected that	14:35:09
11	Lindsey was reaching out.	14:35:11
12	Q. But that no one had told them that	14:35:12
13	that had actually happened?	14:35:15
14	A. From what she told me, yes.	14:35:16
15	Q. Okay. And then you go on you wrote,	14:35:18
16	"And the fact that she's reaching out to me"	14:35:21
17	flip the page " totally believed	14:35:23
18	that." But you continue to write, "Probably	14:35:25
19	means she hasn't gotten much."	14:35:27
20	Do you see that?	14:35:30
21	A. Yes.	14:35:30
22	Q. Is that what Ms. Benton stated to you	14:35:31
23	or was that your view?	14:35:33
24	A. You know, I can't remember. I think	14:35:38
25	that's paraphrasing what Stephanie said, like,	14:35:40

	Pa	age 193
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	you know, she's reaching out to me. You know,	14:35:43
3	why is she reaching out to you, she must not have	14:35:46
4	much. I'm paraphrasing it, but it was something	14:35:50
5	like that, I think.	14:35:52
6	Q. Okay. In the recorded phone	14:35:54
7	conversation, Ms. Boylan twice refers to there	14:35:56
8	being other people who had similar experiences to	14:36:00
9	her.	14:36:03
10	Do you remember that?	14:36:04
11	A. Yes.	14:36:05
12	Q. Okay. Did you have any idea who she	14:36:05
13	was referring to at that time?	14:36:09
14	A. If I can remember remembering who she	14:36:10
15	was referring to.	14:36:13
16	Q. Did anyone in the Executive Chamber	14:36:14
17	ask you who you thought Ms. Boylan was referring	14:36:15
18	to?	14:36:18
19	A. No.	14:36:18
20	Q. Did you discuss with anyone who you	14:36:19
21	thought those two people might be?	14:36:21
22	A. No.	14:36:22
23	Q. Not even with ?	14:36:25
24	A. No.	14:36:27
25	Q. If you turn to Page 792.	14:36:36

	P	age 194
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. Sure.	14:36:39
3	Q. You wrote, "But she emphasized I need	14:36:53
4	to be non-committal and fluid."	14:36:55
5	Who is the "she"?	14:36:58
6	A. I don't really know. I can't	14:37:10
7	remember who I'm talking about here.	14:37:12
8	Q. Just flip back and see if you can	14:37:13
9	A. Yeah.	14:37:16
10	Q refresh your memory.	14:37:16
11	A. I think it was Stephanie.	14:37:40
12	Q. Does that refresh your memory about	14:37:42
13	anything else that Ms. Benton said during her	14:37:45
14	calls with you in advance of you recording a	14:37:47
15	phone call with Ms. Boylan?	14:37:49
16	A. Really all I can remember. I mean,	14:37:52
17	as this comes up, it's helping, but that's really	14:37:54
18	all I can remember.	14:37:56
19	Q. What did you understand her to mean	14:37:57
20	by "non-committal and fluid"?	14:37:59
21	A. Like, you know, just let her talk	14:38:02
22	more and, like, you know, if she wants to you,	14:38:05
23	like, talk to anybody on her staff or, like, an	14:38:11
24	attorney or something like that, I didn't need to	14:38:13
25	do that, you know, stuff like that.	14:38:16

	F	age 195
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Ms. Benton told you you didn't need	14:38:17
3	to do that	14:38:19
4	A. Yes, yes.	14:38:19
5	Q if she wanted you to have those	14:38:20
6	conversations?	14:38:22
7	A. Yes, yes.	14:38:22
8	Q. And then there's a series of it	14:38:23
9	goes on for quite a while about you guys	14:38:26
10	discussing whether the Executive Chamber was a	14:38:28
11	hostile environment and you say, no.	14:38:32
12	Then if you go to 794 and then it	14:38:34
13	continues on. You wrote, "It's not hostile.	14:38:39
14	It's hard," on 796.	14:38:43
15	And and 799 says, "she wants to	14:38:51
16	paint hostile."	14:38:56
17	And then you say after that, "Yes,	14:38:56
18	it's not. It's definitely hard to work there but	14:38:58
19	it's not hostile."	14:39:01
20	Is that your view of your experience	14:39:03
21	in the Executive Chamber?	14:39:04
22	A. Yeah, I mean, I don't know that	14:39:06
23	"hostile" is the right word for it. It's a tough	14:39:08
24	place to work. But, I mean, you know, I don't	14:39:11
25	know that "hostile" is the right word for it.	14:39:14

	Р	age 196
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. You understand that "hostile" has a	14:39:16
3	legal meaning?	14:39:17
4	A. I don't.	14:39:18
5	Q. When you wrote these text, you didn't	14:39:19
6	understand that?	14:39:21
7	A. No, I didn't.	14:39:21
8	Q. Okay. You can put the binder aside.	14:39:22
9	You earlier told me that the first	14:39:35
10	occasion on which you became aware of Charlotte	14:39:44
11	Bennett's accusations of sexual harassment	14:39:46
12	against the Governor was when the New York Times	14:39:49
13	article came out; is that right?	14:39:52
14	A. Yes.	14:39:53
15	Q. Okay. And after the New York Times	14:39:54
16	article came out and I apologize if I've asked	14:39:56
17	you this before, but I don't have real time	14:39:58
18	transcript in front of me.	14:40:00
19	A. It's okay.	14:40:01
20	Q. (Continuing.) Did you speak to anyone	14:40:02
21	about Ms. Bennett's allegations?	14:40:04
22	A. No, I think we said I talked to	14:40:07
23	a little bit, my dad a little bit, but I	14:40:09
24	don't recall talking to anybody else about that.	14:40:10
25	Q. So no one in the Executive Chamber?	14:40:10

	1	Page 197
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No. I hadn't spoken that was the	14:40:12
3	last time I spoke to anyone.	14:40:14
4	Q. Did anyone try to reach out to you?	14:40:16
5	A. No.	14:40:18
6	Q. Did you know Alyssa McGrath when you	14:40:34
7	were working in the Executive Chamber?	14:40:36
8	A. I think I knew of her.	14:40:38
9	Q. Do you have any personal knowledge	14:40:40
10	you're aware that Ms. McGrath has made	14:40:42
11	allegations of inappropriate behavior against	14:40:45
12	Governor Cuomo?	14:40:48
13	A. Yeah, I think so.	14:40:49
14	Q. Do you have any personal knowledge of	14:40:49
15	those allegations?	14:40:51
16	A. I do not.	14:40:51
17	Q. You sent some text messages and we	14:40:53
18	can why don't we just mark them at. It's	14:40:57
19	Tab 66. Let's mark this as the next exhibit.	14:41:00
20	(Deposition Exhibit 33, 3/10/21 text	14:41:00
21	message chain between and Witness 00757	14:41:00
22	to 00757, was marked for identification.)	14:41:00
23	Q. Why don't you look through them and	14:41:13
24	let me know when you're done.	14:41:15
25	Okay. These text refer to an article	14:41:47

	Р	age 198
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	that came out that alleged that the Governor had	14:41:49
3	sexually assaulted someone in the Executive	14:41:53
4	Mansion.	14:41:55
5	Do you remember that article?	14:41:55
6	A. Vaguely.	14:41:56
7	Q. Okay. Do you know who that article	14:41:57
8	is about?	14:42:00
9	A. Not that I can recall, no.	14:42:04
10	Q. Has anyone ever tell you who they	14:42:05
11	think that that article is about?	14:42:08
12	A. Not that I can recall.	14:42:10
13	Q. Okay. So you have no personal	14:42:11
14	knowledge of who that complainant is or any basis	14:42:13
15	to say that complainant's allegations are true or	14:42:16
16	not true; is that right?	14:42:19
17	A. Right.	14:42:20
18	Q. Okay. Do you know Jessica Bakeman?	14:42:21
19	A. No, I don't.	14:42:28
20	Q. Never met her?	14:42:30
21	A. Never even heard of her.	14:42:31
22	Q. Never seen her interact with the	14:42:33
23	Governor?	14:42:35
24	A. No.	14:42:35
25	Q. Do you know Anna Ruch?	14:42:36

		Page 199
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	A. No.	14:42:38
3	Q. Never met her?	14:42:39
4	A. No.	14:42:40
5	Q. In the time when you were the	14:42:46
6	Executive Chamber, did you ever have to look	14:42:47
7	through pictures that were taken at an event?	14:42:50
8	A. No.	14:42:52
9	Q. Did you ever observe the Governor	14:42:53
10	looking through pictures that were taken at an	14:42:55
11	event?	14:42:57
12	A. I saw him, like, signing like letters	14:43:00
13	attached with pictures and I think we would go	14:43:04
14	through them, but that was that. I don't it	14:43:06
15	was pretty much the same picture on every one, if	14:43:09
16	I remember correctly.	14:43:10
17	Q. Meaning, it was a picture of him he	14:43:12
18	was sending to people?	14:43:13
19	A. Yeah.	14:43:13
20	Q. Okay. Did you ever observe him going	14:43:14
21	through pictures that were of him and another	14:43:15
22	person or other people at events?	14:43:17
23	A. No.	14:43:18
24	Q. Do you have any information about	14:43:20
25	people being brought in to be employed in the	14:43:23

	1	Page 200
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Executive Chamber after the Governor met them at	14:43:26
3	an event?	14:43:28
4	A. Yes, I believe Kaitlin was one	14:43:32
5	of them.	14:43:35
6	Q. Okay. Can you tell me what you know	14:43:35
7	about that?	14:43:37
8	A. I believe that like, I heard a	14:43:38
9	story about the way that she got hired is, like,	14:43:41
10	he was at a fundraiser or something and she	14:43:44
11	waited by, like, his exit with her résumé and,	14:43:47
12	like, gave him her résumé on the way out.	14:43:50
13	Q. Who did you hear that story?	14:43:53
14	A. I really can't remember where that	14:43:55
15	was from.	14:43:57
16	Q. Did you ever ask Kaitlin about	14:43:57
17	that?	14:43:59
18	A. I don't think I did, no.	14:43:59
19	Q. Do you know how much Kaitlin made	14:44:02
20	when she joined the Executive Chamber?	14:44:03
21	A. I think it was over hundred thousand	14:44:06
22	dollars.	14:44:08
23	Q. How did you come to know that?	14:44:08
24	A. There is a website, See Through New	14:44:10
25	York.	14:44:12

		Page 201
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. How much did you make?	14:44:12
3	A. At the time she was making that, I	14:44:14
4	think in the .	14:44:16
5	Q. Okay. Did you ever have any	14:44:17
6	discussions with anyone about why there's a	14:44:19
7	salary differential between you and Kaitlin?	14:44:21
8	A. I maybe.	14:44:23
9	Q. Did you ever raise that to Jill	14:44:25
10	DesRosiers?	14:44:27
11	A. I don't know if I ever compared my	14:44:28
12	salary to Kaitlin's to Jill. But I've certainly	14:44:31
13	brought up raises to Jill several times.	14:44:34
14	Q. Okay. But you don't remember using	14:44:36
15	Kaitlin as an illustration of why you should get	14:44:39
16	a raise?	14:44:41
17	A. I don't remember. I may have, but I	14:44:41
18	really don't remember.	14:44:43
19	Q. Did you ever have any discussions	14:44:44
20	with anyone about why Kaitlin was being	14:44:46
21	paid around hundred thousand dollars?	14:44:48
22	A. I mean, I'm sure I have. But I don't	14:44:54
23	know that I can remember anything specific, you	14:44:57
24	know. I mean, she told me that she was or I	14:44:59
25	think Kaitlin told me. I remember I heard a	14:45:04

		Page 203
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. That you could pin the Governor?	14:46:11
3	A. No.	14:46:13
4	Q. Who did you use pins with?	14:46:16
5	A. I used it like, the detail would	14:46:18
6	send me a pin when he was leaving. Sometimes I	14:46:20
7	would send Stephanie pins, but I never really	14:46:23
8	like communicated via pin with the Governor.	14:46:27
9	Q. Is there a reason for that?	14:46:29
10	A. Never had his pin.	14:46:31
11	Q. No one ever gave it to you?	14:46:32
12	A. No.	14:46:34
13	Q. Did you have an understanding as to	14:46:35
14	why pins were being used strike that.	14:46:37
15	Did you ever talk to anyone in the	14:46:43
16	Executive Chamber about why pins were being used?	2 14:46:44
17	A. Well, I believe it was like a	14:46:48
18	security thing, like, you know, cause for most of	14:46:51
19	what I used it for it was like the security of	14:46:53
20	conversation, like about his movements and stuff	14:46:56
21	like that. You know, like, you would get	14:46:58
22	arriving 633 now in elevator, stuff like that.	14:47:01
23	So I believe that there was a security level to	14:47:04
24	this.	14:47:05
25	Q. And how did you come to that	14:47:06

		Page 204
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	understanding?	14:47:07
3	A. I deduced that.	14:47:08
4	Q. Did you talk to anybody about that?	14:47:09
5	A. Not that I can recall.	14:47:11
6	Q. When you were in the Executive	14:47:12
7	Chamber, did you have to give up your BlackBerry	14:47:13
8	at some point and switch to an iPhone?	14:47:15
9	A. No.	14:47:17
10	MS. KENNEDY-PARK: Char, do you have	14:47:23
11	questions?	14:47:25
12	MS. CHUN: You said earlier that you	14:47:29
13	were friends with SI #1 friendly with	14:47:30
14	SI #1; is that right?	14:47:32
15	THE WITNESS: Yes.	14:47:33
16	MS. CHUN: Did you ever have a	14:47:34
17	conversation with SI #1 about anything that	14:47:35
18	SI #1 may have observed between the Governor	14:47:37
19	and any members of senior staff?	14:47:40
20	THE WITNESS: Not that I can recall.	14:47:42
21	MS. CHUN: Anything that he may have	14:47:44
22	observed between SS #1 and the Governor?	14:47:45
23	THE WITNESS: Not that I can recall.	14:47:52
24	MS. CHUN: Anything between	14:47:54
25	SS #2 and the Governor that may have been of a	14:47:55

		Page 206
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	Q. Did you ever tell anyone that Ms.	14:48:44
3	Boylan had been disrespectful to you?	14:48:47
4	A. No.	14:48:49
5	Q. That she had harassed you?	14:48:49
6	A. No.	14:48:51
7	Q. That she was abusive to you?	14:48:51
8	A. No.	14:48:53
9	Q. I think we're at the end.	14:48:58
10	Is there anything that you want to	14:49:01
11	clarify about the answers you want to take a	14:49:03
12	break and talk about that?	14:49:05
13	A. Yeah.	14:49:07
14	MS. KENNEDY-PARK: Why don't we go	14:49:07
15	off the record.	14:49:08
16	MS. CHUN: If we can go off the	14:49:12
17	record.	14:49:14
18	THE VIDEOGRAPHER: It's,	14:49:14
19	approximately, 2:49. We are off the video	14:49:15
20	record.	14:49:18
21	(Recess taken 2:49 to 3:00 p.m.)	15:01:00
22	THE VIDEOGRAPHER: Okay. The time	15:01:00
23	is, approximately, 3 o'clock. We're back on the	15:01:01
24	video record.	15:01:03
25	Q. Before the break, I asked you if	15:01:06

	F	age 207
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	there's any answers that you wanted to add or	15:01:08
3	clarify.	15:01:11
4	Is there anything you would like to	15:01:11
5	clarify?	15:01:13
6	A. Yes. I still have one friend that	15:01:14
7	still works at the Chamber. I was just at his	15:01:16
8	wedding. So I wanted to clarify there is still	15:01:19
9	somebody that I talk to that I'm friends with.	15:01:21
10	Q. Who is that?	15:01:24
11	A. His name is He	15:01:24
12	works in, like, the IT department; sorry.	15:01:27
13	Q. And have you discussed the	15:01:29
14	allegations of sexual harassment with him?	15:01:30
15	A. Not that I can recall. I think we	15:01:32
16	mostly talk about the best way to invest and lose	15:01:34
17	money.	15:01:37
18	Q. So understanding that the scope of	15:01:38
19	our investigation is the allegations of sexual	15:01:40
20	harassment against Governor Cuomo and the	15:01:43
21	surrounding circumstances, is there anything else	15:01:44
22	that you know of that you think we should know?	15:01:47
23	A. No.	15:01:50
24	Q. Okay. At the beginning, I mentioned	15:01:51
25	that I would offer you an opportunity to make a	15:01:53

	1	Page 208
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	sworn statement.	15:01:56
3	Would you like to make a statement?	15:01:57
4	A. No.	15:01:59
5	Q. I'll remind you of what I told you at	15:02:00
6	the beginning, which is this investigation is	15:02:02
7	being done under Executive Law 63(8). Executive	15:02:04
8	Law 63(8) makes it a misdemeanor to tell anybody	15:02:10
9	what it is you spoke to us about today.	15:02:12
10	Do you understand that?	15:02:13
11	A. I do.	15:02:14
12	MS. KENNEDY-PARK: Does your Counsel	15:02:15
13	understand that?	15:02:15
14	(NO RESPONSE.)	
15	MS. KENNEDY-PARK: Okay. We can	
16	close out the record.	
17	THE STENOGRAPHER: I didn't hear him.	
18	I didn't hear	
19	THE VIDEOGRAPHER: And the time is,	
20	approximately, 30	
21	THE STENOGRAPHER: I didn't hear the	
22	response from the attorney, okay.	
23	THE VIDEOGRAPHER: The time is,	
24	approximately, 3	
25	MS. CHUN: He said, yes.	

	Page 209	
1	HIGHLY CONFIDENTIAL - WITNESS 7/7/21	
2	We can close out he record, Mike. 15:02:20	
3	THE VIDEOGRAPHER: My apologies. The 15:02:20	
4	time is, approximately, 3:02. We're going off 15:02:21	
5	the record.	
6	(Time noted: 3:02 p.m.)	
7		
8		
9		
	WITNESS 7/7/21	
10		
11		
12	Subscribed and sworn to before me	
13		
	this day of, 2021.	
14		
15		
	Notary public	
16		
17		
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22		
23		
24		
25		

## HIGHLY CONFIDENTIAL - WITNESS 7/7/21 CERTIFICATE OF REPORTER

I, SILVIA P. WAGE, a Certified
Shorthand Reporter, Certified Realtime Reporter
and Registered Reporter, herby certify that the
witness in the foregoing investigation was by me
duly sworn to tell the truth, the whole truth,
and nothing but the truth in the within-entitled
cause; that said investigation was taken down in
shorthand by me, a disinterested person, at the
time and place therein stated, and that the
testimony of the said witness was thereafter
reduced to typewriting, by computer, under my
direction and supervision

I further certify that I am not of counsel or attorney for either or any of the parties to the said investigation, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

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