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IN THE MATTER OF INDEPENDENT
INVESTIGATION UNDER
EXECUTIVE LAW 63(8)
- - - - - x

July 9, 2021
9:29 a.m.

HIGHLY CONFIDENTIAL
ATTORNEYS' EYES ONLY
- Volume II -

CONTINUED VIDEOTAPED ZOOM DEPOSITION
of WITNESS 7/9/2021, in the above-
entitled investigation, located in New
York State, taken before Dawn Matera, a
Notary Public of the State of New York.

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APPEARANCES:

CLEARY GOTTLIEB STEEN & HAMILTON
On behalf of the New York Attorney
General

One Liberty Plaza
New York, New York 10006

BY: JOON H. KIM, ESQ.
jkim@cgsh.com

BY: YE EUN CHARLOTTE CHUN, ESQ.
chchun@cgsh.com

BY: ANDREW WEAVER, ESQ.
aweaver@cgsh.com

BY: JENNIFER KENNEDY PARK, ESQ.
jkpark@cgsh.com

GREGORY MORVILLO PLLC
Attorneys for Stephanie Benton
90 Broad Street
New York, New York 10008

THE LAW OFFICES OF DIANE FERRONE PLLC
Attorneys for Stephanie Benton
1740 Broadway, 15th Floor
New York, New York 10019

Also Present:
Robert Rudis, Videographer

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ATTORNEYS' EYES ONLY

THE VIDEOGRAPHER: Good morning. We are now on the record at 9:29 a.m., July 9th, 2021. Please note that the microphones are sensitive and may pick up whispers and private conversations. Please mute your microphone whenever possible. Audio and video recording will continue to take place unless all parties agree to go off the record.

This is media unit one of the video-recorded deposition of Stephanie Benton taken on the New York State Attorney General's office independent investigation under New York State Executive Law Section 63(8).

My name is Robert Rudis from the firm of Veritext Legal Solutions and I am the videographer. Our court reporter today is Dawn Matera, also from the firm of Veritext Legal Solutions. This deposition is being held remotely. I am not related to any party in this action nor am I financially interested in the outcome.

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ATTORNEYS' EYES ONLY

Counsel will please now state their appearances and affiliations for the record. If there are any objections to proceeding, please state them at the time of your appearance, beginning with the noticing attorney.

MR. KIM: Joon Kim from Cleary Gottlieb Steen & Hamilton, appearing in my capacity as a Special Deputy to the First Deputy Attorney General.

MR. WEAVER: Andrew Weaver, Cleary Gottlieb, appearing in my capacity as special assistant to the First Deputy Attorney General State of New York.

MS. CHUN: Charlotte Chun, similarly from Cleary Gottlieb for the New York Attorney General.

MR. MORVILLO: Gregory Morvillo on behalf of Ms. Benton, from Morvillo PLLC. I am joined today by my paralegal who sitting across the room on his iPhone who is not paying any attention to this.

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ATTORNEYS' EYES ONLY

MS. FERRONE: Diane Ferrone, on behalf of Ms. Benton, the law offices of Diane Ferrone, PLLC.

MR. MORVILLO: I just wanted to let you know that, Joon, because there is somebody else in the room today because yesterday you asked if there was. There is somebody else in the room today. He has his AirPods in and is not paying attention.

MR. KIM: Okay. Appreciate it.

THE REPORTER: And I just remind Ms. Benton that you are still under oath.

THE WITNESS: Yes.

S T E P H A N I E B E N T O N, the Witness herein, having been previously duly sworn by the Notary Public, was examined and testified as follows:

CONTINUED EXAMINATION

BY MR. KIM:

Q. Ms. Benton, since we broke yesterday, other than your lawyers, have

1 ATTORNEYS' EYES ONLY

2 you spoken with anyone about your
3 testimony?

4 A. Not about my testimony, no.

5 Q. When we broke yesterday, we
6 were talking about Charlotte Bennett.
7 Did there come a time when you learned
8 that Charlotte Bennett had raised
9 concerns with Jill Desrosiers about
10 conversations that she had with the
11 governor?

12 A. The first conversation I had
13 with Jill was that Charlotte was no
14 longer comfortable staffing the governor
15 and that she was going to be moving to a
16 policy position that she had been wanting
17 to transition to for a while.

18 Q. And when did you learn -- about
19 when did you learn that she said she was
20 no longer comfortable staffing the
21 governor?

22 A. I believe it was in June. I
23 don't remember exactly where in June that
24 conversation fell, but that was the first
25 conversation I had.

1 ATTORNEYS' EYES ONLY

2 Q. And prior to that conversation
3 with Jill, had you heard anything on that
4 subject?

5 A. No, not prior to that
6 conversation.

7 Q. Charlotte hadn't spoken to you
8 about it?

9 A. She had not.

10 Q. Okay. And so tell me what you
11 remember about that conversation; how did
12 Jill reach out to you?

13 A. I remember her calling me.

14 Q. And where were you when she
15 called you?

16 A. Oh, I don't remember.

17 Q. You were in the office, you
18 think?

19 A. I don't remember where I was.

20 Q. So Jill called you and what did
21 she say?

22 A. She said pretty much verbatim
23 what I said, which is Charlotte was no
24 longer staffing. She had been wanting to
25 transition from the briefing position

1 ATTORNEYS' EYES ONLY

2 into what she believed would be a more
3 substantive position. And that she was
4 going to be moving into this policy
5 position, I recall in the -- within the
6 health team in the chamber. So a health
7 policy position.

8 Q. And I believe you said she said
9 that she was no longer comfortable
10 staffing the governor?

11 A. Yes.

12 Q. Did Jill say to you what
13 Charlotte Bennett said about why she was
14 no longer comfortable staffing the
15 governor?

16 A. Not that I recall.

17 Q. Did you ask?

18 A. No, I don't remember asking.

19 Q. So that wasn't something you
20 wanted to know?

21 A. I mean, in the time it wasn't
22 something that I thought about.

23 Q. Was that unusual, someone
24 saying "I no longer want to staff the
25 governor"?

1 ATTORNEYS' EYES ONLY

2 A. No, it's not unusual for
3 someone to say they don't want to staff
4 anymore. You know, as we talked about
5 yesterday, there have been many people
6 who have done that job and one of those
7 reasons is that they sort of want to move
8 on from that job.

9 Q. Was it unusual that she had
10 raised it with Jill first without raising
11 it with you?

12 A. No. In Jill's role as Chief of
13 Staff, you know, she handled those sort
14 of staffing issues. She would have been
15 the one to talk about moving out of
16 staffing. She would have been the one to
17 talk about the potential for a different
18 position.

19 Q. What was your relationship with
20 Charlotte Bennett like at this time?

21 A. It was fine. It was pleasant.

22 Q. Were you friendly with her?
23 Was she friendly with you?

24 A. I would use the word
25 "pleasant." You know, I wouldn't call

1 ATTORNEYS' EYES ONLY

2 her a friend. But it was perfectly
3 pleasant, as I recall.

4 Q. And substantively she worked or
5 reported to you, correct?

6 A. No. She continued, much like
7 many of the people who help out in this
8 role, in her position as briefer. I am
9 not sure who the briefers report to, but
10 likely Chief of Staff.

11 Q. But in terms of providing help
12 in the executive assistant role or
13 staffing the governor and helping him in
14 the capacity that we talked about
15 yesterday, you sort of help oversee that
16 role, correct?

17 A. Yes. I would ask her to help
18 out if there was a need.

19 Q. But when Jill told you that she
20 said she no longer felt comfortable
21 staffing the governor, you weren't
22 curious to know why?

23 A. Not in that moment.

24 Q. How about later?

25 A. I don't know that there was a

1 ATTORNEYS' EYES ONLY

2 moment that I was curious.

3 Q. I am just trying to understand,
4 because it seems natural that you're
5 working with someone.

6 In their functioning, there may
7 be other people that she reports to, but
8 you're certainly someone who overseeing a
9 part of her work. You see her presumably
10 on a regular basis. And you are told she
11 is no longer comfortable staffing the
12 governor, she's getting moved. A natural
13 question is why? What happened?

14 MR. MORVILLO: Look, that's a
15 natural question for you.

16 MR. KIM: That's why I am
17 asking.

18 MR. MORVILLO: I am saying, I
19 know you're saying it's a natural
20 question. I am not sure it's a
21 natural question. You can ask her if
22 it's a natural question.

23 MR. KIM: Greg, I appreciate
24 your views, but you're not the witness
25 or under oath.

1 ATTORNEYS' EYES ONLY

2 MR. MORVILLO: I understand, but
3 your commentary isn't testimony
4 either.

5 MR. KIM: I was leading into a
6 question. Trying to explain it. So
7 if I can start again.

8 Q. It would seem a natural
9 question for someone who works with
10 someone and hears that they are no longer
11 comfortable staffing the governor to ask
12 why, what happened. Is that not
13 something that you asked or considered
14 asking?

15 A. Not in that -- not in that
16 moment. Not after that conversation. We
17 were still in the height of COVID, so
18 Jill was calling me so that I knew that
19 Charlotte would no longer be someone that
20 I could call on to ask for help.

21 Q. Was it just you on the phone
22 with Jill?

23 A. Yes, on that call.

24 Q. Do you know if she was telling
25 other people as well, Jill?

1 ATTORNEYS' EYES ONLY

2 A. I don't know if she did.

3 Q. Do you know if she spoke to
4 Melissa DeRosa?

5 A. I mean, I do now. At that time
6 she wasn't telling me that she was
7 telling other people that I recall.

8 Q. And then when you learned that,
9 what did you do with that information?

10 A. I didn't do anything.

11 Q. Did you tell the governor?

12 A. I don't recall telling the
13 governor.

14 Q. Did you tell Melissa DeRosa?

15 A. I don't recall telling Melissa.

16 Q. You don't remember -- you
17 remember talking to Melissa DeRosa about
18 it?

19 A. I do.

20 Q. What do you remember?

21 A. Well, at some point -- I don't
22 remember specifically talking to Melissa
23 about this initial call, which is she was
24 transitioning.

25 At some point I recall Melissa

1 ATTORNEYS' EYES ONLY

2 and I having a conversation with Judy
3 Mogul.

4 Q. When was that?

5 A. I don't know specifically. I
6 think maybe a few days after the call
7 with Jill.

8 Q. And what led to that call?

9 A. After Jill initially had spoken
10 to Charlotte, my understanding is that
11 Judy sat with Charlotte. I don't
12 remember if Jill participated in that
13 conversation or not. And Judy, I think,
14 at length spoke with Charlotte about what
15 her comfort was. And they had, I think,
16 a pretty extensive conversation.

17 Q. And then after that, did they
18 report to you some of the more -- more of
19 the details around what had happened?

20 A. Yes, that's the call that I
21 recall with Melissa, with Judy telling us
22 about Charlotte's discomfort and the
23 things that she said to Judy, some of the
24 things she said to Judy.

25 Q. And what did you learn about

1 ATTORNEYS' EYES ONLY

2 what Charlotte Bennett said?

3 MR. MORVILLO: Can I just ask a
4 question of you, Joon, has the
5 Executive Committee waived privilege
6 over this issue? Because I don't want
7 to stumble headlong into that problem.

8 MR. KIM: You know, to be
9 honest, I don't understand the lines
10 that have been drawn. Certainly, as
11 you have seen, notes from Judy Mogul
12 of what she learned from Charlotte
13 Bennett have been produced. You know,
14 they are pretty close to verbatim.
15 They are very detailed. They're
16 testified about, you know, what their
17 assessment of the credibility of
18 Charlotte Bennett. So in some ways we
19 do already know, without hiding the
20 ball, what it is she told them, what
21 Charlotte Bennett told them at the
22 time.

23 I believe communication of the
24 facts of what they learned has been
25 waived and permitted.

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ATTORNEYS' EYES ONLY

MR. MORVILLO: Okay.

MR. KIM: And advice that they gave, you know, I don't want to --

MR. MORVILLO: No, I don't want to walk out of here later on and then realize that we ended up talking about something.

Putting it aside that you may have learned that conversation from, for example, Ms. Bennett, right, that would be one thing. And I am definitely not asking you to tell me, you know, who you learned about it from. But if there are people that work for the Executive Committee who you have interviewed and they have had -- and they have told you about this conversation, I am comfortable going forward with it. If not, then I think maybe I should call somebody over at the chamber just to make sure. Because like I said, I don't want to make a mistake here.

If you're comfortable

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ATTORNEYS' EYES ONLY

representing to me that perhaps in addition to or outside of conversations you had with Ms. Bennett you learned about this from people who work with the Executive Committee, without telling me who, then I'm okay with that if that's okay with you. Otherwise I --

MR. KIM: Why don't we deal with this and we'll look at the other testimony at a break and then I'll just put a pin in here.

MR. MORVILLO: Okay.

MR. KIM: And then I'll move on a little bit.

CONTINUED EXAMINATION

BY MR. KIM:

Q. So after this discussion you had with Judy Mogul, where you got more detail about what Charlotte Bennett had said, did you speak to anyone about that, about the information that you learned?

A. Well, yes, I spoke to Melissa about it.

1 ATTORNEYS' EYES ONLY

2 Q. And what did Melissa say?

3 A. Specifically I don't recall
4 what she said, but we were both, I think
5 it's fair to say -- I'll speak for myself
6 actually -- very surprised and I think, I
7 think upset is fair about the things that
8 she was claiming had been said.

9 Q. And did you have a conversation
10 with the governor about it?

11 A. I did not, that I recall.

12 Q. Did you tell him that you
13 learned information from Judy Mogul about
14 what Charlotte Bennett had said?

15 A. I don't recall speaking to him
16 about it.

17 Q. Did Melissa DeRosa tell you
18 that she spoke to the governor about it?

19 A. Yes, I think she did.

20 Q. What did she tell you?

21 A. I don't remember specifically.

22 Q. Generally?

23 A. I also recall that Judy may
24 have spoken to the governor.

25 Q. Who did you learn that from?

1 ATTORNEYS' EYES ONLY

2 A. I don't remember.

3 Q. Going back to Melissa DeRosa,
4 do you remember generally what she told
5 the governor and what the governor told
6 her?

7 A. No, I don't.

8 Q. Do you remember Melissa DeRosa
9 telling you that she was -- became upset
10 after talking to the governor about it?
11 That she sort of stepped out of a car and
12 left?

13 A. That she did what? I'm sorry.

14 Q. That she was in a car when she
15 spoke to the governor about it and then
16 she stepped out and left the car?

17 A. I don't remember saying that.

18 Q. Do you remember her calling you
19 again later that same day in the evening,
20 after she had been drinking?

21 A. Not specifically.

22 Q. Generally?

23 A. I don't recall that call.

24 Q. And do you remember after that
25 conversation with Judy Mogul whether

1 ATTORNEYS' EYES ONLY

2 there were any changes in practices in
3 terms of how to staff the governor?

4 A. No, I don't remember any
5 changes. The protocol has always been to
6 have more than one person there.

7 There are a handful of times
8 where, because we couldn't find at
9 whatever particular time one person, that
10 has not been executed. I don't recall at
11 that time any new procedure.

12 Q. Were there discussions about
13 being more vigilant of making sure that
14 only one -- it wasn't only one person
15 staffing the governor?

16 MR. MORVILLO: Other than
17 conversations with lawyers.

18 A. I don't remember specifically.
19 There may have been.

20 Q. Do you remember that being
21 something that you did to try to make
22 sure that it wasn't just one person
23 staffing the governor?

24 A. I don't remember specifically
25 making sure that that happened, but I

1 ATTORNEYS' EYES ONLY

2 pretty confidently say that is what has
3 happened.

4 Q. And you can confidently say
5 that there has never been one person who
6 staffed the governor when they are
7 helping the governor?

8 A. I would say that there have
9 been a handful of times over the
10 course -- oh, you're saying since
11 Charlotte, right?

12 Q. Yeah.

13 A. I am sure there has been one or
14 two times.

15 Q. That was something that you
16 were trying to avoid?

17 A. Yes.

18 Q. And is that something that you
19 talked to Melissa about?

20 A. I don't specifically recall. I
21 am sure I did.

22 Q. And when is the first time then
23 that you recall talking to the governor
24 about Charlotte Bennett's allegations?

25 A. I don't specifically remember.

1 ATTORNEYS' EYES ONLY

2 Q. How about generally?

3 A. I mean, the first time I can
4 remember being a part of the conversation
5 was much later. I don't know that I
6 really spoke to him about it around that
7 time.

8 Q. And by much later, are you
9 referring to after she went public with
10 her allegations?

11 A. Yes.

12 Q. Okay. So between June, which
13 still hasn't happened, I think until late
14 February of this year.

15 A. Right.

16 Q. So between June of last year
17 and late February of this year, you
18 didn't speak to the governor about
19 Charlotte Bennett?

20 A. I don't remember if I did. I
21 don't remember a specific conversation or
22 a general conversation. I may have.

23 Q. So you testified that when you
24 learned about the things that Charlotte
25 Bennett had said -- the governor had said

1 ATTORNEYS' EYES ONLY

2 to her, I think you said you were upset.
3 So even though you were upset, it's not
4 something you raised with the governor?

5 A. No.

6 Q. What were you upset about?

7 A. Some of the things that she
8 claims he said to her to me could be
9 upsetting.

10 Q. Like what things?

11 A. I recall that she said he -- he
12 said he would date someone as young as
13 22. The sound of that didn't sit well
14 with me.

15 I believe she claimed that he
16 said he wanted to ride off on a
17 motorcycle with her. That didn't seem
18 right.

19 I recall Judy -- oh, I am not
20 supposed to say that.

21 MR. MORVILLO: You can actually
22 talk about the facts that you learned
23 from Judy. But no advice, no
24 commentary, and no, you know, thought
25 process or things like that. But just

1 ATTORNEYS' EYES ONLY

2 strictly the facts.

3 A. My recollection of that
4 particular claim from that call with Judy
5 was that she told Judy that he said there
6 were times that he wanted to ride off on
7 his motorcycle. So the claim that she
8 makes later with that adjustment is, you
9 know, doesn't sound right.

10 I am trying to think of some of
11 the others.

12 Q. What do you mean by that, what
13 adjustment are you talking about?

14 A. As I recall Judy relaying to
15 us, to Melissa and myself, on that
16 telephone call, one of the things she
17 said Charlotte told her was that the
18 governor at times wanted to ride off on
19 his motorcycle. I then, I recall later
20 on when Charlotte is interviewed, at some
21 point she said he said to her "I want to
22 ride off with you on my motorcycle."

23 So in my mind --

24 Q. You heard her say that, is this
25 one of the TV interviews?

1 ATTORNEYS' EYES ONLY

2 A. I recall it from somewhere. I
3 don't know if it was a newspaper story or
4 an interview. But one of those things is
5 much different than the other.

6 I can't immediately recall all
7 of her specific --

8 Q. How about her saying that the
9 governor asked her whether she had been
10 with an older man? Do you remember being
11 told that?

12 A. I do.

13 Q. And how did that sit with you?

14 A. That one sits with me
15 differently based on what I knew then,
16 know now, knew before, about his own
17 personal experience.

18 Q. And what is that?

19 A. He has a family member, [REDACTED]
20 [REDACTED] who actually was, is a survivor
21 of an assault that apparently virtually
22 mirrors Charlotte's experience while she
23 was in college.

24 And I know that the governor
25 has gone through a lot of issues,

ATTORNEYS' EYES ONLY

1
2 circumstances, situations, post [REDACTED]
3 [REDACTED] assault. And I think that
4 that is, based on my understanding, one
5 of the sorts of behaviors that a survivor
6 may turn to.

7 Q. By that behavior, you mean
8 being with older men?

9 A. Correct.

10 Q. And so that --

11 A. When I heard that, I didn't
12 think of it as an invitation. I thought
13 of it as something that, in his
14 experience and with his knowledge, he
15 knows is something that is, that is a
16 possibility.

17 Q. And so that sat with you
18 differently because of your knowledge of
19 the governor's prior experience?

20 A. Yes.

21 Q. And even though the governor,
22 you had heard, also said he was willing
23 to have a relationship with a woman as
24 young as 22?

25 A. Yes. And when we talked about

1 ATTORNEYS' EYES ONLY

2 that statement, I said that that one did
3 not sit well with me.

4 Q. Did you learn that the
5 governor -- she said that the governor
6 also said that he was lonely during the
7 pandemic?

8 A. I recall that she claimed that,
9 yes.

10 Q. And also that she asked her
11 about whether she had really hugged
12 anyone recently during the pandemic?

13 A. I don't specifically recall
14 that one.

15 Q. Or when she talked about
16 hugging family, the governor said "No,
17 not that like that, you know, a real
18 hug"?

19 A. I don't remember that claim.

20 Q. And do you remember learning
21 that the governor had said she looked
22 like Daisy Duke with jean shorts?

23 A. I don't remember that.

24 Q. Anything else that you remember
25 learning about the details of what

1 ATTORNEYS' EYES ONLY

2 Charlotte Bennett had said?

3 A. Not specifically at that time.
4 Judy may have given more, but I don't
5 specifically remember.

6 Q. Did Judy say whether or not she
7 found Charlotte Bennett to be credible?

8 MR. MORVILLO: That we are
9 asserting privilege over for the
10 Executive Committee or the Executive
11 Committee is asserting privilege.
12 It's not my privilege to assert.

13 MR. KIM: Okay.

14 Q. And then other than Melissa
15 DeRosa, did you have any conversations
16 with anyone else about what you learned
17 the governor had said to Charlotte
18 Bennett?

19 A. Well, Judy -- at that time, I
20 don't recall.

21 Q. Did you speak with Jill?

22 A. I don't know that I ever spoke
23 with Jill about the specifics. I knew
24 that Jill was involved in the
25 conversation.

1 ATTORNEYS' EYES ONLY

2 Q. Did you consider -- it sounds
3 like some of what you learned did not sit
4 well with you. Some it sounds like maybe
5 you understood more. Did you consider
6 reporting this to anyone?

7 A. I did not.

8 Q. Why not?

9 A. It was my understanding that
10 Judy, in her capacity as counsel, was
11 handling the issue.

12 Q. Do you know if GOER was
13 consulted at all or whether this was
14 reported to GOER at the time?

15 A. I do not know.

16 Q. When you first learned about
17 the fact that Charlotte was no longer
18 comfortable staffing the governor, did
19 you learn that the conversation that had
20 led to that had been just a week or so
21 earlier?

22 A. Oh, you mean the conversation
23 that Charlotte had with the governor?

24 Q. Yes, yes.

25 A. I don't know that I knew that.

1 ATTORNEYS' EYES ONLY

2 Q. You said that you are not great
3 with dates, so I am trying to put some
4 timing around it. And now you obviously
5 know a bit more from the reporting about
6 what the conversation was and where it
7 happened, et cetera.

8 Do you remember now or at any
9 point do you remember looking back and
10 saying "Oh, right, it was that day, you
11 know, when I saw her come out of the
12 office" or where you, in your mind,
13 pieced together the day she had her
14 conversation with the governor?

15 MR. MORVILLO: I'm not sure I
16 understand what you mean. Are you
17 asking if she is relying on the press
18 reports to recall when something
19 happened or are you asking her if
20 having read stuff it refreshed her
21 recollection of when it happened?

22 MR. KIM: More the second. I am
23 saying more -- she said she had this
24 conversation. We kind of now know
25 from reporting when it was. She has

1 ATTORNEYS' EYES ONLY

2 said she ran into Ms. Bennett coming
3 out, or at least one of those
4 conversations.

5 Q. So I am trying to now explore
6 with you what you remember about the
7 actual conversations that she said
8 happened. You weren't in there. But,
9 you know, you were, I think, at least one
10 of them, outside of the office when she
11 said she ran into you after she left. I
12 am trying to explore your memory of those
13 days.

14 MR. MORVILLO: I just want to
15 make sure, you know, she's not relying
16 on the press release, and what I
17 personally consider to be privileged.

18 MR. KIM: I am asking in a
19 convoluted way. I am assuming she
20 doesn't remember "On June 5th, I saw
21 Charlotte Bennett walk out." I am
22 trying to put it in context.

23 MR. MORVILLO: So if the press
24 helps you remember when it happened,
25 or put context around it.

1 ATTORNEYS' EYES ONLY

2 MR. KIM: Or learning when Jill
3 first raised it with you, that was
4 closer in time and whether you
5 remember, "Oh, yeah, I remember seeing
6 her the week before" or not. So
7 that's what I am asking.

8 A. I mean, the conversation we had
9 yesterday about Charlotte coming out of
10 the office on a particular day and me
11 asking if she had gotten an answer to a
12 question that we needed an answer to, I
13 remember that happening clearly. I
14 couldn't tell you when it was. I
15 couldn't tell you if it was a week
16 before.

17 Q. I see. The one conversation
18 that you told us about yesterday is the
19 one, is the only one that you remember
20 having a conversation of that type where
21 you asked -- well, let me ask you another
22 way.

23 Do you remember ever Charlotte
24 Bennett coming out of the office and you
25 asking "Why were you in there so long?"

1 ATTORNEYS' EYES ONLY

2 What were you talking about"?

3 A. No, not in those words. But I
4 believe this is the same conversation
5 that I had with her, where I asked her if
6 she had gotten the answer to the question
7 and she said no. And I said we got to
8 capitalize on our opportunities with him.

9 And I do recall saying to her,
10 "What were you talking about? What's
11 going on? Anything to know?" Because I
12 often say to people who come out,
13 "Anything I need to know?"

14 And I recall her saying, "We
15 were talking about his leadership in
16 COVID."

17 Q. Anything else you remember her
18 saying?

19 A. No, I don't recall her saying
20 very much at all. It was a pretty quick
21 conversation, as I remember it.

22 Q. Do you remember her also
23 mentioning her expressing her views to
24 the governor's response to Black Lives
25 Matter?

1 ATTORNEYS' EYES ONLY

2 MR. MORVILLO: You mean that
3 specific conversation or ever?

4 MR. KIM: Let's start with that
5 specific conversation.

6 A. Her expressing her views on
7 Black Lives Matter?

8 Q. Yes, to the governor?

9 A. No, I don't ever remember that.

10 Q. Not ever?

11 A. Never.

12 Q. And when she walked out on that
13 occasion that you remember, did she seem
14 upset?

15 A. No, not that I recall.

16 Q. And that time that you
17 remembered, you believe that was also
18 close in time to June of 2020 when you
19 had the conversation with Jill?

20 A. I can't tell you for sure. It
21 could have been, but it also could have
22 been May.

23 Q. Do you remember ever on that
24 occasion she had originally gone in to
25 take dictation along with Executive Assistant #2?

1 ATTORNEYS' EYES ONLY

2 A. I don't remember. No, I think
3 that that -- the conversation that I am
4 recalling that we are discussing was when
5 she had -- she was in the building very,
6 very early one morning. He arrived very
7 early. Unless I am mixing them up. And
8 I got to the office while she was in
9 there. That's my recollection.

10 Q. I see. That recollection is
11 coming in really early, was that a
12 weekend, do you remember?

13 A. I don't remember. It could
14 have been.

15 Q. And she was already there. And
16 then do you remember leaving and going to
17 the mansion after seeing that she was
18 there to cover, to staff the governor?

19 A. I think we may be talking about
20 different situations, different days
21 perhaps. I know what we are talking
22 about, but I don't know that that was the
23 same day.

24 Q. So why don't you tell me what
25 you remember. It sounds like you

ATTORNEYS' EYES ONLY

1
2 remember at least one incident, also
3 early morning you went in and she was
4 there. She went in to speak to the
5 governor. She came out and you asked
6 whether she had asked a question that she
7 needed an answer to and she said no and
8 you said you need to capitalize; you
9 don't know how long before the Jill
10 conversation or not?

11 A. I don't.

12 Q. That's one. And you're saying
13 there may be another one that my
14 questions seem to be getting at. So what
15 do you remember about another
16 interaction?

17 A. There was -- and I believe this
18 was a weekend day. And I believe this
19 was in June because I recall the governor
20 saying "You guys need to take a break."
21 It had been many, many, many, many, many
22 days in a row. So Melissa and I decided
23 that we were going to get out of the
24 office for an hour, whatever the case may
25 be.

1 ATTORNEYS' EYES ONLY

2 And I don't know if I had seen
3 Charlotte in the building prior to this
4 or knew that she was there somehow, or if
5 I had called her or if I had called other
6 people. But Charlotte was in the Capitol
7 at that time. So I asked her to come and
8 sit in my desk in the event he wanted to
9 get somebody on the phone or somebody was
10 trying to get him on the phone. And she
11 did do that. And Melissa and I left the
12 office for a bit.

13 Q. And where did you go?

14 A. My recollection is that we went
15 to a store.

16 Q. And during the time of COVID,
17 were you staying at the mansion during
18 the pandemic?

19 A. I did for a period of time.

20 Q. From when to when?

21 A. I think late March to maybe
22 early summer through. And then sort of
23 on and off after that.

24 Q. And what bedroom did you use
25 when you stayed there?

1 ATTORNEYS' EYES ONLY

2 A. Well, how would you like me to
3 describe it?

4 Q. Which floor.

5 A. The second floor.

6 Q. Okay. And who else stayed on
7 the second floor with you when you were
8 there?

9 A. Melissa did. The governor's
10 suite is on the second floor.

11 Q. So on the second floor is the
12 governor's suite and then you were
13 staying there and Melissa was staying in
14 another room?

15 A. Yes.

16 Q. So going back to, other than
17 those two interactions you remember with
18 Charlotte Bennett in the office, any
19 others that, around that time period?

20 A. Not specifically.

21 Q. Do you remember some time after
22 you learned from Jill that Charlotte
23 would no longer be staffing the governor,
24 there being a party at the mansion,
25 sometime after that?

1 ATTORNEYS' EYES ONLY

2 A. The timing for me is not clear
3 on that. There was a party at the
4 mansion on June 19th.

5 Q. So on the June 19th party, what
6 was that party for?

7 A. June 19th was the 111th
8 straight day of COVID briefings. It was
9 his last daily briefing. Very emotional
10 day, I think, for everybody. Good and
11 bad. And we had a little bit of a
12 cookout outside the mansion for the
13 senior staff, some of the more junior
14 staff, some of the assistants, really a
15 group of people who just worked every
16 single day for that period of time.

17 Q. And so who was invited to that?

18 A. The senior staff was all
19 invited. Do you want me to name them?

20 Q. No. How about in terms of --
21 so the senior staff that were in Albany
22 at the time?

23 A. Correct.

24 Q. Was Charlotte Bennett invited
25 to it?

1 ATTORNEYS' EYES ONLY

2 A. She was.

3 Q. Was there any discussion
4 about -- with anyone about whether or not
5 to invite her?

6 A. I don't remember for this one
7 if I showed the governor a list of
8 people. I may have. Melissa and I may
9 have discussed the list.

10 Q. And do you remember the
11 governor saying anything about the list?

12 A. I don't recall him saying
13 anything.

14 Q. How about Charlotte Bennett?

15 A. I don't recall him saying
16 anything.

17 Q. And by that point in time, you
18 knew that Charlotte Bennett had moved or
19 was moving and was not going to staff the
20 governor anymore?

21 A. I can't say that for certain.
22 I don't remember the sequence of events.

23 Q. So you don't remember it being
24 after or before?

25 A. Correct.

1 ATTORNEYS' EYES ONLY

2 Q. Do you remember seeing
3 Charlotte Bennett at the event?

4 A. I do.

5 Q. What do you remember about
6 that?

7 A. I mean nothing particular
8 noteworthy. She was there. She was
9 there with other more junior staff
10 people. I think people that she's
11 friendly with socially.

12 And I just remember it being a
13 really lovely gathering and people being
14 happy, relieved, appreciating each other.

15 Q. Did you see Charlotte Bennett
16 interact with the governor?

17 A. I don't recall specifically.

18 Q. And then after the party, did
19 Charlotte Bennett reach out to you, send
20 you an e-mail?

21 A. Yes, I do remember that.

22 Q. What do you remember about
23 that?

24 A. I remember her sending a very
25 nice and kind e-mail to Melissa and

1 ATTORNEYS' EYES ONLY

2 myself thanking us for what we do.

3 Q. And does that jog your memory
4 about whether the party was after she was
5 leaving or before it?

6 A. It doesn't.

7 Q. So it's not necessarily the
8 e-mail was "I am leaving now," so here's
9 an e-mail saying "Thank you," no?

10 A. No, I don't recall it saying
11 that she was leaving. I think it was
12 reflective of the, you know, the emotion
13 and the gratitude we just sort of all had
14 as a collective at that gathering.

15 Q. Okay. So if you want to turn
16 to tab 51 of the binder?

17 A. Geez.

18 Q. Does this look like the e-mail?

19 A. Yes. It's nicer than I
20 remember.

21 Q. It is a nice e-mail?

22 A. Yes.

23 Q. But it's not necessarily the
24 case that, in your mind, that it's more
25 likely after she was leaving or not; it

1 ATTORNEYS' EYES ONLY

2 could just be the event in your mind?

3 A. You're talking about the
4 subject line?

5 Q. Yeah.

6 A. I think that that's absolutely
7 she had left the gathering.

8 Q. She had left the gathering, oh,
9 before you had left?

10 A. Or before I had left, yes.
11 Before Melissa and I left.

12 Q. You're also saying the niceness
13 of it and the tone, it's not necessarily
14 because she had left, it could also be
15 what the environment of the party was and
16 what it was about?

17 A. That's exactly right. There
18 were toasts given to these staff members
19 at the party. Melissa gave an especially
20 emotional toast. She cried during it,
21 thanking all of these people, not just
22 the senior staff. Our own essential
23 workers. It was very nice.

24 Q. Have you had discussions since
25 then with anyone about this e-mail, like

1 ATTORNEYS' EYES ONLY

2 since Charlotte Bennett's allegations
3 became public?

4 MR. MORVILLO: Other than with a
5 lawyer?

6 MR. KIM: Other than with a
7 lawyer.

8 A. I don't remember having a
9 conversation about the e-mail.

10 Q. So it sounds like -- or you
11 testified earlier, from the time you
12 learned about her being -- Jill telling
13 you that she's no longer going to staff
14 the governor, and then you're learning
15 more about what she said from Judy Mogul.
16 It sounds like a conversation with
17 Melissa DeRosa. And you say you don't
18 remember speaking to the governor about
19 it.

20 Between that time and late
21 February when her allegations become
22 public, any conversations with anyone
23 about Charlotte Bennett?

24 A. Prior to the publishing of the
25 New York Times article, which I recall

1 ATTORNEYS' EYES ONLY

2 was the first interview she did, again,
3 we had had the press inquiry, and there
4 was a call with a group of people to
5 discuss the press inquiry that I began,
6 probably facilitated the dial in and
7 remember hearing some of that call.

8 Q. And when you say a press
9 inquiry, what do you mean? A press
10 inquiry prior to the New York Times
11 coming out?

12 A. Yes, the way it works, and I
13 don't mean to explain to you, certainly,
14 but a story is being worked on. The
15 press then comes to the press office and
16 says, "I am working on this story. Here
17 is what it could, will, might say. What
18 do you have to say about it?"

19 Q. So within a few days prior to
20 the actual publishing of the article?

21 A. Likely. I don't know how long
22 the Times was working on it. I don't
23 remember how much notice they had given
24 us, but likely within a few days.

25 Q. So that press inquiry came in

1 ATTORNEYS' EYES ONLY

2 and then you helped set up some calls?

3 A. I remember a call before that.

4 Q. A call before that. What do
5 you remember about the call before that?

6 A. That Judy had --

7 THE WITNESS: Is this okay?

8 MR. MORVILLO: It's fine.

9 A. That Judy had gone through her
10 notes, so that we knew what Judy had
11 reported what Charlotte had said to her
12 at the time.

13 Q. And how did that call get set
14 up?

15 A. I don't remember specifically.

16 Q. You said it was before the
17 press inquiry. Was it before --

18 A. I'm sorry, then I misspoke. As
19 a result of the press inquiry.

20 Q. I see. So a press inquiry came
21 in. A call was set up -- the press
22 inquiry made clear it was about Charlotte
23 Bennett. So a call was set up and Judy
24 Mogul read her notes?

25 A. She discussed her notes. I

1 ATTORNEYS' EYES ONLY

2 don't know if she read them all. I don't
3 know.

4 Q. And who was on that call?

5 A. I don't remember specifically,
6 other than Melissa. And I am sure Rich
7 and Peter. But I don't know who else.

8 Q. The governor?

9 A. I don't believe he was on that
10 call.

11 Q. Was Liz Smith on the call?

12 A. I don't remember if Liz was on
13 the call.

14 Q. Josh Vlasto?

15 A. I don't remember if Josh was on
16 that call.

17 Q. Rich Bamberger.

18 A. I don't remember if Bamberger
19 was on that call.

20 Q. Steve Cohen?

21 A. I don't specifically remember
22 Steve.

23 Q. So what do you remember about
24 what Judy said on that call?

25 A. Generally, I remember that she

ATTORNEYS' EYES ONLY

1
2 went through, she explained to the people
3 on the phone that she had had this
4 conversation with Charlotte and that she
5 had made notes about what Charlotte had
6 said. And she went through some of what
7 Charlotte had claimed to Judy way back
8 when in that conversation.

9 Q. And was -- was she literally
10 reading from the notes, as far as you can
11 tell, of her conversation with Charlotte
12 Bennett?

13 A. It seemed so.

14 Q. So was there anything in your
15 mind that was new or different than what
16 you had heard from Judy when you spoke to
17 her in June?

18 A. I do think there were
19 additional pieces that I had not heard
20 before.

21 Q. What were some of the
22 additional pieces?

23 A. I can't remember specifically.
24 But I remember thinking that I hadn't
25 heard this piece before. I can't

1 ATTORNEYS' EYES ONLY

2 remember specifically.

3 Q. And what was your reaction to
4 hearing these additional pieces and the
5 full story?

6 A. Well, without being able to
7 specifically remember the additional
8 pieces, I can't really explain my
9 reaction.

10 Q. And then what happened after
11 that call?

12 A. Can I go back for a second?

13 Q. Sure.

14 A. There is a piece from, aside
15 from her specific additional or not
16 claims, there was a piece that Judy had
17 said in that call from her notes that she
18 hadn't -- that wasn't a part of the
19 previous conversation we had, which was
20 that Charlotte had explicitly said she
21 didn't want to file a complaint. "The
22 governor is my friend. I just want to go
23 to this new job."

24 That was a piece that I don't
25 believe Judy had said to me previously.

1 ATTORNEYS' EYES ONLY

2 Q. That was something new?

3 A. Yes, I think that's when I
4 heard that the first time.

5 Q. Did you hear that she also said
6 that she was afraid of the governor?

7 A. I don't think I've heard that.

8 Q. And what did you do after that
9 call?

10 A. I don't think I did anything
11 after that call.

12 Q. Did you set up any other calls
13 or were you a part of any other calls?

14 A. I don't recall any other calls.

15 Q. Any conversations with the
16 governor about Charlotte Bennett's
17 allegations?

18 A. After the reporting there were
19 discussions.

20 Q. Okay. What discussions with
21 the governor after the reporting?

22 A. I recall a discussion, I think
23 just before he had a press conference
24 where he, where he -- I don't know that
25 he spoke -- yes, I think he did speak

1 ATTORNEYS' EYES ONLY

2 about Charlotte in particular. But it
3 may have been more about -- I'm sorry.

4 In any event, there was a
5 discussion where he -- with some
6 additional folks, so in other words, in
7 addition to Melissa and myself, who knew
8 a bit about the history, sort of shared
9 with people what he had been through
10 personally with [REDACTED] [REDACTED].

11 Q. And who were the people who
12 knew this?

13 A. Who knew it previously?

14 Q. Yeah.

15 A. I did. Melissa did. Outside
16 of family and --

17 MR. MORVILLO: No lawyers.

18 THE WITNESS: No lawyers?

19 MR. MORVILLO: No.

20 A. Outside of family, I don't know
21 who else knew.

22 Q. So who did you share it with?

23 A. I didn't share it with anyone.
24 He spoke about it.

25 Q. He spoke about it?

1 ATTORNEYS' EYES ONLY

2 A. He spoke that he had his
3 experience in his life with [REDACTED] .
4 How devastating it had been. How
5 traumatic it had been. How [REDACTED] still
6 struggles with it every day. He thought
7 he was being paternalistic. He thought
8 he knew, you know, patterns of behavior.
9 He wanted to help.

10 Charlotte had come to him and
11 said she was writing a speech that she
12 wanted to give to a group. I think it's
13 at a college, I am not certain, and talk
14 about her experience. And he was trying
15 to encourage her. But it was an
16 emotional moment because he was sharing
17 the story with other staff members who I
18 think were shocked to hear even generally
19 about it.

20 Q. And what did he say had
21 happened to [REDACTED] ?

22 A. That when [REDACTED] [REDACTED] [REDACTED] had
23 been the victim of a sexual assault. And
24 that he fought long and hard on [REDACTED]

25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

1 ATTORNEYS' EYES ONLY

2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], because
3 [REDACTED] [REDACTED] was not being helpful or even
4 really facilitating [REDACTED] [REDACTED]
5 efforts to find some sort of justice in
6 the matter.

7 Q. And he said that experience
8 affected the way he was interacting with
9 Charlotte Bennett, is that what he was
10 saying?

11 A. Yeah, I think he could say
12 pretty verbatim that he heard what
13 Charlotte said he saw [REDACTED] [REDACTED].

14 Q. And did the governor then tie
15 that to the things that Charlotte Bennett
16 said he said? Did he tie it directly to
17 any of his statements?

18 A. I don't remember him talking
19 about it specifically.

20 Q. So you didn't say, "As a result
21 of that, that's why I said this"?

22 A. I don't remember him doing
23 that.

24 Q. Like, for example, that "I
25 would be comfortable dating someone 22,

1 ATTORNEYS' EYES ONLY

2 as young as 22," you didn't tie that to
3 his experience with [REDACTED] [REDACTED] ?

4 A. I don't remember him getting
5 into specifics about specific claims.

6 Q. Other than in that group
7 setting, have you had any discussions
8 with the governor about Charlotte
9 Bennett's allegations?

10 A. I have had additional
11 conversations with him, but virtually the
12 same conversation.

13 Q. Your other conversations with
14 him, were they one-on-one or with other
15 groups of people as well?

16 A. I may have talked about it
17 one-on-one. It may have been in -- it
18 may have been him and Melissa and myself.

19 But that conversation about him
20 hearing Charlotte's experience and
21 seeing, like, really just seeing [REDACTED]
22 [REDACTED], I've had with him a few times.

23 Q. Any other discussions with him
24 about any of the other, any other
25 specific allegations?

1 ATTORNEYS' EYES ONLY

2 A. I don't recall ever talking to
3 him about specific allegations, specific
4 claims.

5 Q. So no discussions about, what
6 did you mean?

7 A. No.

8 Q. Driving a motorcycle to the
9 mountain, what do you mean by that?

10 A. I never said those things to
11 him.

12 Q. Or heard him address any of the
13 specific allegations?

14 A. Not that I recall.

15 Q. After the reporting, did you
16 reach out to other former members of the
17 Executive Chamber about Charlotte
18 Bennett?

19 A. Not that I recall.

20 Q. Did you reach out to Andrew
21 Ball?

22 A. About Charlotte Bennett?

23 Q. Yeah.

24 A. Not that I recall.

25 Q. Or have any conversation with

1 ATTORNEYS' EYES ONLY

2 Andrew Ball where Charlotte Bennett came
3 up?

4 A. I don't remember that I did.

5 Q. Anyone else or anyone?

6 A. I don't remember talking to
7 anybody about Charlotte.

8 Q. And then did you play a role in
9 working on or drafting responses or
10 statements that the governor might make?

11 A. Not in drafting, no.

12 Q. How about in typing up
13 statements?

14 A. Yes, I am sure I did.

15 Q. Okay. So if you want to look
16 at --

17 MR. MORVILLO: Sorry, if this is
18 going to be a long section, because we
19 have been going for an hour and
20 change, so if we can take a break at
21 some point?

22 THE WITNESS: And I never say
23 this, but I would appreciate the
24 ladies' room.

25 MR. KIM: Let's take a break.

1 ATTORNEYS' EYES ONLY

2 THE VIDEOGRAPHER: Off the
3 record at 10:34, this marks the end of
4 media unit number 1.

5 (Off the record.)

6 THE VIDEOGRAPHER: We are back
7 on the record at 10:45, this marks the
8 beginning of media unit number 2.
9 Please proceed.

10 CONTINUED EXAMINATION

11 BY MR. KIM:

12 Q. Ms. Benton, can you turn to tab
13 87 in your binder. And this is a series
14 of e-mails back and forth among a group
15 of people that includes you and others.
16 And it looks to be different drafts of
17 possible statements that the governor
18 will make in response to Charlotte
19 Bennett's allegations.

20 Do you see that?

21 A. Yes.

22 Q. So an exchange like this, where
23 you're on, what's your involvement in
24 sort of this back and forth of comments
25 and drafts?

1 ATTORNEYS' EYES ONLY

2 A. Unless this was drafted by the
3 governor, and it doesn't look like this
4 particular one was, I don't really have
5 any involvement.

6 Q. How can you tell if it was
7 drafted by the governor?

8 A. Because they are being sent
9 from different people. So if you want my
10 interpretation of this, it is this group
11 of people on an e-mail proposing a draft
12 for him to look at.

13 Q. And then at some point, do you
14 then -- he doesn't have e-mails, right,
15 because he's not on the chain?

16 A. Correct.

17 Q. For him to look at -- how does
18 it ultimately get to him to look at an
19 e-mail chain like this?

20 A. That would explain why I am on
21 it, because ultimately I would print it
22 for him.

23 Q. How would that work, would you
24 print all of the exchanges and bring it
25 in to him or would you wait until it gets

1 ATTORNEYS' EYES ONLY

2 to a certain point and someone says show
3 it to him or how did that work?

4 A. Yes, the latter.

5 Q. At some point someone would say
6 okay now, unless it's something he
7 drafted first?

8 A. That's right.

9 Q. Okay. And so if you go in the
10 middle here, and Melissa DeRosa, if you
11 look at 66 at the bottom, he proposes a
12 different approach.

13 Ms. Bennett came to work in the
14 governor's office for a short period of
15 time. During her time in the office she
16 told the governor she had been a victim
17 of sexual assault, et cetera, et cetera.
18 Do you know where Melissa DeRosa is
19 getting the information to propose a
20 different approach like this?

21 A. I don't know.

22 Q. So in an exchange like this,
23 let me ask you, are you particularly
24 focused on the substance or are you sort
25 of waiting to see at some point "Do I

1 ATTORNEYS' EYES ONLY

2 need to print it out and give it to the
3 governor"?

4 A. The latter.

5 Q. So if you can look at tab 91.

6 A. Yes.

7 Q. This one starts with an e-mail
8 from you to Jefrey Pollock and Josh
9 Vlasto.

10 A. Yes.

11 Q. And there is a draft for the
12 governor to say at a press conference
13 tomorrow and there is again a long text.

14 What is your interpretation of
15 this? Is this something that the
16 governor would have given to you in a
17 draft and then type up and then you're
18 forwarding to people?

19 A. For this one, yes.

20 Q. Okay. And then if you can
21 just, if you can kind of flip over to 92,
22 although I am going to come to 91, but 92
23 is an image of a BlackBerry PIN?

24 A. Yes.

25 Q. And it looks like it's from

1 ATTORNEYS' EYES ONLY

2 Mark.2, but I think we've seen from other
3 BlackBerry PINs that that's the governor?

4 A. Yes.

5 Q. Why is he Mark.2?

6 A. It's his middle name.

7 Q. And what's the .2?

8 A. I think the 2 is, I think it's
9 just a new contact.

10 Q. Because you may have had one
11 before?

12 A. Yes, or just Mark before.

13 Q. And so here this is also marked
14 1, he sends you a PIN with some
15 substance: "Told the female reporter to
16 'eat the whole sausage'." But it's part
17 of -- there is a paragraph like that in
18 the e-mail, too, as well.

19 So what are you doing, if
20 you're getting PINS from him like this,
21 what do you do with it?

22 A. I don't know on this, because
23 is this the entire message, if you know?

24 Q. It appears to be or at least
25 this page. If you go to the next one, if

1 ATTORNEYS' EYES ONLY

2 you look at the second page of 92, you
3 will see it's from Mark.2 to you,
4 "Context and fact is also important. A
5 press report said," et cetera. It looks
6 like the entire PIN.

7 A. I don't know with this one.
8 Because I do believe there is an
9 instruction for what he intends for his
10 message, like to send it to someone or to
11 put it into a document. I can't tell you
12 on this particular one.

13 Q. Okay. So usually in the PIN he
14 will try to communicate what he wants you
15 to do with whatever text is in there?

16 A. Correct.

17 Q. So if you stay on 91, and look
18 at page 78 at the bottom, or 10078,
19 Melissa DeRosa says: "Plus adding some
20 people, this would be for presser
21 tomorrow."

22 Do you remember a press
23 conference in early March following
24 Charlotte Bennett's allegations?

25 A. Generally.

1 ATTORNEYS' EYES ONLY

2 Q. And what do you remember about
3 that?

4 A. That he addressed allegations
5 at a press conference.

6 Q. And where were you when he was
7 at that press conference?

8 A. Probably in my office watching
9 it on the computer.

10 Q. And who are you -- were there
11 other people around you who were watching
12 it?

13 A. No.

14 Q. So if you were in your office
15 in the Capitol, it's just you?

16 A. It's just me.

17 Q. And then you have to go to the
18 other room, with EA #2 and EA #3 ?

19 A. Correct. And at that time,
20 they are still in the suite across the
21 hall.

22 Q. I see. So they are actually
23 even further away?

24 A. Correct.

25 Q. And this was the press

1 ATTORNEYS' EYES ONLY

2 conference I believe where one of the
3 things he said is "I never touched anyone
4 inappropriately"?

5 A. Yes, I recall that.

6 Q. Yeah. Do you remember getting
7 anyone's reaction in the office following
8 that press conference?

9 A. I don't.

10 Q. Did you see anyone, like either
11 during or after the press conference?

12 A. Not that I remember, other
13 than -- well, right after the press
14 conference I would have seen the
15 governor, Melissa come back through, pass
16 me to her office from the red room.

17 I don't recall specifically who
18 else appeared with him at this particular
19 press conference, if anyone.

20 Q. Did you remember saying
21 anything to the governor after that press
22 conference?

23 A. I don't remember.

24 Q. Or him saying anything to you?

25 A. I don't remember.

1 ATTORNEYS' EYES ONLY

2 Q. Or Melissa saying anything to
3 you?

4 A. I don't remember that.

5 Q. Do you remember talking to any
6 of the executive assistants, EA #2 or
7 EA #3, about the press conference?

8 A. No, I don't remember that I
9 did.

10 Q. How about Brittany Commisso?

11 A. No.

12 Q. Alyssa McGrath?

13 A. No.

14 Q. So any other discussions about
15 Charlotte Bennett's allegations, other
16 than the ones we've talked about?

17 A. There is one other conversation
18 that I had, and I don't know whether it
19 was before Judy's conversation or after
20 Judy's conversation, the initial
21 conversation. And my recollection is
22 that Jill told me that Staffer #4 spoke
23 with her.

24 MR. MORVILLO: Who is the "her"?

25 THE WITNESS: Jill.

1 ATTORNEYS' EYES ONLY

2 A. And Staffer #4 had told Jill
3 that he was out socializing at a bar with
4 a group of the younger staffers and that
5 there was a situation where Charlotte was
6 talking to two or three other co-workers
7 and became very upset and was talking
8 about her experience at school. And I
9 don't remember in that conversation
10 whether S#4 said to me that she spoke
11 about the governor. My recollection is
12 that she was upset in sharing her
13 experience at school with these
14 coworkers.

15 After that -- oh, wait, I'm
16 conflating the two again. So Jill told
17 me that Staffer #4 had had that conversation
18 with her. I don't remember if I called
19 S#4 or S#4 called me but S#4 relayed it
20 to me.

21 Q. What did S#4 say to you?

22 A. As I just explained is what he
23 said to me. I don't think that Jill gave
24 me that much detail other than S#4 had
25 called her and said Charlotte was upset.

1 ATTORNEYS' EYES ONLY

2 S#4 -- as I recall, S#4 said to
3 me that they were out with a bunch of
4 people but that she was at some point
5 sitting with two or three people, and
6 became upset in speaking about her
7 experience at school.

8 Q. And then you said you weren't
9 sure whether she also said her experience
10 with the governor?

11 A. Yes. I don't recall him saying
12 that at that point. I don't recall him
13 saying that she was talking about that.

14 Q. And when do you think this
15 conversation that you had with Staffer #4
16 was?

17 A. It was definitely after the
18 initial conversation with Jill with
19 Charlotte being uncomfortable in
20 transitioning to a new role. But don't
21 recall if it was before or after I spoke
22 with Jill -- I'm sorry, Judy and Melissa.

23 Q. Okay. Certainly before the
24 public allegations?

25 A. Yes, yes.

1 ATTORNEYS' EYES ONLY

2 Q. So sometime after the initial
3 call with Jill, you don't know whether
4 it's before or after the second, the call
5 with Judy?

6 A. That's right.

7 Q. And Jill raised it with you;
8 did she ask you to call S#4

9 A. No.

10 Q. I see. She just told you, "I
11 had this conversation with S#4

12 A. Correct, as I recall.

13 Q. So you called S#4 ?

14 A. I don't recall if I called S#4
15 or if S#4 called me.

16 Q. And do you know why S#4 was
17 raising that with Jill?

18 A. No, I don't know what his
19 thought process was.

20 Q. And it's your recollection that
21 it involved her experience in college.
22 You're not sure whether he also discussed
23 the governor, or whether she said she
24 discussed the governor?

25 A. Correct. I don't remember him

1 ATTORNEYS' EYES ONLY

2 saying that at that time.

3 Q. You don't remember him saying
4 that?

5 A. I don't.

6 Q. And what did you do with that
7 information?

8 A. I don't remember if I told
9 Melissa or not. But if I did anything,
10 that's what I would have done.

11 Q. But you're not sure if you told
12 Melissa?

13 A. I don't recall having that
14 conversation with her.

15 Q. Did you talk to the governor
16 about it?

17 A. No.

18 Q. Any other conversations about
19 Charlotte Bennett that we haven't
20 discussed?

21 A. No, not that I remember.

22 Q. Do you remember any discussions
23 about people looking into or, looking
24 into her, Charlotte Bennett's, background
25 or history, including college?

1 ATTORNEYS' EYES ONLY

2 A. No, I don't remember that.

3 Q. If you look at tab 117. I
4 think this was produced from you, so I
5 think is a text message to you from
6 Madelyn?

7 A. Yes, I see it.

8 Q. And it's a group chat with
9 Melissa and you and Madelyn. And she
10 forwards what looks like a screenshot
11 that says [REDACTED],
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 Do you remember getting this?

16 A. I don't.

17 Q. You don't, okay.

18 Do you remember anything about

19 [REDACTED]
20 [REDACTED]

21 A. No, I never did. I don't want
22 to sound disrespectful, but it's very
23 rare that I read Madelyn's text messages.

24 Q. And why is that?

25 A. She sends a lot of stuff that

1 ATTORNEYS' EYES ONLY

2 is particularly relevant to my job.

3 Q. How about Chris Cuomo?

4 A. What about him?

5 Q. Does he also send you links in
6 texts?

7 A. I rarely hear from Chris.

8 Q. How many calls that you were on
9 was Chris Cuomo on where you're
10 discussing the response to the sexual
11 harassment allegations?

12 A. I know that Chris was on a
13 handful of calls. I don't recall hearing
14 him specifically discuss the allegations
15 in anything that I heard or was listening
16 to, but I know that he was on some calls.

17 Q. Do you remember what his view
18 was in terms of how to respond?

19 A. Not specifically. Generally, I
20 recall him just obviously, maybe not
21 obviously, but as a brother wanting to be
22 a defender of his brother.

23 Q. How about looking into or
24 investigating complainants like Charlotte
25 Bennett and their history?

1 ATTORNEYS' EYES ONLY

2 A. I don't recall being a part of
3 any conversation where this is discussed.
4 In fact, I can tell you that despite the
5 fact that Madelyn sent me this, I don't
6 remember ever seeing this. I wasn't
7 aware that there was [REDACTED].

8 Q. Have you been a part of any
9 discussions or communications about doing
10 or finding negative information about the
11 people in charge of the AG's office
12 investigation?

13 A. I have not.

14 Q. Do you know what opposition
15 research is?

16 A. I do.

17 Q. What is opposition research?

18 A. Research in the attempt to
19 discredit a theory or an individual or
20 cause.

21 Q. Have you heard of or been a
22 part of any discussions about doing
23 opposition research on any of the lawyers
24 involved in our investigation?

25 MR. MORVILLO: If that comes

1 ATTORNEYS' EYES ONLY

2 from lawyers -- I don't know about
3 this, but if this comes from a lawyer
4 conversation, don't answer that.

5 A. I am not aware of it.

6 Q. I believe you said you attended
7 Gareth Rhodes' wedding, right?

8 A. I did.

9 Q. And you've seen, obviously, the
10 pictures that came out in the New York
11 Times of the governor with a woman and he
12 is sort of giving her a kiss and holding
13 her, did you see those?

14 A. I saw the picture, yes.

15 Q. Did you see that happen or have
16 you just seen the pictures?

17 A. I don't believe I saw it while
18 I was at the wedding.

19 Q. Okay. And do you remember
20 seeing the governor at the wedding?

21 A. I do.

22 Q. Okay. And do you remember
23 seeing him interact with anyone or do you
24 remember seeing him interact with people?

25 A. Not specifically, other than

1 ATTORNEYS' EYES ONLY

2 with the bride and the groom when he
3 performed the ceremony. I don't remember
4 specifically his interaction in the
5 crowd.

6 Q. If you can turn to tab 94. And
7 this is a text exchange that includes
8 you, Annabel Walsh and Dani Lever, and it
9 attaches pictures from that wedding.
10 Also Steph is in the photo, too, Annabel
11 Walsh says.

12 Were you in these pictures?

13 A. I vaguely remember this text
14 message. I don't see myself in the
15 picture.

16 Q. And then you say, "No, I'm not,
17 where?" And then lower you say, "Can you
18 call me together, please, please,
19 please."

20 Do you remember what the
21 discussion was or why you wanted them to
22 call you?

23 A. I don't remember.

24 Q. And after the New York Times
25 article about this wedding, did you speak

1 ATTORNEYS' EYES ONLY

2 to Gareth Rhodes?

3 A. Yes, I remember talking to
4 Gareth.

5 Q. When?

6 A. I don't remember exactly.

7 Q. Was it shortly after the New
8 York Times article?

9 A. I don't remember exactly.

10 Q. Did you ask him to do anything?

11 A. I don't know that I asked him
12 to do anything. I vaguely remember
13 talking to him about the story. I don't
14 remember the conversation.

15 Q. Did you ask him to call the
16 woman who was in the picture?

17 A. I don't remember if I did.

18 Q. Did anyone ask you to do that?

19 A. I don't recall that.

20 Q. Have you had any conversations
21 with the governor about the wedding,
22 Gareth Rhodes' wedding?

23 A. I don't specifically remember a
24 conversation with the governor.

25 Q. How about generally?

1 ATTORNEYS' EYES ONLY

2 A. There were general
3 conversations, it could have been
4 Melissa, it could have been the governor,
5 it could have been the press guy, about
6 the fact that, I specifically remember
7 that, you know, there is a billion
8 pictures like this with people, all
9 people at virtually any event he goes to.

10 Q. Any other discussions?

11 A. Not that I remember about the
12 wedding.

13 Q. You know Karen Hinton, right?

14 A. I know Karen. Not well, but
15 yes.

16 Q. Any discussions that you had
17 with the governor about Karen Hinton?

18 A. When Karen, I forget how Karen
19 reported her claims, but when she did he
20 had asked me about a letter he recalled
21 her sending to him that I think was
22 thanking him for his help and his
23 friendship after she had had a [REDACTED]
24 [REDACTED] [REDACTED].

25 Q. Did he ask you about that

1 ATTORNEYS' EYES ONLY

2 letter?

3 A. Yes.

4 Q. To pull it up?

5 A. Yes, to see if we could find
6 it.

7 Q. Were you able to find it?

8 A. I don't believe so.

9 Q. Can you look at tab 41.

10 Are you are there?

11 A. I am there, sorry.

12 Q. This is an e-mail from you to
13 Alyssa McGrath from December 2019.

14 A. Yes.

15 Q. And it looks like you asked her
16 to format and print two letters for him.
17 And then you have sort of the text of the
18 two letters.

19 A. Yes.

20 Q. Is this something that you
21 sometimes did, sort of send substance of
22 documents or letters and send it to
23 Alyssa McGrath to type up or put into a
24 letter format?

25 A. It's something that I have

1 ATTORNEYS' EYES ONLY

2 done; not specifically with Alyssa. It
3 could be with others.

4 Q. People who play that role as
5 Alyssa or sort of helping out, or EA #3
6 or EA #2 or others?

7 A. Correct. Or from time to time
8 I may just send the text of the letter to
9 the correspondence office who would
10 format it and print it out.

11 Q. Yeah. If you read the bottom
12 part, the second letter looks like it's
13 to Karen and it's about "Hope you're
14 doing better," et cetera.

15 Does that look to be the letter
16 you were talking about?

17 A. No. So this looks to be a
18 response.

19 Q. Oh, he was looking for the
20 letter from Karen?

21 A. Correct.

22 Q. This is the response, I see.

23 So you were not able to find
24 the letter from Karen?

25 A. I was not.

1 ATTORNEYS' EYES ONLY

2 Q. Okay. And then if you look at
3 tab 43. It looks like Alyssa has --
4 there are four letters to send out and
5 one of them is to Karen Hinton?

6 A. Yes.

7 Q. So if you go to tab 101, so
8 that was December and it looks like he
9 drafted or you drafted, you and Alyssa
10 put together a letter from him to respond
11 to Karen in the letter.

12 And now in March, I think March
13 5th, this must be after the Karen Hinton
14 allegations went public, he said, "Let's
15 do this right on Hinton. Google what she
16 said and see if we have the TY" -- I
17 assume it's thank you -- "letter she just
18 sent me after her [REDACTED]."

19 A. Yeah.

20 Q. "Did you find it?" So these
21 are the texts or PINS from the governor
22 asking you to find that letter or asking
23 a group of you?

24 A. Correct.

25 Q. If you go likely, four pages

1 ATTORNEYS' EYES ONLY

2 in?

3 MR. MORVILLO: What's the Bates
4 you're looking at?

5 MR. KIM: 18089.

6 MR. MORVILLO: Thank you.

7 Q. You write back: "Yes, I spoke
8 with [REDACTED] [REDACTED]. She's looking now."

9 Who is [REDACTED] [REDACTED]?

10 A. She runs the correspondence
11 bureau.

12 Q. I see. So you spoke to her to
13 see if she could find this letter from
14 Karen Hinton?

15 A. Correct.

16 Q. And if you can turn to, this is
17 the same day, March 5th, if you can turn
18 to tab 104, and this is an e-mail from
19 [REDACTED] [REDACTED] [REDACTED]. And there is a
20 few e-mails from her or letters that were
21 part of your production to us.

22 Who is [REDACTED] [REDACTED] [REDACTED]?

23 A. She is, she was [REDACTED]
24 [REDACTED] to the [REDACTED] [REDACTED] when

25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

1 ATTORNEYS' EYES ONLY

2 Q. And do you know her?

3 A. I do not know her.

4 Q. Have you met her ever?

5 A. I have never met her. I have
6 spoken to her on the phone once. I've
7 exchanged e-mails with her over the
8 course of time, but I haven't replied to
9 any of her e-mails in a long time.

10 Q. Does she regularly e-mail you?

11 A. She does.

12 Q. Okay. Why is she e-mailing
13 you?

14 A. I don't know.

15 Q. And what did you do when you
16 got this? What did you do with this
17 e-mail when you got it?

18 A. I don't know specifically what
19 I did with each e-mail. There are many
20 of them.

21 And there were times that I
22 told the governor that [REDACTED] [REDACTED] had
23 e-mailed and the gist of the context to
24 the extent I can understand what she was
25 saying. But that's what I would have

1 ATTORNEYS' EYES ONLY

2 A. She does, but honestly, from my
3 perspective, it's always been a struggle
4 for me to understand what she's really
5 saying.

6 But, no, he has not, he has not
7 ever talked to me about her. Her tenure
8 was far before my time.

9 Q. Have you talked to anyone else
10 about her, other than the governor?

11 A. I have spoken to Linda Lacewell
12 about her. Melissa is aware that she had
13 sent a couple of these e-mails because I
14 told her.

15 Q. And what did Melissa say about
16 her?

17 A. You know, frankly, that she's
18 nuts.

19 Q. Anything else?

20 A. Not that I recall specifically.

21 Q. How about Linda Lacewell, what
22 did she say?

23 A. Linda Lacewell was, the
24 conversation I had, I think, estimate,
25 but fair to say early COVID. [REDACTED] [REDACTED]

1 ATTORNEYS' EYES ONLY
2 was reaching out frequently. You know,
3 as I recall, at first she had a
4 connection for PPE. Then she was talking
5 about many of her celebrity friends who
6 could help in some way. At that point, I
7 would respond from time to time and just
8 express things.

9 And then I vaguely recall at
10 some point in that period she sent me an
11 e-mail that affirmatively said she had
12 asked someone to do something that, as I
13 recall, it was in some way representing
14 the governor or the administration. So I
15 said, "Linda, can you please call [REDACTED]
16 [REDACTED] and explain to her that she can't
17 make any sort of arrangements on behalf
18 of the state or the governor certainly
19 without going through us and having these
20 situations really vetted and understood."

21 And I recall that, I believe,
22 Linda reached her.

23 Q. And told her that?

24 A. I don't know exactly what she
25 told her, but that's the conversation I

1 ATTORNEYS' EYES ONLY

2 had with Linda.

3 Q. And did Linda report back after
4 her conversation with her?

5 A. I don't remember specifically.
6 I imagine it was something like "I spoke
7 to her and it's taken care of."

8 I do recall then that [REDACTED] at
9 some point e-mailed me saying "I didn't
10 appreciate being phone-banked by Linda
11 Lacewell." So I guess that does tell me
12 that she spoke.

13 Q. You mentioned in this letter
14 [REDACTED] [REDACTED]; do you know who that is?

15 A. I do.

16 Q. You do?

17 A. Yes.

18 Q. Who is [REDACTED] [REDACTED]?

19 A. [REDACTED] [REDACTED], my knowledge of
20 her interaction, experience, is that she
21 worked, I believe, on the 2020 governor's
22 campaign. Since then, I think in that
23 capacity was a fundraiser of sorts.

24 MR. MORVILLO: You said 2020?

25 A. I'm sorry, 2002. That's how

1 ATTORNEYS' EYES ONLY

2 good my grasp with time is.

3 So I was saying I think -- this
4 was also before my time. But I think at
5 that time she was helping with
6 fundraising for the campaign. She's been
7 a long-time Cuomo family friend. You
8 know, she will still attend an event from
9 time to time.

10 Q. Have you heard whether she has
11 had a romantic or sexual relationship
12 with the governor?

13 A. I had not, aside from what [REDACTED]
14 [REDACTED] has written to me.

15 Q. And other than what was written
16 to you from [REDACTED] [REDACTED], have you spoken
17 to or discussed that with anyone?

18 A. About [REDACTED] and an alleged
19 relationship with the governor?

20 Q. Yes.

21 A. I have spoken to him about it.
22 I think what he had said to me is that
23 they went on a date at some point when he
24 was single.

25 And I have spoken with [REDACTED]

ATTORNEYS' EYES ONLY

1
2 about it, too. I don't believe I
3 directly asked her. I think she
4 volunteered that similarly, they went on
5 a date or two when he was single and when
6 she was not working for him. Other than
7 that, I don't think I discussed [REDACTED]
8 with anyone.

9 Q. And why did you -- how did you
10 raise it, end up raising it with [REDACTED]
11 how did it come up?

12 A. I called [REDACTED] after one of
13 these e-mails and I said, "I just want
14 you to know that I have received this
15 e-mail from [REDACTED] [REDACTED] and she's using
16 your name." And she said, "I know she
17 is. I hear from her, too."

18 "I also heard it from," I think
19 she said "[REDACTED] [REDACTED] [REDACTED]" and I think
20 she said "[REDACTED] [REDACTED]."

21 Q. And you also raised it with the
22 governor after receiving one of these?

23 A. Whether or not he had a
24 relationship with [REDACTED]

25 Q. Yes.

1 ATTORNEYS' EYES ONLY

2 A. No, that wasn't after these.

3 Q. What was the context of that?

4 A. I don't remember. It may have
5 been after one of [REDACTED] [REDACTED] e-mails,
6 but maybe a long time ago. I don't
7 remember.

8 Q. You said they just had went on
9 one date?

10 A. Yeah. Well, he said, "We
11 didn't have a relationship. We went on
12 like one date."

13 [REDACTED] described it to me, I
14 think, as a couple of dates.

15 Q. Can we switch topics now and
16 turn to Brittany Commisso.

17 So when did you first meet
18 Brittany Commisso?

19 A. I don't remember.

20 Q. What's the first memory you
21 have of her?

22 A. The first memory I have is her
23 assisting John Maggiore, who was one of
24 our policy people.

25 Q. And what was her role working

1 ATTORNEYS' EYES ONLY

2 for John Maggiore?

3 A. She was an assistant, I
4 believe.

5 Q. And did there come a point in
6 time when Brittany Commisso started
7 working more closely with the governor --
8 more closely with the governor?

9 A. Well, the answer was yes. She
10 was one of those people that we pulled
11 from to help supplement.

12 Q. So how did that come about
13 where she was pulled to supplement?

14 A. I don't remember exactly.

15 Q. Whose decision was it to have
16 her come to supplement in that role?

17 A. I don't remember that, either.

18 Q. Were you part of it?

19 A. I don't remember, I mean I
20 don't remember. It's entirely possible.

21 Q. Do you remember her coming and
22 working with the Executive Chamber along
23 with someone named [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED]

25 A. I don't recall her coming with

1 ATTORNEYS' EYES ONLY

2 [REDACTED] [REDACTED] but it makes sense because [REDACTED]
3 [REDACTED] also worked with John Maggiore.

4 Q. What was [REDACTED] [REDACTED] role?

5 A. I don't know exactly. I
6 couldn't sit here and tell you her title,
7 but I think she did substantive policy
8 with Maggiore.

9 Q. So you remember at some point
10 Brittany Commisso playing that role of
11 supplementing executive assistants,
12 helping?

13 A. Yes.

14 Q. And when she was in the office
15 in the Capitol, where did she sit?

16 A. She has sat from time to time
17 in the -- what did I call it yesterday?
18 The front office with EA#3 and EA#2

19 At some point everybody moved
20 and they were then based in the suite of
21 offices across the hallway, which is
22 where they all are now, I believe.

23 Q. What kind of work did Brittany
24 Commisso do?

25 A. She did a lot of help on the

ATTORNEYS' EYES ONLY

1
2 phones with EA#3 and EA#2 She would
3 take dictation from the governor from
4 time to time.

5 Q. And would she sometimes do
6 that, help out at the mansion?

7 A. She has.

8 Q. And that was during the
9 pandemic or COVID, when the governor was
10 working out of the mansion more?

11 A. Yes, she may have been during
12 the pandemic. I don't remember when she
13 first started. In other words, I don't
14 know if it would have happened
15 pre-pandemic.

16 Q. And how did you organize the
17 weekend coverage for the governor when he
18 was at the mansion?

19 A. The group of assistants would
20 identify who was available when and
21 usually send me an e-mail Friday
22 afternoon so I knew.

23 I don't know when exactly we
24 started doing that. Before that it was
25 more like fly by the seat of your pants,

1 ATTORNEYS' EYES ONLY

2 because on weekends, you don't know if
3 it's going to be relatively quiet or if
4 there is going to be a lot of stuff that
5 he wants to get done. So if on a
6 Saturday morning I would get a call from
7 him or a message saying "Can you send
8 somebody to the mansion," then I would
9 just like pick up the phone and start
10 calling people to see who could get there
11 the quickest.

12 At some point we got a little
13 bit more organized about it and they
14 shared with me their weekend availability
15 so I would know who I could go to.

16 Q. So you would know who is
17 available and then would you still wait
18 for the governor to say "I need someone"
19 before reaching out or would you --

20 A. Yes.

21 Q. I see. But then you would know
22 who was available, so then you would call
23 them and say --

24 A. Yeah, a little less of a fire
25 alarm.

1 ATTORNEYS' EYES ONLY

2 Q. And then once you knew who was
3 going, did you alert anyone, like the
4 troopers, that they were coming to the
5 mansion?

6 A. I would either call the
7 troopers in advance or when the person
8 got there the troopers would let me know,
9 me and Melissa know, that they were there
10 and we would say let them in or not.

11 Q. How would they communicate to
12 you that someone was here?

13 A. By PIN.

14 Q. Sometimes you would tell them
15 that so and so is coming. Sometimes you
16 might not. They would just show up and
17 PIN you and Melissa and say "Brittany is
18 here" or "Alyssa is here," and you would
19 respond "Fine," or do you even need to
20 respond?

21 A. No, you do need to respond.

22 Q. So you would say "It's fine"?

23 A. "Fine" or "Yes" or "Send them
24 in," or some sort of affirmative
25 language.

1 ATTORNEYS' EYES ONLY

2 Q. So when you -- did you have the
3 opportunity to observe Brittany
4 Commisso's interactions with the
5 governor?

6 A. Some, yes.

7 Q. And what kind of interactions
8 did you observe?

9 A. I observed her to be, I
10 observed Brittany to be -- just generally
11 speaking, first, I think that she's a
12 very --

13 MR. MORVILLO: She asked what
14 kind of observation, what kind of
15 activity did you observe.

16 A. What kind of activities?

17 Q. No, what did you observe in
18 terms of their interactions?

19 A. Interactions. They were
20 friendly interactions. She was very
21 friendly with him. She, I think was, you
22 know, she was kind of like starry-eyed
23 high school kid with her, like she was a
24 little bit star-struck. But she very
25 much wanted to get to him when she could.

1 ATTORNEYS' EYES ONLY

2 You know, she said things like -- I heard
3 her say "Italians are very affectionate
4 people." She told me a story about --
5 she showed me the newspaper clipping that
6 her grandmother way back when had been
7 quoted in this newspaper about Governor
8 Mario Cuomo.

9 So in terms of the interaction,
10 he was very nice to her. He was friendly
11 with her. He sort of responds to people
12 like a give and take a bit.

13 Q. You said she was very friendly
14 to him. Was she generally friendly to
15 other people, as well?

16 A. Yes. She's a pretty friendly,
17 bubbly personality, I would say.

18 Q. And you said she would try to
19 get in front of him or, I forget the
20 exact phrase, what did you mean by that?

21 A. She would come into the office,
22 you know, with a cup of coffee that no
23 one had asked for, try to walk right back
24 there with it. You know, she made it
25 very clear on multiple occasions that she

1 ATTORNEYS' EYES ONLY

2 was interested, wanted to staff whenever
3 possible in the office on weekends.

4 Q. And what did you do when she
5 tried to go in with coffee or --

6 A. If I was able, I would take the
7 coffee and bring it to the governor. If
8 I was on the phone or something like
9 that, like in that moment, I would say,
10 "Can you drop it off to him."

11 Q. Why would you try to take it in
12 yourself?

13 A. No particular reason other than
14 people don't need to be in and out of
15 there needlessly. And there is no one
16 else who I can think of who in this, with
17 this example, ever brought him an
18 unsolicited coffee.

19 Q. So she would come with coffee
20 and say, "I would like to take coffee
21 in"?

22 A. It was more that she would just
23 try to walk by with the coffee. And if I
24 could, I would grab it from her.

25 Q. How many times did she try

1 ATTORNEYS' EYES ONLY

2 that?

3 A. I don't know. A few, at least.

4 Q. No one else would do that, no
5 one else had done that, try to give
6 unsolicited coffee?

7 A. I have, but that's because I
8 know his coffee schedule.

9 Q. What's his coffee schedule?

10 A. We have a couple in the morning
11 and maybe one in the afternoon.

12 Q. And did you ever see them
13 physically interact?

14 A. I have seen them hug.

15 Q. Where have you seen them hug?

16 A. I don't remember specifically.

17 Q. In the office?

18 A. I can't say I specifically
19 remember them in the office, but I assume
20 so.

21 Q. What else have you, what else
22 have you seen? Have you seen them kiss?

23 A. I don't recall seeing them
24 kiss.

25 Q. On the cheek? No?

1 ATTORNEYS' EYES ONLY

2 A. I don't remember that, no.

3 Q. Have you seen him touch her or
4 her touch him?

5 A. Other than hugging?

6 Q. Yeah.

7 A. I've seen photos of them.
8 There is one particular photo that I
9 remember from one of our office
10 receptions where he is posing with her
11 for a photo and has I think his hands on
12 her waist.

13 Q. And that's just from the photo.
14 You haven't seen him posing with pictures
15 with Brittany?

16 A. I don't remember being there
17 and seeing the picture taken, no.

18 Q. Any other physical interactions
19 that you recall between the governor and
20 Brittany Commisso?

21 A. Not that I can recall.

22 Q. How about conversations? Have
23 you heard conversations between them?

24 A. I don't recall any specific
25 conversations.

1 ATTORNEYS' EYES ONLY

2 Q. Other than sort of being
3 friendly, any other observations? Did
4 they flirt with each other?

5 A. I would describe her generally
6 as flirtatious. And, you know, and I
7 don't know that I observed the two of
8 them in that way, but I think just as a
9 general personality she is a little
10 flirtatious.

11 Q. Would you describe the governor
12 as flirtatious?

13 A. No. I would describe him as
14 charming from time to time.

15 Q. And what do you mean by
16 charming?

17 A. You know, sort of welcoming,
18 friendly, joking.

19 Q. Do you remember at any point in
20 March of this year when Brittany Commisso
21 was supposed to be covering or was
22 scheduled to cover the governor on a
23 Saturday, but it was changed to Executive
24 Assistant #3?

25 A. I generally remember that.

1 ATTORNEYS' EYES ONLY

2 Q. What did you remember about
3 that?

4 A. I think that the governor had
5 told me, I don't know if it was this
6 instance where he said "Let Brittany have
7 the day and be with [REDACTED] [REDACTED]," or if it
8 was the conversation I had with him where
9 he was dictating something and had wanted
10 EA#3 to do it.

11 Q. So it sounds like you remember
12 at least two times where it was going to
13 be Brittany, but someone else. One was
14 kid?

15 A. It could be. Unless it's the
16 same instance, and I'm not -- and I'm
17 separating them.

18 Q. Well, why don't we look at some
19 PINS that have been produced. If you
20 have 105. And this is a series of PINS
21 between you and the governor on March
22 6th, which I think is the week before the
23 press conference responding to the
24 allegations or some of the allegations.

25 And you see from you, the first

1 ATTORNEYS' EYES ONLY

2 sentence, "Is [REDACTED] staying? I'm trying
3 to find a [REDACTED]." Do you know what --
4 and then there is some redactions here,
5 so this is from the Executive Chamber, so
6 I don't -- we don't know what is said in
7 the redactions, but you obviously can
8 talk about the rest of it.

9 When you say, "Is [REDACTED]
10 staying? I'm trying to find [REDACTED]," he
11 writes "No." Do you know what that is in
12 reference to?

13 A. [REDACTED] is [REDACTED]. I think
14 she was visiting.

15 Q. And you say, "I'm trying to
16 find [REDACTED]"?

17 A. [REDACTED]

18 Q. For [REDACTED]?

19 A. Mm-hmm.

20 Q. He says "No."

21 If you look at the next page,
22 you say, "I will come."

23 A. Yes.

24 Q. And then he says, "No, not
25 you." It's a little hard to read, but

1 ATTORNEYS' EYES ONLY

2 this is the way they produced it. You
3 say "No, not you." And then redacted.

4 And then you say, next page,
5 "Brittany is on call today, do you want
6 her now?"

7 And he says, "EA#3 's better?"
8 And then there is some sort of redaction
9 from you.

10 And then he writes back,
11 "EA#3 's better."

12 And you write, "I called EA#3
13 She can do. I'm telling her to head
14 there now."

15 A. Yes.

16 Q. Can you sort of interpret this
17 text chain for us?

18 A. Sure. Starting with?

19 Q. Yeah, after the [REDACTED], I'm sure
20 [REDACTED] and [REDACTED] has nothing to do with
21 EA#3

22 A. Yes. So "I will come" has to
23 be in response to him saying "Send
24 someone here."

25 "No, not you" is him saying he

1 ATTORNEYS' EYES ONLY

2 doesn't want me to come. Tell him
3 "Brittany is on call, is EA#3 better?"
4 And I think that is, my interpretation of
5 this is that it's based on what he's,
6 what he wants to work on.

7 Q. Do you remember what he wanted
8 to work on?

9 A. I'm assuming it was dictation
10 and not that we have favorites, but EA#3
11 is the stellar dictator.

12 Q. Is EA#3 a better dictator, a
13 better dictation taker?

14 A. EA#3 is very good and very --
15 and she turns around the document very
16 quickly.

17 Q. And a bunch of these were
18 redacted or parts of these texts were
19 redacted for privilege.

20 Do you know what the subject
21 matter was? Because that part, Greg, you
22 can confirm the statement, but you are
23 permitted to say what the subject matter
24 was.

25 A. I can't tell from this.

1 ATTORNEYS' EYES ONLY

2 Q. Did you have any discussions
3 with anyone in this time frame about
4 whether or not Brittany should staff the
5 governor?

6 A. No.

7 Q. No discussions with anyone?

8 A. Staff the governor, period, no.

9 Q. Or on weekends at the mansion?

10 A. No, not that I remember.

11 Q. And was this at a time, you
12 said, generally, you would not want a
13 single person to staff the governor.
14 Here it seems like EA#3 was sent alone,
15 right?

16 A. Yes. I assume so, unless
17 Melissa was there or someone else was
18 there.

19 Q. How do you explain that? Is it
20 just -- how do you explain that?

21 A. I don't know that I can.

22 Q. So it was something that you
23 tried to do but couldn't always?

24 A. Right.

25 Q. Anything else you remember

1 ATTORNEYS' EYES ONLY

2 about this exchange and having EA#3 go
3 instead of Brittany?

4 A. Nothing else I can think of.

5 Q. Did you tell EA#3 -- do you
6 remember telling EA#3 not to tell
7 Brittany that she was going instead?

8 A. I do recall saying to EA#3
9 that "He wants you to do the dictation,
10 so don't -- don't make Brittany feel
11 upset about the fact that he's choosing
12 you."

13 Q. And what did EA#3 say?

14 A. Okay.

15 Q. You specifically remember
16 saying "Don't tell Brittany that he's
17 asking you to do dictation," you
18 specifically remember saying that it was
19 dictation?

20 A. No, I can't say I specifically
21 remember saying dictation, but that was
22 the context of that conversation with
23 EA#3

24 Q. Do you remember the governor
25 telling you that that's what he intended

1 ATTORNEYS' EYES ONLY

2 to do on March 6th, dictation?

3 A. Not specifically.

4 Q. So then why -- but you
5 testified that that's what you think this
6 was, right?

7 A. It is what I think it was.

8 Q. So why do you think it was
9 dictation?

10 A. Because, as I said, EA#3 is
11 the stellar dictator. She's the go-to on
12 dictation.

13 Q. But it can be dictation or you
14 can give handwritten notes, right?

15 A. He can do both, yes. But if
16 he's decided to dictate something, you
17 know, we know that.

18 Q. Do you think on March 6th, you
19 knew that's what he was intending to do?

20 A. I think based on these text
21 messages, I believed that's why he said
22 "EA#3 better."

23 Q. You're interpreting -- because
24 he's saying EA#3 you're sort of
25 interpreting or assuming it must be

1 ATTORNEYS' EYES ONLY

2 because of dictation?

3 A. That's correct.

4 Q. Because EA#3 is a good
5 dictator?

6 A. Correct.

7 Q. Not because you remember him
8 saying "That's what I mean"?

9 A. I don't specifically remember
10 that, no.

11 Q. Any discussions you had with
12 the governor about Brittany Commisso at
13 all?

14 A. Yeah. He has said to me on
15 that one adamantly that he did not do
16 what she is alleging.

17 Q. Let's get to what she alleged.
18 Before moving away from the BlackBerry,
19 it continues to say, if you keep going in
20 the text PIN chain, "Please see if you
21 can get [REDACTED] [REDACTED] and [REDACTED] [REDACTED] on the
22 phone with me together this morning."

23 A. Mm-hmm.

24 Q. Do you know what that is about?

25 A. Yeah, [REDACTED] [REDACTED] and [REDACTED]

1 ATTORNEYS' EYES ONLY

2 [REDACTED] were both staff members of his when
3 he was Secretary at HUD.

4 My best recollection is that
5 this is in response to the story being
6 written about Karen Hinton. Karen Hinton
7 was also a staff member at HUD and [REDACTED]
8 and [REDACTED] knew her. May still know her.

9 Q. Was it your understanding that
10 on this day the work he was going to do
11 related to the sexual harassment
12 allegations that were made, either by
13 Karen Hinton or someone else?

14 A. I don't know that I had an
15 understanding of what it was. I don't
16 remember. I don't remember.

17 Q. Right. But that's one of the
18 things that was going on at that time,
19 March 6th?

20 A. Yes.

21 Q. Because I think if you go a few
22 pages further, I think your speculation
23 about Karen Hinton is right, because I
24 think if you go to 8072, he's talking
25 about the reporter Amy Brittain: "20

1 ATTORNEYS' EYES ONLY

2 years ago, she never said anything.

3 Karen publicly said Clinton solicited

4 her. Why didn't she say me?" It's all

5 from the same day?

6 A. Yes.

7 Q. When did you first learn about

8 the allegations that --

9 MR. MORVILLO: Before we do the
10 Brittany piece, I don't know how long
11 we have been going, but we've been
12 going for an hour or change, can we
13 take another break?

14 MR. KIM: Yes, let's take a
15 quick break. You want to say noon?

16 MR. MORVILLO: Yeah, that's
17 fine.

18 THE VIDEOGRAPHER: Off the
19 record at 11:50. This marks the end
20 of media unit number 2.

21 (Off the record.)

22 THE VIDEOGRAPHER: We are back
23 on the record at 12:02, this marks the
24 beginning of media unit number 3.

25 Thank you.

1 ATTORNEYS' EYES ONLY

2 CONTINUED EXAMINATION

3 BY MR. KIM:

4 Q. Ms. Benton, so when do you
5 remember first learning about the
6 allegations that Brittany Commisso is
7 making against the governor?

8 A. The day before the Times Union
9 article was published.

10 Q. How did you learn?

11 A. I think Melissa called me
12 directly and told me.

13 Q. What did she tell you?

14 A. That there would be a story
15 alleging further claims by another
16 person. She knew it was Brittany. She
17 told me it was Brittany.

18 But before the article was
19 published, the incidents described from
20 the reporter to us were that the claimant
21 was saying that he had slammed the door,
22 threw her up against the wall and groped
23 her.

24 Q. And Melissa DeRosa was
25 reporting to you what the reporter was

1 ATTORNEYS' EYES ONLY

2 saying?

3 A. Correct.

4 Q. Did she say that, did she say
5 whether others in the Executive Chamber
6 had reported it as well, to Judy Mogul?

7 A. Yes. I'm aware that Judy knew.
8 I had a conversation with Judy. I don't
9 think it was that day, but I think it was
10 the day of the article or after the
11 article, that Judy called me and said
12 "This claimant is anonymous. We know
13 that it's Brittany. You have to
14 understand that nothing can change as far
15 as Brittany is concerned in her job
16 responsibilities," to understand that.

17 So to answer your question, was
18 Judy aware?

19 Q. Was -- I guess I asked the
20 question because you said you first
21 learned about it from Melissa who was
22 reporting what a reporter had said.

23 A. Correct.

24 Q. But then my follow-up question
25 was, did you also learn that Judy had

1 ATTORNEYS' EYES ONLY

2 heard, not from a reporter, but from
3 others within the Executive Chamber?

4 MR. MORVILLO: Did you hear that
5 others in the executive chamber had --

6 A. Yes.

7 Q. And what did you hear about
8 that?

9 A. But I want to be clear, I don't
10 remember if it was Judy.

11 Q. I see.

12 A. I had heard that Brittany was
13 having drinks with the other women that
14 she works with. I believe EA#2 I
15 think EA#3 was there, and I believe
16 Alyssa. At which point she told them of
17 allegations. I don't remember
18 specifically what she said.

19 Q. And how did you hear that and
20 from who did you hear that?

21 A. I think Melissa told me that.

22 Q. And in the same conversation
23 she told you about what the reporter was
24 saying or different conversations?

25 A. I don't recall.

1 ATTORNEYS' EYES ONLY

2 Q. And then did you have any
3 conversations that involved the governor
4 about the allegations of groping, and I
5 guess it wasn't, it wasn't specifically
6 tied to Brittany Commisso, but it sounds
7 like people knew it was her?

8 A. My understanding, separate and
9 aside from my own knowledge, is it's
10 widely understood; not prior to the news
11 report.

12 Q. How about after the news
13 report?

14 A. Yes, after the news report he
15 had said to me, "This is absolutely
16 untrue."

17 Q. And by "this," what did he
18 mean?

19 A. The allegations.

20 Q. Did you read the allegations?

21 A. Yes, I read them.

22 Q. And so there was the groping
23 allegation of the breast. There was also
24 allegations of hugs, you know, sort of
25 close hugs and things like that. Did you

1 ATTORNEYS' EYES ONLY

2 have any discussions with the governor
3 that addressed the specific allegations
4 that were alleged?

5 A. No, not individually.

6 Q. So it was sort -- the groping
7 allegation was the one that you
8 understood him to be denying?

9 A. I understood him to be denying
10 everything she was claiming.

11 Q. There was also an allegation
12 that they took a selfie together in the
13 office and that he grabbed her butt.
14 There were the hugs. So in addition to
15 the groping, there was other things.

16 I'm trying to understand
17 whether you had conversations with the
18 governor about any of the allegations?

19 A. He, on the selfie, yes. I
20 remember him saying specifically on the
21 selfie that she asked him to take a
22 selfie.

23 Q. Did he say anything about the
24 allegations in there about how he told
25 her not to share it with anyone, other

1 ATTORNEYS' EYES ONLY

2 than Alyssa McGrath?

3 A. Yeah, he said that did not
4 happen.

5 Q. So did you go sort of through
6 the whole article with him?

7 A. Well, to be fair, I would want
8 to see it. But if you list each one I
9 can say yes or no if we talked about that
10 one specifically.

11 Q. So did you actually go through
12 it?

13 A. I didn't read the article with
14 him, no.

15 Q. I see. But you remember him
16 saying -- denying, essentially,
17 everything in it, other than the selfie?

18 A. Denying that he asked her to
19 take a selfie, not that they took one.
20 Denying certainly that he groped her.
21 Denying that he touched her butt.

22 I don't think he would -- he
23 did not deny, I don't think he would, I
24 would not, that he never hugged her. And
25 I'm not recalling additional claims at

1 ATTORNEYS' EYES ONLY

2 this moment.

3 Q. How many conversations did you
4 have with the governor about Brittany?

5 A. I don't know.

6 Q. Several, many, or a few?

7 A. Maybe a couple.

8 Q. Anything else that he told you
9 other than denying the things that you've
10 mentioned?

11 A. I don't recall specifically. I
12 don't recall anything specifically.

13 Q. Okay. Did you talk, for
14 example, about the fact that she had been
15 scheduled to staff him the Saturday
16 before, but that EA#3 did instead?

17 A. Did we talk about that?

18 Q. Yeah.

19 A. I don't remember talking about
20 that other than the PIN that we looked
21 at.

22 Q. Any discussions about whether
23 she should continue to staff?

24 A. Yeah, we talked about that.

25 Q. What did you talk about?

1 ATTORNEYS' EYES ONLY

2 A. That it was sort of a tricky
3 situation because we had to proceed as if
4 none of this had happened, vis-a-vis her
5 employment. But also, you know, is it a
6 situation where she can do her job
7 effectively without necessarily being in
8 direct contact with him if that was an
9 option. And the answer is she can and he
10 can.

11 And he's been in the office
12 very little. He's working really out of
13 the mansion or traveling. So it hasn't
14 been an issue at all.

15 Q. So you had those conversations
16 with the governor?

17 A. I don't know if I have spoken
18 to him directly about that. That's more
19 Melissa and myself talking about her
20 being comfortable, him being able to work
21 productively.

22 Q. How about weekend management
23 coverage, who has been providing that?

24 A. I can't remember the last time
25 we had weekend mansion coverage.

1 ATTORNEYS' EYES ONLY

2 Q. So on weekends, what do you do?
3 Is he not working anymore?

4 A. No, that's never the case. I
5 just can't remember that there was the
6 need for that type of staffing for him at
7 the mansion, the dictation situation.

8 Q. So there is not always that he
9 needs someone there?

10 A. Correct.

11 Q. And so you don't remember there
12 being a need since that time when EA#3
13 was sent?

14 A. I don't specifically remember.
15 There may have been, but I don't
16 remember.

17 Q. Have you had any conversations
18 with Executive Assistant #3 or Executive Assistant #2
19 about Brittany Commisso's allegations?

20 A. I have not.

21 Q. How about Alyssa McGrath?

22 A. No.

23 Q. Okay. Anyone else you've
24 spoken to about it, other than your
25 lawyer?

1 ATTORNEYS' EYES ONLY

2 A. Well, only the conversations
3 that I mentioned to you earlier with Judy
4 and Melissa, to the best of my
5 recollection.

6 Q. How about Beth Garvey?

7 A. Well, when I said to you
8 before --

9 Q. It was Beth?

10 A. -- that I didn't know it was
11 Judy, that's when I was thinking I
12 thought it was Beth.

13 Q. So that may have been Beth,
14 that conversation?

15 A. Correct.

16 Q. Any conversations that you had
17 about reporting Brittany's allegations to
18 GOER?

19 A. Not that I have.

20 Q. Do you know if it was reported
21 to GOER?

22 A. I do not know.

23 Q. And did you play a role --
24 well, can you turn to tab 14 -- I'm
25 sorry, 114. This is an e-mail that

1 ATTORNEYS' EYES ONLY

2 originates from you and it's typed: "As
3 I said yesterday, I never done anything
4 like this. The details of this report
5 are gut wrenching and completely untrue
6 and I'm not allowed to defend myself
7 publicly because of the review but I'm
8 confident in the results of the Attorney
9 General report."

10 Do you see that?

11 A. Yes.

12 Q. That's you sending it and
13 typing it. What do you think this --
14 this statement, why is it that you send
15 it?

16 A. This is something that he sent
17 to me and gave me the folks he wanted me
18 to send it to.

19 Q. Do you think he sent it to you
20 or you're type/dictating it?

21 A. No, you can tell when it's a
22 copy and paste from him because it's
23 pretty choppy. But, no, it appears as
24 though I typed it.

25 Q. So this does not look like a

1 ATTORNEYS' EYES ONLY

2 copy and paste?

3 A. No.

4 Q. You think he read this to you
5 or gave it to you in handwritten notes or
6 it could be either?

7 A. Yeah, I don't think he would
8 have written such a short statement.

9 Q. I see. So how would it have
10 happened that you would have gone into
11 his office and he would have --

12 A. I'm assuming, but, yeah,
13 suspect that's what that is.

14 Q. And he would say, "Send this to
15 Steve" and copy so-and-so, so-and-so,
16 so-and-so?

17 A. Yes.

18 Q. And then you see Steve Cohen
19 writes back, "Take out. Completely
20 untrue. Retain version."

21 Do you remember Steve Cohen
22 saying "Take out. Completely untrue"?

23 A. You mean do I remember this
24 e-mail?

25 Q. Yes.

1 ATTORNEYS' EYES ONLY

2 A. No, not specifically.

3 Q. Do you remember separate from
4 this e-mail Steve Cohen suggesting that
5 you take out, completely untrue?

6 A. I don't.

7 Q. Any discussions you remember
8 about that topic?

9 A. No.

10 Q. And then something like this,
11 you type it up from the governor, you
12 send it to people he asks. And then
13 there is exchanges.

14 Are you reporting -- do you
15 report to the governor each of the
16 exchange? Because he's not on them
17 again. Do you tell him, "Steve Cohen
18 says take out this. Do this or that," or
19 do you wait?

20 A. Generally, we work on
21 consensus. So when the group that
22 received this comes to consensus, then I
23 would give it back to him and see if he
24 signs off on it.

25 Q. But it's not like a realtime

1 ATTORNEYS' EYES ONLY

2 conveying of every response?

3 A. Generally, no.

4 Q. If you turn to 144, to the same
5 day out of order. This time it looks
6 like you send on a text a screenshot of
7 essentially the same statement from, it
8 looks like someone's computer screen,
9 probably yours. On the bottom it says
10 "Steph can you send to me on exec
11 e-mail."

12 Looking at this, can you
13 interpret sort of what's going on here
14 and why you're sort of separately sending
15 it through text on the phones?

16 A. I can.

17 Q. You can.

18 A. This is a screenshot of a
19 laptop, I assume it's a laptop, and I did
20 it in this way because I was at the
21 mansion and not on my executive e-mail.

22 Q. So were you at the mansion
23 because you were staying there or were
24 you there to work or -- this is March
25 10th --

1 ATTORNEYS' EYES ONLY

2 A. No, I was not staying there.

3 Q. So you had been called to the
4 mansion to work with the governor?

5 A. Yes.

6 Q. Okay. And if you actually go a
7 little further in, the second page, Steve
8 Cohen sends the same or similar
9 suggestion, Drop untrue, "I have never
10 done anything like this and this is gut
11 wrenching" you said drop the completely
12 untrue part."

13 Does this jog your memory of of
14 discussions you had about why dropping
15 untrue?

16 A. It does not.

17 Q. The next page, the party says:
18 "Steph, can you make sure he sees this,
19 I'm running out of time."

20 A. Yes.

21 Q. What's that a reference to?

22 A. Do you want my interpretation?

23 Q. Yes.

24 MR. MORVILLO: Do you remember?

25 THE WITNESS: No, I don't

1 ATTORNEYS' EYES ONLY

2 specifically remember any of this.

3 MR. MORVILLO: Now you can
4 interpret this.

5 Q. What's your interpretation
6 looking at the text?

7 A. My interpretation is that Rich
8 was responding to a story in the
9 statement, which is really just a
10 sentence, is the response that we are
11 discussing giving to whatever the
12 reporter is. And reporters have
13 deadlines, so that's as a party's
14 reference to running out of time.

15 Q. And "make sure he sees this" is
16 a reference to showing it to the governor
17 and making sure he's okay with it?

18 A. Yes.

19 Q. Is that generally the case
20 before a statement goes out?

21 A. Yes.

22 Q. From him, that he needs to look
23 at it?

24 A. Yes.

25 Q. Is it true for all general

1 ATTORNEYS' EYES ONLY

2 statements from the office, Executive
3 Chamber generally, or anything attributed
4 to him personally?

5 A. I can't say all general chamber
6 releases, but many.

7 Q. Only anything that is his
8 voice, like when it's "I" or it's coming
9 from him?

10 A. No, not only.

11 Q. Not only. But more than that?
12 Right, I'm saying certainly those?

13 A. Certainly, yes, certainly
14 those.

15 Q. But also most statements coming
16 out of the Executive Chamber, period?

17 A. Yes, well, most is probably
18 right. I would say many.

19 Q. Yeah. Okay. Any discussions
20 about Brittany Commisso and her
21 allegations that, you know, I haven't
22 covered or you haven't had an opportunity
23 to tell me about because of the
24 questions?

25 A. I don't recall any other

1 ATTORNEYS' EYES ONLY

2 conversations about her. There are
3 conversations I had with her prior to the
4 allegations.

5 Q. What conversations have you had
6 with her?

7 A. There were two specific
8 conversations. One was in December, just
9 before Christmas. She spoke actually,
10 she asked to speak with both Melissa and
11 myself and volunteered, I mean basically
12 verbatim, "I can't wait to get out of bed
13 in the morning. This is my dream job."
14 And just said she was so thrilled and
15 happy with this job and couldn't imagine
16 doing anything else. And we told her
17 that she was doing a great job and we
18 were happy to have her.

19 There was a second
20 conversation, I believe, about a
21 week-and-a-half-ish to two weeks before
22 her allegations were reported in the
23 Times Union, where she said to me that
24 she wanted me to know that she was

25 ██████████ ██████████. That she had ██████████

1 ATTORNEYS' EYES ONLY

2 [REDACTED] [REDACTED] [REDACTED]. That she would be
3 needing to leave during the week when she
4 had [REDACTED] to pick up her [REDACTED]
5 [REDACTED]. And that she was very -- she
6 wanted me to keep her in mind for any
7 future overtime staffing.

8 I told her that I was sorry
9 about her situation and we would try to
10 make it all work out. But I wanted to
11 share those with you.

12 Q. Okay. Anything else?

13 A. No, those are the two
14 conversations that I had with her. I
15 don't recall any other specific
16 conversations about her.

17 Q. Or other people talking about
18 her?

19 A. No.

20 Q. So have you spoken to her
21 directly since her allegations?

22 A. I have.

23 Q. And how have they been?

24 A. They have been fine. "How are
25 you?" I call her Brit. She calls me

1 ATTORNEYS' EYES ONLY

2 Steph. They have been fine.

3 Q. Can we talk about Alyssa

4 McGrath. So when did you first meet

5 Alyssa McGrath?

6 A. I don't remember.

7 Q. How did her hiring come about

8 in the Executive Chamber?

9 A. I don't know.

10 Q. You don't know, okay.

11 So at some point -- it wasn't

12 you?

13 A. It wasn't me. And on Alyssa, I

14 really have never had a tremendous amount

15 of interaction with her, so I'm going to

16 be really fuzzy on this one.

17 Q. And why is it with her that you

18 haven't had a lot of interaction?

19 A. She really has only helped in

20 this capacity, I would say, a handful of

21 times.

22 Q. What's her regular job?

23 A. I'm embarrassed to say I

24 actually don't know, but I think she's on

25 the other side of the floor.

1 ATTORNEYS' EYES ONLY

2 Q. And so you don't know the
3 origins of how it came about that she
4 started helping out?

5 A. I don't.

6 Q. But at some point was she one
7 of the people that you could reach out to
8 to help?

9 A. She was one of the people that
10 we would ask to help when we needed
11 assistance on phone coverage.

12 I think we tried Alyssa once or
13 twice with dictation and it didn't -- I
14 don't really think it's her thing, which,
15 you know, is fine. But in her capacity
16 helping, it was for phone coverage.

17 Q. How did you find out that her
18 dictation wasn't as good?

19 A. Well, he would have, he told me
20 that.

21 Q. He said "I don't think" -- what
22 did he say?

23 A. I don't remember exactly.

24 Q. And then as a result, did you
25 not have her go to the mansion as much or

1 ATTORNEYS' EYES ONLY

2 cover for what might be dictation?

3 A. Yeah, I believe so.

4 Q. Any other conversations you had
5 with the governor about Alyssa McGrath?

6 A. Not that I recall.

7 Q. Did you ever observe the
8 governor and Alyssa McGrath interacting?

9 A. I don't remember any specific
10 interactions with them.

11 Q. Have you seen them hug?

12 A. I don't think that I have.

13 Q. Kiss?

14 A. No.

15 Q. Pictures?

16 A. She's in that picture earlier
17 with Brittany at a reception.

18 Q. That's the one where he had
19 both?

20 A. Yes.

21 Q. Other than that, observe any
22 physical interactions, holding, hugging,
23 anything like that?

24 A. Not that I can recall.

25 Q. Any discussions with Melissa

1 ATTORNEYS' EYES ONLY

2 DeRosa about Melissa McGrath?

3 A. Not that I recall.

4 Q. And have you read the reporting
5 of the allegations she has made?

6 A. Yes, I did.

7 Q. Did you discuss those
8 allegations with the governor?

9 A. I don't remember discussing
10 those, no.

11 Q. With anyone else?

12 A. Not specifically. I actually
13 don't specifically in this moment
14 remember what those allegations are.

15 I think she said that he tried
16 to look down her blouse perhaps.

17 Q. Yes, one of them?

18 A. Yeah.

19 Q. Anything else about Melissa
20 McGrath?

21 A. No, I don't really have
22 anything there.

23 Q. Do you know Ana Liss? Do you
24 know Ana Liss?

25 A. Barely.

1 ATTORNEYS' EYES ONLY

2 Q. What do you remember, what do
3 you know about her?

4 A. She assisted in some way Howard
5 Glazer when Howard was director of state
6 operations. I really don't know much
7 about her.

8 The way the office is set up
9 there is a door on both sides of
10 Melissa's office. The door furthest from
11 me on the side of her office opens up
12 into the suite for state operations.
13 There were times that I would walk
14 through that suite and literally say
15 hello to her. Other than that, I don't,
16 I don't really know her.

17 Q. Did you observe any
18 interactions between her and the
19 governor?

20 A. I don't recall any
21 interactions.

22 Q. Do you recall her touching her
23 in any way?

24 A. I don't recall seeing that, to.

25 Q. Kiss her?

1 ATTORNEYS' EYES ONLY

2 A. I don't recall seeing him kiss
3 her.

4 Q. Kiss her hands?

5 A. Not that I saw her.

6 Q. You ever hear him call her
7 sweetheart?

8 A. I do not recall hearing that.

9 Q. Is that something he does, the
10 governor, call people sweetheart or
11 honey?

12 A. Yes, he does.

13 Q. Who does he call sweetheart or
14 honey?

15 A. Any number of people.

16 Q. A lot of people, women?

17 A. Yes.

18 Q. Does he call you sweetheart or
19 honey?

20 A. He has, yes.

21 Q. Do you remember whether you
22 heard him ask her whether she had a
23 boyfriend, Ana Liss?

24 A. Did I hear him ask her that?

25 Q. Yes.

1 ATTORNEYS' EYES ONLY

2 A. No.

3 Q. Is that something the governor
4 does, ask people whether they have a
5 girlfriend, boyfriend?

6 A. Yes, I heard him ask that.

7 Q. Like to who?

8 A. I don't recall specifically.

9 Q. Have you heard him ask people
10 about their sex lives?

11 A. No.

12 Q. Or talk about people's sex
13 lives?

14 A. Not that I can recall.

15 Q. So it doesn't sound like Ana
16 Liss -- do you remember after her
17 allegations, were you a part of any
18 discussions?

19 A. Not that I recall.

20 Q. Anything else about Ana Liss?

21 A. No, I just really don't have
22 anything there either.

23 Q. Do you remember in March
24 learning that Ronan Farrow was doing a
25 piece on the allegations?

1 ATTORNEYS' EYES ONLY

2 A. I do.

3 Q. And what was your role in
4 responding to those?

5 A. I did not have a role in
6 responding to his report, other than I
7 believe that was the article that Lindsey
8 Boylan said that the governor made fun of
9 my haircut.

10 So my role was to approve the
11 response that the press office was
12 sending from me.

13 Q. Right. We talked about that --

14 A. Yes.

15 Q. -- yesterday.

16 Can you turn to 120, have 120.
17 And this is an e-mail exchange with a
18 number of people?

19 MR. MORVILLO: At 120?

20 MR. KIM: Yeah, I think so.

21 MR. MORVILLO: I don't have a
22 120. I have two 121s, okay. I'll go
23 with the first 121.

24 MR. KIM: The first 121 is
25 probably 120.

1 ATTORNEYS' EYES ONLY

2 MR. MORVILLO: Got it.

3 Q. It's March 14, 2021.

4 A. Got you. 10:35 p.m.?

5 Q. Yeah. This is an e-mail
6 exchange where it looks like the press
7 office sort of writes statements or
8 allegations or things that are going to
9 be in the Ronan Farrow piece, fact
10 checking, and then there are draft
11 responses. And, Ms. Benton, you are on
12 of the e-mail exchange, including other
13 people.

14 But if you look at the
15 second-to-last e-mail here from Beth
16 Garvey, she writes: "We don't have to
17 make news with that answer. It can be
18 spun as retaliatory."

19 And Melissa DeRosa in her last
20 e-mail pushes back, "Retaliatory how?"
21 Et cetera, et cetera.

22 Do you remember any discussions
23 or communications around whether the way
24 in which the Executive Chamber responded
25 to the reporter could be retaliatory or

1 ATTORNEYS' EYES ONLY

2 considered retaliation?

3 A. I can't remember any specific
4 conversation.

5 Q. Do you remember any discussions
6 ever in connection with the sexual
7 harassment allegations where there was
8 questions about retaliation, would we be
9 retaliating if we did something or
10 another?

11 A. I don't remember specific
12 conversations.

13 Q. What about generally
14 conversations about retaliation?

15 A. No, I told you about the
16 conversation I had with Judy where he
17 informed me of Brittany's situation.

18 Q. That you can't retaliate,
19 right?

20 A. Correct. I don't remember
21 conversations about retaliation that I
22 participated in. And I don't remember
23 reading this.

24 Q. Not necessarily the case, just
25 because you're on it, you would read all

1 ATTORNEYS' EYES ONLY

2 of these e-mails?

3 A. That's correct.

4 Q. You would kind of wait for a
5 consensus before, if you are supposed to
6 run it by the governor?

7 A. Yeah. There would be no --
8 there would be no -- the only reason I'm
9 on this is there is the one line where
10 I'm involved. So I wouldn't have
11 bothered to read all of this stuff.

12 Q. If you look at 121, which is a
13 PIN from that same day, slightly earlier
14 in the day, you say: "Going to push
15 a little bit. Group on phone re Ronan
16 article now includes some of the 1:15."

17 Was the governor on the calls
18 where you were talking about responding
19 to the Ronan Farrow article?

20 A. No, as evidenced I would argue
21 by this PIN.

22 Q. So this PIN suggests there is a
23 1:15 call that he has, but you're pushing
24 it off because the Ronan call is going
25 late and some people are on that. Is

1 ATTORNEYS' EYES ONLY

2 that a fair reading of this PIN?

3 A. I think that's fair.

4 Q. Can you turn to tab 155. This
5 is also from, I think, we put the title,
6 it just says "Q&A," but I think it's from
7 the hard drive of your computer or some
8 part of the Executive Chamber computer
9 system that's affiliated with you.

10 So it looks like a Q&A draft
11 relating to allegations of sexual
12 harassment, including Charlotte Bennett,
13 Lindsey Boylan, Ana Liss and others.

14 Do you remember what this
15 document is?

16 A. It looks like preparation for
17 Q&A that he would have done for a press
18 conference.

19 Q. Do you remember being a part of
20 prep sessions for a Q&A, press conference
21 for Q&As?

22 A. I do not.

23 Q. Do you remember if there was
24 prep session that was done up at the
25 mansion in Albany in March before his

1 ATTORNEYS' EYES ONLY

2 first press conference?

3 A. There was, I don't remember
4 which press conference, but, yes, there
5 was at the mansion with a group of
6 people.

7 Q. And were you there when they
8 were prepping him?

9 A. I was here and I recall being
10 in and out. I mean it's not something I
11 participate in.

12 Q. All right. I think you can put
13 that to the side.

14 So over the years that you
15 worked with the governor, have you -- is
16 he -- have you heard him speak harshly to
17 people?

18 A. I heard him speak very directly
19 to people. Harsh -- what --

20 Q. What do you mean by "directly"?

21 A. He cuts to the chase. He says
22 what he wants and he expects it to be
23 done.

24 Q. Have you heard him yell at
25 people?

1 ATTORNEYS' EYES ONLY

2 A. I've heard him raise his voice.
3 It's not a frequent -- it's not a
4 frequent behavior for him.

5 Q. Has he yelled at you?

6 A. I'm sure he has at some point.

7 Q. Have you heard him insult
8 people?

9 A. Insult? I don't know. It's
10 such a general term. How do we want to
11 qualify it?

12 Q. Have you heard him threaten
13 anyone?

14 A. No, I don't believe I have.

15 Q. Have you heard the audio of him
16 where he says he'll compare someone to a
17 child molester?

18 A. I don't think I ever listened
19 to that. That was reported?

20 Q. That was in the New York Times
21 podcast.

22 A. I know what you're referencing,
23 but I don't think I ever listened to
24 that.

25 Q. Have you ever heard him compare

1 ATTORNEYS' EYES ONLY

2 someone to a child molester or threaten
3 to do that?

4 A. No, I haven't.

5 Q. Anything like that that you
6 have heard?

7 A. Not that I can recall.

8 Q. Have you ever seen or heard him
9 throw anything at anyone, heard of him
10 throwing anything at anyone?

11 A. I don't think I've ever seen
12 him throw anything. He will play catch
13 in the office sometimes or kick the
14 soccer ball. I don't think I've seen him
15 throw anything.

16 Q. Like have you ever heard that
17 he threw a computer speaker at someone?

18 A. I don't think so.

19 Q. How about fruit, throwing
20 fruit?

21 A. Fruit is what he tends to play
22 catch with.

23 Q. So is there like a fruit bowl?

24 A. Yes, the fruit basket in the,
25 what do they call it, the front office.

1 ATTORNEYS' EYES ONLY

2 Q. In Albany or in both?

3 A. In Albany.

4 Q. He throws that, he plays catch
5 with people?

6 A. He does from time to time.

7 Q. How about not for catch, but to
8 throw it?

9 A. I don't think I've ever seen
10 that.

11 Q. You said you haven't heard him
12 comment or question people about their
13 sex lives?

14 A. I don't remember that
15 happening.

16 Q. How about any suggestive,
17 sexually suggestive jokes or comments?

18 A. I don't think sexually
19 suggestive.

20 Q. Have you ever heard him joke
21 when he heard someone was pregnant, say
22 "I'm not the father"?

23 A. I don't think I have.

24 Q. Okay. Have you heard him
25 comment on the size of his hands?

1 ATTORNEYS' EYES ONLY

2 A. No, I don't think I have.

3 Q. Have you ever heard him joke
4 that he legalized sodomy?

5 A. No.

6 Q. Have you ever heard him joke
7 about the Emmy statue, and how the figure
8 of the Emmy statue, you know, he won the
9 Emmy?

10 A. Yes: The figure of the statue?

11 Q. How buxom it is or the lady is?

12 A. I have not heard that.

13 Q. We talked about the Valentine's
14 Day flowers and you said, at least in
15 2017, you first came up with the list.
16 And you may or may not have shown it to
17 the governor; is that a fair description?

18 A. Yes.

19 Q. Is that every year, that you
20 would come up with the list or would it
21 vary?

22 A. Yeah, that's my recollection,
23 that would be something that, you know,
24 was part of my day.

25 I also just want to be clear,

1 ATTORNEYS' EYES ONLY

2 for what it's worth, it wasn't every
3 year. Like I don't remember doing it
4 last year. I don't know if we did it the
5 year before.

6 Q. And when you did it, would you
7 run by the list with the governor?

8 A. I may have.

9 Q. Does he sometimes add people?

10 A. I don't remember that.

11 Q. Or take people out?

12 A. I don't remember that.

13 Q. How about perfume, has he or
14 you gotten perfume for staff, female
15 staff members?

16 A. Not that I'm aware of.

17 Q. So you haven't purchased
18 perfume on either his or the office's
19 behalf for female staffers?

20 A. Not that I recall.

21 Q. Have you ever heard him talk
22 about tattoos?

23 A. I have heard him talk about
24 tattoos.

25 Q. On what occasions have you

1 ATTORNEYS' EYES ONLY

2 heard him talk about tattoos?

3 A. I think in a variety of
4 occasions. He, [REDACTED] [REDACTED] at some
5 point, had a temporary tattoo that she
6 tricked him into thinking was real. You
7 know, he watches a lot of shows on car
8 fix-up with possibly a mechanic who has
9 tattoos; "Look at that guy's tattoo."

10 Q. How about any recollection of
11 the governor meeting someone at an event
12 who had a tattoo and looking her up and
13 asking people to look her up through the
14 pictures?

15 A. No. I had heard that rumor,
16 but I had no -- -I have no knowledge of
17 that.

18 Q. Do you remember a Super Bowl
19 party in 2017 at Dorian's?

20 A. Vaguely.

21 Q. Did you go to that?

22 A. I don't believe I did.

23 Q. Okay. And that's, I think,
24 where at least there has been some
25 reporting of someone with a tattoo, a

1 ATTORNEYS' EYES ONLY

2 dove tattoo and the governor talking to
3 someone with a dove tattoo.

4 Any recollection of any
5 discussions of that?

6 A. No, no recollection for me.

7 Q. Have you been in pool at the
8 mansion?

9 A. I have.

10 Q. How often?

11 A. A couple of times.

12 Q. Twice?

13 A. Yeah, maybe like between two
14 and five times.

15 Q. So when you were there during
16 the pandemic, did you go in the pool?

17 A. Yeah. That's primarily when,
18 the times that I'm talking about. His
19 daughters were living here at the time.
20 And I had been in the pool with his
21 daughters in a little bit of free time.

22 Q. And then have you ever been in
23 the pool or has there been any parties or
24 events where you and others jumped in the
25 pool?

1 ATTORNEYS' EYES ONLY

2 A. Yes.

3 Q. Can you tell us about that?

4 A. I can't tell you what year it
5 was. But there was a gathering, I'm
6 going to assume post-session, just given
7 the weather up here. But it was a sort
8 of end-of-the-cycle gathering.

9 [REDACTED] was secretary.

10 Senior staff. A couple of more junior
11 staff. And a majority of the attendees
12 all jumped in the pool fully clothed.

13 Q. Were you one of them?

14 A. Yes.

15 Q. Was the governor there?

16 A. I'm not positive that he was
17 there at that point. He may have been.

18 Q. Did he jump in the pool?

19 A. No.

20 Q. Any other incidents where you
21 jumped in the pool?

22 A. That's what I --

23 Q. Fully clothed? That's the one
24 time you remember?

25 A. Yeah.

1 ATTORNEYS' EYES ONLY

2 Q. Can you look at tab 108. And
3 this is sort of a text chain, someone, I
4 guess a reporter or someone, is asking,
5 "Mansion party, February 20, was rowdy.
6 Senior Staffer #3 was picked up drunk and naked."

7 Do you remember any event or
8 incident like that where Senior Staffer #3 SS #3
9 was drunk and naked?

10 A. I don't.

11 Q. Did you hear about it at all?

12 A. No.

13 Q. Do you remember this text chain
14 or having discussions about it?

15 A. I don't remember it.

16 Q. Have you heard the term "mean
17 girls" used in the executive chamber?

18 A. I have.

19 Q. In what context?

20 A. There was a text chain that I
21 think included myself, Annabel, Dani Jill
22 and Melissa, is my best recollection,
23 with Andrew Ball. And I think Ball named
24 the text chain "mean girls."

25 Q. If you look at tab 24, I think

1 ATTORNEYS' EYES ONLY

2 that is at least one of the text chains
3 and it says name "mean girls"; does that
4 look like the people?

5 A. Sorry, I'm not there just yet.

6 Q. All right. 24.

7 A. Yes.

8 Q. Does the governor ever use the
9 term "mean girls"?

10 A. I don't remember him saying
11 "mean girls."

12 Q. Other than just being the name
13 of a text chain, have you heard people
14 refer to this group or any other group as
15 mean girls within the Executive Chamber?

16 A. Well, I read that they do. I
17 have never -- no one has ever said it to
18 me aside from Ball labeling it as such.
19 I mean, not to me directly.

20 Q. Were there times in New York
21 City where the governor sometimes slept
22 in the office in New York City?

23 A. He has a couple of times, I
24 think.

25 Q. And how does he do that, he

1 ATTORNEYS' EYES ONLY

2 sets up -- is there a bed there?

3 A. There's -- there is a couch
4 that I think pulls out.

5 Q. And have you been asked to get
6 bedding for that at times and have you?

7 A. I have. I wasn't asked to.

8 Q. You did that?

9 A. I did. He didn't ask me to, if
10 that's the question. He was surprised
11 when I brought it to the office.

12 Q. What was he doing before that,
13 without the bedding?

14 A. I don't know that he slept in
15 the office before that.

16 Q. I see. I know I asked you
17 yesterday about rumors about Senior
18 Staffer #1 and yourself.

19 Have you heard any other rumors
20 about the governor having any
21 relationship with any members of staff or
22 the state employees?

23 A. I heard lots of rumors. I
24 think there has been rumors about him for
25 a long time in different roles.

1 ATTORNEYS' EYES ONLY

2 I think [REDACTED] [REDACTED]
3 has been a rumor. I think Senior Staffer #3 has
4 been a rumor. I think there were people
5 in the AG's office that were rumors.

6 Q. But [REDACTED] [REDACTED], do
7 you have any basis to know whether or not
8 there is any truth to that?

9 A. I don't believe there is any
10 truth to that.

11 Q. Why not?

12 A. I know [REDACTED] very, very well
13 and I don't believe there is any truth to
14 it. I have certainly never seen any
15 evidence of it.

16 Q. Have you spoken to her about
17 it?

18 A. I don't know that I have.

19 Q. How about the governor?

20 A. No, I don't know that I have.
21 Just one of those things that's like
22 generally understood, I think, or
23 generally thought.

24 Q. How about Senior Staffer #3 [REDACTED] ?

25 A. Do I have any basis?

1 ATTORNEYS' EYES ONLY

2 Q. Yeah.

3 A. I have no evidence or knowledge
4 of that rumor being more than a rumor.

5 Q. Have you ever seen them
6 interact in any way that's not
7 professional or not purely a professional
8 relationship?

9 A. When you say "purely
10 professional," he interacted with Senior Staffer #3
11 much like he interacts with a lot of
12 people. They've hugged. He's kissed her
13 on the cheek. I have seen no evidence of
14 any physical relationship.

15 Q. Has he kissed her on the lips?

16 A. Not to my knowledge.

17 Q. Not that you've seen?

18 A. Not that I've seen.

19 MR. KIM: If we can pause for a
20 second and I will ask my colleagues
21 who are on if they have any other
22 questions. I think I'm coming to a
23 close and we can either go off record
24 or could end it here.

25 I said I would give you an

1 ATTORNEYS' EYES ONLY

2 opportunity to, Ms. Benton, if you
3 want to give a short sworn statement,
4 if you want. If there is anything
5 else you want to add, we can do that.
6 But unless my colleagues have other
7 questions, I think that does it for
8 me.

9 Andrew, Charlotte? You're on
10 mute, Andrew, but it looks like you're
11 saying no.

12 MR. WEAVER: No.

13 MR. MORVILLO: We're not making
14 any sworn statements today.

15 THE WITNESS: I'm sure you would
16 love me to go on and on for maybe
17 another couple.

18 MR. KIM: Thank you for your
19 time. I know it went a while, but we
20 appreciate it. And thanks.

21 THE WITNESS: Thank you. And
22 thank you again for the personal
23 courtesy from last week.

24 MR. KIM: No problem. No
25 problem.

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ATTORNEYS' EYES ONLY

THE VIDEOGRAPHER: This concludes today's testimony given by Stephanie Benton as stipulated by all parties.

The total number of media units used was three and will be retained by Veritext Legal Solutions, New York.

We are off the record at 12:57.

(Time noted: 12:57 p.m.)

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ATTORNEYS' EYES ONLY
CERTIFICATION

I, DAWN MATERA, a Notary Public for
and within the State of New York, do
hereby certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 15th day of July, 2021.

Dawn Matera

DAWN MATERA

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