

# STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL SUBPOENA AD TESTIFICANDUM

## THE PEOPLE OF THE STATE OF NEW YORK GREETINGS

**TO**: Chris Cuomo

YOU ARE HEREBY COMMANDED, pursuant to Executive Law § 63(8) and New York Civil Practice Law and Rules § 2302(a), to appear and attend before the Special Deputies to the First Deputy Attorney General, on July 8, 2021 at 9:00 AM, or any agreed upon adjourned date or time, at One Liberty Plaza, 38th Floor, New York, New York 10006 to testify in connection with an investigation into allegations of and circumstances surrounding sexual harassment claims made against Governor Cuomo, or any matter that the Attorney General deems pertinent thereto.

**TAKE NOTICE** that the Attorney General deems the testimony commanded by this Subpoena to be relevant and material to an investigation and inquiry undertaken in the public interest.

**TAKE NOTICE** that the examination may be recorded by stenographic, videographic and/or audio means.

TAKE FURTHER NOTICE that Your disobedience of this Subpoena, by failing to appear and attend and testify on the date, time and place stated above or on any agreed upon adjourned date or time, <u>may subject You to penalties and other lawful punishment</u> under Executive Law § 63(8), New York Civil Practice Law and Rules § 2308 and/or other statutes.



**WITNESS, The Honorable Letitia James,** Attorney General of the State of New York, this 28th day of June, 2021.

/s/ Anne L. Clark By: By: Anne L. Clark Joon H. Kim Jennifer Kennedy Park Yannick Grant Abena Mainoo Special Deputies to the Special Deputies to the First Deputy Attorney General @ag.ny.gov First Deputy Attorney General @ag.ny.gov @ag.ny.gov @ag.ny.gov @ag.ny.gov



### STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL

# SUBPOENA DUCES TECUM THE PEOPLE OF THE STATE OF NEW YORK GREETINGS

**TO**: Chris Cuomo

YOU ARE HEREBY COMMANDED, under Executive Law § 63(8), N.Y. Civil Practice Law and Rules § 2302(a), and/or other statutes, to deliver and turn over to the Special Deputies to the First Deputy Attorney General, on *the 8th day of July*, 2021, at 9:30 a.m., or any agreed upon adjourned date or time, at One Liberty Plaza, 38th Floor, New York, New York 10006, all documents and information requested in the attached Schedule in accordance with the instructions and definitions contained therein.

**TAKE NOTICE** that the Attorney General deems the documents and information commanded by this Subpoena to be relevant and material to an investigation and inquiry undertaken in the public interest.

TAKE FURTHER NOTICE that Your disobedience of this Subpoena, by failing to deliver the documents and information requested in the attached Schedule on the date, time and place stated above or on any agreed upon adjourned date or time, <u>may subject</u> <u>You to penalties and other lawful punishment</u> under Executive Law § 63(8), New York Civil Practice Law and Rules § 2308 and other statutes.



**WITNESS, The Honorable Letitia James,** Attorney General of the State of New York, this 28th day of June, 2021.

/s/ Anne L. Clark By: By: Anne L. Clark Jennifer Kennedy Park Yannick Grant Abena Mainoo Special Deputies to the First Deputy Attorney General Special Deputies to the First Deputy Attorney General @ag.ny.gov @ag.ny.gov @ag.ny.gov @ag.ny.gov @ag.ny.gov

#### **SCHEDULE**

#### A. General Definitions and Rules of Construction

- 1. "All" means each and every.
- 2. "Any" means any and all.
- 3. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Subpoena all information or Documents that might otherwise be construed to be outside of its scope.
- 4. "<u>Communication</u>" means any conversation, discussion, letter, email, call, text message, instant message, memorandum, meeting, note or other transmittal of information or message, whether transmitted in writing, orally, electronically or by any other means, and shall include any Document that abstracts, digests, transcribes, records or reflects any of the foregoing.
- 5. "Concerning" means, directly or indirectly, in whole or in part, relating to, referring to, describing, evidencing or constituting.
- 6. "<u>Custodian</u>" means any Person or Entity that, as of the date of this Subpoena, maintained, possessed, or otherwise kept or controlled such Document.
- 7. "Document" is used herein in the broadest sense of the term and means all records and other tangible media of expression of whatever nature however and wherever created, produced or stored (manually, mechanically, electronically or otherwise), including without limitation all versions whether draft or final, all annotated or nonconforming or other copies, electronic mail ("email"), instant messages, text messages, Blackberry or other wireless device messages, voicemail, calendars, date books, appointment books, diaries, books, papers, files, notes, confirmations, accounts statements, correspondence, memoranda, reports, records, journals, registers, analyses, code (e.g., C/C++/C#, SQL, JavaScript), algorithms, code repositories (e.g., GitHub), commit messages, audit logs, data or databases (e.g., Oracle, postgres or other SQL or non-SQL systems), plans, manuals, policies, telegrams, faxes, telexes, wires, telephone logs, telephone messages, message slips, minutes, notes or records or transcriptions of conversations or Communications or meetings, tape recordings, videotapes, disks, and other electronic media, microfilm, microfiche, storage devices, press releases, contracts, agreements, notices and summaries. Any non-identical version of a Document constitutes a separate Document within this definition, including without limitation drafts or copies bearing any notation, edit, comment, marginalia, underscoring, highlighting, marking, commit messages, or any other alteration of any kind resulting in any difference between two or more otherwise identical Documents. In the case of Documents bearing any notation or other marking made by highlighting ink, the term Document means the original version bearing the highlighting ink, which original must be produced as opposed to any copy

thereof.

- 8. "Entity" means without limitation any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or other firm or similar body, or any unit, division, agency, department, or similar subdivision thereof.
- 9. "Identify" or "Identity," as applied to any Document means the provision in writing of information sufficiently particular to enable the Attorney General to request the Document's production through subpoena or otherwise, including but not limited to: (a) Document type (letter, memo, etc.); (b) Document subject matter; (c) Document date; and (d) Document author(s), addressee(s) and recipient(s). In lieu of identifying a Document, the Attorney General will accept production of the Document, together with designation of the Document's Custodian, and identification of each Person You believe to have received a copy of the Document.
- 10. "<u>Identify</u>" or "<u>Identity</u>," as applied to any Entity, means the provision in writing of such Entity's legal name, any d/b/a, former, or other names, any parent, subsidiary, officers, employees, or agents thereof, and any address(es) and any telephone number(s) thereof.
- 11. "<u>Identify</u>" or "<u>Identity</u>," as applied to any natural person, means and includes the provision in writing of the natural person's name, title(s), position(s), any aliases, place(s) of employment, telephone number(s), email address(es), mailing addresses and physical address(es).
- 12. "Person" means any natural person, or any Entity.
- 13. "Sent" or "received" as used herein means, in addition to their usual meanings, the transmittal or reception of a Document by physical, electronic or other delivery, whether by direct or indirect means.
- 14. "Subpoena" means this subpoena and any schedules or attachments thereto.
- 15. The use of the singular form of any word used herein shall include the plural and vice versa. The use of any tense of any verb includes all other tenses of the verb.

#### **B.** Particular Definitions

1. "Complainant" means Jessica Bakeman, Charlotte Bennett, Lindsey Boylan, Karen Hinton, Ana Liss, Alyssa McGrath, Anna Ruch, Sherry Vill, and any other individual who has made any Complaints known to You, any member of the Executive Chamber, or the public, whether anonymously or otherwise. For the avoidance of doubt, to the extent additional allegations come to light following the issuance of this Subpoena, individuals who make such allegations should be included in this definition.

- 2. "Complaint" means any and all complaints, allegations, comments, accusations, or other statements of workplace misconduct, sexual harassment, sex- or gender-based misconduct, or other behavior or comments of a sexual, abusive or otherwise inappropriate or uncomfortable nature, whether made formally or informally.
- 3. "Executive Chamber" means the Executive Chamber of the State of New York, including but not limited to Governor Andrew M. Cuomo, and all other officers, directors, supervisors, personnel, employees, secretaries, interns, fellows, agents, contractors, consultants, representatives, and attorneys of the Executive Chamber, or any other Persons associated with or acting on behalf of the foregoing, or acting on behalf of any predecessors, successors, or affiliates of the foregoing at any point during the relevant time.
- 4. "Governor" means the New York State Governor Andrew M. Cuomo.
- 5. "New York Attorney General" or "Attorney General" means the New York State Office of the Attorney General.
- 6. "Respondent," "You," or "Your" means Christopher "Chris" Charles Cuomo, and any agent, attorney, or other representative associated with or acting on behalf of You at any point during the relevant time.
- 7. "State" or "New York" means the State of New York.

#### C. Instructions

- 1. Preservation of Relevant Documents and Information; Spoliation. You are reminded of Your obligations under law to preserve Documents and information relevant or potentially relevant to this Subpoena from destruction or loss, and of the consequences of, and penalties available for, spoliation of evidence. No agreement, written or otherwise, purporting to modify, limit or otherwise vary the terms of this Subpoena, shall be construed in any way to narrow, qualify, eliminate or otherwise diminish Your aforementioned preservation obligations. Nor shall You act, in reliance upon any such agreement or otherwise, in any manner inconsistent with Your preservation obligations under law. No agreement purporting to modify, limit or otherwise vary Your preservation obligations under law shall be construed as in any way narrowing, qualifying, eliminating or otherwise diminishing such aforementioned preservation obligations, nor shall You act in reliance upon any such agreement, unless a Special Deputy to the First Deputy Attorney General confirms or acknowledges such agreement in writing, or makes such agreement a matter of record in open court.
- 2. <u>Possession, Custody, and Control.</u> The Subpoena calls for all responsive Documents or information in Your possession, custody or control. This includes, without limitation, Documents or information possessed or held by You or any of Your officers, directors, employees, agents, representatives, consultants,

divisions, affiliates, subsidiaries or Persons from whom You could request Documents or information. If Documents or information responsive to a request in this Subpoena are in Your control, but not in Your possession or custody, You shall promptly Identify the Person with possession or custody and notify that Person of the Person's obligation to preserve such Documents and provide them to You for production.

- 3. Documents No Longer in Your Possession. If any Document requested herein was formerly in Your possession, custody or control but is no longer available, or no longer exists, You shall submit a statement in writing under oath that: (a) describes in detail the nature of such Document and its contents; (b) Identifies the Person(s) who prepared such Document and its contents; (c) Identifies all Persons who have seen or had possession of such Document; (d) specifies the date(s) on which such Document was prepared, transmitted or received; (e) specifies the date(s) on which such Document became unavailable; (f) specifies the reason why such Document is unavailable, including without limitation whether it was misplaced, lost, destroyed or transferred; and if such Document has been destroyed or transferred, the conditions of and reasons for such destruction or transfer and the Identity of the Person(s) requesting and performing such destruction or transfer; and (g) Identifies all Persons with knowledge of any portion of the contents of the Document.
- 4. <u>No Documents Responsive to Subpoena Requests.</u> If there are no Documents responsive to any particular Subpoena request, You shall so state in writing under oath in the Affidavit of Compliance attached hereto, identifying the paragraph number(s) of the Subpoena request concerned.
- 5. <u>Format of Production.</u> You shall produce Documents and information responsive to this Subpoena in the format requested by the Office of the New York State Attorney General, as set out in Attachments 1 and 2 or as otherwise agreed upon.
- 6. <u>Databases.</u> To the extent that any data responsive to the requests herein is maintained in an electronic repository of records, such as a detailed transcription report, such information should be produced by querying the database for responsive information and generating a report or a reasonably usable and exportable electronic file (for example, \*.csv and/or \*.xls formats) for review. If it is not possible to export data in this format, You must make the database available to the undersigned for meaningful inspection and review of the information.
- 7. Existing Organization of Documents to be Preserved. Regardless of whether a production is in electronic or paper format, each Document shall be produced in the same form, sequence, organization or other order or layout in which it was maintained before production, including but not limited to production of any Document or other material indicating filing or other organization. Such production shall include without limitation any file folder, file jacket, cover or similar organizational material, as well as any folder bearing any title or legend

that contains no Document. Likewise, all Documents that are physically attached to each other in Your files shall remain so attached in any production; or if such production is electronic, shall be accompanied by notation or information sufficient to indicate clearly such physical attachment.

- 8. Manner of Compliance Custodians/Search Terms/Technology-Assisted Review. Prior consultation with the Special Deputies to the First Deputy Attorney General is required concerning selection of custodians for document searches (whether electronic or otherwise) or for use of search term filters, predictive coding or other forms of technology-assisted review. The Office of the Attorney General reserves the right to approve, disapprove, modify or supplement any proposed list of custodians, search terms, and/or review methodology. The selection or use of custodians, search term filters, and/or technology-assisted review in no way relieves You of Your obligation to fully respond to these requests for Documents or information.
- 9. <u>Document Numbering.</u> All Documents responsive to this Subpoena, regardless of whether produced or withheld on ground of privilege or other legal doctrine, and regardless of whether production is in electronic or paper format, shall be numbered in the lower right corner of each page of such Document, without disrupting or altering the form, sequence, organization or other order or layout in which such Documents were maintained before production. Such number shall comprise a prefix containing the producing Person's name or an abbreviation thereof, followed by a unique, sequential, identifying document control number.
- 10. <u>Privilege Placeholders.</u> For each Document withheld from production on ground of privilege or other legal doctrine, regardless of whether a production is electronic or in hard copy, You shall insert one or more placeholder page(s) in the production bearing the same document control number(s) borne by the Document withheld, in the sequential place(s) originally occupied by the Document before it was removed from the production.
- 11. Privilege. If You withhold or redact any Document responsive to this Subpoena on ground of any privilege or other legal doctrine, You shall submit with the Documents produced a statement in writing under oath, stating: (a) the document control number(s) of the Document withheld or redacted; (b) the type of Document; (c) the date of the Document; (d) the author(s) and recipient(s) of the Document; (e) the general subject matter of the Document; and (f) the legal ground for withholding or redacting the Document. If the legal ground for withholding or redacting the Document is attorney-client privilege, You shall indicate the name of the attorney(s) whose legal advice is sought or provided in the Document.
- 12. <u>Your Production Instructions to Be Produced.</u> You shall produce a copy of all written or otherwise recorded instructions prepared by You concerning the steps taken to respond to this Subpoena. For any unrecorded instructions given, You shall provide a written statement under oath from the Person(s) who gave such

- instructions that details the specific content of the instructions and any Person(s) to whom the instructions were given.
- 13. Cover Letter, Index, and Identifying Information. Accompanying any production(s) made pursuant to this Subpoena, You shall include a cover letter that shall at a minimum provide an index containing the following: (a) a description of the type and content of each Document produced therewith; (b) the paragraph number(s) of the Subpoena request(s) to which each such Document is responsive; (c) the Identity of the Custodian(s) of each such Document; and (d) the document control number(s) of each such Document. As further set forth in Attachment 2, information must also be included in the metadata and load files of each production concerning the identity of each Document's custodian, as well as information identifying the particular Document requests and/or information to which each document is responsive.
- 14. <u>Affidavit of Compliance.</u> A copy of the Affidavit of Compliance provided herewith shall be completed and executed by all natural persons supervising or participating in compliance with this Subpoena, and You shall submit such executed Affidavit(s) of Compliance with Your response to this Subpoena.
- 15. <u>Identification of Persons Preparing Production.</u> In a schedule attached to the Affidavit of Compliance provided herewith, You shall Identify the natural person(s) who prepared or assembled any productions or responses to this Subpoena. You shall further Identify the natural person(s) under whose personal supervision the preparation and assembly of productions and responses to this Subpoena occurred. You shall further Identify all other natural person(s) able to competently testify: (a) that such productions and responses are complete and correct to the best of such person's knowledge and belief; and (b) that any Documents produced are authentic, genuine and what they purport to be.
- 16. <u>Continuing Obligation to Produce.</u> This Subpoena imposes a continuing obligation to produce the Documents and information requested. Documents located or created, and information learned, acquired or created, at any time after Your response is due shall be promptly produced at the place specified in this Subpoena.
- 17. <u>No Oral Modifications.</u> No agreement purporting to modify, limit or otherwise vary this Subpoena shall be valid or binding, and You shall not act in reliance upon any such agreement, unless a Special Deputy to the First Deputy Attorney General confirms or acknowledges such agreement in writing, or makes such agreement a matter of record in open court.
- 18. <u>Time Period.</u> Unless otherwise specified, the time period covered by this Subpoena shall be from December 1, 2020 forward.

#### **D.** Documents to Be Produced

- 1. Any and all Documents concerning Communications with the Governor or any current or former member of the Executive Chamber relating to any Complaint concerning the Governor or any public or private response to any such Complaint.
- 2. Any and all other Documents relating to any Complaint concerning the Governor, including but not limited to any Communication relating to any response (whether public or private) to a Complaint.

#### ATTACHMENT 1

#### **Electronic Document Production Specifications**

Unless otherwise specified and agreed to by the Office of Attorney General, all responsive documents must be produced in LexisNexis® Concordance® format in accordance with the following instructions. Any questions regarding electronic document production should be directed to the Special Deputy to the First Deputy Attorney General whose telephone number appears on the subpoena.

- 1. <u>Concordance Production Components</u>. A Concordance production consists of the following component files, which must be produced in accordance with the specifications set forth below in Section 7.
  - A. *Metadata Load File.* A delimited text file that lists in columnar format the required metadata for each produced document.
  - B. *Extracted or OCR Text Files.* Document-level extracted text for each produced document or document-level optical character recognition ("OCR") text where extracted text is not available.
  - C. **Single-Page Image Files.** Individual petrified page images of the produced documents in tagged image format ("TIF"), with page-level Bates number endorsements.
  - D. *Opticon Load File.* A delimited text file that lists the single-page TIF files for each produced document and defines (i) the relative location of the TIF files on the production media and (ii) each document break.
  - E. *Native Files.* Native format versions of non-printable or non-print friendly produced documents.
- 2. <u>Production Folder Structure</u>. The production must be organized according to the following standard folder structure:
  - data\ (contains production load files)
  - images\ (contains single-page TIF files, with subfolder organization) \0001, \0002, \0003...
  - native\_files\ (contains native files, with subfolder organization) \0001, \0002, \0003...
  - text\ (contains text files, with subfolder organization) \0001, \0002, \0003...
- 3. <u>De-Duplication</u>. You must perform global de-duplication of stand-alone documents and email families against any prior productions pursuant to this or previously related subpoenas.
- 4. <u>Paper or Scanned Documents</u>. Documents that exist only in paper format must be scanned to single-page TIF files and OCR'd. The resulting electronic files should

be pursued in Concordance format pursuant to these instructions. You must contact the Special Deputy to the First Deputy Attorney General whose telephone number appears on the subpoena to discuss (i) any documents that cannot be scanned, and (ii) how information for scanned documents should be represented in the metadata load file.

5. <u>Structured Data</u>. Before producing structured data, including but not limited to relational databases, transactional data, and xml pages, you must first speak to the Special Deputy to the First Deputy Attorney General whose telephone number appears on the subpoena. Structured data is data that has a defined length and format and includes, but is not limited to, relational databases, graphical databases, JSON files, or xml/html pages.

#### A. Relational Databases

- 1. Database tables should be provided in CSV or other delimited machine-readable, non-proprietary format, with each table in a separate data file. The preferred delimiter is a vertical bar "|". If after speaking with the Special Deputy to the First Deputy Attorney General and it is determined that the data cannot be exported from a proprietary database, then the data can be produced in the proprietary format so long as the Office of the Attorney General is given sufficient access to that data.
- 2. Each database must have an accompanying Data Dictionary.
- 3. Dates and numbers must be clearly and consistently formatted and, where relevant, units of measure should be explained in the Data Dictionary.
- 4. Records must contain clear, unique identifiers, and the Data Dictionary must include explanations of how the files and records relate to one another.
- 5. Each data file must also have an accompanying summary file that provides total row counts for the entire dataset and total row counts.

#### B. Compression

1. If Documents are provided in a compressed archive, only standard lossless compression methods (e.g., gzip, bzip2, and ZIP) shall be used. Media files should be provided in their original file format, with metadata preserved and no additional lossy encoding applied.

6. Media and Encryption. All documents must be produced on CD, DVD, or hard-drive media. After consultation with the Special Deputy to the First Deputy Attorney General, Documents may also be produced over a secure file transfer protocol (FTP) or a pre-approved cloud-based platform (e.g., Amazon Web Services S3 bucket). All production media must be protected with a strong, randomly generated password containing at least 16 alphanumeric characters and encrypted using Advanced Encryption Standard with 256-bit key length (AES-256). Passwords for electronic documents, files, compressed archives and encrypted media must be provided separately from the media.

#### 7. <u>Production File Requirements</u>.

#### A. Metadata Load File

- Required file format:
  - o ASCII or UTF-8
  - Windows formatted CR + LF end of line characters, including full CR + LF on last record in file.
  - o .dat file extension
  - o Field delimiter: (ASCII decimal character 20)
  - o Text Qualifier: þ (ASCII decimal character 254). Date and pure numeric value fields do not require qualifiers.
  - o Multiple value field delimiter: ; (ASCII decimal character 59)
- The first line of the metadata load file must list all included fields. All required fields are listed in Attachment 2.
- Fields with no values must be represented by empty columns maintaining delimiters and qualifiers.
- *Note:* All documents must have page-level Bates numbering (except documents produced only in native format, which must be assigned a document-level Bates number). The metadata load file must list the beginning and ending Bates numbers (BEGDOC and ENDDOC) for each document. For document families, including but not limited to emails and attachments, compound documents, and uncompressed file containers, the metadata load file must also list the Bates range of the entire document family (ATTACHRANGE), beginning with the first Bates number (BEGDOC) of the "parent" document and ending with the last Bates number (ENDDOC) assigned to the last "child" in the document family.
- Date and Time metadata must be provided in separate columns.
- Accepted date formats:
  - o mm/dd/yyyy
  - o yyyy/mm/dd
  - o yyyymmdd
- Accepted time formats:
  - o hh:mm:ss (if not in 24-hour format, you must indicate am/pm)

#### o hh:mm:ss:mmm

#### B. Extracted or OCR Text Files

- You must produce individual document-level text files containing the full extracted text for each produced document.
- When extracted text is not available (for instance, for image-only documents) you must provide individual document-level text files containing the document's full OCR text.
- The filename for each text file must match the document's beginning Bates number (BEGDOC) listed in the metadata load file.
- Text files must be divided into subfolders containing no more than 500 to 1000 files.

#### C. Single-Page Image Files (Petrified Page Images)

- Where possible, all produced documents must be converted into single-page tagged image format ("TIF") files. See Section 7.E below for instructions on producing native versions of documents you are unable to convert.
- Image documents that exist only in non-TIF formats must be converted into TIF files. The original image format must be produced as a native file as described in Section 7.E below.
- For documents produced only in native format, you must provide a TIF placeholder that states "Document produced only in native format."
- Each single-page TIF file must be endorsed with a unique Bates number.
- The filename for each single-page TIF file must match the unique page-level Bates number (or document-level Bates number for documents produced only in native format).
- Required image file format:
  - o CCITT Group 4 compression
  - o 2-Bit black and white
  - o 300 dpi
  - o Either .tif or .tiff file extension.
- TIF files must be divided into subfolders containing no more than 500 to 1000 files. Where possible documents should not span multiple subfolders.

#### D. Opticon Load File

- Required file format:
  - ASCII
  - Windows formatted CR + LF end of line characters
  - o Field delimiter: , (ASCII decimal character 44)
  - No Text Qualifier
  - o .opt file extension

- The comma-delimited Opticon load file must contain the following seven fields (as indicated below, values for certain fields may be left blank):
  - o ALIAS or IMAGEKEY the unique Bates number assigned to each page of the production.
  - o VOLUME this value is optional and may be left blank.
  - RELATIVE PATH the filepath to each single-page image file on the production media.
  - O DOCUMENT BREAK defines the first page of a document. The only possible values for this field are "Y" or blank.
  - o FOLDER BREAK defines the first page of a folder. The only possible values for this field are "Y" or blank.
  - o BOX BREAK defines the first page of a box. The only possible values for this field are "Y" or blank.
  - o PAGE COUNT this value is optional and may be left blank.

#### • Example:

ABC00001,,IMAGES\0001\ABC00001.tif,Y,,,2 ABC00002,,IMAGES\0001\ABC00002.tif,,,, ABC00003,,IMAGES\0002\ABC00003.tif,Y,,,1 ABC00004,,IMAGES\0002\ABC00004.tif,Y,,,1

#### E. Native Files

- Non-printable or non-print friendly documents (including but not limited to spreadsheets, audio files, video files and documents for which color has significance to document fidelity) must be produced in their native format.
- The filename of each native file must match the document's beginning Bates number (BEGDOC) in the metadata load file and retain the original file extension.
- For documents produced only in native format, you must assign a single document-level Bates number and provide an image file placeholder that states "Document produced only in native format."
- The relative paths to all native files on the production media must be listed in the NATIVEFILE field of the metadata load file.
- Native files that are password-protected must be decrypted prior to conversion and produced in decrypted form. In cases where this cannot be achieved the document's password must be listed in the metadata load file. The password should be placed in the COMMENTS field with the format Password: <PASSWORD>.
- You may be required to supply a software license for proprietary documents produced only in native format.

### ATTACHMENT 2 Required Fields for Metadata Load File

FIELD NAME	FIELD DESCRIPTION	FIELD VALUE EXAMPLE <sup>1</sup>
DOCID	Unique document reference (can be used for de-duplication).	ABC0001 or ###.################################
BEGDOC	Bates number assigned to the first page of the document.	ABC0001
ENDDOC	Bates number assigned to the last page of the document.	ABC0002
BEGATTACH	Bates number assigned to the first page of the parent document in a document family ( <i>i.e.</i> , should be the same as BEGDOC of the parent document, or PARENTDOC).	ABC0001
ENDATTACH	Bates number assigned to the last page of the last child document in a family ( <i>i.e.</i> , should be the same as ENDDOC of the last child document).	ABC0008
ATTACHRANGE	Bates range of entire document family.	ABC0001 - ABC0008
PARENTDOC	BEGDOC of parent document.	ABC0001
CHILDDOCS	List of BEGDOCs of all child documents, delimited by ";" when field has multiple values.	ABC0002; ABC0003; ABC0004
DOCREQ	List of particular Requests for Documents to be Produced in the subpoena	1; 2; 3
INTERROG	List of particular Requests for Information or interrogatories in the subpoena	1; 2; 3
COMMENTS	Additional document comments, such as passwords for encrypted files.	

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<sup>&</sup>lt;sup>1</sup> Examples represent possible values and not required format unless the field format is specified in Attachment 1.

NATIVEFILE	Relative file path of the native file on the production media.	.\Native_File\Folder\\BE GDOC.ext
SOURCE	For scanned paper records this should be a description of the physical location of the original paper record. For loose electronic files this should be the name of the file server or workstation where the files were gathered.	Company Name, Department Name, Location, Box Number
CUSTODIAN	Owner of the document or file.	Firstname Lastname, Lastname, Firstname, User Name; Company Name, Department Name
FROM	Sender of the email.	Firstname Lastname < FLastname @domain >
ТО	All to: members or recipients, delimited by ";" when field has multiple values.	Firstname Lastname < FLastname @domain >; Firstname Lastname < FLastname @domain >;
CC	All cc: members, delimited by ";" when field has multiple values.	Firstname Lastname < FLastname @domain >; Firstname Lastname < FLastname @domain >;
BCC	All bcc: members, delimited by ";" when field has multiple values	Firstname Lastname < FLastname @domain >; Firstname Lastname < FLastname @domain >;
SUBJECT	Subject line of the email.	
DATERCVD	Date that an email was received.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
TIMERCVD	Time that an email was received.	hh:mm:ss AM/PM or hh:mm:ss
DATESENT	Date that an email was sent.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd

TIMESENT	Time that an email was sent.	hh:mm:ss AM/PM or hh:mm:ss	
CALBEGDATE	Date that a meeting begins.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd	
CALBEGTIME	Time that a meeting begins.	hh:mm:ss AM/PM or hh:mm:ss	
CALENDDATE	Date that a meeting ends.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd	
CALENDTIME	Time that a meeting ends.	hh:mm:ss AM/PM or hh:mm:ss	
CALENDARDUR	Duration of a meeting in hours.	0.75, 1.5	
ATTACHMENTS	List of filenames of all attachments, delimited by ";" when field has multiple values.	AttachmentFileName.; AttachmentFileName.doc x; AttachmentFileName.pdf;	
NUMATTACH	Number of attachments.	1, 2, 3, 4	
RECORDTYPE	General type of record.	IMAGE; LOOSE E-MAIL; E-MAIL; E-MAIL; E-DOC; IMAGE ATTACHMENT; LOOSE E-MAIL ATTACHMENT; E-MAIL ATTACHMENT; E-DOC ATTACHMENT	
FOLDERLOC	Original folder path of the produced document.	Drive:\Folder\\	
FILENAME	Original filename of the produced document.	Filename.ext	
DOCEXT	Original file extension.	html, xls, pdf	
DOCTYPE	Name of the program that created the produced document.	Adobe Acrobat, Microsoft Word, Microsoft Excel, Corel WordPerfect	
TITLE	Document title (if entered).		
AUTHOR	Name of the document author.	Firstname Lastname; Lastname, First Name; FLastname	
REVISION	Number of revisions to a document.	18	

DATECREATED	Date that a document was created.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
TIMECREATED	Time that a document was created.	hh:mm:ss AM/PM or hh:mm:ss
DATEMOD	Date that a document was last modified.	mm/dd/yyyy, yyyy/mm/dd, or yyyymmdd
TIMEMOD	Time that a document was last modified.	hh:mm:ss AM/PM or hh:mm:ss
FILESIZE	Original file size in bytes.	128, 512, 1024
PGCOUNT	Number of pages per document.	1, 2, 10, 100
IMPORTANCE	Email priority level if set.	Low, Normal, High
TIFFSTATUS	Generated by the Law Pre-discovery production tool (leave blank if inapplicable).	Y, C, E, W, N, P
DUPSTATUS	Generated by the Law Pre-discovery production tool (leave blank if inapplicable).	P
MD5HASH	MD5 hash value computed from native file (a/k/a file fingerprint).	BC1C5CA6C1945179FE E144F25F51087B
SHA1HASH	SHA1 hash value	B68F4F57223CA7DA358 4BAD7ECF111B8044F86 31
MSGINDEX	Email message ID	

#### AFFIDAVIT OF COMPLIANCE WITH SUBPOENA

Sta Co	te of
I,	, being duly sworn, state as follows:
1.	I am employed by Respondent in the position of;
2.	Respondent's productions and responses to the Subpoena of the Attorney General of the State of New York, dated, 20 (the "Subpoena") were prepared and assembled under my personal supervision;
3.	I made or caused to be made a diligent, complete and comprehensive search for all Documents and information requested by the Subpoena, in full accordance with the instructions and definitions set forth in the Subpoena;
4.	Respondent's productions and responses to the Subpoena are complete and correct to the best of my knowledge and belief;
5.	No Documents or information responsive to the Subpoena have been withheld from Respondent's production and response, other than responsive Documents or information withheld on the basis of a legal privilege or doctrine;
6.	All responsive Documents or information withheld on the basis of a legal privilege or doctrine have been identified on a privilege log composed and produced in accordance with the instructions in the Subpoena;
7.	The Documents contained in Respondent's productions and responses to the Subpoena are authentic, genuine and what they purport to be;
8.	Attached is a true and accurate record of all persons who prepared and assembled any productions and responses to the Subpoena, all persons under whose personal supervision the preparation and assembly of productions and responses to the Subpoena occurred, and all persons able competently to testify: (a) that such productions and responses are complete and correct to the best of such person's knowledge and belief; and (b) that any Documents produced are authentic,

genuine and what they purport to be; and

9.	Attached is a true and accurate statement of those requests under the Subpoena as to which no responsive Documents were located in the course of the aforementioned search.		
	Signature of Affiant	Date	
	Printed Name of Affiant		
	* *	*	
Subsc	ribed and sworn to before me this	_ day of	, 20
	, Notary Pu	ublic	
Му со	ommission expires:		

Monday, March 1 2021 01:27 PM Date: Subject: RE: one sendtence added to end - everyone OK w this? Peter Ajemian @exec.ny.gov > From: 'Jefrey Pollock' @globalstrategygroup.com >; Melissa DeRosa @exec.ny.gov >; To: Richard Azzopardi @exec.ny.gov >; Christopher Cuomo @gmail.com >; Josh Vlasto CC: @gmail.com>; Shipped without that line From: Jefrey Pollock @globalstrategygroup.com > Sent: Monday, March 1, 2021 1:01 PM **To:** Melissa DeRosa @exec.ny.gov >; Peter Ajemian @exec.ny.gov>; Richard Azzopardi @exec.ny.gov > Cc: Christopher Cuomo @gmail.com>; Josh Vlasto @gmail.com> Subject: RE: one sendtence added to end - everyone OK w this? I prefer this one to the one with the garbage line. From: Melissa DeRosa @exec.ny.gov> Sent: Monday, March 1, 2021 12:51 PM @exec.ny.gov>; Richard Azzopardi To: Peter Ajemian @exec.ny.gov> @globalstrategygroup.com >; Christopher Cuomo Cc: Jefrey Pollock Josh Vlasto @gmail.com> Subject: Re: one sendtence added to end - everyone OK w this?

#### [EXT EMAIL]

"This is malicious and untrue. I have worked incredibly hard to get where I am and always thought my work should and did speak for itself. There have been misogynistic rumors in Albany and in government for years but I never thought I'd have to respond to them in the press. The Governor and I have never had an intimate relationship. The Governor and I have been close friends and colleagues for over ten years -- we've had countless meals together and suggestions or innuendo around that is inappropriate, offensive and wrong."

- Melissa DeRosa

From: Melissa DeRosa

**Sent:** Monday, March 01, 2021 12:45 PM **To:** Peter Ajemian; Richard Azzopardi

Cc: Jefrey Pollock; Christopher Cuomo; Josh Vlasto
Subject: one sendtence added to end - everyone OK w this?

Christopher Cuomo

Exhibit 3

PB - 07.15.21.

"This is malicious and untrue. I have worked incredibly hard to get where I am and always thought my work should and did speak for itself. There have been misogynistic rumors in Albany and in government for years but I never thought I'd have to respond to them in the press. The Governor and I have never had an intimate relationship. The Governor and I have been close friends and colleagues for over ten years -- we've had countless meals together and suggestions or innuendo around that is inappropriate, offensive and wrong.

This kind of garbage should no longer be the cost of being a successful woman." - Melissa DeRosa

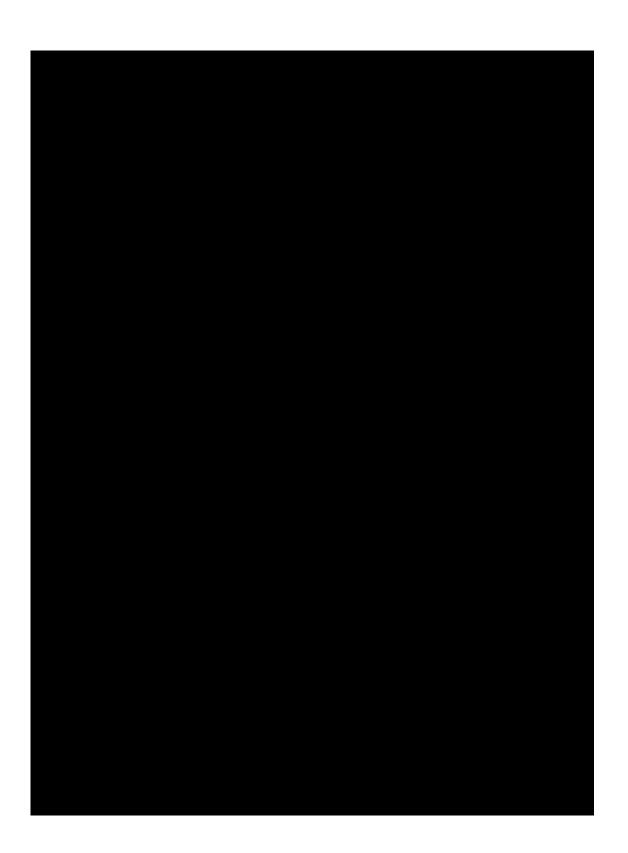
From: Melissa DeRosa

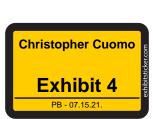
Sent: Monday, March 01, 2021 12:18 PM To: Peter Ajemian; Richard Azzopardi

Cc: Jefrey Pollock; Christopher Cuomo; Josh Vlasto

Subject:

"This is malicious and untrue. I have worked incredibly hard to get where I am and always thought my work should and did speak for itself. There have been misogynistic rumors in Albany and in government for years but I never thought I'd have to respond to them in the press. The Governor and I have never had an intimate relationship. The Governor and I have been close friends and colleagues for over ten years -- we've had countless meals together and suggestions or innuendo around that is inappropriate, offensive and wrong." - Melissa DeRosa

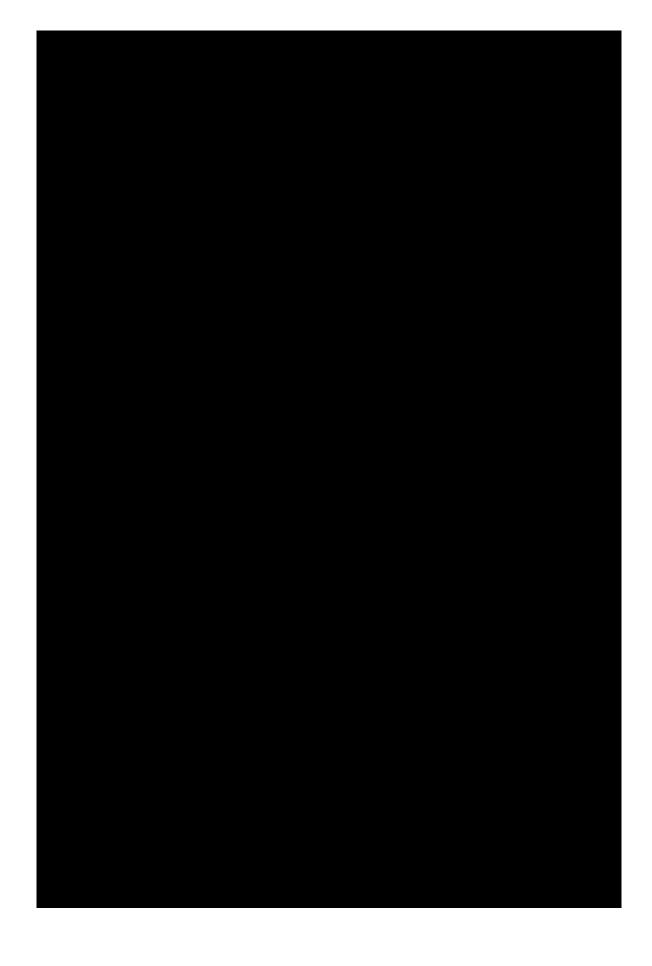


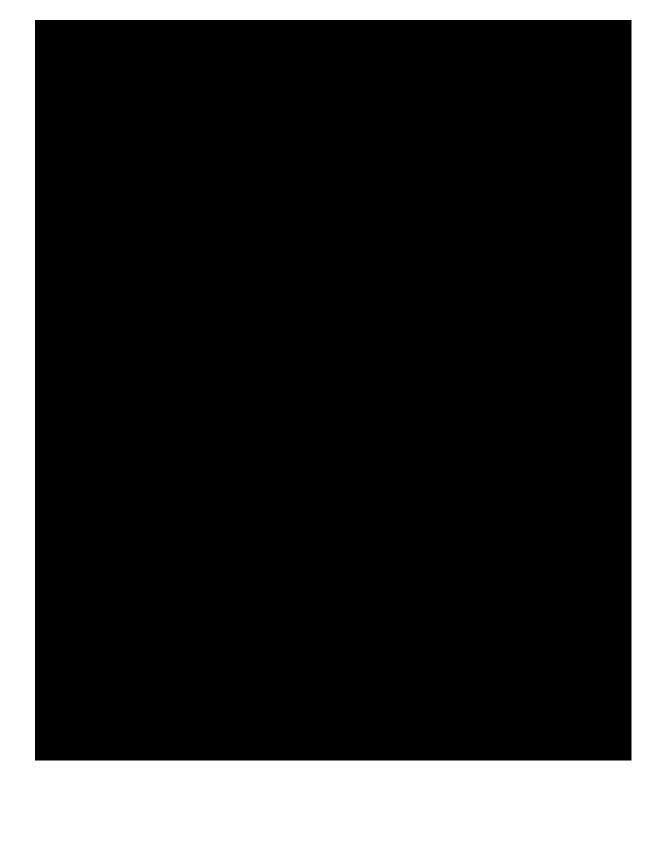


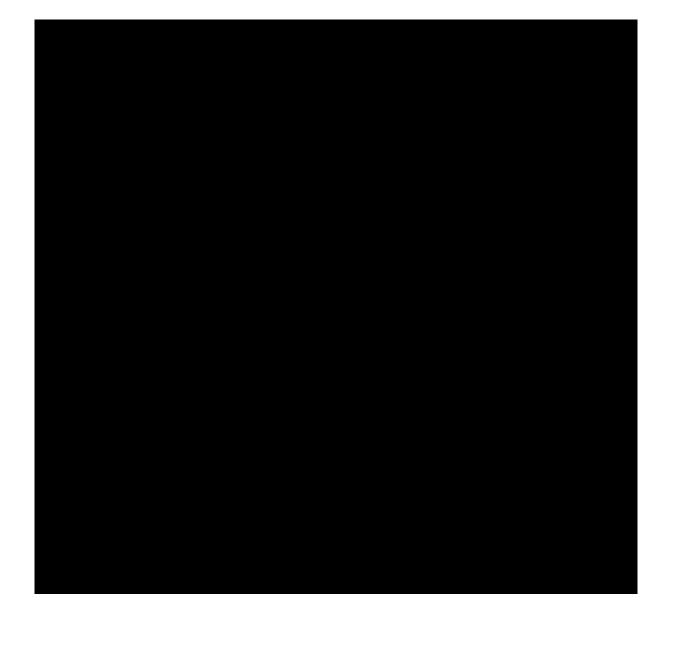






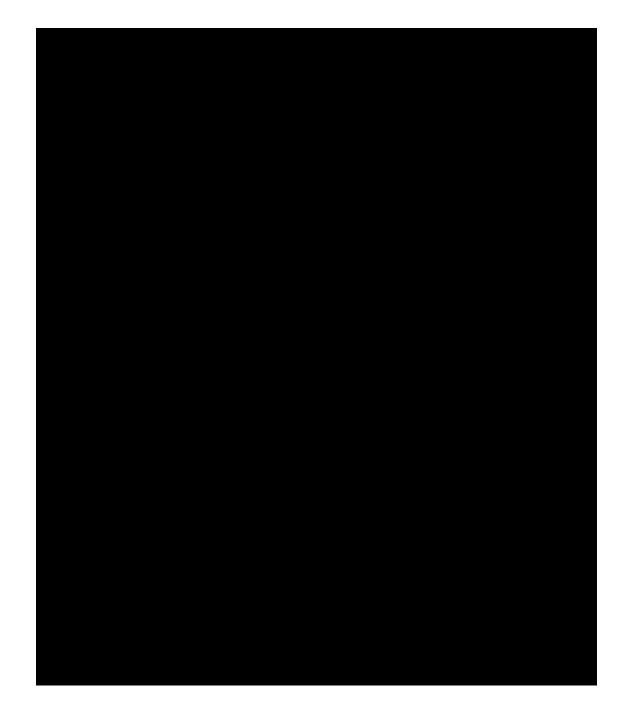










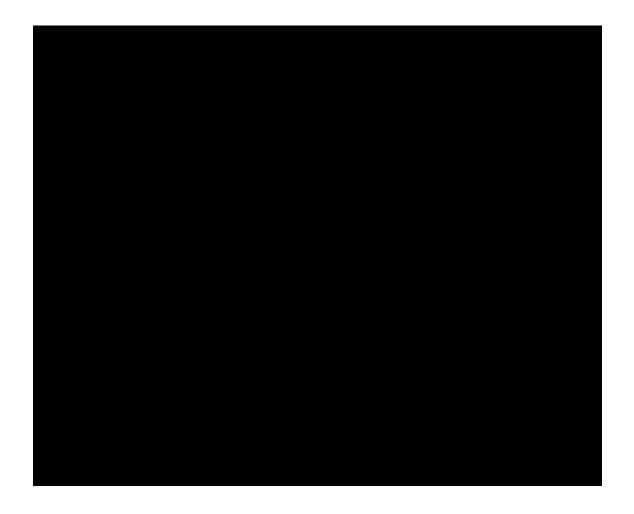
























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Andrew Cuomo 

@NYGovCuomo

Father, fisherman, n enthusiast, 56th Go

Jerry Avenaim 

@avenaim

Award winning pho Fashion, Celebrity, / -Chicago Native -Lc Mental Health Advo

# What's happening

 ${\sf Entertainment} \cdot {\sf LIVE}$ 

Happy birthday, Tom Holla

Trending with Tom Holland

Music · Trending

JUST ANNOUNCED

17K Tweets

Trending in United States

#### **HELP THE BEAR**

People react to a viral TikTok fearlessly pushing a bear awa before running inside to pro-4,843 Tweets

COVID-19 · LIVE

New York: COVID-19: New! updates for New York

Holidays · 1 hour ago

Pride Month celebrations k across the world

Trending with #pride . LGBTQ

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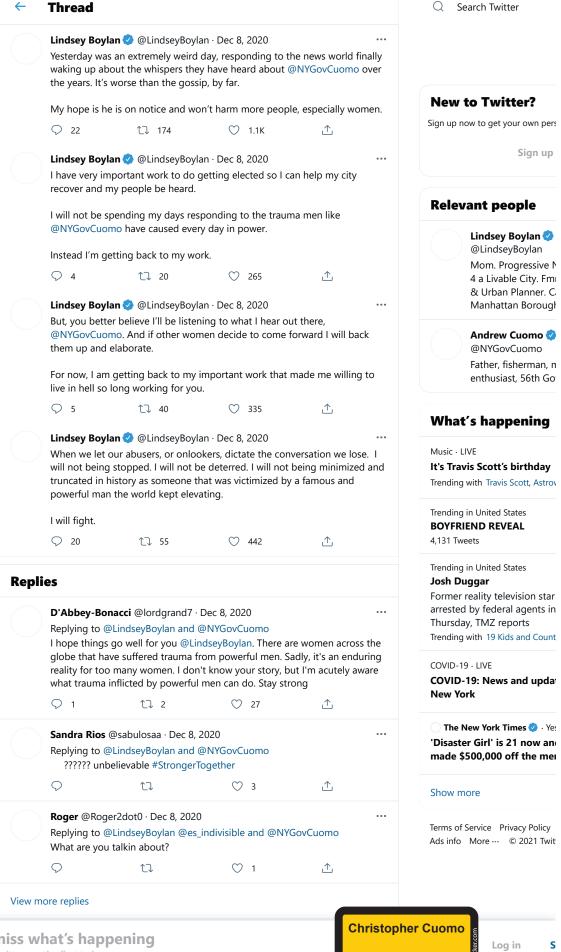
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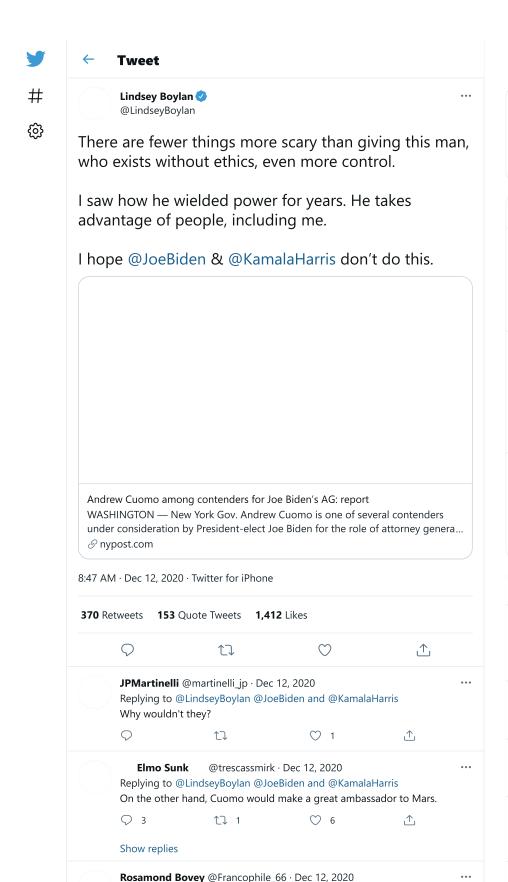
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1/5



Replying to @LindseyBoylan @JoeBiden and @KamalaHarris

There are better candidates like Yates. Come on.

Andrew Karter @AndrewKarter · Dec 12, 2020

17

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Joe Biden 📀

@JoeBiden

United States gov Husband to @DrBide and grandfather. Rea better for all America account is @POTUS.

Kamala Harris

@KamalaHarris

United States gov Fighting for the peop Auntie. She/her. Offic @VP.

# What's happening

NCAA Men's Basketball · LIVE

#### Georgetown Hoyas at Color Buffaloes

Trending with Hoyas, Georgetown

Trending in United States

Ms. Frizzle

92.8K Tweets

 ${\sf Politics}\cdot{\sf Trending}$ 

Goofus

2,239 Tweets

COVID-19 · LIVE

COVID-19: News and update New York

NCAA Men's Basketball  $\cdot$  LIVE

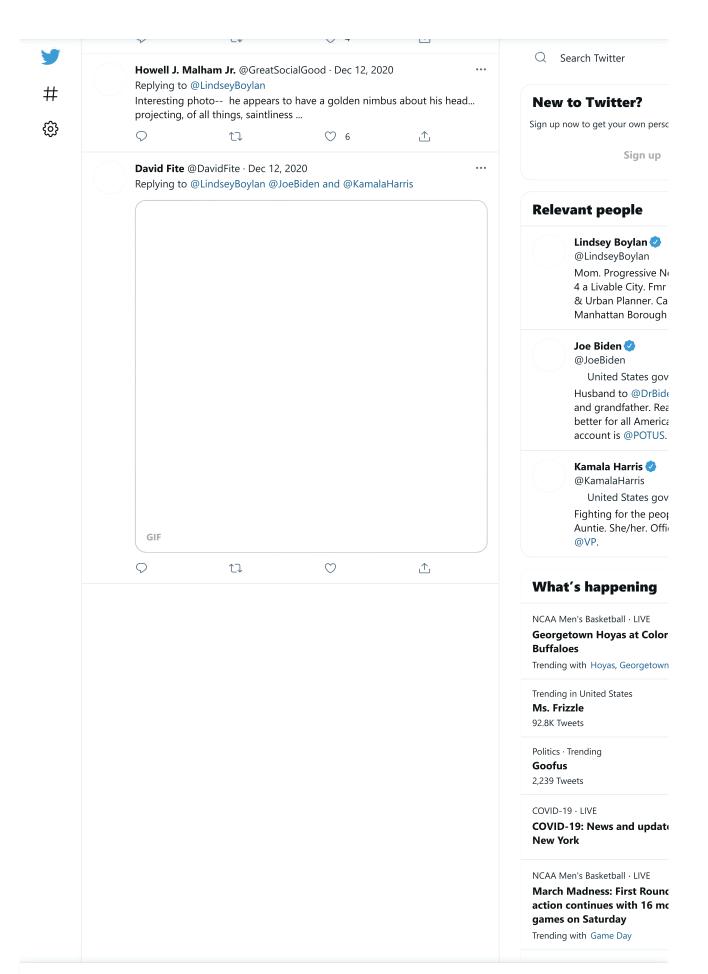
March Madness: First Rounc action continues with 16 mc games on Saturday

Trending with Game Day

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# **Relevant people**



# Lindsey Boylan 📀



@LindseyBoylan Mom. Progressive No 4 a Livable City. Fmr & Urban Planner. Ca Manhattan Borough



#### Joe Biden 📀



@JoeBiden

United States gov Husband to @DrBide and grandfather. Rea better for all America account is @POTUS.



#### Kamala Harris



@KamalaHarris

United States gov Fighting for the peop Auntie. She/her. Office @VP.

# What's happening

NCAA Men's Basketball · LIVE

#### **Georgetown Hoyas at Color Buffaloes**

Trending with Hoyas, Georgetown

Trending in United States

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92.8K Tweets

Politics · Trending Goofus

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COVID-19 · LIVE

COVID-19: News and update **New York** 

NCAA Men's Basketball · LIVE

**March Madness: First Rounc** action continues with 16 mc games on Saturday

Trending with Game Day









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Lindsey Boylan OLindseyBoylan

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# What's happening

World news · Yesterday

Chinese government says t first human case of H10N3 flu is unlikely to spread

Trending in United States

# Concorde

1,700 Tweets

Music · Trending **Olamide** 

24.2K Tweets

COVID-19 · LIVE

New York: COVID-19: New! updates for New York

BuzzFeed News 🤣 · Last nig

Tulsa Raised Millions of Do To Memorialize The 1921 Massacre. Not Much Went The Black Community.

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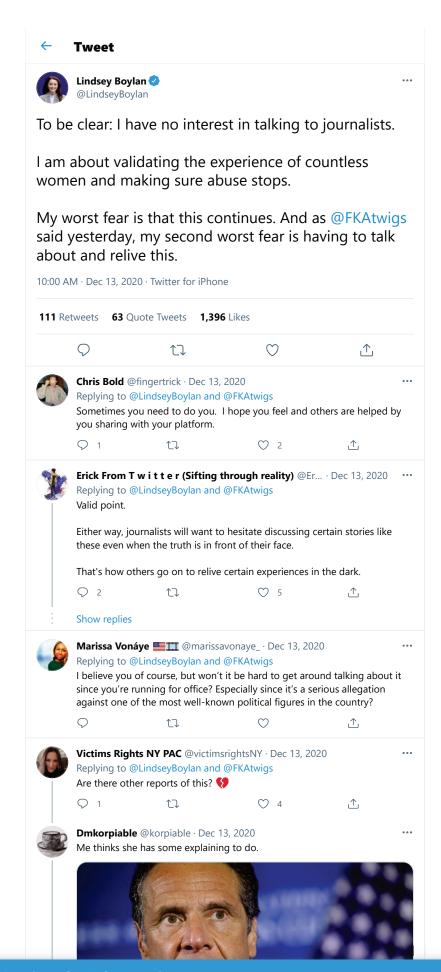
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#### Relevant people



Lindsey Boylan 📀 @LindseyBoylan

Mom. Progressive N Fighting 4 a Livable Govt Official & Urba Candidate 4 Manha (She/Her)



FKA twigs 📀 @FKAtwigs

# What's happening

Gaming · LIVE

**Summer Game Fest 2021** 

Trending with Elden Ring, #SummerGameFest (

Video games · Trending

#### **Call of Duty**

27.6K Tweets

Video games · Trending

#### IT'S REAL

96.5K Tweets

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# **Lindsey Boylan**

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# My story of working with Governor Cuomo



Lindsey Boylan Feb 24 · 8 min read

"Let's play strip poker."

I should have been shocked by the Governor's crude comment, but I wasn't.

We were flying home from an October 2017 event in Western New York on his taxpayerfunded jet. He was seated facing me, so close our knees almost touched. His press aide was to my right and a state trooper behind us.



"That's exactly what I was thinking," I responded sarcastically and awkwardly. I tried to play it cool. But in that moment, I realized just how acquiescent I had become.

Governor Andrew Cuomo has created a culture within his administration where sexual harassment and bullying is so pervasive that it is not only condoned but expected. His inappropriate behavior toward women was an affirmation that he liked you, that you must be doing something right. He used intimidation to silence his critics. And if you dared to speak up, you would face consequences.

That's why I panicked on the morning of December 13.

While enjoying a weekend with my husband and six-year-old daughter, I spontaneously decided to share a small part of the truth I had hidden for so long in shame and never planned to disclose. The night before, a former Cuomo staffer confided to me that she, too, had been the subject of the Governor's workplace harassment. Her story mirrored my own. Seeing his name floated as a potential candidate for U.S. Attorney General — the highest law enforcement official in the land — set me off.

In a few tweets, I told the world what a few close friends, family members and my therapist had known for years: Andrew Cuomo abused his power as Governor to sexually harass me, just as he had done with so many other women.

As messages from journalists buzzed on my phone, I laid in bed unable to move. I finally had decided to speak up, but at what cost?

Parts of a supposed confidential personnel file (which I've never seen) were leaked to the media in an effort to smear me. The Governor's loyalists called around town, asking about me.

Last week, Assemblymember Ron Kim spoke out publicly about the intimidation and abuse he has faced from Governor Cuomo and his aides. As Mayor de Blasio remarked, "the bullying is nothing new." There are many more of us, but most are too afraid to speak up.

I'm compelled to tell my story because no woman should feel forced to hide their experiences of workplace intimidation, harassment and humiliation — not by the Governor or anyone else.

I expect the Governor and his top aides will attempt to further disparage me, just as they've done with Assemblymember Kim. They'd lose their jobs if they didn't protect him. That's how his administration works. I know because I was a part of it.

I joined state government in 2015 as a Vice President at Empire State Development. I was quickly promoted to Chief of Staff at the state economic development agency. The

news of my appointment prompted a warning from a friend who served as an executive with an influential civic engagement organization: "Be careful around the Governor."

My first encounter with the Governor came at a January 6, 2016, event at Madison Square Garden to promote the new Pennsylvania Station-Farley Complex project. After his speech, he stopped to talk to me. I was new on the job and surprised by how much attention he paid me.

My boss soon informed me that the Governor had a "crush" on me. It was an uncomfortable but all-too-familiar feeling: the struggle to be taken seriously by a powerful man who tied my worth to my body and my appearance.

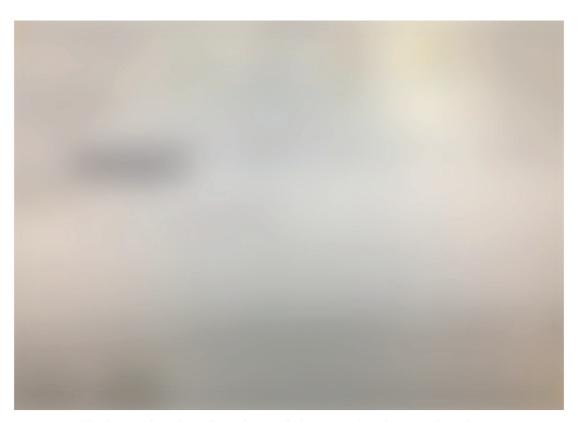
Stephanie Benton, Director of the Governor's Offices, told me in an email on December 14, 2016 that the Governor suggested I look up images of Lisa Shields — his rumored former girlfriend — because "we could be sisters" and I was "the better looking sister." The Governor began calling me "Lisa" in front of colleagues. It was degrading.





The Governor's staff was directed to tell me I looked like his rumored former girlfriend.

I had complained to friends that the Governor would go out of his way to touch me on my lower back, arms and legs. His senior staff began keeping tabs on my whereabouts. "He is a sexist pig and you should avoid being alone with him!" my mother texted me on November 4, 2016.



The Governor's senior staff member emailed my supervisor about my whereabouts.

I shared my concern with my mother at the time.

The Governor's behavior made me nervous, but I didn't truly fear him until December 2016. Senior State employees gathered at the Empire State Plaza Convention Center in Albany to celebrate the holidays and our year's work. After his remarks, the Governor spotted me in a room filled with hundreds of people waiting to shake his hand. As he began to approach me, I excused myself from coworkers and moved upstairs to a more distant area of the party.

Minutes later, I received a call from an unlisted number. It was the Governor's body person. He told me to come to the Capitol because the Governor wanted to see me.

I made my way through the underground connection that linked the Plaza to the Capitol. As the black wrought-iron elevator took me to the second floor, I called my husband. I told him I was afraid of what might happen. That was unlike me. I was never afraid.

I exited the elevator to see the body person waiting for me. He walked me down the Hall of Governors. "Are there cameras here?" I asked him. I remembered my mother's text

warning the month before. I worried that I would be left alone with the Governor. I didn't know why I was there. Or how it would end.

I was escorted into the Governor's office, past the desks of administrative assistants and into a room with a large table and historical artifacts. The door closed behind me. It was my first time in his Albany office. The Governor entered the room from another door. We were alone.

As he showed me around, I tried to maintain my distance. He paused at one point and smirked as he showed off a cigar box. He told me that President Clinton had given it to him while he served as the Secretary of Housing and Urban Development. The two-decade old reference to President Clinton's affair with Monica Lewinsky was not lost on me.

The Governor must have sensed my fear because he finally let me out of the office. I tried to rationalize this incident in my head. At least he didn't touch me. That made me feel safer.

His inappropriate gestures became more frequent. He gave roses to female staffers on Valentine's Day and arranged to have one delivered to me, the only one on my floor. A signed photograph of the Governor appeared in my closed-door office while I was out. These were not-so-subtle reminders of the Governor exploiting the power dynamic with the women around him.

In 2018, I was promoted to Deputy Secretary for Economic Development and Special Advisor to the Governor. I initially turned the job down — not because I didn't want the responsibility or work but because I didn't want to be near him. I finally accepted the position at the Governor's insistence with one requirement — I would keep my old agency office and remain on a separate floor from him and his inner circle.

The Governor's pervasive harassment extended beyond just me. He made unflattering comments about the weight of female colleagues. He ridiculed them about their romantic relationships and significant others. He said the reasons that men get women were "money and power."

I tried to excuse his behavior. I told myself "it's only words." But that changed after a one-on-one briefing with the Governor to update him on economic and infrastructure projects. We were in his New York City office on Third Avenue. As I got up to leave and walk toward an open door, he stepped in front of me and kissed me on the lips. I was in shock, but I kept walking.

I left past the desk of Stephanie Benton. I was scared she had seen the kiss. The idea that someone might think I held my high-ranking position because of the Governor's "crush" on me was more demeaning than the kiss itself.

After that, my fears worsened. I came to work nauseous every day. My relationship with his senior team — mostly women — grew hostile after I started speaking up for myself. I

was reprimanded and told to get in line by his top aides, but I could no longer ignore it.

On September 26, 2018, I sent a mass email informing staff members of my resignation.

There is a part of me that will never forgive myself for being a victim for so long, for trying to ignore behavior that I knew was wrong. The Governor exploited my weaknesses, my desire to do good work and to be respected. I was made to believe this was the world I needed to survive in.

It was all so normalized — particularly by Melissa DeRosa and other top women around him — that only now do I realize how insidious his abuse was.

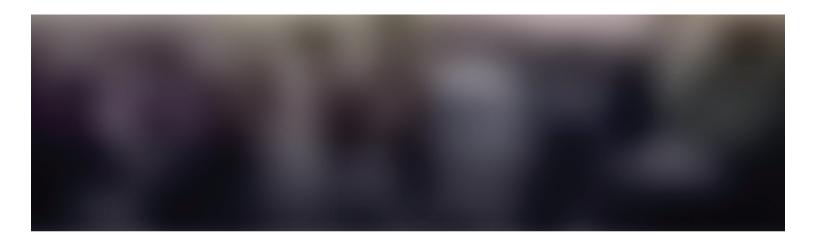
After my tweets about the Governor in December, two women reached out to me with their own experiences. One described how she lived in constant fear, scared of what would happen to her if she rejected the Governor's advances. The other said she was instructed by the Governor to warn staff members who upset him that their jobs could be at risk. Both told me they are too afraid to speak out.

I know some will brush off my experience as trivial. We are accustomed to powerful men behaving badly when no one is watching. But what does it say about us when everyone is watching and no one says a thing? Telling my truth isn't about seeking revenge. I was proud to work in the Cuomo Administration. For so long I had looked up to the Governor. But his abusive behavior needs to stop.

I am speaking up because I have the privilege to do so when many others do not. No one should have to be defined or destroyed by this kind of sexual harassment. Nor should they be revictimized if they decide to speak their own truth.

I hope that sharing my story will clear the path for other women to do the same.





About Help Legal

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To: Peter Ajemian[ Dexec.ny.gov]; Richard Azzopar	di[ @exec.ny.gov]; Linda A Lacewell (dfs.ny.gov @dfs.ny.gov]; Josh Vlasto			
gmail.com]				
Cc: Melissa DeRosa (exec.ny.gov); Christopher Cuomo	@gmail.com]; Dani Lever @gmail.com]; Jefrey Pollock @globalstrategygroup.com];			
Lis Smitl gmail.com]; Stephanie Benton	@exec.ny.gov]; Steven Cohen (esd.ny.gov)			
From: Judith Mogul[/O=NYEC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5DA2632596FB4016A2FACBD65E5C9CEB-JUDITH				
MOGUL]				
Sent: Sat 2/27/2021 4:00:49 PM Eastern Standard Time				
Subject: Re: Current Statement				

actual answer should be - but need to clear this - that we will set no limits on the scope of the review and that Judge Jones will determine the appropriate scope of the review

From: Peter Ajemian

Sent: Saturday, February 27, 2021 3:55 PM

To: Richard Azzopardi; Linda A Lacewell (dfs.ny.gov); Josh Vlasto

Cc: Melissa DeRosa; Christopher Cuomo; Dani Lever; Jefrey Pollock; Judith Mogul; Lis Smith; Stephanie Benton; Steven Cohen (esd.ny.gov)

Subject: Re: Current Statement

What is the answer to this question?

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

From: Richard Azzopardi

**Sent:** Saturday, February 27, 2021 3:07 PM **To:** Linda A Lacewell (dfs.ny.gov); Josh Vlasto

Cc: Melissa DeRosa; Christopher Cuomo; Dani Lever; Jefrey Pollock; Judith Mogul; Lis Smith; Peter Ajemian; Stephanie Benton; Steven Cohen (esd.ny.gov)

Subject: Re: Current Statement

Maybe we say wideranging review? All I'm saying is that this will be the first followup.

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

From: Lacewell, Linda A (DFS)

Sent: Saturday, February 27, 2021 3:04 PM

To: Josh Vlasto

Cc: Melissa DeRosa; Christopher Cuomo; Dani Lever; Jefrey Pollock; Judith Mogul; Lis Smith; Peter Ajemian; Richard Azzopardi; Stephanie Benton; Steven Cohen

(esd.ny.gov)

Subject: Re: Current Statement

Rich; Although in no way required by law, the Governor has requested an independent review and all staff will cooperate in that endeavor. Former Federal Judge Barbara Jones will lead the review.

Sent from my iPhone

On Feb 27, 2021, at 3:02 PM, Josh Vlasto @gmail.com> wrote:

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Spoke to MDR

This clause has to come out

nor did I ever think that I was acting in any way that was inappropriate

On Sat, Feb 27, 2021 at 2:56 PM Melissa DeRosa < exec.ny.gov> wrote:

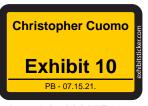
Ms. Bennett was a hardworking and valued member of our team during COVID. She has every right to speak out.

When she came to me and opened up about being a sexual assault survivor and how it shaped her and her ongoing efforts to create an organization that empowered her voice to help other survivors, I tried to be supportive and helpful. Ms. Bennett's initial impression was right: I was trying to be a mentor to her. I never made advances toward Ms. Bennett nor did I ever think that I was acting in any way that was inappropriate. The last thing I would ever have wanted was to make her feel any of the things that are being reported.

This situation cannot and should not be resolved in the press so I believe the best way to get to the truth is through a full and thorough outside review and I am directing all state employees to comply with that effort. I will have no further comment until the review has concluded.

From: Judith Mogul

Sent: Saturday, February 27, 2021 2:49 PM



To: Peter Aiemian: Jefrev Pollock

Cc: Richard Azzopardi; Melissa DeRosa; Linda A Lacewell (dfs.ny.gov); Lis Smith; Josh Vlasto; Stephanie Benton; Steven Cohen (esd.ny.gov);

Christopher Cuomo; Dani Lever

Subject: Re: Current Statement

paternalistic is not a good think it means patronizingly looking down on someone - I think we mean paternal if we are going to say anything like that at all

From: Peter Ajemian

Sent: Saturday, February 27, 2021 2:46 PM

To: Jefrey Pollock

Cc: Richard Azzopardi; Melissa DeRosa; Linda A Lacewell (dfs.ny.gov); Lis Smith; Josh Vlasto; Judith Mogul; Stephanie Benton; Steven Cohen

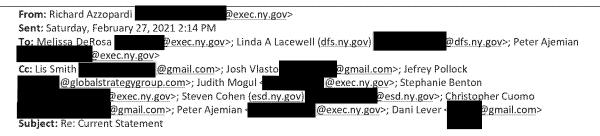
(esd.ny.gov); Christopher Cuomo; Dani Lever

Subject: Re: Current Statement

The word "paternal" is NOT in the copy. She referred to him as a being like a "father figure" at one point when she first started working

On Feb 27, 2021, at 2:21 PM, Jefrey Pollock @globalstrategygroup.com> wrote:

I retract my last comment about the broader one. But I still think unless paternalistic is in the story we should change. And if it IS in the story I might even put it in quotes? Peter?



TENT EMANT

Minor grammatical to next to last sentence.

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

From: Melissa DeRosa

Sent: Saturday, February 27, 2021 2:08 PM To: Linda A Lacewell (dfs.ny.gov); Peter Ajemian

Cc: Richard Azzopardi; Lis Smith; Josh Vlasto; Jefrey Pollock; Judith Mogul; Stephanie Benton; Steven Cohen (esd.ny.gov); Christopher Cuomo; Peter Ajemian; Dani Lever

Subject: Current Statement

Statement draft:

Ms. Bennett has every right to speak out. She was a hardworking and valued member of our team during COVID.

When she came to me and opened up about being a sexual assault survivor and how it shaped her and her ongoing efforts to create an organization that empowered her voice to help other survivors, I tried to be supportive and helpful. Ms. Bennett's initial impression was right: I was trying to be paternalistic towards her and help mentor her. I never made advances toward Ms. Bennett nor did I ever think that I was acting in any way that was inappropriate. The last thing I would ever have wanted was to make her feel any of the things that are being reported.

This situation cannot and should not be resolved in the press so I believe the best way to get to the truth is through a full and thorough outside review and I am directing all state employees to comply with that effort. I will have no further comment until the review has concluded.



FEBRUARY 27, 2021 Albany, NY

# Statement From Governor Andrew M. Cuomo

# Statement From Governor Andrew M. Cuomo

"Ms. Bennett was a hardworking and valued member of our team during COVID. She has every right to speak out.

"When she came to me and opened up about being a sexual assault survivor and how it shaped her and her ongoing efforts to create an organization that empowered her voice to help other survivors, I tried to be supportive and helpful. Ms. Bennett's initial impression was right: I was trying to be a mentor to her. I never made advances toward Ms. Bennett nor did I ever intend to act in any way that was inappropriate. The last thing I would ever have wanted was to make her feel any of the things that are being reported.

"This situation cannot and should not be resolved in the press; I believe the best way to get to the truth is through a full and thorough outside review and I am directing all state employees to comply with that effort. I ask all New Yorkers to await the findings of the review so that they know the facts before making any judgements. I will have no further comment until the review has concluded."

# STATEMENT FROM BETH GARVEY, SPECIAL COUNSEL AND SENIOR ADVISOR TO THE GOVERNOR

"Ms. Bennett's concerns were treated with sensitivity and respect and in accordance with applicable law and policy.

"The matter was promptly escalated to special counsel. Ms. Bennett received the transfer she requested to a position in which she had expressed a long-standing interest, and was

thoroughly debriefed on the facts which did not include a claim of physical contact or inappropriate sexual conduct. She was consulted regarding the resolution, and expressed satisfaction and appreciation for the way in which it was handled.

"The determination reached based on the information Ms Bennett provided was that no further action was required which was consistent with Ms Bennett's wishes.

"Although in no way required by law, the Governor has requested an independent review and all staff will cooperate in that endeavor. Former Federal Judge Barbara Jones will lead the review."

# **Contact the Governor's Press Office**

Contact us by phone:

Albany: (518) 474 - 8418

New York City: (212) 681 - 4640

Contact us

by email: <u>Press.Office@exec.ny.gov</u>



Date: Saturday, February 27 2021 07:28 PM

Subject: [Chat #4617]

From: Joshua Vlasto < [Chris Cuomo]; To:

If people accept it, then we live with Jones and she does her thing and we hope another woman one doesn't

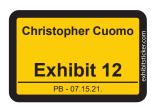
drop

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

ICCID:



Date: Saturday, February 27 2021 07:28 PM

Subject: [Chat #4618]

From: Joshua Vlasto <

To: [Chris Cuomo];

If they don't, then tish jumps in and gets a special prosecutor

----METADATA INFORMATION----- Device Owner:

Josh Vlasto

ICCID:

Date: Saturday, February 27 2021 07:28 PM

Subject: [Chat #4619]

From: Joshua Vlasto <

To: [Chris Cuomo];

And then it's a tougher situation but still survivable

----METADATA INFORMATION----Device Owner:

Josh Vlasto

Date: Saturday, February 27 2021 07:29 PM

Subject: [Chat #4620]

From: Joshua Vlasto <
To: [Chris Cuomo];

But the leaders have weighed in so no quick push to resign so that means we do live to fight another day

Device Owner:
Josh Vlasto
ICCID:

Date: Saturday, February 27 2021 07:35 PM

Subject: [Chat #4622]

From: Joshua Vlasto < To: [Chris Cuomo];

Special counsel probably the technical term

----METADATA INFORMATION----

**Device Owner:** 

Josh Vlasto

Date: Saturday, February 27 2021 07:36 PM

Subject: [Chat #4623]

From: Joshua Vlasto < >
To: [Chris Cuomo];

It's what the gov did when he was ag with Judith Kaye on Paterson domestic violence cover up

----METADATA INFORMATION- ---Device Owner:

Josh Vlasto
ICCID:

Date: Saturday, February 27 2021 08:21 PM

Subject: [Chat #4625]

From: Joshua Vlasto < > To: [Chris Cuomo];

Wrap it

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Saturday, February 27 2021 08:21 PM

Subject: [Chat #4626]

From: Joshua Vlasto >
To: [Chris Cuomo];

up

----METADATA INFORMATION----

**Device Owner:** 

Josh Vlasto

Date: Saturday, February 27 2021 08:21 PM

Subject: [Chat #4627]

From: Joshua Vlasto < >
To: [Chris Cuomo];

Getting loose

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Saturday, February 27 2021 08:33 PM

Subject: [Chat #4629]

From: Joshua Vlasto <

To: [Chris Cuomo];

We are. Just need to be focused on the details too

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Saturday, February 27 2021 08:33 PM

Subject: [Chat #4630]

From: Joshua Vlasto <

To: [Chris Cuomo];

All fine and aggressive is good

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Saturday, February 27 2021 09:18 PM

Subject: [Chat #4632]

From: Joshua Vlasto <
To: [Chris Cuomo];

Attachments: DE343E4B-0DD6-4751-9458-DB01D488736A.pluginPayloadAttachment

https://twitter.com/ZackFinkNews/status/1365848104231194624

----METADATA INFORMATION-----

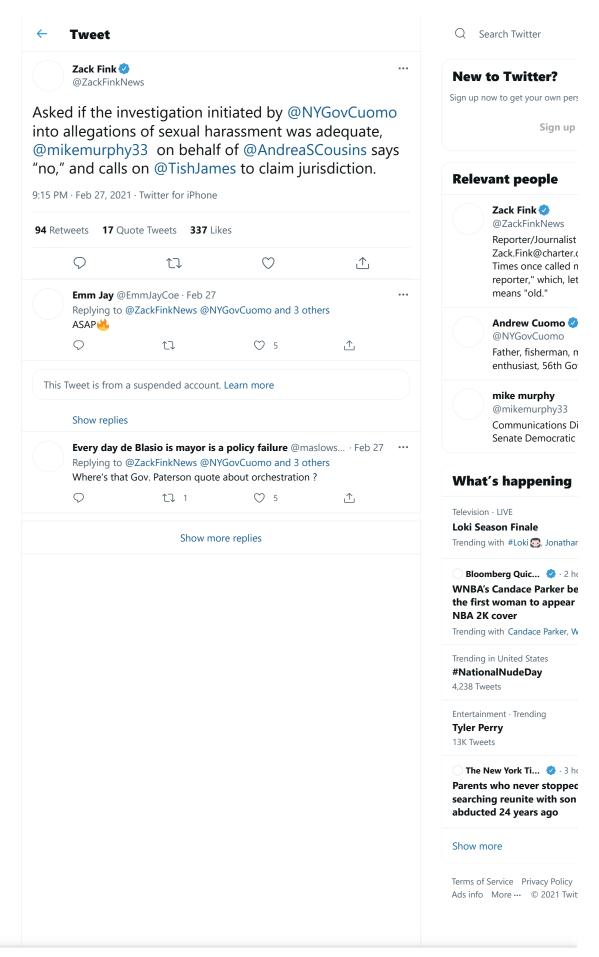
**Device Owner:** 

Josh Vlasto





## Settings



Date: Saturday, February 27 2021 09:18 PM

Subject: [Chat #4633]

From: Joshua Vlasto < > To: [Chris Cuomo];

trouble

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Sunday, February 28 2021 10:13 AM

Subject: [Chat #4636]

From: Joshua Vlasto < > To: [Chris Cuomo];

More or less

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Sunday, February 28 2021 10:13 AM

Subject: [Chat #4637]

From: Joshua Vlasto <

To: [Chris Cuomo];

Will need to have tish do the investigation but is what it is

----METADATA INFORMATION----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4673]

From: Joshua Vlasto < > To: [Chris Cuomo];

op-ed saying it wasn't a big deal is the top story on the website

Device Owner:
Josh Vlasto
ICCID:

Subject: [Chat #4674]

From: Joshua Vlasto < > To: [Chris Cuomo];

so not too bad

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4676]

From: Joshua Vlasto < > To: [Chris Cuomo];

Not great

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4677]

From: Joshua Vlasto < > To: [Chris Cuomo];

thats for sure

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4678]

From: Joshua Vlasto < > > To: [Chris Cuomo];

But despite all the celebrations, this situation is still terrible and its going to take time to dig out of

----METADATA INFORMATION- ---Device Owner:

Josh Vlasto
ICCID:

Subject: [Chat #4679]

From: Joshua Vlasto < [Chris Cuomo];

But the momentum has shifted

----METADATA INFORMATION----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4680]

From: Joshua Vlasto < > To: [Chris Cuomo];

Thats what we needed

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4682]

From: Joshua Vlasto < To: [Chris Cuomo];

Its all in how he interacts with them

----METADATA INFORMATION----

Device Owner:

Josh Vlasto

Subject: [Chat #4683]

From: Joshua Vlasto <
To: [Chris Cuomo];

If he makes them part of the success of the reopening and stops attacking him, they'll calm down

----METADATA INFORMATION- ---Device Owner:

Josh Vlasto
ICCID:

Subject: [Chat #4684]

From: Joshua Vlasto < > > To: [Chris Cuomo];

If he keeps hitting them and antagonizing them, they'll dump him

----METADATA INFORMATION- ---Device Owner:

Josh Vlasto
ICCID:

Subject: [Chat #4685]

From: Joshua Vlasto < [Chris Cuomo];

Thats the key even if the stories continue

----METADATA INFORMATION----Device Owner:

Josh Vlasto

Subject: [Chat #4687]

From: Joshua Vlasto < > > To: [Chris Cuomo];

going to be a long time before we know that we are past it and then there is the tish report

----METADATA INFORMATION- ---Device Owner:
Josh Vlasto
ICCID:

Subject: [Chat #4688]

From: Joshua Vlasto <
To: [Chris Cuomo];

But the bar gets higher for the stories and tish to hit the more goodwill he has with the leg

----METADATA INFORMATION- ---Device Owner:
Josh Vlasto
ICCID:

Subject: [Chat #4731]

From: Joshua Vlasto < > > To: [Chris Cuomo];

Killers

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4732]

From: Joshua Vlasto <

To: [Chris Cuomo];

Preet's deputy

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4733]

From: Joshua Vlasto <

To: [Chris Cuomo];

BUT won't be a rush job

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4734]

Will take tome

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Subject: [Chat #4735]

From: Joshua Vlasto <

To: [Chris Cuomo];

And allows us to make the argument to let the investigation go forward

----METADATA INFORMATION----Device Owner:

Josh Vlasto

Date: Tuesday, March 9 2021 02:36 PM

Subject: [Chat #4738]

From: Joshua Vlasto

To: [Chris Cuomo];

Not since the call at 11ish

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 11:26 AM

Subject: [Chat #4739]

From: Joshua Vlasto [Chris Cuomo];

Just checking in

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 11:26 AM

Subject: [Chat #4740]

From: Joshua Vlasto

To: [Chris Cuomo];

anying new on your end?

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 11:57 AM

Subject: [Chat #4746]

From: Joshua Vlasto

To: [Chris Cuomo];

Those have been good. Everyone trying to find out who the person is from the story yesterday and what the details are

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 02:55 PM

Subject: [Chat #4755]

Spoke to dawsey again. He has nothing new.

----METADATA INFORMATION----Device Owner:

Josh Vlasto

Date: Wednesday, March 10 2021 03:06 PM

Subject: [Chat #4757]

From: Joshua Vlasto <

To: [Chris Cuomo];

well that would be good news

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 06:08 PM

Subject: [Chat #4760]

From: Joshua Vlasto

To: [Chris Cuomo];

Most of it

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 06:09 PM

Subject: [Chat #4762]

From: Joshua Vlasto < > > To: [Chris Cuomo];

It crosses his own line

----METADATA INFORMATION----Device Owner:

Josh Vlasto

Date: Wednesday, March 10 2021 06:09 PM

Subject: [Chat #4763]

From: Joshua Vlasto <

To: [Chris Cuomo];

He said he never touched anyone

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 06:09 PM

Subject: [Chat #4764]

From: Joshua Vlasto

To: [Chris Cuomo];

She is saying he did

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 10 2021 06:19 PM

Subject: [Chat #4766]

From: Joshua Vlasto

To: [Chris Cuomo];

Attachments: Untitled attachment 05659.dat; Untitled attachment 05662.dat

https://www.timesunion.com/news/article/Female- aide-said-Cuomo-aggressively-groped-her-at-16015863.php

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 11:27 AM

Subject: [Chat #4776]

From: Joshua Vlasto

To: [Chris Cuomo];

Stories this am about reporters seem like duds.

----METADATA INFORMATION----- Device Owner:

Josh Vlasto

Date: Thursday, March 18 2021 11:28 AM

Subject: [Chat #4777]

From: Joshua Vlasto

To: [Chris Cuomo];

Ronan also shaping up to be a dud

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 09:38 PM

Subject: [Chat #4779]

From: Joshua Vlasto <

To: [Chris Cuomo];

Not yet

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 09:39 PM

Subject: [Chat #4781]

From: Joshua Vlasto

To: [Chris Cuomo];

Same

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 09:39 PM

Subject: [Chat #4783]

From: Joshua Vlasto < > > To: [Chris Cuomo];

Seems odd to do it so late

----METADATA INFORMATION----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 10:02 PM

Subject: [Chat #4784]

From: Joshua Vlasto

To: [Chris Cuomo];

Attachments: 67DDEA9C-B40D-44EE-B612-9CF506B9D566.pluginPayloadAttachment; 2CB34DE0-0E06-41D8-99DF-

5BD2CD0BEECA.pluginPayloadAttachment

 $https://www.newyorker.com/news/news-\ desk/cuomos-first-accuser-raises-new-claims-of-harassment-and-retaliation\\$ 

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 10:50 PM

Subject: [Chat #4786]

From: Joshua Vlasto <

To: [Chris Cuomo];

melissa

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 10:50 PM

Subject: [Chat #4787]

From: Joshua Vlasto

To: [Chris Cuomo];

story is a snoozer

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 10:57 PM

Subject: [Chat #4789]

From: Joshua Vlasto

To: [Chris Cuomo];

Liz talking to gmail from what I can tell

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Thursday, March 18 2021 10:57 PM

Subject: [Chat #4790]

From: Joshua Vlasto

To: [Chris Cuomo];

gma

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Date: Wednesday, March 24 2021 02:32 PM

Subject: [Chat #4795]

From: Joshua Vlasto <

To: [Chris Cuomo];

will do

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

**Date:** Friday, March 26 2021 11:37 AM

Subject: [Chat #4797]

From: Joshua Vlasto

To: [Chris Cuomo];

good. MDR did well in the bloomberg story I thought

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

**Date:** Friday, March 26 2021 11:37 AM

Subject: [Chat #4798]

From: Joshua Vlasto

To: [Chris Cuomo];

Good push back and the hits weren't anything new or interesting

----METADATA INFORMATION----Device Owner:

Josh Vlasto

**Date:** Friday, March 26 2021 12:01 PM

Subject: [Chat #4800]

From: Joshua Vlasto

To: [Chris Cuomo];

I think thats right

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

**Date:** Friday, March 26 2021 12:01 PM

Subject: [Chat #4801]

From: Joshua Vlasto

To: [Chris Cuomo];

And are getting old

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

Friday, March 26 2021 12:24 PM Date:

Subject: [Chat #4803]

From: Joshua Vlasto To: [Chris Cuomo];

none

----METADATA INFORMATION-----

**Device Owner:** 

Josh Vlasto

**Date:** Friday, March 26 2021 12:25 PM

Subject: [Chat #4804]

From: Joshua Vlasto

To: [Chris Cuomo];

And they'll be a lot of noises because I bet the Assembly investigation and AG's will butt in to each other

----METADATA INFORMATION- ---Device Owner:

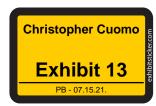
Josh Vlasto
ICCID:



FEBRUARY 27, 2021 Albany, NY

### Statement From Governor Andrew M. Cuomo

#### Statement From Governor Andrew M. Cuomo



"Ms. Bennett was a hardworking and valued member of our team during COVID. She has every right to speak out.

"When she came to me and opened up about being a sexual assault survivor and how it shaped her and her ongoing efforts to create an organization that empowered her voice to help other survivors, I tried to be supportive and helpful. Ms. Bennett's initial impression was right: I was trying to be a mentor to her. I never made advances toward Ms. Bennett nor did I ever intend to act in any way that was inappropriate. The last thing I would ever have wanted was to make her feel any of the things that are being reported.

"This situation cannot and should not be resolved in the press; I believe the best way to get to the truth is through a full and thorough outside review and I am directing all state employees to comply with that effort. I ask all New Yorkers to await the findings of the review so that they know the facts before making any judgements. I will have no further comment until the review has concluded."

# STATEMENT FROM BETH GARVEY, SPECIAL COUNSEL AND SENIOR ADVISOR TO THE GOVERNOR

"Ms. Bennett's concerns were treated with sensitivity and respect and in accordance with applicable law and policy.

"The matter was promptly escalated to special counsel. Ms. Bennett received the transfer she requested to a position in which she had expressed a long-standing interest, and was

thoroughly debriefed on the facts which did not include a claim of physical contact or inappropriate sexual conduct. She was consulted regarding the resolution, and expressed satisfaction and appreciation for the way in which it was handled.

"The determination reached based on the information Ms Bennett provided was that no further action was required which was consistent with Ms Bennett's wishes.

"Although in no way required by law, the Governor has requested an independent review and all staff will cooperate in that endeavor. Former Federal Judge Barbara Jones will lead the review."

#### **Contact the Governor's Press Office**

Contact us

by phone: Albany: (518) 474 - 8418

New York City: (212) 681 - 4640

Contact us

by email: <u>Press.Office@exec.ny.gov</u>

Date: Sunday, February 28 2021 03:20 PM Subject: Re: statement final Josh Vlasto @gmail.com> From: To: Chris Cuomo @gmail.com>; @amail\_com>; Jefrey Pollock Dani Lever @globalstrategygroup.com>; Linda A Lacewell (dfs.nv.aov) @dfs.ny.gov >; Lis Smith @gmail.com>; Melissa DeRosa CC: @exec.nv.gov >; Peter Ajemian @exec.nv.gov >: Richard Azzopardi @exec.ny.gov >; Steven Cohen (esd.ny.gov)

I can't seems to dial back in C

On Sun, Feb 28, 2021 at 3:13 PM Chris Cuomo

"Questions have been raised about some of my past interactions with people in the office.

I spend most of my life at work and colleagues are often also personal friends. I never intended to offend anyone or cause any harm.

sometimes I am playful and make jokes. You have seen me do it at briefings hundreds of times. My only desire is to add some levity and banter to what is a very serious business.

I now understand that my interactions may have been insensitive or too personal and that some of my comments, given my position, made others feel in ways I never intended. I'm sorry and feel deeply embarrassed about that.

Separately, my office has heard anecdotally that some people have reached out to Ms. Bennett to express displeasure about her coming forward. My message to anyone doing that is you have misjudged what matters to me and my administration and you should stop now period."



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Separately, my office has heard anecdotally that some people have reached out to Ms. Bennett to express displeasure about her coming forward. My message to anyone doing that is you have misjudged what matters to me and my administration and you should stop now - period."



I now understand (not know)

On Feb 28, 2021, at 3:05 PM, Melissa DeRosa



"Questions have been raised about some of my past interactions with people in the office.

I never intended to offend anyone or cause any harm. I spend most of my life at work and colleagues are often also personal friends.

At work sometimes I think I am being playful and make jokes that I think are funny. I do, on occasion, tease people in what I think is a good natured way. I do it in public and in private. You have seen me do it at briefings hundreds of times. I have teased people about their personal lives, their relationships, about getting married or not getting married. I mean no offense and only attempt to add some levity and banter to what is a very serious business.

I know understand that my interactions may have been insensitive or too personal and that some of my comments, given my position, made others feel in ways I never intended. I acknowledge some of the things I have said have been misinterpreted as an unwanted flirtation. To the extent anyone felt that way, I'm sorry and feel deeply embarrassed about that.

That's why I have asked for an outside, independent review that

looks at all of this. To be clear I never touched anybody and I never propositioned anybody, but these are serious allegations that New Yorkers deserve answers to.

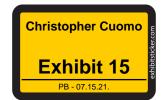
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## Full Text of Cuomo's Statement in Response to Harassment Accusations

Gov. Andrew Cuomo issued a statement on Sunday in response to accusations of sexual harassment.

Feb. 28, 2021

#### STATEMENT FROM GOVERNOR ANDREW M. CUOMO



"Questions have been raised about some of my past interactions with people in the office.

"I never intended to offend anyone or cause any harm. I spend most of my life at work and colleagues are often also personal friends.

"At work sometimes I think I am being playful and make jokes that I think are funny. I do, on occasion, tease people in what I think is a good natured way. I do it in public and in private. You have seen me do it at briefings hundreds of times. I have teased people about their personal lives, their relationships, about getting married or not getting married. I mean no offense and only attempt to add some levity and banter to what is a very serious business.

"I now understand that my interactions may have been insensitive or too personal and that some of my comments, given my position, made others feel in ways I never intended. I acknowledge some of the things I have said have been misinterpreted as an unwanted flirtation. To the extent anyone felt that way, I am truly sorry about that.

"To be clear I never inappropriately touched anybody and I never propositioned anybody and I never intended to make anyone feel uncomfortable, but these are allegations that New Yorkers deserve answers to.

"That's why I have asked for an outside, independent review that looks at these allegations.

"Separately, my office has heard anecdotally that some people have reached out to Ms. Bennett to express displeasure about her coming forward. My message to anyone doing that is you have misjudged what matters to me and my administration and you should stop now - period."



To: Stephanie Bentor @exec.ny.gov] From: Judith Mogul[/O=NYEC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5DA2632596FB4016A2FACBD65E5C9CEB-JUDITH MOGUL1 Sent: Mon 3/1/2021 8:36:44 PM Eastern Standard Time Subject: Re: Privileged. Ty Sent from my iPhone On Mar 1, 2021, at 8:35 PM, Stephanie Benton < @exec.ny.gov> wrote: Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network. From: Judith Mogul Sent: Monday, March 1, 2021 8:33 PM To: Melissa DeRosa Cc: Jefrey Pollock; Stephanie Benton; Josh Vlasto; Christopher Cuomo; Dani Lever; Linda A Lacewell (dfs.ny.gov) Subject: Re: Privileged. Is there a dial in? Sent from my iPhone On Mar 1, 2021, at 8:22 PM, Melissa DeRosa @exec.ny.gov> wrote: we are on for 830 @globalstrategygroup.com> From: Jefrey Pollock Sent: Monday, March 01, 2021 7:17 PM To: Stephanie Benton; Melissa DeRosa; 'Josh Vlasto'; Christopher Cuomo; Dani Lever Cc: Judith Mogul; Linda A Lacewell (dfs.ny.gov) Subject: Re: Privileged. I need to feed but happy to do a call tonight after 8 or 830 or so. Jefrey Pollock Presid D My pronouns: he, him, his From: Stephanie Benton pexec.ny.gov> Sent: Monday, March 1, 2021 7:15:46 PM To: Jefrey Pollock şlobalstrategygroup.com>; Melissa DeRosa ⊋exec.ny.gov>; 'Josh Vlasto' @gmail.com>; Dani Lever @gmail.com>; Christopher Cuomo @gmail.com> Cc: Judith Mogul pexec.ny.gov>; Linda A Lacewell (dfs.ny.gov) Subject: Re: Privileged. (EXT EMAIL)

New one. Watch out for a call to happen son please and thank you.

For the Governor to say at a press conference tomorrow:

Let me address recent complaints made by several women about my behavior in the work place.

First, let me be clear. I've never touched anyone inappropriately. I've never made inappropriate advances. And I never intended or believed I ever made a person feel uncomfortable. But I understand that is not what this is about.

Sexual harassment is a question of what a person perceives and feels as "unwelcome and uninvited", not necessarily what another person does or intends.

I apologize deeply to anyone who felt my actions made them feel uncomfortable. I fully understand it was'nt my intention but their feeling and perception that is relevant. I understand Charlotte Bennett perceived me to be making unwanted advances. That was not my intention at all, but quite the opposite. Ms. Bennett had told me about her experiences as a victim of sexual assault. She told me that she wanted to set up a not for profit organization to advance survivo' mights, and I said I applauded her efforts and that I would be helpful. She asked me to help her on a speech to her alma mater which she believed had whitewashed her allegations. I told her I would and I did. We discussed possible strategies to have the alma mater right their wrong, and for her to achieve justice against her abuser, as she felt her abuser had not been held accountable. Ms. Bennett said to me that she had wanted to join the administration, in part, because of our efforts to stop universities from covering up sexual assault on campuses.

Ms. Bennett reportedly said her initial impression was that I was trying to mentor her, and she was right. To the extent she felt that impression changed, I apologize, because that was not my intention and it never did. I applaud her efforts and her commitment. My only intention was to be supportive and constructive.

To be totally clear, I never inappropriately touched Ms. Bennett nor intended any advances In retrospect, I should have never engaged in conversations with Ms. Bennett. I should have referred her to someone who was in an appropriate position to be of assistance to her. And again, I apologize to Ms. Bennett for making her feel uncomfortable in any way.

I believed the people I work with on a daily basis were more comfortable with me and my personality and we had a more informal relationship. I understand now that for some, I was wrong.

There is no doubt that some people misinterpreted my behavior and that is on me.

I understand that for some, my customary behavior may be too familiar and forthcoming. I do pat some men and women on the cheek of the face on occasion. I do greet people hello or say goodbye with a hug or a kiss. I do kiss women hello or goodbye. I do kiss men hello or goodbye. I often greet staff, friends and colleagues this way. I did an event in Queens the other day — I hugged the Assemblymembers and the pastors. That is my usual custom. I have a picture hanging in my office kissing Al Gore. I've kissed Speaker Carl Heastie and Senate Leader Andrea Stewart Cousins hello. I kiss some reporters hello. You can go online and find pictures of me kissing and hugging hundreds of people. At least prior to COVID. If I ever get a sense that people are standoffish I respect that.

At work sometimes I am playful and make jokes that I think are funny. I realize now, some people do not find them funny. I do, on occasion, tease people in a good natured way and I do use nicknames. I call Robert Mujica the Sphinx. I call leading, I say Dr. Malatras is not really a doctor, I call Beth Bethesda. I do it in public and in private. You have seen me do it at briefings hundreds of times. I have teased people about getting married or not getting married eased men about their dress. Upon reflection, I sometimes refer to women I work with aboney". I mean it only as a term of endearment, but I see how it could be interpreted as patronizing. I mean no offense.

I understand that in today's environment that type of behavior may not be considered appropriate by all. Customs change and the level of sensitivity has changed and that what might have been usual custom in the past is now found by some to be insensitive or too personal. I understand the norms have changed. I want to be hyper vigilant and exemplify that change.

I've always treated women with the utmost respect and never intended anything else. I have three young daughters and I am sensitive to how they are treated and I would never want anyone to treat my daughter with less than total respect.

I've asked the Attorney General to engage an independent professional firm to review any allegations.

In the meantime, I want to take additional actiofm going to bring in a private firm to train all my staff, myself included, as to the highest standards of appropriate workplace interaction.

I also want to engage a firm that will be available to any employee who wants to make a complaint but may feel uncomfortable going through formal government channels.

I understand that life evolves and behavior evolves and I want my government to illustrate the best practices and the highest level of professionalism.

I'm confident that when people understand the facts of this situation, post the AG's review, they will understand the full context for my behavior. Again, I never touched anyone inappropriately, made advances inappropriately, or intended to make anyone feel my behavior was inappropriate. Again, to the extent I did make people feel uncomfortable, I apologize and I will learn from this and be the better for it.

We will do this and we will attend to the important work of the state. We are at a critical juncture with COVID and vaccinations and rebuilding. To my political adversaries, who would like to score political points during this time, I ask them to wait for the results of the Attorney General's report so that we have facts on which to base an opinion. I also ask them to fulfill their public duty, there is much work to do in the meantime and I will not be distracted from that work. We have important decisions to make and I will fight for what is in the best interest of the people of the State of New York.

From: Jefrey Pollock @globalstrategygroup.com>

Sent: Monday, March 01, 2021 5:37 PM

To: Melissa DeRosa; Stephanie Benton; 'Josh Vlasto'; Christopher Cuomo; Dani Lever

Cc: Judith Mogul; Linda A Lacewell (dfs.ny.gov)

Subject: RE: Privileged.

This is not for email. We should either discuss this or something else, but this is not editable.

From: Melissa DeRosa exec.ny.gov>

Sent: Monday, March 1, 2021 5:09 PM

To: Stephanie Benton @globalstrategygroup.com>; 'Josh Vlasto'

pgmail.com>; Christopher Cuomo < gmail.com>; Dani Lever @gmail.com>
Cc: Judith Mogu | exec.ny.gov>; Linda A Lacewell (dfs.ny.gov) < @dfs.ny.gov>

Subject: Re: Privileged.

[EXT EMAIL]

+some people

this would be for presser tomorrow

From: Stephanie Benton

Sent: Monday, March 01, 2021 5:04 PM

To:Jef Pollock Josh Vlasto'

Cc: Judith Mogul; Linda A Lacewell (dfs.ny.gov); Melissa DeRosa

Subject: Re: Privileged.

From: Stephanie Benton

Sent: Monday, March 01, 2021 5:02 PM

To: Jef Pollock 'Josh Vlasto'

Cc: Judith Mogul
Subject: Privileged.

Draft.

For the Governor to say at a press conference tomorrow:

Let me address recent complaints made by several women about my behavior in the work place.

First, let me be clear. I've never touched anyone inappropriately. I've never made inappropriate advances. And I never intended or believed I ever made a person feel uncomfortable. But I understand that is not what this is about.

Sexual harassment is a question of what a person perceives and feels as "unwelcome and uninvited" and if a person feels that way, despite the intent, that is wrong.

I've worked with hundreds of men and women over the years and no one ever told me that I made them feel uncomfortable.

But I understand that's not the point either.

I apologize deeply to anyone who felt my actions made them feel uncomfortable. I fully understand my intention was irrelevant and that their feeling and perception is all that is relevant. I understand Charlotte Bennett perceived me to be making unwanted advances. That was not my intention at all, but quite the opposite. Ms. Bennett had told me about her experiences as a victim of sexual assault. She told me that she wanted to set up a not for profit organization to advance survivors' rights, and I said I applauded her efforts and that I would be helpful. She asked me to help her on a speech to her alma mater which she believed had whitewashed her allegations. I did. We discussed possible avenues to force the alma mater to right their wrong, and for her to achieve justice against her abuser, as she felt her abuser had not been held accountable. Ms. Bennett said to me that she wanted to join the administration, in part, because of our efforts to stop universities from covering up sexual assault on campuses. Ms. Bennett repeatedly said her initial impression was that I was trying to mentor her, and she was right. To the extent she felt that impression changed, I apologize, because that was not my intention. I applaud her efforts and her commitment. My only intention was to be supportive and constructive. To be totally clear, I never inappropriately touched Ms. Bennett nor intended any advances. However, again, it is her perception that matters. In retrospect, I should have never engaged in conversations with Ms. Bennett. I should have referred her to someone who was in an appropriate position to be helpful. And again, I apologize to Ms. Bennett for making her feel uncomfortable in any way.

There is no doubt that my usual custom is to try to bring levity and distraction to the stress of the workplace. How I act in private is how I act in public. I do tease people. I do joke around. I do try to be personable and friendly. I do try to show people I appreciate and like them. I understand as Governor, people can feel intimidated by the position and I always try to keep that in mind.

I believed the people I work with on a daily basis were more comfortable with me and my personality and we had a more informal relationship. I understand now that for some, I was wrong. While no one ever said to me I made them feel uncomfortable, I understand that is also irrelevant.

There is no doubt people misinterpreted my behavior and that is on me.

In addition, situations without context can be misleading. The press reported that I told a female reporter at the New York State Fair, while eating a sandwich, that "you have to eat the whole sausage". They inferred a sexual innuendo. In truth, visiting Gianelli's sausage stand at the State Fair is a political custom. I have done it for many years. I had brought my daughters to the Fair and told them before the event that as a sign of respect, it was important that the they finish the entire sandwich to show that they enjoyed it. In fact, after we purchased the sandwiches we sat down at a table and myself and my daughters finished our entire sandwiches. It was not just a political gesture; the sandwich was also excellent. However, what I said to my daughters is the same statement I had made to the reporter. There was no inference beyond that.

In my conference room, I have many artifacts, gifts from my father, Bill Clinton, Ted Kennedy, and others. I have done hundreds of tours in the conference room and I always show a cigar box that was given to me by Bill Clinton. There is no inference beyond the obvious, it is a memento from my eight years in the Clinton administration.

Melissa DeRosa is a topflight professional and probably the most qualified person I have ever served with. We are friends and have worked together for ten years. We go to meetings, events, and to dinner on many occasions. Our relationship is professional, collegial and as true friends. To suggest anything else demeans women in the work place. I have gone to dinners with all prior Secretaries – Steve Cohen, Larry Schwartz – and no one has raised any inferences.

I understand that my customary behavior may be too familiar and forthcoming. I do greet people hello or say goodbye with a hug or a kiss. I do kiss women hello or goodbye. I do kiss men hello or goodbye. I often greet staff, friends and colleagues this way. I did an event in Queens the other day — I hugged the Assemblymembers and the pastors. That is my usual custom. I have a picture hanging in my office kissing Al Gore. I've kissed Speaker Carl Heastie and Senate Leader Andrea Stewart Cousins hello. I kiss some reporters hello. You can go online and find pictures of me kissing and hugging hundreds of people. At least prior to COVID. If I ever get a sense that people are standoffish I respect that.

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I've asked the Attorney General to engage an independent professional firm to review any allegations. In the meantime, I want to take additional action'm going to bring in a private firm to train all my staff, myself included, as to appropriate workplace interaction. I also want to engage a firm that will be available to any employee who wants to make a complaint but may feel uncomfortable going through formal government channels.

I understand that life evolves and behavior evolves and I want my government to illustrate the best practices and the highest level of professionalism.

We will do this and we will attend to the important work of the state. We are at a critical juncture with COVID and vaccinations and rebuilding. To my political adversaries, who would like to score political points during this time, I ask them to wait for the results of the Attorney General's report so that we have facts on which to base an opinion. I also ask them to fulfill their duty, there is much work to do in the meantime and I will not be distracted from that work. We have important decisions to make and I will fight for what is in the best interest of the people of the State of New York.

I'm confident that when people understand the facts of this situation, post the AG's review, they will understand the full context for my behavior. Again, I never touched anyone inappropriately, made advances inappropriately, or intended to make anyone feel my behavior was inappropriate. Again, to the extent I did make people feel uncomfortable, I apologize and I will learn from this and be the better for it.

\_\_\_\_

From: Lis Smith @gmail.com> on behalf of Lis Smith < @gmail.com>

 To:
 Melissa DeRosa

 Sent:
 2/24/2021 4:26:46 PM

Subject: Q's to practice

#### Q's

Did you forcibly kiss Ms Boylan?

Did you touch her legs/arms/torso?

Did you tell her you wanted to play strip poker?

Did you say that she looked like a better looking version of your ex girlfriend?

Did you call her Lisa?

Do you think it's appropriate that you compared a female staffer to an ex-girlfriend of yours?

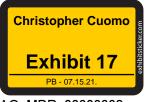
Did you make unflattering comments about the weight of female staffers? Did you bring up their romantic relationships and significant others?

Have you ever had inappropriate relationships with women on your staff?

Do you think other women will come forward?

Do you have regrets about the language you have used toward women in the workplace?

You have a long history of saying inappropriate things to women, like the time you repeatedly told a young female TV reporter that you wanted to see her "eat the whole sausage." Do you believe those comments were acceptable?



From: Melissa DeRosa < @exec.ny.gov>

**Sent:** Saturday, March 06, 2021 6:32 PM

To: \_\_Christopher Cuomo; Josh Vlasto \_\_< \_\_ @gmail.com>; Jefrey Pollock;

Lis Smith @gmail.com>;

**Subject:** Fw: More stuff. Fw: Washington Post- request for comment (on deadline)

Importance: High

See below -

**From:** Brittain, Amy

Sent: Saturday, March 6, 2021 6:06 PM

**To:** Richard Azzopardi **Cc:** Peter Ajemian

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

Hi Rich,

We have worked in these statements into the draft. Thank you for sending.

For awareness, wanted to flag a few other anecdotes that are in the story. Some (Feiner and Kim) are involving situations that have been reported previously, but please let me know if Gov. Cuomo would like to respond to any of these points. Happy to add in responses but would need them ASAP- within an hour or so.

- A HUD political appointee who worked closely with Cuomo told The Post that during meetings, staffers avoided the seats next to him, as though physical distance would somehow protect them from his wrath. She recalled that she witnessed women dissolve into tears and one man's face turn beet red after Cuomo dressed them down. "People were terrified of him," the former appointee said. "You couldn't forget it. Anyone who tells you they don't remember is not telling the truth. Everybody got their turn, including me."
- The accounts of such behavior by Cuomo stretch back decades. Paul Feiner, now the town supervisor in Greenburgh, N.Y., said that when he was Westchester County legislator in the late 1980s, he had a run-in with Cuomo about a transitional housing project that Cuomo wanted to build in the wealthy enclave. Feiner had proposed downsizing the project. He said Cuomo, who then ran a nonprofit development organization, called him and said: "I'm going to destroy your career and break every bone in your body." Feiner said he ended up voting for the full project.
- Bennett's attorney, Debra Katz, noted that Bennett's experience came several years after Cuomo heralded
  legislative changes in New York following the height of the #MeToo movement related to sexual harassment
  law. "He knows exactly what is against the law and should be done, and he violated it with impunity," she said.
- A high-ranking HUD political appointee recalled a 2000 incident she characterized as so "inappropriate" that it has bothered her for more than two decades. She had only been on the job for about three weeks when she had a meeting scheduled with Cuomo and an official from the Treasury Department. She and the Treasury official were already at the conference table when Cuomo entered the room. She stood to greet him, and she recalled Cuomo walking over to hug her, then kiss her on the cheek. "I remember being to this day mortified that he had done this to me in front of this official," the woman recalled. After the meeting ended and Cuomo left, the Treasury official turned to ask her how long she and Cuomo had been friends. She responded that she had just started the job. The woman said she did not consider the kiss sexual and did not feel Cuomo was coming on to her. Instead, she said she felt the move was "more like a power trip" designed to establish himself as dominant in front of the Treasury official.

- "I was so embarrassed, because of course I felt like he was thinking, 'She was just brought on to be a squeeze,'" she said. "It completely diminished me, of course, in the eyes of this person. I have no doubt about that."
- New York State Assemblyman Ron Kim (D) said he was on the receiving end of Cuomo's temper last month after
  he gave a news outlet a statement criticizing the administration's handling of nursing home deaths linked to the
  coronavirus pandemic. Kim said he was getting his young daughters ready for bath time when he got a call on his
  cellphone; it was an operator saying the governor was on the line.

"Mr. Kim, are you an honorable man?" was the first thing Cuomo said, Kim said. During a 10-minute call, the governor threatened

to destroy his career and reputation if he did not immediately issue a statement walking back his criticism, he recounted.

Kim said Cuomo was yelling so loudly that his wife could hear the governor through the phone and began shaking and crying.

After Kim went public with his account of the call, Cuomo attacked Kim at a news conference, accusing him of improperly soliciting campaign donations.

"I think it's all one interlinked pattern where he feels untouchable," Kim said. "Whether it's verbal or physical abuse, or threatening lawmakers or journalists for doing their jobs, it's come to a level where it's so normalized that he doesn't think twice about behaving that way."

From: Richard Azzopardi @exec.ny.gov>

Sent: Saturday, March 6, 2021 4:29 PM

To: Brittain, Amy @washpost.com>
Cc: Peter Ajemian @exec.ny.gov>

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

#### **CAUTION: EXTERNAL SENDER**

### From Peter Ajemian, Director of Communications for the Governor:

#### Global about work environment

"The people of this state elected the Governor to represent them four times during the last 14 years and they know he works day and night for them. There is no secret these are tough jobs, and the work is demanding, but we have a top tier team with many employees who have been here for years, and many others who have left and returned. The Governor is direct with employees if their work is sub-par because the people of New York deserve nothing short of excellence."

Re Karen Hinton "This did not happen. Karen Hinton is a known antagonist of the Governor's who is attempting to take advantage of this moment to score cheap points with made up allegations from 21 years ago. All women have the right to come forward and tell their story -- however, it's also the responsibility of the press to consider self-motivation. This is reckless."

#### Work environment for women

aides pointed out that a majority of senior aides, including secretary, ops-director, counsel, etc are women, many of whom have worked their way up from other positions and were promoted.

Re: language male staffers attributed to the governor: From Rich Azzopardi, Senior advisor to the Governor: "I've been here more than eight years and I have never heard him use coarse language like that."

From: Brittain, Amy <a href="mailto:own-vertical-action-">own-vertical-action-own-vert

Sent: Saturday, March 6, 2021 4:27 PM

To: Richard Azzopardi @exec.ny.gov>

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

Hi Rich,

I told this to Melissa but we need Gov. Cuomo's comment by 4:30.

Thank you, Amy

From: Brittain, Amy

Sent: Saturday, March 6, 2021 3:05 PM To: Richard Azzopardi

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

Hi Rich,

Just wondering when we can expect a response.

Thanks, Amy From: Brittain, Amy

Sent: Friday, March 5, 2021 7:03 PM To: Richard Azzopardi

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

Hi Rich,

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

Specifically, we plan to report the following:

- Karen Hinton, who worked for Cuomo at HUD, alleges that he summoned her to his dimly lit hotel room and
  physically embraced her following a work event in 2000, when Cuomo led the U.S. Department of Housing and
  Urban Development. Hinton says that she pulled away from Cuomo but he pulled her back toward his body,
  holding her before she broke away and left the room.
- Hinton has discussed the allegation in detail, saying that it happened after she left her fulltime job with the agency, when she was working as a consultant for HUD. She said the trip was to California, where she worked with the governor to help arrange press coverage on his media tour.
- Hinton said there was a "power dynamic" at play even though she was a consultant at the time, not an
  employee. "It was the same to me," she said, adding that was she concerned about the "the personal and
  professional problems that could have been created." She said she described his move as a "power play" for
  "manipulation and control."
- Hinton has said that she and Cuomo never discussed the incident after she left his room that night.
- Two male aides who worked for Cuomo over the course of his career say that he berated them with explicit language: sometimes calling them "pussies" and sometimes saying "you have no balls," among other comments.
- Two women, both of whom worked in the governor's office several years ago as young staffers, says that Cuomo quizzed them about their dating lives. They have said they did not view the encounters as propositions but rather as part of an office culture they believed was degrading to young women.
- An additional woman has said that during a meeting with Gov. Cuomo, he insinuated that his male staffer should
  date her. She said that it was part of a larger pattern of a hostile workplace defined by blame cast upon
  others, angry outbursts and a pattern of undermining colleagues that left her with crippling anxiety and
  feelings of questioning her self worth.
- Altogether, over 20 former Cuomo staffers have told us in interviews that Cuomo fostered a hostile workplace
  culture in which he makes searing verbal attacks on subordinates. Some said he seemed to delight in humiliating
  his employees, particularly in group meetings. Most said they still fear his wrath and his power to destroy
  careers.
- We are also planning on including comments from other staffers who say they never witnessed abusive behavior.

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

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

Best, Amy

Amy Brittain
Reporter
The Washington Post
(cell)
@washpost.com

From:	Melissa DeRosa @exec.ny.gov	1888
Subject:	Re: priv and confidential - pls review asap	(MID)
Date:	March 12, 2021 at 11:17 AM	
To:	Jefrey Pollock globalstrategygroup.com, Christopher Cuomo gmail.com.	
	Lis Smith egmail.com, Dani Lever egmail.com, Steven Cohen (esd.ny.gov) @esd.ny.gov,	
	Richard Azzopardi @exec.ny.gov	
Cc:	Linda A Lacewell (dfs.ny.gov) @dfs.ny.gov, Judith Mogul @exec.ny.gov, Beth Garvey	
	@exec.ny.gov	

I understand the pressure and I dont blame these politicans. A lot of these people are my long time friends.

I'm answering to a different standard -- people put me here -- I am focused on doing the job, getting the budget done and getting vaccines in arms.

All women have a right to come forward and I support that right. But I want to be clear: I did not do anything like what is being alleged. I do not know why the person who is saying it is saying it. I am not in a position to argue this in the press -- and there is no one who wants these investigations to happen more than I do.

There is due process in this country and I believe when the investigation is over the facts will show that. I made a promise to protect the people of new york and I'm doing that job. Again, I did not do any of the things that are being alleged. You have known me for 40 years. You have elected me Governor thress times. I am asking New Yorker's to have faith in that history and reserve their judgement until the conclusion of the review.



From: Melissa DeRosa exec.ny.gov

Subject: Fw: Privileged

Date: March 12, 2021 at 12:54 PM

To: Lis Smith @gmail.com, Christopher Cuomo @gmail.com, Jefrey Pollock @globalstrategygroup.com, Steven Cohen (esd.ny.gov) @esd.ny.gov

Cc: Beth Garvey @exec.ny.gov

From: Stephanie Benton

Sent: Friday, March 12, 2021 12:54 PM

To: Melissa DeRosa Cc: Judith Mogul Subject: Privileged

#### DRAFT GAMC

As I have said before and firmly believe: Women have a right to come forward and be heard. And I encourage that.

But I also want to clear: There is still a question of the truth. I did not do what has been alleged. I will not speculate about people's possible motives but I know, as a former attorney general, there are often many motivations for making an allegation and that is why you need to know the facts before you make a decision. There are two reviews underway. Let them do it. And no one wants them to happen more quickly and thoroughly than I do.

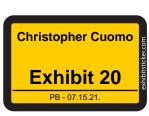
I will not argue this issue in the press. That is not how it is done, but at the same time, it is hypocritical for politicians to say there are serious allegations and then play politics with them. Serious allegations should be weighed seriously – that's why they are called serious. As I have told New Yorkers many times – there are facts and opinions and we must separate the two. Politicians who don't know a single fact, but yet form a conclusion and opinion are reckless and dangerous.

The people of New York should not have confidence in a politician who takes a position without knowing any facts or substance. That's politics at its worst.

Politicians take positions for all sorts of reasons, including political expediency and bowing to pressure. But people know the difference between playing politics, bowing to cancel culture and truth.

Let the review proceed. I am not going to resign. I was not elected by the politicians. I was elected the people. Part of this is I am not part of the political club and I am proud of it.

I made a promise to protect the people of New York and I am doing that job—as I have to eleven years. We have a budget due in two weeks for a state in fiscal crisis, we have to perform 15 million vaccinations and rebuild our state from the bottom up. That is my job, and that is what I am focused on.



You have known me for forty years. You have elected me attorney general, you have elected me Governor three times. Wait for the facts. That is all I am going to say on this topic until the review is complete. I remain 100 per cent focused on my job and serving the people of New York.

Date: Sunday, March 14 2021 09:43 AM

[Chat #1445] Subject:

From: Chris Cuomo <

[Joshua Vlasto (owner)]"; +
[Jefrey Pollock]; + [Melissa DeRosa]; + Section 1. To:

Cohen]; + [Liz Smith];

Attachments: IMG\_9859.jpeg

Have you seen this? Is it fake?

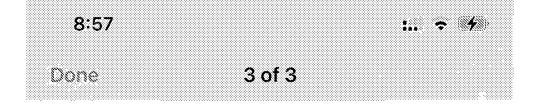
----METADATA INFORMATION- ----

Device Owner:

Josh Vlasto

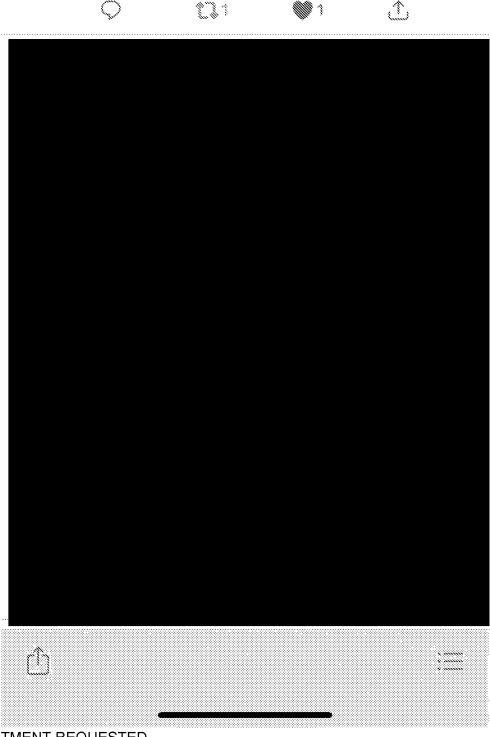
ICCID:





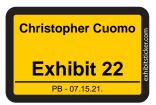
# All Mentions

US Constitutional Right. If they try to take that away, ramifications are frightening. This is benchmark. It could set precedence & mark end of Democracy as we know it, that our forefathers fought wars over for. Thats alot to lose.



## HIGHLY CONFIDENTIAL HIGHLY SENSITIVE DESTROY OR RETURN AFTER TESTIMONY

# **CC-MDR TEXTS**



Chat #	From	То	Body	Timestamp: Time
1	Melissa DeRosa	Chris Cuomo 2 Melissa DeRosa (owner)	Jesse McKinley (@jessemckinley) Tweeted: EXCLUSIVE/BREAKING: A 25-year-old former aide to @NYGovCuomo told the @nytimes the Governor sexually harassed her, asking if she had had sex with older men, among other claims.  Cuomo says was a mentor, "never made advances," or acted inappropriately.  https://t.co/y7TzrelJj9 https://twitter.com/jessemckinley/status/1365805490194812928?s=20	2/27/2021 6:28:32 PM(UTC-5)
1	Chris Cuomo 2	Melissa DeRosa (owner) Melissa DeRosa (owner)	What happened to the statement?	2/28/2021 4:33:12 PM(UTC-5)
1	Melissa DeRosa	Chris Cuomo 2 Melissa DeRosa (owner)	I'm on w the AG	2/28/2021 4:46:26 PM(UTC-5)
1	Chris Cuomo 2	Melissa DeRosa (owner)  Melissa DeRosa (owner)	Here's what he should have said:  I have carefully considered Ms. Bennett's statement and my own conduct. I don't dispute that our conversation was as she reports. I also do not dispute that my words and supervisory position may have created a hostile work environment. I apologize to Ms. Bennett and will promptly seek to personally communicate my apology to her. I also apologize to the people of New York State, who have a right to better conduct from their Governor. This will not happen again.	

1			Melissa DeRosa	Andrew Cuomo's poor statement,	3/1/2021 7:29:59
<u> </u>	Chris Cuomo 2	(owner)		annotated	PM(UTC-5)
		(0.11101)	Melissa DeRosa		(5.55)
		(owner)		"Questions have been raised about some	
		,		of my past interactions with people in	
				the office [Questions have not been	
				raised; accusations have been made].	
				"I never intended to offend anyone or	
				cause any harm [No one says he	
				intended to offend or harm. What he's	
				accused of is creating a hostile work	
				environment, which is judged objectively	
				by the natural meaning of his words and	
				conduct, not by what he now says he	
				intended.]. I spend most of my life at	
				work and colleagues are often also	
				personal friends [It's perhaps true that	
				work colleagues are personal friends, but	
				most supervisors know that many issues	
				may arise from personal friendships with	
				work subordinates.].	
				"At work sometimes I think I am being	
				playful and make jokes that I think are	
				funny. I do, on occasion, tease people in	
				what I think is a good natured way. I do it	
				in public and in private. You have seen	
				me do it at briefings hundreds of times. I	
				have teased people about their personal	
1			Melissa DeRosa	Goddam	3/2/2021 1:17:35
	Chris Cuomo 2	(owner)		I panic every fucking time	PM(UTC-5)
			Melissa DeRosa	I see your name	
		(owner)	_		
				The talk is precarious	
				I worry abt this "if investigation proves	
				allegations he has to go"	
			_		
1			Melissa DeRosa	Please let me help with the prep	3/3/2021 9:47:14
	Chris Cuomo 2	(owner)	<b>.</b>		AM(UTC-5)
			Melissa DeRosa		
		(owner)			

1		Chi	ris Cuomo 2	Just came in.	3/4/2021 12:23:50
	Melissa DeRosa			ireless 4G LTE network.	PM(UTC-5)
		(owner)		From: Kaplan, Michael	(0.00)
		(0111101)		@cbsnews.com>	
				Sent: Thursday, March 4, 2021 11:21 AM	
				To: Abramowitz, Elkan; Richard	
				Azzopardi	
				Cc: Press Office;	
				Subject: Re: CBS News Request for Gov.	
				Cuomo	
				Hi Richard and Elkan,	
				We are planning on imminently airing	
				Norah's on-camera interview with Gov.	
				Cuomo's former executive assistant	
				Charlotte Bennett. As such, we would	
				like to give Gov. Cuomo the opportunity	
				to respond to allegations made by Ms.	
				Bennett.	
				Specifically, we would like Gov. Cuomo to	
				address the following:	
				dual ess the following.	
				-Gov. Cuomo's views on his	
				relationship with Ms. Bennett.	
1			elissa DeRosa	Thoughts?	3/4/2021 12:27:13
	Chris Cuomo 2	(owner)	l: 0.0		PM(UTC-5)
			elissa DeRosa		
		(owner)			
1				Called	3/4/2021 2:10:04
	Chris Cuomo 2	(owner)		I have a lead on the wedding girl	PM(UTC-5)
			elissa DeRosa		
		(owner)			
1		Me	elissa DeRosa	https://www.newsweek.com/women-	3/5/2021 5:12:19
	Chris Cuomo 2	(owner)		accusing-cuomo-wont-come-out-top-	PM(UTC-5)
		Me	elissa DeRosa	opinion-1573595	
		(owner)			

1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	See dowd. Not bad for her	3/6/2021 10:50:33 AM(UTC-5)
1		(owner)	Chris Cuomo 2	I didn't read it	3/6/2021 10:59:25
	Melissa DeRosa	(owner)	Melissa DeRosa		AM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	https://lindastasi.medium.com/i-come- to-praise-cuomo-not-to-bury-him- 4a186d420322	3/6/2021 1:31:37 PM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	Follow up from Washington post In inbox	PM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	https://www.washingtonpost.com/politics/cuomo-toxic-workplace/2021/03/06/7f7c5b9c-7dd3-11eb-b3d1-9e5aa3d5220c_story.html	3/6/2021 8:55:15 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	I need all the best facts for is for reporters  Who can do it?	3/6/2021 11:20:22 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Hello?	3/6/2021 11:33:54 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Can call her?	3/7/2021 11:38:07 AM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa		3/7/2021 12:51:21 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Heastie used our language at least	3/7/2021 3:35:58 PM(UTC-5)

1			Chris Cuomo 2	Hey	3/7/2021 7:58:28
	Melissa DeRosa	(owner)	Melissa DeRosa		PM(UTC-5)
 L			Chris Cuomo 2	Rumor going around from politico 1-2	3/7/2021 7:58:43
	Melissa DeRosa	(owner)	Melissa DeRosa	more ppl coming out tomorrow	PM(UTC-5)
			Chris Cuomo 2	Can u check your sources	3/7/2021 7:58:48
	Melissa DeRosa	(owner)	Melissa DeRosa		PM(UTC-5)
L	Chris Cuomo 2	(owner)	Melissa DeRosa	On it	3/7/2021 8:02:33 PM(UTC-5)
	Cimis cacino 2	(owner)	Melissa DeRosa		(3.33)
			Melissa DeRosa	No one has heard that yet	3/7/2021 8:41:43
	Chris Cuomo 2	(owner)	Melissa DeRosa		PM(UTC-5)
	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	K	3/7/2021 8:44:24 PM(UTC-5)
		(comer)	Chris Cuomo 2	https://www.dailymail.co.uk/tvshowbiz/	3/7/2021 9:29:21
-	Melissa DeRosa	(owner)	Melissa DeRosa	article-9336481/Alec-Baldwin-shares-14-minute-rant-hitting-cancel-culture-	
		,	Molices DeDes-	arguing-process.html	2/7/2024 0:20:44
-	Chris Cuomo 2	(owner)	Melissa DeRosa  Melissa DeRosa	My friend asked him to do it  Very close to him	3/7/2021 9:36:11 PM(UTC-5)
		(owner)		3.555 55	

1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	Edward-Isaac Dovere   @IsaacDovere  Replying to @IsaacDovere  There are New York politicians tonight looking at the statements on Cuomo, panicked as they think about the women who could speak out against them. There are others who were intoxicated enough for incidents that they may be unaware of some of the stories women could tell.  9:01 PM - Mar 7, 2021 - Twitter for iPhone	3/7/2021 9:41:49 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	3 Retweets 16 Likes  Why do you guys like this so much?	3/7/2021 9:49:47 PM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	Brush back	3/7/2021 9:51:14 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Week late	3/7/2021 9:53:13 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	No resign No resign No resign	3/7/2021 9:53:23 PM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	No resign	3/7/2021 9:53:31 PM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	thoughts?  -Any allegation made — either directly or indirectly — is being forwarded to Joon firm and Anne Clerke in real experienced and disigned prosecutors to load up this experienced and disigned prosecutors to load up this yorkers have all of the facts at its correctation. The	3/9/2021 12:20:23 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Lose last	3/9/2021 12:21:38 PM(UTC-5)

1			Melissa DeRosa	"In real time". Thats it	3/9/2021 12:22:19
	Chris Cuomo 2	(owner)	_		PM(UTC-5)
			Melissa DeRosa	Keep it short	
		(owner)			
1			Chris Cuomo 2	Rumor about Ronan getting ready to	3/9/2021 1:45:27
	Melissa DeRosa		Melissa DeRosa	move	PM(UTC-5)
		(owner)	_		
1			Chris Cuomo 2	Can u check your sources	3/9/2021 1:45:35
_	Melissa DeRosa		Melissa DeRosa		PM(UTC-5)
		(owner)			(= = = )
1			Chris Cuomo 2	Do u see this	3/9/2021 1:52:08
	Melissa DeRosa	(	Melissa DeRosa		PM(UTC-5)
		(owner)			
1			Chris Cuomo 2	https://www.timesunion.com/news/artic	3/9/2021 3:00:23
	Melissa DeRosa		Melissa DeRosa	le/Cuomo-faces-new-allegation-of-sexual-	PM(UTC-5)
		(owner)		harassment-16011424.php	
1		(	Melissa DeRosa	Why didnt you tell him abt potential ATU	
	Chris Cuomo 2	(owner)	Melissa DeRosa	intv with 6?	AM(UTC-5)
		(owner)	Melissa Denosa		
		(OWITET)			
1			Chris Cuomo 2	I asked u not to say anything until I talked	3/10/2021 11:02:22
	Melissa DeRosa		Melissa DeRosa	to him	AM(UTC-5)
		(owner)			
1			Melissa DePosa	That was a day ago	3/10/2021 11:05:15
	Chris Cuomo 2	(owner)	IVICII33a DENUSA		AM(UTC-5)
	2	(0111101)	Melissa DeRosa	Stop	(3.33)
		(owner)		Hiding shit	
1			Melissa DeRosa	I told him it is a suspicion	3/10/2021 11:05:22
	Chris Cuomo 2	(owner)	NA-Harris D. D.		AM(UTC-5)
		(owner)	Melissa DeRosa		
		(owner)			
1			Melissa DeRosa	You need to trust me lis and jeff more	3/10/2021 11:05:49
	Chris Cuomo 2	(owner)		-	AM(UTC-5)
			Melissa DeRosa	We are making mistakes we cant afford	
		(owner)	<del></del>		

1	Melissa DeRosa	Chris Cuomo Melissa DeRo (owner)	S	3/10/2021 11:05:52 AM(UTC-5)
1	Melissa DeRosa	Chris Cuomo Melissa DeRo (owner)		3/10/2021 11:06:04 AM(UTC-5)
1	Chris Cuomo 2	Melissa DeRo (owner) Melissa DeRo (owner)	Not a huge one	3/10/2021 11:06:42 AM(UTC-5)
1	Melissa DeRosa	Chris Cuomo Melissa DeRo (owner)		3/10/2021 12:28:54 PM(UTC-5)
1	Melissa DeRosa	Chris Cuomo Melissa DeRo (owner)	3 1	3/10/2021 12:29:01 PM(UTC-5)
1	Melissa DeRosa	Chris Cuomo Melissa DeRo (owner)	·	3/10/2021 12:29:04 PM(UTC-5)
1	Chris Cuomo 2	Melissa DeRo (owner)  Melissa DeRo (owner)	Doesnt make sense tho	3/10/2021 12:31:06 PM(UTC-5)
1	Chris Cuomo 2	Melissa DeRo (owner)  Melissa DeRo (owner)	I am told lawyer got calls from two people saying she has problems with story  And that may want to talk abt her	3/10/2021 12:31:40 PM(UTC-5)
1	Chris Cuomo 2	Melissa DeRo (owner)  Melissa DeRo (owner)	sa And i know this	3/10/2021 12:31:58 PM(UTC-5)
1	Chris Cuomo 2	Melissa DeRo (owner)  Melissa DeRo (owner)		3/10/2021 8:56:46 PM(UTC-5)

1			Melissa DeRosa	50 more calling to resign?	3/10/2021 9:51:09
	Chris Cuomo 2	(owner)	Wienssa Berrosa	So more daming to resign.	PM(UTC-5)
	cinis cacinio 2	(owner)	Melissa DeRosa		(0.03)
		(owner)	Wienssa Berrosa		
		(0)			
1			Chris Cuomo 2	Verizon LTE	3/11/2021 9:02:01
	Melissa DeRosa		Melissa DeRosa	I Just got this from I heard from a person familiar that Seth called the Albany Police	AM(UTC-5)
		(owner)		a oriminal investigation into the Feel very confident in the source and am writing a story. Please call.	,
				required by our policies and protection of the p	
1			Melissa DeRosa	READ THIS:	3/12/2021 12:27:20
	Chris Cuomo 2	(owner)			PM(UTC-5)
			Melissa DeRosa	I will not resign. I cannot resign. I am in a	
		(owner)		different position and I am working with	
				a different standard than these other	
				politicians	
				I understand why they have to say what	
				they are saying. I understand the political	
				pressure I understand the stakes of	
				political warfare, and that's what this is	
				And I understand the conformity that can	
				be forced by cancel culture.	
				I do not begrudge them what they were	
				saying, many of these people on my	
				friends. My only concern is that our party	
				does not become what it says it opposes	
				la contra constante de la contra del contra de la contra del contra de la contra del l	
				I want to people who voted for me to	
				take comfort in the simple truth that I	
				have never done anything like what is	
				being alleged.	
				There are multiple investigations working	
				to present the facts behind what is being	
				said.	
1			Chris Cuarra 2	Schumer, Gillibrand Joint Statement on	2/12/2021 5:20:22
1	Molissa Dallasa		Chris Cuomo 2	Governor Cuomo  Washington, D.C. – Senale Majorily Leador Chuck Schumer (O.NY) and Senator ticeton dillibrand (D. NY) released the following statement:	3/12/2021 5:39:32
	Melissa DeRosa	(owner)	Melissa DeRosa	NY) released the following statement:  "Confronting and overcoming the Covid crisis requires sure and steady headership. We commend the brave actions of the individuals who have come	PM(UTC-5)
		(owner)		"Confronting and overcoming the Covid crisis requires sure and steady leadership. We commend the brave actions of the individuals who have come forward with serious allegations of abuse and misconduct. Due to the multiple, credible sexual misconduct. Due to the multiple, credible sexual that Governor Cuomo has lost the confidence of his governing partners and the people of New York. Governor Cuomo should resign."	
1			Chris Cuomo 2		3/13/2021 8:52:05
1	Melissa DeRosa		Melissa DeRosa	https://www.nytimes.com/2021/03/12/us/politics/al-franken-cuomo-me-	AM(UTC-5)
	ואובווסטמ הבעהסמ	(owner)	ואובווספע הקעמפע	too.html	UNINI(OTC-3)
		(OWITEL)		100.111111	
				<u> </u>	

1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	https://app.criticalmention.com/app/#cli p/view/1908c3d2-1fe2-4641-a125- 41151f8c7e40?token=c9fdd55c-2439- 43b2-88c9-9625bbe5f480	3/13/2021 12:45:02 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Biaggi all but admitted they want to cancel him	3/13/2021 12:48:02 PM(UTC-5)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	Real Time with Bill Maher (@RealTimers) Tweeted: "Women and people of color lost one of their most powerful advocates when Kirsten Gillibrand decided to disappear Al Franken so she could have a 7-minute run for president. And we're in the midst of a pile-on right now."  Watch @ProfGalloway & @LarryWilmore react to #CuomoResign: https://t.co/kMV3rQnmde https://twitter.com/RealTimers/status/1 370609030318592001?s=20	
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	Really interesting segment. I texted Liz have not heard anything.	3/13/2021 2:20:26 PM(UTC-5)
1	Chris Cuomo 2	(owner)	Melissa DeRosa Melissa DeRosa	If ronan has nothing better than boylan thats a great sign	3/14/2021 9:35:28 AM(UTC-4)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa		3/14/2021 12:57:00 PM(UTC-4)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	To discuss rownan convo	3/14/2021 12:57:12 PM(UTC-4)
1	Melissa DeRosa	(owner)	Chris Cuomo 2 Melissa DeRosa	Did u get any more intel?	3/15/2021 9:48:37 PM(UTC-4)

1	Chris Cuomo 2	(owner)	Melissa DeRosa	1	3/15/2021 9:57:28 PM(UTC-4)
		(owner)	Melissa DeRosa		(e.e)
1	Melissa DeRosa	,	Chris Cuomo 2 Melissa DeRosa		3/15/2021 10:04:31 PM(UTC-4)