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HIGHLY CONFIDENTIAL - WITNESS 7/7/21

-----x

The Matter of Independent Investigation  
Under New York State Executive Law  
Section 63(8)

-----x

VIDEOTAPE DEPOSITION VIA ZOOM OF:  
WITNESS 7/7/21  
WEDNESDAY, JULY 7, 2021  
9:42 a.m.

VIRTUAL ZOOM INVESTIGATION before  
SILVIA P. WAGE, a Certified Shorthand Reporter,  
Certified Realtime Reporter, Registered  
Professional Reporter, and Notary Public for the  
States of New Jersey, New York and Pennsylvania.

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HIGHLY CONFIDENTIAL - WITNESS 7/7/21  
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A L S O P R E S E N T:  
MICHAEL PELLEGRINO  
VIDEOGRAPHER

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   THE VIDEOGRAPHER: Good morning. We                   09:03:47

3                   are going on the video record at, approximately,                   09:42:23

4                   9:42 a.m., on July 7th, 2021.                   09:42:26

5                   Audio and video recording will                   09:42:31

6                   continue to take place unless all parties agree                   09:42:33

7                   to go off the video record.                   09:42:35

8                   This is the video recorded deposition                   09:42:37

9                   of witness 7/7/21 in the matter of Independent                   09:42:39

10                  Investigation under New York State Executive Law                   09:42:44

11                  Section 63(8). This deposition is being held                   09:42:48

12                  remotely via Zoom.                   09:42:53

13                  My name is Michael Pellegrino. I'm                   09:42:54

14                  the Videographer. The Court Reporter is Silvia Wage.                   09:42:56

15                  Appearances will be notated on the                   09:43:01

16                  stenographic record.                   09:43:03

17                  Will the Reporter please swear in the                   09:43:04

18                  witness.                   09:43:04

19                  WITNESS 7/7/21,                   09:43:04

20                  After having been duly sworn, was examined                   09:43:04

21                  and testified as follows:                   09:43:13

22                  THE STENOGRAPHER: Thank you.                   09:43:13

23                  You may proceed.                   09:43:14

24                  EXAMINATION BY MS. KENNEDY-PARK:                   09:43:17

25                  Q. FIRST NAME, is it okay if I call you                   09:43:17





1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 your attorneys are not here to object. But to 09:44:46  
3 the extent that they have concerns about 09:44:48  
4 privilege, we can address those with your 09:44:50  
5 lawyers. 09:44:53

6 Do you understand? 09:44:53

7 A. Yes. 09:44:54

8 Q. Okay. We've got a Court Reporter 09:44:54  
9 present virtually. So, when you're answering my 09:44:56  
10 questions, you can't nod or say uh-huh. You have 09:45:01  
11 to give a verbal answer. 09:45:03

12 Do you understand? 09:45:04

13 A. Yes. 09:45:06

14 Q. If you don't understand my question, 09:45:06  
15 I want you to tell me and I'll ask I better one, 09:45:07  
16 alright? 09:45:11

17 A. Okay. 09:45:11

18 Q. And if at any point you want to 09:45:11  
19 clarify an answer you've previously given me, you 09:45:12  
20 should just let me know and we'll clarify on the 09:45:15  
21 record. 09:45:17

22 A. Okay. 09:45:18

23 Q. I'll be asking you about some names 09:45:19  
24 and some dates and specific information. If you 09:45:21  
25 don't remember a name or you don't remember a 09:45:25

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   date but you have a general memory or an                   09:45:27  
3                   approximation, you should tell me that, okay,               09:45:29  
4                   because the purpose of today is to do a fact                   09:45:33  
5                   finding investigation.   09:45:35

6                                   Do you understand?   09:45:35

7                                   A. Yes.   09:45:37

8                                   Q. If you want a break at any point, you                   09:45:37  
9                   should just let me know. If I asked a question,               09:45:40  
10                  I am going to want you to answer that question               09:45:43  
11                  first and then we'll take a break, okay?                   09:45:45

12                                  A. Okay.   09:45:47

13                                  MS. KENNEDY-PARK: If you could -- if                   09:45:47  
14                  your Counsel could just confirm that none of you               09:45:48  
15                  are recording this proceeding surreptitiously in           09:45:51  
16                  any way?

17                                  (NO RESPONSE.)

18                                  MS. KENNEDY-PARK: Okay.

19                                  THE STENOGRAPHER: I didn't get any  
20                  response.

21                                  MS. KENNEDY-PARK: And that you're                   09:45:57  
22                  not going to communicate in realtime about the               09:45:58  
23                  substance of the testimony with anyone?               09:45:59

24                                  MR. SANDICK: That is correct.                           09:46:00

25                                  Q. Okay. So, as I think we informed you               09:46:05

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           by e-mail, but I'll remind you on the record,           09:46:08

3           Executive Law Section 63(8) prohibits you and           09:46:11

4           makes it a misdemeanor if you do reveal the           09:46:14

5           contents of your testimony today to anyone.           09:46:17

6                   Do you understand that?           09:46:19

7                   A. Yes.           09:46:20

8                   Q. And that covers your Counsel as well.           09:46:20

9                   MS. KENNEDY-PARK: Does Counsel           09:46:22

10           understand?           09:46:23

11                   THE STENOGRAPHER: I'm not getting a           09:46:23

12           response from Counsel.           09:46:23

13                   MS. KENNEDY-PARK: Okay.           09:46:23

14                   Q. Are you taking any substance or drugs           09:46:23

15           that might make it difficult for you to           09:46:27

16           understand my questions today?           09:46:29

17                   A. No.           09:46:30

18                   Q. Have you had any alcohol today?           09:46:31

19                   A. No.           09:46:32

20                   Q. Will you state your name, your date           09:46:32

21           of birth and your current home and business           09:46:34

22           address.           09:46:36

23                   A. My name is WITNESS born [REDACTED]           09:46:37

24           [REDACTED]. Home address is [REDACTED]           09:46:43

25           [REDACTED]. Business address is           09:46:47



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 THE STENOGRAPHER: The response,  
3 along with the attorneys when you were talking to  
4 them about the -- I can't pick them up on the  
5 audio so...

6 MS. KENNEDY-PARK: Okay. So let's -- 09:47:34  
7 if you can guys just put your microphones and 09:47:36  
8 turn your microphones on. 09:47:39

9 MR. SANDICK: Yeah, I was on -- I 09:47:41  
10 think I was on mute before. 09:47:42

11 So I understood your question and we 09:47:44  
12 won't disclose this to others outside of the law 09:47:46  
13 firm. 09:47:49

14 MS. KENNEDY-PARK: Okay. And can you 09:47:49  
15 confirm that you're not recording this in any way 09:47:51  
16 for the record? 09:47:54

17 MR. SANDICK: Yes. 09:47:54

18 MS. KENNEDY-PARK: Okay. 09:47:55

19 MS. QUINN: Confirmed. 09:47:55

20 Q. Okay. And so the question that the 09:47:56  
21 Court Reporter, I think, missed was for you to 09:47:58  
22 state your name, date of birth and current and 09:48:00  
23 home/business address? 09:48:02

24 A. Sure. Can they hear me? Are we 09:48:04  
25 good? 09:48:06



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           about it to each other, you know, so we don't           09:48:56

3           really talk about what's going on.                   09:48:58

4                   Q.   You don't talk about the substance?           09:49:00

5                   A.   No.   09:49:01

6                   Q.   Does [REDACTED] know that you're           09:49:02

7           testifying today?                                   09:49:04

8                   A.   Yes.   09:49:04

9                   Q.   Who else knows that you're testifying           09:49:05

10          today?   09:49:07

11                  A.   My dad.   09:49:07

12                  Q.   Anyone else?                                   09:49:07

13                  A.   My boss.   09:49:09

14                  Q.   Anyone else?                                   09:49:12

15                  A.   That's it.                                   09:49:13

16                  Q.   Okay.   There's a binder to your           09:49:14

17          right.   I want you to open up that binder.       09:49:17

18                  A.   Sure.   09:49:19

19                  Q.   I want you to turn Tab 1 of the           09:49:29

20          binder and we'll mark this as the first exhibit.   09:49:32

21                                   (Deposition Exhibit 1, testimony           09:49:32

22          Subpoena Ad Testificandum to WITNESS, was marked   09:49:32

23          for identification.)                               09:49:40

24                  Q.   You should take a moment to review it   09:49:40

25          and when you've reviewed it, why don't you look   09:49:42



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   If you hadn't read it before today,           09:53:22

3                   what did you do to comply with this subpoena?       09:53:25

4                   A.   Whatever my lawyers advised me to do.           09:53:28

5                   Q.   Okay.  What devices did you give your           09:53:30

6                   lawyers access to to respond to this subpoena?       09:53:32

7                   A.   My cell phone.                                   09:53:34

8                   Q.   Okay.  Anything else?                           09:53:35

9                   A.   That's it.                                       09:53:37

10                  Q.   Do you have personal computers?                 09:53:38

11                  A.   Yes.   09:53:40

12                  Q.   What kind of personal computers?               09:53:41

13                  A.   It's a laptop.                                   09:53:43

14                  Q.   Okay.  Does that laptop have any             09:53:44

15                  information on it from your time in the Executive   09:53:46

16                  Chamber?   09:53:48

17                  A.   No, not that I'm aware of.                   09:53:48

18                  Q.   Did you give your lawyers access to             09:53:51

19                  your personal e-mail?                           09:53:52

20                  A.   No, I don't think so.                       09:53:55

21                  Q.   Is there anything in your personal             09:54:03

22                  e-mail that you think is related to this           09:54:05

23                  investigation?                               09:54:06

24                  A.   No, not that I'm aware of.                   09:54:07

25                  Q.   Did you communicate with [REDACTED]           09:54:08





1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Starting with university. 09:56:00

3 A. Sure. I went to St. John's 09:56:01

4 University and I graduated in government politics 09:56:04

5 and then I also have a Master's degree from St. 09:56:07

6 John's University in public administration. 09:56:11

7 Q. When did you get your Master's 09:56:12

8 degree? 09:56:13

9 A. I did it part-time. I started, I 09:56:14

10 believe, it was 2013 and finished in 2016. 09:56:16

11 Q. And can you take us through your 09:56:21

12 employment history starting with after your 09:56:23

13 graduation from St. John's with your 09:56:26

14 undergraduate degree? 09:56:28

15 A. Sure. So I started as an intern on 09:56:29

16 the Cuomo campaign. I think it was probably 2011 09:56:32

17 or 2012, somewhere around that time. And I was 09:56:37

18 an intern and I did that for couple of years. 09:56:40

19 And then I got a job at the Workers' Compensation 09:56:44

20 Board of New York and I did that for about a year 09:56:48

21 and a half. And then after that I went and 09:56:52

22 worked for the Executive Chamber. I think it was 09:56:59

23 like in March of 2015 I started there. And then 09:57:01

24 I left the Executive Chamber in June of 2019 and 09:57:08

25 started working at the Port Authority of New York 09:57:12





1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   Who did you interview with for the                   09:59:05

3                   role of Special Assistant?                                   09:59:07

4                   A.   Joe Percoco.   09:59:08

5                   Q.   Anyone else?   09:59:09

6                   A.   That's it.   09:59:11

7                   Q.   And how long did your on-boarding                         09:59:13

8                   process take?   09:59:16

9                   A.   Maybe two weeks, maybe three weeks,                   09:59:20

10                  something like that.   09:59:26

11                  Q.   Maybe I should be clear by what I                         09:59:28

12                  meant by "on-boarding."   09:59:31

13                                 How long between the time you                             09:59:32

14                  interviewed and the time you started working?             09:59:33

15                  A.   That's what I thought you meant,                         09:59:36

16                  yeah. It's like two to three weeks, yeah.                   09:59:38

17                  Q.   Had you already gone through a                             09:59:40

18                  background process to work for the Workers'                 09:59:42

19                  Compensation Board?   09:59:44

20                  A.   Yes.   09:59:44

21                  Q.   When you started in March of 2015 as                   09:59:47

22                  a Special Assistant, where were you sitting?                 09:59:49

23                  A.   The 39th floor.   09:59:56

24                  Q.   Of what address?   09:59:57

25                  A.   633 Third Avenue.   09:59:59

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Who was your office nearest to, who 10:00:04  
3 sat to your right, left and across from you? 10:00:07

4 A. There was an office behind me for 10:00:09  
5 someone named [REDACTED]. That was the 10:00:11  
6 closest. 10:00:14

7 Q. Did you share your office with 10:00:16  
8 anyone? 10:00:17

9 A. I didn't have an office. 10:00:18

10 Q. Did you have a cubicle? 10:00:19

11 A. I had a cubicle. 10:00:20

12 Q. Okay. Was your cubicle outside of 10:00:21  
13 Mr. Percoco's office? 10:00:24

14 A. No. It was outside of [REDACTED]'s 10:00:26  
15 office. 10:00:28

16 Q. Okay. And where was your office in 10:00:28  
17 relation to Mr. Percoco's office? 10:00:31

18 A. I didn't have an office. 10:00:32

19 Q. I'm sorry, your cubicle. I 10:00:34  
20 apologize. 10:00:35

21 A. My cubicle. So, I guess, if you were 10:00:36  
22 coming out of his office, you would have had to 10:00:39  
23 have had made a left and gone passed another 10:00:41  
24 office to get to my cubicle. 10:00:45

25 Q. And where was your cubicle in 10:00:46

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           relation to where the Governor's office was?           10:00:48

3                   A.   Where -- it was to the right of Joe's           10:00:51

4           office.   So it was about two offices down from           10:00:54

5           me, two office door lengths down from me.           10:00:56

6                   Q.   And at the time that you started as a           10:00:59

7           Special Assistant, who was sitting outside the           10:01:03

8           Governor's office?           10:01:05

9                   A.   I'm trying to remember because when I           10:01:15

10          started, I believe, they were in Albany for           10:01:18

11          session.   So I can't really remember who was           10:01:20

12          sitting there.   I think maybe Annabelle had it           10:01:22

13          when I was there, I think.           10:01:28

14                   Q.   And did that change over time?           10:01:31

15                   A.   Yes.           10:01:33

16                   Q.   Okay.   And who else occupied that           10:01:33

17          position after Ms. Walsh?           10:01:35

18                   A.   There was [REDACTED], [REDACTED]           10:01:41

19          [REDACTED], Kaitlin [REDACTED], me.   That's all I can           10:01:52

20          think of.           10:02:13

21                   Q.   And Ms. Walsh, [REDACTED], [REDACTED]           10:02:14

22          and [REDACTED] Kaitlin [REDACTED] and you, where did you sit in           10:02:18

23          relation -- when you occupied that seat, where           10:02:20

24          did you seat in relation to Stephanie Benton?           10:02:22

25                   A.   So she sat in the office right           10:02:24

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 behind, so the cubicle was outside of her office. 10:02:27

3 She sat at a desk in an office behind the 10:02:29

4 cubicle. 10:02:34

5 Q. Okay. So, if you were sitting in the 10:02:34

6 cubicle outside of the Governor's office, are you 10:02:36

7 in shouting distance of him? 10:02:39

8 A. If he shouted loud enough. 10:02:42

9 Q. How did it come to be that you went 10:02:45

10 from sitting in the cubicle that you described 10:02:47

11 that was further down from the Governor's 10:02:50

12 Office's to occupying a role in support of the 10:02:52

13 Governor? 10:02:55

14 A. So, I believe, that it was Kaitlin 10:02:56

15 that had the desk before me and she was moved off 10:03:00

16 that desk and then, I believe, they tapped me to 10:03:05

17 sit there just to help out while they were 10:03:09

18 looking for other people to fill that role. 10:03:11

19 Q. What do you know about why Kaitlin 10:03:15

20 [REDACTED] was moved out of that role? 10:03:18

21 A. Only what she told me. 10:03:20

22 Q. Okay. And what did [REDACTED] Kaitlin tell 10:03:22

23 you? 10:03:25

24 A. That she said that the Governor told 10:03:25

25 her that she was too smart to do the job and that 10:03:27

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 she should go -- she would be moving to, like, do 10:03:30  
3 something, you know, more challenging for her. 10:03:32

4 Q. How did you feel about that comment 10:03:37  
5 given that you were being asked to do the job? 10:03:40

6 A. I thought it was a little 10:03:41  
7 condescending to me. She said it in a tone that 10:03:45  
8 was bragging so... 10:03:47

9 Q. Just be careful with the mike. 10:03:48  
10 Can you just repeat what you said? 10:03:49

11 A. I said, she said it in a tone that 10:03:49  
12 was bragging. 10:03:51

13 Q. How did your responsibilities change 10:03:56  
14 when you started sitting in support of the 10:03:59  
15 Governor? 10:04:02

16 A. Well, you would have to be earlier, 10:04:03  
17 you know. You have to prepare a little bit more 10:04:09  
18 for your day. You have to prepare to be at that 10:04:13  
19 desk for most of the day. You can't really leave 10:04:17  
20 to take a break, you know. You just have to be 10:04:19  
21 more responsive to, you know, when they want you 10:04:25  
22 around. 10:04:27

23 Q. Is that role, essentially, serving as 10:04:29  
24 an Executive Assistant to the Governor? 10:04:31

25 A. Pretty much, yeah. 10:04:34

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. And supporting Ms. Benton in her role 10:04:34  
3 as Executive Assistant to the Governor? 10:04:37

4 A. Correct. 10:04:39

5 Q. Who did you talk to about 10:04:41  
6 transitioning into that role? 10:04:44

7 A. I don't know that I ever talked to 10:04:48  
8 anybody about it, because I was never under the 10:04:51  
9 impression that it was a long-term position for 10:04:53  
10 me. 10:04:55

11 Q. But when you were asked to transition 10:04:55  
12 into the role, who asked you? 10:04:58

13 A. I believe Stephanie came over and 10:05:01  
14 asked me to sit there. 10:05:04

15 Q. And I said "asked." 10:05:05

16 Were you asked or were you told? 10:05:08

17 A. I can't remember how I came to be 10:05:11  
18 there. 10:05:15

19 Q. Did you raise any concerns about 10:05:16  
20 making the transition? 10:05:18

21 A. I think like after the first week 10:05:25  
22 that I sat there, I went and talked to Jill about 10:05:27  
23 leaving to go to the MTA because I was of a 10:05:30  
24 suspicion -- like, I knew I could do the job and 10:05:35  
25 I knew I could do it well and I think that's the 10:05:37





1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Governor Cuomo? 10:07:53

3 A. I guess when I sat there -- I mean, 10:08:05

4 what -- like, when I saw him in the office or 10:08:09

5 when he actually spoke to me or, you know, when 10:08:12

6 he said, hi, how are you? Like, I don't know 10:08:13

7 what "met" really means. 10:08:17

8 Q. Good point. 10:08:18

9 So the first time you interacted with 10:08:19

10 him, not just saw him. 10:08:21

11 A. I think when I sat there is really 10:08:29

12 when I interacted with him. 10:08:31

13 Q. So, when you worked on the campaign, 10:08:33

14 you didn't ever meet or interact with Governor 10:08:35

15 Cuomo? 10:08:38

16 A. No. 10:08:38

17 Q. Tell us what it's like to work for 10:08:38

18 Governor Cuomo. 10:08:41

19 A. It's a hard job. There is really no 10:08:45

20 normal day there. Some days can start at 5:30. 10:08:50

21 Some days can, you know, can start a little bit 10:08:56

22 later than that. Some days can end at 5, some 10:08:59

23 days end at 8, some days end at 11. There is 10:09:01

24 really no schedule to it, demanding and, yeah, 10:09:06

25 just a really tough and demanding job. 10:09:19

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   So I was asking, specifically, about           10:09:22  
3                   Governor Cuomo and how he treated you.                   10:09:24

4                               Was he tough and demanding?                   10:09:27

5                   A.    (UNINTELLIGIBLE.)                               10:09:29

6                               THE STENOGRAPHER:  I'm sorry.  I                   10:09:32  
7                   didn't catch that.  I'm sorry, I didn't catch           10:09:32  
8                   that.   10:09:34

9                               Q.   Did you ever see how he interacted                   10:09:34  
10                   with Kaitlin [REDACTED]?                               10:09:36

11                   A.    Sorry, which part do I need to                   10:09:37  
12                   repeat?   10:09:38

13                               STENOGRAPHER:  Was he tough and                   10:09:38  
14                   demanding, I didn't get a response.                   10:09:42

15                   A.    Yes.   10:09:44

16                   Q.   Did you observe the Governor interact           10:09:47  
17                   with Kaitlin [REDACTED]?                               10:09:49

18                   A.    Not really.  Like, we -- we staffed           10:09:55  
19                   him together.  There was a brief period where I           10:09:58  
20                   would sit at the cubicle outside and she would           10:10:00  
21                   sit in the back office, like, when Stephanie           10:10:03  
22                   wasn't there and, like, we would staff him           10:10:05  
23                   together.  But I didn't really see how they           10:10:08  
24                   interacted because I kind of -- my back was to           10:10:11  
25                   me, you know.  So I didn't really see how they           10:10:14

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   were. But I know that, you know, we staffed him     10:10:16  
3                   together at once.   10:10:19

4                   Q. Did she ever talk to you about how                   10:10:20  
5                   the Governor treated her?                                   10:10:21

6                   A. I mean, I'm trying to -- like,                         10:10:25  
7                   nothing specific, like, just sometimes, like, he     10:10:35  
8                   was mean to her, you know, stuff like -- that's     10:10:37  
9                   the only thing I can really recall just saying         10:10:40  
10                  that, you know, he was mean to her sometimes.       10:10:42

11                  Q. Did she give you anymore details by                 10:10:44  
12                  what she meant by "he was mean to her"?             10:10:47

13                  A. Not that I can really recall, no.                   10:10:48

14                  Q. Did you ever see Kaitlin interact             10:10:52  
15                  with the members of the Governor's senior staff?     10:10:55

16                  A. Not really.   10:11:03

17                  Q. Generally?   10:11:08

18                  A. I mean, walking to and from their                 10:11:08  
19                  offices, you know, that would be the only thing     10:11:10  
20                  that -- not really anything else that I can         10:11:12  
21                  really recall.   10:11:15

22                  Q. Did Kaitlin ever speak to you about     10:11:16  
23                  her interactions with the Governor's senior         10:11:20  
24                  staff?   10:11:23

25                  A. I mean, I don't really recall that I             10:11:24

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   can recall specifics of it, you know. Like, I           10:11:27

3                   don't think she was a fan, you know, of a lot of       10:11:30

4                   them. But there's nothing really specific that I       10:11:32

5                   can recall to kind of pinpoint that, you know,       10:11:34

6                   it's just a general sense that I had.                   10:11:37

7                   Q. And you can't call to your mind how               10:11:39

8                   you got that "general sense" that she was not       10:11:42

9                   happy with how they treated her?                   10:11:44

10                  A. No, I really can't.                               10:11:46

11                  Q. Did you ever hear anyone refer to               10:11:48

12                  Kaitlin [REDACTED] as "Sponge"?               10:11:50

13                  A. No.   10:11:52

14                  Q. Never heard any of the senior staff           10:11:53

15                  refer to her as "Sponge"?                       10:11:55

16                  A. No.   10:11:57

17                  Q. Did the Governor refer to her as               10:11:58

18                  "Sponge"?                                       10:12:00

19                  A. No.   10:12:00

20                  Q. You seemed surprised by that.               10:12:01

21                  A. I never heard that before.                   10:12:03

22                  Q. Have you heard the Governor have           10:12:04

23                  nicknames for other people?                   10:12:07

24                  A. Yeah, Annabelle.                           10:12:12

25                  Q. What was her nickname?                   10:12:13

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A.   Anna May Belle.                   10:12:15

3                   Q.   Anybody else?                   10:12:17

4                   A.   That I can think of, no.           10:12:20

5                   Q.   Did you ever hear the Governor or any   10:12:23

6                   member of his senior staff refer to someone as   10:12:24

7                   "██████ the Man"?

8                   A.   No, but I -- no.                   10:12:33

9                   Q.   You seem like you paused there.       10:12:36

10                  A.   No, I don't think I ever heard that   10:12:41

11                  one before.                   10:12:42

12                  Q.   Are there other ones that you had       10:12:42

13                  heard?                   10:12:44

14                  A.   Not that I can recall, no.           10:12:44

15                  Q.   Okay. Did the Governor ever yell at   10:12:45

16                  you?                   10:12:50

17                  A.   Yes.                   10:12:50

18                  Q.   How often?                   10:12:51

19                  A.   I don't -- I wouldn't say it was that   10:12:55

20                  often. Usually, on stressful days when there was   10:12:58

21                  a lot going on, maybe a handful of times, six   10:13:04

22                  times or so maybe, if I had to guess.       10:13:07

23                  Q.   And what was your reaction to the       10:13:10

24                  Governor yelling at you?           10:13:12

25                  A.   Well, I would usually kind of just   10:13:18

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 pause and try to take a break and, you know, fix 10:13:20  
3 whatever it was that the problem was, you know, 10:13:24  
4 and that was generally how I tried to approach it 10:13:27  
5 whenever he was mad. 10:13:31

6 Q. Did any of the senior staff observe 10:13:32  
7 you being yelled at by the Governor? 10:13:34

8 A. Not that I can recall, maybe 10:13:40  
9 Stephanie. 10:13:42

10 Q. Did the Governor ever curse at you? 10:13:44

11 A. Not that I can recall. 10:13:50

12 Q. Did he ever threaten you? 10:13:53

13 A. No. 10:13:57

14 Q. Did he ever throw anything at you? 10:13:58

15 A. No. 10:14:02

16 Q. Has the Governor ever hugged you? 10:14:05

17 A. No. 10:14:08

18 Q. Has he ever kissed you? 10:14:09

19 A. No. 10:14:11

20 Q. Have you ever been to an event at the 10:14:15  
21 Executive Mansion? 10:14:17

22 A. No. Well, I'm sorry, let me take -- 10:14:18  
23 when I first started, there was a pinning 10:14:23  
24 ceremony in 2015. That was the only time that I 10:14:25  
25 went to the Executive Mansion, I believe. 10:14:29

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   And at that pinning ceremony, did you   10:14:30

3                   go swimming?   10:14:33

4                   A.   No.   10:14:34

5                   Q.   Has the Governor ever commented on           10:14:38

6                   your appearance?                                   10:14:40

7                   A.   Yeah.   10:14:42

8                   Q.   Tell us about that.                           10:14:43

9                   A.   He made a remark about the haircut           10:14:45

10                  that I got one time. I can't remember when it   10:14:48

11                  was. But he -- it's different than the style I   10:14:52

12                  have now. But he looked at me and he was like,   10:14:57

13                  you know, it's quite a style that you chose or   10:14:59

14                  something along those lines.                   10:15:01

15                  And, you know, I kind of laughed it           10:15:03

16                  off.   10:15:08

17                  Q.   Were you uncomfortable with the           10:15:08

18                  Governor commenting on your appearance?       10:15:10

19                  A.   No.   10:15:11

20                  Q.   Any other occasions in which the           10:15:12

21                  Governor commented on your appearance?       10:15:14

22                  A.   Not that I can recall, no.               10:15:16

23                  Q.   Did the Governor ever comment on your   10:15:18

24                  clothing?                                       10:15:20

25                  A.   No, I don't think so.                   10:15:22

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q. Did you ever hear the Governor make           10:15:24  
3 jokes that had a sexual content or section nature   10:15:26  
4 to them?   10:15:29

5                   A. No, I don't recall.                                   10:15:30

6                   Q. Did you ever hear the Governor talk           10:15:33  
7 about the size of his hands?                           10:15:34

8                   A. No.   10:15:36

9                   Q. Did the Governor ever ask you about           10:15:41  
10 your personal relationships?                           10:15:42

11                  A. No, he didn't.                                   10:15:44

12                  Q. Did he ever ask you about your sex       10:15:46  
13 life?   10:15:48

14                  A. No, he didn't.                                   10:15:48

15                  Q. Did he ever send you flowers?           10:15:50

16                  A. No.   10:15:52

17                  Q. Did he ever ask you to sing a song   10:15:53  
18 for him?   10:15:56

19                  A. No.   10:15:56

20                  Q. Did you ever hear the Governor asking   10:16:02  
21 about -- strike that.                               10:16:05

22                               Did the Governor ever ask you about   10:16:06  
23 any tattoos you might have?                       10:16:07

24                  A. No.   10:16:10

25                  Q. Did the Governor ever call you by a   10:16:10

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           term of endearment like honey or sweetheart or           10:16:13

3           darling or dear?           10:16:16

4                   A.   No.           10:16:18

5                   Q.   Did he ever speak Italian to you?           10:16:19

6                   A.   Yes.           10:16:24

7                   Q.   Do you speak Italian?           10:16:25

8                   A.   A little.           10:16:27

9                   Q.   Okay. Did you understand what he was           10:16:27

10           saying to you?           10:16:29

11                   A.   Yes.           10:16:29

12                   Q.   What did he say?           10:16:29

13                   A.   He said, let's go, let's go. In           10:16:30

14           Italian it would be like "andiamo."           10:16:34

15                   Q.   I was going to say that.           10:16:36

16                   A.   Yeah.           10:16:38

17                   Q.   Alright.           10:16:38

18                   A.   You know, "Vieni qua," which means           10:16:40

19           come here so...           10:16:42

20                   But that was pretty much the extent           10:16:44

21           of it.           10:16:46

22                   Q.   That's it?           10:16:47

23                   A.   Yeah, that's all.           10:16:48

24                   Q.   Did he ever use Italian terms of           10:16:50

25           endearment to refer to you?           10:16:54



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   years on top of that.                   10:17:52

3                   Q.   And why did it take so long for you           10:17:54  
4                   to leave?   10:17:57

5                   A.   I think because they liked me and           10:18:01  
6                   they thought I did a good job and didn't want me   10:18:05  
7                   to go.   10:18:08

8                   Q.   And what do you mean by that?           10:18:08

9                   A.   That they liked having me there and           10:18:11  
10                  they didn't want to see me leave.           10:18:13

11                 Q.   And what did they do to ensure that       10:18:16  
12                  you weren't leaving?                       10:18:19

13                 A.   Well, I had -- would periodically       10:18:21  
14                  check in to see, you know, where we were because   10:18:25  
15                  they said that they would move me out of the       10:18:29  
16                  Chamber to a job at the MTA. They would set me     10:18:31  
17                  up with an interview. And they did. And that       10:18:35  
18                  was about a year in. But the offer was for less     10:18:38  
19                  than I was making at the time.           10:18:41

20                 So we started over and, you know,       10:18:43  
21                  they said, what else would you like to do.       10:18:47

22                 And I decided on the Port Authority       10:18:49  
23                  where I am now and I think about another year I   10:18:51  
24                  want to say went by and I would periodically   10:18:55  
25                  check in to see what was going on, you know, how   10:18:58



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   And they said, yes. And, yeah.                   10:20:00

3                   Q. Did you tell them where the other                   10:20:04

4 offer was from?                   10:20:06

5                   A. No.                   10:20:07

6                   Q. And why not?                   10:20:08

7                   A. I didn't want to tell them.                   10:20:11

8                   Q. Why not?                   10:20:12

9                   A. I didn't want them to know where it                   10:20:16

10 was to maybe call and stop them -- stop the offer                   10:20:20

11 at Geto & de Milly and, you know, from being                   10:20:25

12 offered to me.                   10:20:27

13                   Q. And why did you think someone from                   10:20:28

14 the Executive Chamber might call and stop your                   10:20:30

15 offer from another employer?                   10:20:32

16                   A. Well, I think, that was something                   10:20:34

17 that was wildly rumored to have happened there.                   10:20:35

18 I think some of it came out during the Percoco                   10:20:40

19 trial as well too. So it was always of a                   10:20:43

20 suspicion that that might happen.                   10:20:45

21                   Q. Were there particular people that you                   10:20:47

22 heard those rumors about or that you observed                   10:20:50

23 that about by paying attention to the Percoco                   10:20:53

24 trial?                   10:20:57

25                   A. Not that I can really remember, no.                   10:21:00

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   And so, after you told Ms. DesRosiers       10:21:07  
3                   that you had another job offer and you were       10:21:10  
4                   giving your two weeks notice, what happened?   10:21:12

5                   A.   So they said they were going to work       10:21:17  
6                   to get me at the Port Authority and about a week   10:21:23  
7                   and a half in -- I stayed with like the two-week   10:21:28  
8                   timeline. About a week and a half in, they       10:21:33  
9                   didn't have anyone to replace me and they had set 10:21:35  
10                  me up with an interview and it was a sign of good 10:21:38  
11                  faith for me. So I said, I'll stay third week,   10:21:41  
12                  and then I went on the interview.               10:21:44

13                  Q.   And did you get the job?                   10:21:48

14                  A.   Yes.                                       10:21:49

15                  Q.   And how long after the interview did       10:21:50  
16                  you get the job?                               10:21:52

17                  A.   I took -- I'm trying to think how       10:21:54  
18                  long. I took three weeks paid vacation off, so   10:21:58  
19                  right after that.                             10:22:01

20                  Q.   Did anyone ask you to stay -- from       10:22:04  
21                  the Executive Chamber ask you to stay longer   10:22:07  
22                  after that?                                   10:22:08

23                  A.   No.                                       10:22:09

24                  Q.   And who was your replacement?           10:22:11

25                  A.   It was Charlotte Bennett.               10:22:13

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q. Did you talk to the Governor about           10:22:20

3                   leaving?   10:22:23

4                   A. No.   10:22:24

5                   Q. Do you have any idea how the Governor           10:22:27

6                   came to know that you were leaving the Executive   10:22:29

7                   Chamber?   10:22:32

8                   A. I assume Stephanie told him.                   10:22:32

9                   Q. Did he say good-bye to you?                   10:22:34

10                  A. No.   10:22:36

11                  Q. What was your last interaction with           10:22:37

12                  Governor Cuomo?                                   10:22:42

13                  A. I don't even know the last time I saw           10:22:42

14                  him. I don't even think that he was there the   10:22:45

15                  last week that I was there either; so probably a   10:22:48

16                  week before I left.                               10:22:51

17                  Q. Nothing memorable?                           10:22:51

18                  A. No.   10:22:52

19                  Q. Did you ever work out of the Albany           10:22:54

20                  office?   10:22:56

21                  A. While staffing the Governor, no.           10:23:01

22                  Q. I guess in any role that you had, did           10:23:03

23                  you ever work out of the Executive Chamber office   10:23:06

24                  in Albany?                                       10:23:08

25                  A. I went there for two or three days           10:23:09



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Did you ever hear the Governor use 10:24:23  
3 that term? 10:24:24

4 A. No, not that I can recall. 10:24:26

5 Q. Was it just used amongst junior staff 10:24:29  
6 or did you ever hear the senior staff use it to 10:24:31  
7 describe themselves? 10:24:36

8 A. I think, mostly, just amongst junior 10:24:36  
9 staff, as far as I can remember. 10:24:40

10 Q. And what did it mean to you? 10:24:42

11 A. I don't know. I don't know. I don't 10:24:49  
12 know what that means. Just that they were, you 10:24:50  
13 know, I guess, popular like in the movie, you 10:24:57  
14 know, popular girls. 10:25:00

15 Q. Did it mean that they were mean? 10:25:01

16 A. That too, yeah. 10:25:05

17 Q. Were they mean to you? 10:25:06

18 A. Sometimes but, no, they were pretty 10:25:12  
19 good with me for the most part. 10:25:16

20 Q. Okay. And when you say, "sometimes," 10:25:18  
21 can you give us an example of that? 10:25:20

22 A. Well, like, sometimes Melissa would 10:25:23  
23 be short with you when you're trying to figure 10:25:26  
24 something out, you know. She was just difficult 10:25:28  
25 to deal with sometimes, you know. She would kind 10:25:34

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   of bark a lot of things that she wanted to get           10:25:37  
3                   done at once and you would have to kind of, you       10:25:39  
4                   know, triage them in your head, you know. She       10:25:41  
5                   was difficult in that regard.                           10:25:43

6                   Q. Did Melissa DeRosa ever curse at you?           10:25:45

7                   A. Not that I can recall.                           10:25:52

8                   Q. Did she ever say anything to you that           10:25:53  
9                   you felt was belittling or degrading?               10:25:56

10                  A. Not that I can recall.                           10:26:03

11                  Q. Okay. Can you compare your                   10:26:04

12                  experience working now at the Port Authority with   10:26:08

13                  your experience working in the Executive Chamber?   10:26:10

14                  A. Well, it's definitely, you know, more       10:26:17

15                  regimental approach to the day. You know, I       10:26:19

16                  would go in start at nine and if you want it       10:26:22

17                  could end by five. You know, it's almost like     10:26:24

18                  apples and oranges just because I'm also doing a   10:26:27

19                  different job there. So, I mean, I've got a       10:26:30

20                  little bit more freedom to take meetings and to   10:26:35

21                  kind of go out and take lunch. It's also a       10:26:39

22                  slower pace. There's deadlines that, you know,   10:26:44

23                  are a little bit different. There were -- some   10:26:46

24                  could be a week as opposed to having something   10:26:49

25                  being an hour, like, in the Executive Chamber.   10:26:52

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2 It's definitely, like, just a more regimental 10:26:58  
3 approach, you know. You can kind of -- if your 10:27:06  
4 calendar is one thing, it's pretty much going to 10:27:08  
5 stay that way. 10:27:12

6 Q. Let's talk about Charlotte Bennett. 10:27:14

7 So, when was the first time you met 10:27:16  
8 Ms. Bennett? 10:27:22

9 A. I mean, I may have seen her around 10:27:27  
10 when she started. But I think the first time 10:27:28  
11 that she and I actually spoke when she was coming 10:27:31  
12 that the desk. 10:27:35

13 Q. When you say, "that desk," you mean 10:27:36  
14 the -- 10:27:37

15 A. The one outside the Governor's 10:27:37  
16 office. 10:27:41

17 Q. The one outside the Governor's, okay. 10:27:41  
18 And were you supposed to be training 10:27:44

19 Ms. Bennett? 10:27:47

20 A. Yes. 10:27:48

21 Q. To take over your role? 10:27:48

22 A. Yes. 10:27:49

23 Q. And what did you do to train Ms. 10:27:49  
24 Bennet? 10:27:49

25 A. So she like -- when the Governor was 10:27:56

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2           in -- I remember there was a day that like we           10:27:58  
3           split the desk. So she took one side of it and I   10:27:59  
4           had the other side of it. And she was kind of           10:28:00  
5           there to watch what I was doing and, you know,       10:28:02  
6           ask a question.   10:28:06

7                       And then I would kind of fill her,           10:28:07  
8           this is why I do this, this is why I do that and   10:28:09  
9           then like show her the phones.                           10:28:12

10                      And then the days that he wasn't in,       10:28:12  
11           I asked her if she wanted to sit at the cube,       10:28:15  
12           which is the outside of the Governor's office and   10:28:18  
13           I sat in the back. And I said, get comfortable       10:28:20  
14           with your surroundings. You know, if anything       10:28:22  
15           pops into your head, you can just kind of pop       10:28:23  
16           back here and we can talk, you know, stuff like   10:28:25  
17           that.   10:28:27

18                      Q. What did you tell Ms. Bennett about       10:28:27  
19           interacting with the Governor?                       10:28:31

20                      A. I don't know. I don't remember what       10:28:34  
21           I told her.   10:28:36

22                      Q. Do you remember generally what you       10:28:37  
23           told her?   10:28:39

24                      A. Probably what I would tell anybody       10:28:41  
25           when interacting with him. Don't lie to him, you   10:28:43

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2 know. If you don't know the answer to something, 10:28:46

3 say I don't know; always call him "Governor." 10:28:48

4 Q. Any occasion on which you lied to the 10:28:54

5 Governor? 10:28:57

6 A. I don't think so no. 10:28:59

7 Q. Why were you giving that advice? 10:29:00

8 A. Cause I was always of the mind frame 10:29:03

9 that it's just better to tell him the truth, even 10:29:06

10 if it's an answer he doesn't like, because I -- 10:29:10

11 it was one -- it's like one of those things he 10:29:15

12 always knew if he knew you were lying or you 10:29:18

13 always get that impression if you were lying. So 10:29:21

14 it was always just better to tell him the truth, 10:29:23

15 you know, or even just to tell him, I don't know, 10:29:26

16 even if that's the answer he didn't want to hear. 10:29:29

17 Q. What happens if you tell the Governor 10:29:31

18 something he doesn't want to hear? 10:29:33

19 A. I mean, he'd get mad. 10:29:36

20 Q. Did the Governor ever get mad at you? 10:29:39

21 A. Sometimes, yeah. 10:29:42

22 Q. And what does that look like? 10:29:43

23 A. I mean, he would kind of just ask, 10:29:50

24 you know, do you even know what you're doing, you 10:29:52

25 know, stuff like that, you know. 10:29:57

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2 Q. What did you tell Ms. Bennett about 10:30:02  
3 interacting with the Governor's senior staff? 10:30:07

4 A. I don't know what I told her. I 10:30:13  
5 think for Stephanie, I probably would have told 10:30:15  
6 her, you know, like, you know, treat this job as 10:30:18  
7 if you're Stephanie's assistant first and then 10:30:21  
8 the Governor's, cause that's kind of how it felt 10:30:23  
9 when I was there so... 10:30:27

10 But, as far as anybody -- I don't 10:30:29  
11 know that I told her about anybody else, because 10:30:31  
12 I don't know that I had a lot of hands-on with 10:30:34  
13 them. 10:30:37

14 Q. Do you think looking at some of your 10:30:37  
15 text messages might refresh your recollection? 10:30:39

16 A. Yeah. 10:30:41

17 Q. Why don't we take a break and we can 10:30:41  
18 look at some documents. 10:30:43

19 MS. KENNEDY-PARK: We can go off the 10:30:44  
20 record. 10:30:45

21 THE VIDEOGRAPHER: Okay. Everyone 10:30:46  
22 the time is, approximately, 10:30. We are going 10:30:47  
23 off the video record. 10:30:50

24 (Recess taken 10:30 to 10:43 a.m.) 10:41:17

25 THE VIDEOGRAPHER: Okay. The time is 10:43:15



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2                   A.   Maybe Steph on the cheek when she was       10:44:41  
3                   leaving to go home maybe, I think.                   10:44:45

4                   Q.   Did you ever see the Governor kiss               10:44:47  
5                   anyone on the lips?                                   10:44:50

6                   A.   No, I don't think so.                           10:44:51

7                   Q.   Did you ever hear about the Governor           10:44:52  
8                   about kissing anyone on the lips?               10:44:55

9                   A.   No, I don't think so.                           10:44:58

10                  Q.   Have you ever observed anyone sitting       10:45:00  
11                  on the Governor's lap?                           10:45:03

12                  A.   No.   10:45:05

13                  Q.   Have you ever heard about anyone from       10:45:06  
14                  the staff sitting on the Governor's lap?       10:45:08

15                  A.   No, I don't think so.                           10:45:12

16                  Q.   Have you ever heard about -- ever           10:45:13  
17                  seen or heard about the Governor putting his head 10:45:25  
18                  in someone's lap?                           10:45:27

19                  A.   No.   10:45:30

20                  Q.   Have you ever heard about or seen           10:45:33  
21                  someone that was part of the Executive Mansion 10:45:37  
22                  not fully clothed?                       10:45:39

23                  A.   No.   10:45:42

24                  Q.   Have you ever heard or heard about       10:45:54  
25                  the Governor making jokes of a sexual nature or 10:45:55

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2           sexual content in front of someone else?           10:45:58

3                   A.   No.   10:46:02

4                   Q.   Is there anything you ever witness           10:46:03

5           the Governor do that you thought was concerning?   10:46:05

6                   A.   What do you mean by "concerning"?           10:46:12

7           What does that mean, like?                           10:46:14

8                   Q.   Why don't you tell me.                           10:46:15

9                           Is there something that you saw that           10:46:17

10          you observed that made you feel uncomfortable for   10:46:18

11          the person that it was happening to?           10:46:21

12                   A.   Nothing specific that I can think of,           10:46:25

13          no.   10:46:27

14                   Q.   Did you ever see the Governor speak           10:46:28

15          Italian to other people?                           10:46:37

16                   A.   Yeah.   10:46:38

17                   Q.   And did you know what he was saying?           10:46:39

18                   A.   Yeah.   10:46:41

19                   Q.   Did he ever use Italian terms of               10:46:43

20          endearment or make comments in Italian that were   10:46:46

21          of a sexual nature?                               10:46:48

22                   A.   No, it was more like, "chow chow,"           10:46:50

23          you know, when he was walking in and out of the   10:46:52

24          office.   10:46:54

25                   Q.   Never heard him call someone "bella"?           10:46:55

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2                   A.   Maybe, yeah.  That sounds like --                   10:46:58

3                   yeah, I may have heard that, yeah.                   10:47:01

4                   Q.   Do you remember who he was saying it                   10:47:03

5                   to you?                   10:47:05

6                   A.   No, I don't.  I'm sorry.                   10:47:05

7                   Q.   Did he call other women in the                   10:47:09

8                   Executive Chamber by terms of endearment?                   10:47:11

9                   A.   Like what?                   10:47:14

10                  Q.   Dear, honey, sweetheart, darling.                   10:47:15

11                  A.   Yeah, I think, maybe Steph a couple                   10:47:23

12                  times, like, okay, dear, you know, have a safe                   10:47:24

13                  trip home.                   10:47:27

14                  Q.   Did you ever observe the Governor                   10:47:30

15                  ever asking anyone to sing for him?                   10:47:33

16                  A.   No.                   10:47:39

17                  Q.   Did you ever hear about the Governor                   10:47:40

18                  asking someone to sing for him?                   10:47:43

19                  A.   Yes.                   10:47:45

20                  Q.   And what did you hear about that?                   10:47:45

21                  A.   That was Charlotte that said she had                   10:47:47

22                  to sing for him.                   10:47:51

23                  Q.   Okay.  And what did Ms. Bennett tell                   10:47:52

24                  you about singing for the Governor?                   10:47:55

25                  A.   If I remember correctly, I think, she                   10:47:57

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2           had to sing "Bohemian Rhapsody" for him.                   10:48:00

3                   Q.   Do you remember her telling you                   10:48:06

4           anything else about that?                   10:48:08

5                   A.   Not really, no.                   10:48:11

6                   Q.   There is a time period after you --                   10:48:12

7           or when Ms. Bennett began and shortly after you           10:48:16

8           left where you and she were texting; is that           10:48:19

9           right?                   10:48:22

10                  A.   (No response.)                   10:48:22

11                  Q.   And during the time period after you           10:48:23

12           left the Executive Chamber, was text your only           10:48:25

13           form of communication with Ms. Bennett?           10:48:27

14                  A.   Yes.                   10:48:29

15                  Q.   Did you talk to her on the phone?           10:48:30

16                  A.   I don't think I ever talked to her on           10:48:32

17           the phone.                   10:48:34

18                  Q.   After you left the Executive Chamber.           10:48:34

19                  A.   Correct.                   10:48:37

20                  Q.   Okay.   And so the content of the text           10:48:37

21           messages is all you know about her experience in           10:48:39

22           the Executive Chamber?                   10:48:41

23                  A.   Yes.                   10:48:41

24                  Q.   Okay.   Why don't we -- you open your           10:48:42

25           binder, which you have in front of you.   And           10:48:46



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2                   thing. So I was just, like, telling her it's           10:49:55  
3                   going to be fine, you know, like this -- just           10:49:57  
4                   breathe.   10:50:00

5                   Q. And you wrote back, "It's going to be           10:50:00  
6                   okay."   10:50:04

7                   A. Uh-huh.   10:50:04

8                   Q. And then she said, "Do you think it           10:50:04  
9                   was a mistake to agree to this? Some people on           10:50:07  
10                  38 you can guess were kind of making me feel like   10:50:08  
11                  it was or at least that I should clarify some           10:50:11  
12                  things beforehand."                                       10:50:15

13                  What did you understand her to mean           10:50:16  
14                  by that?   10:50:18

15                  A. That people were going to jealous of           10:50:19  
16                  her when she was moved up to staff the Governor.   10:50:21

17                  Q. And what did you understand were the           10:50:24  
18                  things that she "should clarify"? Because you           10:50:26  
19                  wrote back, "you should absolutely clarify with           10:50:31  
20                  them."   10:50:33

21                  A. I don't really -- I don't know what I           10:50:38  
22                  mean. Like, I don't -- can't really remember           10:50:40  
23                  what we were talking about to "clarify."           10:50:52

24                  Q. And what was your understanding of           10:50:54  
25                  who the people she was referring to on 38 were?   10:50:56

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2 A. I believe it was the other briefer 10:51:01  
3 that she worked with. 10:51:04

4 Q. And who was that? 10:51:05

5 A. It was a woman named [REDACTED]. 10:51:06

6 Q. Can you flip to the next page. 10:51:11

7 A. Yeah. 10:51:13

8 Q. Okay. At the bottom of that page you 10:51:14  
9 say, "It can be the most frustrating thing you'll 10:51:17  
10 ever do maybe ever." 10:51:20

11 What did you mean by that? 10:51:22

12 A. Working there. 10:51:37

13 Q. And what did you mean was 10:51:39  
14 "frustrating" about working there? In fact, I 10:51:41  
15 think, you said, "it was the most frustrating 10:51:43  
16 thing you'll do maybe ever." 10:51:45

17 Why was working in the Executive 10:51:47  
18 Chamber the "most frustrating thing" you might do 10:51:48  
19 ever? 10:51:52

20 A. I mean, I think, we've talked about 10:51:52  
21 it. There are early mornings. There are late 10:51:54  
22 nights. There's no real thank you's to anything 10:51:56  
23 you do. When you're at that desk, you can't 10:52:00  
24 really leave ever for the day. There's -- you 10:52:03  
25 know, it's like bring your lunch type of thing. 10:52:07

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2                   And just the way that the place moved, it's a                   10:52:11  
3                   very fast moving place and it's really really                   10:52:13  
4                   hard to keep that adrenaline rush every day that                   10:52:17  
5                   you're in there.                   10:52:21

6                   Q.   When you say, "there are no thank                   10:52:22  
7                   you's," what do you mean?                   10:52:24

8                   A.   There are no thank you's for doing                   10:52:25  
9                   your job.                   10:52:28

10                  Q.   Did any of the senior staff ever                   10:52:29  
11                  thank you for anything you did?                   10:52:31

12                  A.   I don't know.   It's tough for me to                   10:52:42  
13                  recall.   I don't know that I was necessarily                   10:52:45  
14                  looking for thank you's or paying attention to                   10:52:46  
15                  that, you know.   I can't remember being thanked.           10:52:50

16                  Q.   Do you think working in the Executive                   10:52:51  
17                  Chamber was a respectful work environment?                   10:52:53

18                  A.   I don't know.                   10:53:01

19                  Q.   I'm going to ask you a different                   10:53:02  
20                  question.                   10:53:04

21                  How would you describe the culture of                   10:53:04  
22                  the Executive Chamber, not the job demands but                   10:53:07  
23                  the culture?   How did people treat you?                   10:53:11

24                  A.   I'm -- I mean, it's a strange thing                   10:53:20  
25                  because they're friendly to you.   Like, it's a                   10:53:27

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2                   friendly place. You make a lot of friendships.           10:53:30

3                   But it's also -- you can be meant to feel stupid           10:53:32

4                   sometimes.   10:53:36

5                   Q. Can you give me an example of how you           10:53:38

6                   were made "to feel stupid"?                                   10:53:41

7                   A. I don't know. Just -- I don't know.           10:53:50

8                   I'm trying to think. I can't come up with an           10:53:55

9                   example. I just remember feeling stupid           10:53:58

10                  sometimes.   10:54:01

11                 Q. Did anything anyone in the Executive           10:54:01

12                 Chamber did to you leave you in tears?           10:54:02

13                 A. No. There were days where, I think,           10:54:09

14                 I probably would have wanted to cry, but I don't   10:54:11

15                 know that I ever cried at work.           10:54:14

16                 Q. And the days where you can kind of           10:54:16

17                 "wanted to cry," can you describe to us what's   10:54:18

18                 that day like?   10:54:21

19                 A. It's usually the third or fourth day           10:54:21

20                 in the row of getting to the office by 5:30 and   10:54:23

21                 getting home by like 8 o'clock at night and just   10:54:26

22                 being really tired.                                       10:54:29

23                 Q. Not having to do with anything to do           10:54:30

24                 with the way someone treated you?           10:54:32

25                 A. I don't know. I can't recall a           10:54:37

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2                   specific thing of being treated that way.                   10:54:44

3                   Q.   Okay.  I asked you just a few moments                   10:54:46

4                   ago that you thought that the culture of the                   10:54:48

5                   Executive Chamber when you were there was                   10:54:50

6                   respectful.  You said you couldn't answer that                   10:54:52

7                   question.                   10:54:54

8                   Why can't you say it was respectful?                   10:54:55

9                   A.  Well, I mean, "respectful" of what                   10:54:59

10                  your time?  Because if that's the case, it's not                   10:55:01

11                  respectful of your time.  There is a demand for                   10:55:04

12                  weekends and, you know, if it's respect -- you                   10:55:06

13                  know, like, you know -- I don't know.  I don't                   10:55:09

14                  know.                   10:55:18

15                  Q.  How about respectful of you as a                   10:55:19

16                  person?                   10:55:21

17                  A.  Not always.                   10:55:24

18                  Q.  And can you remember any occasions in                   10:55:26

19                  which you felt disrespected?                   10:55:29

20                  A.  When I asked to leave to go to                   10:55:31

21                  another job and it took about two years to do                   10:55:33

22                  that and it felt like it was a my own doing to                   10:55:35

23                  finally get them to do it.                   10:55:40

24                  Q.  Any other occasions?                   10:55:41

25                  A.  Having to threaten to resign the day                   10:55:42



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2           others, but in your own experience whether there       11:22:56  
3           were occasions in which you were told that your       11:22:58  
4           work wasn't up to standard?                               11:23:02

5                   A.   Well, I don't know that it was said       11:23:10  
6           that it was up to standard.   But most of what I       11:23:13  
7           would pick that was kind of dismissive to me was,   11:23:16  
8           like, you would get a look, like, okay, really,       11:23:18  
9           you know, it was mostly body language and type       11:23:21  
10          looks that you could just foresee it as, you       11:23:23  
11          know, you've let me down on this one, you know.   11:23:26  
12          And those were things that would kind of really   11:23:29  
13          eat at you.   11:23:32

14                  Q.   So, when people were not happy with       11:23:32  
15          your work performance, they conveyed that to you   11:23:36  
16          using body language or looks?                       11:23:39

17                  A.   Yeah.   For instance, if I was going       11:23:40  
18          to give Stephanie something, you know, I would       11:23:41  
19          hand it to her and she would be like, really, you   11:23:44  
20          know, something like that, you know.   So not       11:23:46  
21          actually saying something but the body language   11:23:49  
22          is perceived to be, like, you know, this isn't   11:23:51  
23          great.   11:23:54

24                  Q.   And were there ever occasions in       11:23:54  
25          which you got more than that in terms of feedback   11:23:56

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   on your work product, more than a look or more           11:23:59  
3                   than sort of a dismissive gesture?                           11:24:02

4                   A.   Not really because my work product it           11:24:04  
5                   was mostly like scheduling meetings.   So it was,           11:24:07  
6                   you know, if I couldn't get the person on the           11:24:10  
7                   phone, when, you know it's like come on, figure           11:24:12  
8                   it out, where is he, what's going on here, you           11:24:13  
9                   know, which was frustrating because I can't           11:24:15  
10                  control the other person's phone, you know.   So           11:24:16  
11                  things like that that were just like you really           11:24:18  
12                  need to find this person, you really need to do           11:24:19  
13                  this, you really need to do that.                       11:24:22

14                  Q.   Were there times you felt like you           11:24:24  
15                  were being blamed or your work performance were           11:24:26  
16                  being judged on things that were out of your           11:24:29  
17                  control?   11:24:31

18                  A.   Yes, but I don't know that I remember           11:24:36  
19                  something specific to that.   But I do remember           11:24:39  
20                  thinking like, you know, what the heck, you know,           11:24:41  
21                  this isn't my fault but, yes.                           11:24:42

22                  Q.   And what about observing other           11:24:44  
23                  people, did you have the Governor give feedback           11:24:46  
24                  to people on their work?                               11:24:49

25                  A.   Well, they would have -- well, the           11:24:54

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           Governor and senior staff would have like these           11:24:56  
3           scheduling-type event type meetings and they           11:24:59  
4           would come to him and present to him the event           11:25:02  
5           they come up with and, you know, everything of           11:25:04  
6           it. And it wouldn't be uncommon for senior staff   11:25:06  
7           to exit that meeting, you know, with like           11:25:09  
8           shoulders hunched over, you know, like heavy           11:25:12  
9           exhaling, you know, going back to their offices   11:25:16  
10          and slamming the door, stuff like that after a   11:25:18  
11          bad meeting.   11:25:21

12                   Q. So leaving his office upset,                   11:25:22  
13                   essentially?   11:25:24

14                   A. Right.   11:25:24

15                   Q. Okay. And how often did you see                   11:25:25  
16                   people in the Executive Chamber upset?                   11:25:26

17                   A. I don't know how often. I don't know           11:25:34  
18                   if I could tell you how often it was. I mean,           11:25:35  
19                   you know, when the days where there were, you           11:25:38  
20                   know, events flying and you had to do this,           11:25:43  
21                   people would get upset because it's lot of work           11:25:46  
22                   to turn around in a really quick time. I don't           11:25:49  
23                   know how often it is, though.                           11:25:52

24                   Q. Did you have to -- not have to.                   11:25:54

25                                   But did you ever comfort someone who           11:25:55



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Okay. And how did you know when you 11:27:05  
3 had to be in the office, when you were staffing 11:27:08  
4 the Governor? 11:27:11

5 A. I would get a pin alert that would go 11:27:13  
6 off to my phone letting me know that, you know, 11:27:16  
7 he was leaving or likely to leave soon. 11:27:19

8 Q. And what's the earliest you think a 11:27:21  
9 pin alert like that ever came? 11:27:25

10 A. Three or four in the morning. 11:27:31

11 Q. When you get the pin alert, what does 11:27:32  
12 it mean to you as someone who is staffing the 11:27:36  
13 Governor? 11:27:39

14 A. I immediately got up and got ready 11:27:39  
15 for work and got to the office. 11:27:41

16 Q. Did you have to get to the office 11:27:41  
17 before the Governor got to the office? 11:27:43

18 A. Normally, that was the rule. When it 11:27:44  
19 was earlier like that, there was kind of some 11:27:46  
20 flex time that was allowed for that. 11:27:49

21 Q. Any occasion in which you were ever 11:27:53  
22 perceived as being late to the office? 11:27:55

23 A. I don't think so. I really do not 11:28:00  
24 like being late. I still don't like being late 11:28:02  
25 to this day so... 11:28:05

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Ever observe anyone that was 11:28:05  
3 perceived as being late and saw what happened? 11:28:08

4 A. Yes. 11:28:11

5 Q. And who was that? 11:28:11

6 A. Kaitlin [REDACTED]. 11:28:15

7 Q. And what happened? 11:28:15

8 A. I remember she would come in late 11:28:16  
9 quite often. And, I think, sometimes, when she 11:28:19  
10 was -- depending on how late she got in, like, 11:28:25  
11 they would pull somebody for a second to sit 11:28:30  
12 there, like, they may have pulled me for like a 11:28:32  
13 second to sit there until she got there. But I 11:28:36  
14 don't really know what happens after that. I can 11:28:40  
15 just guess that Stephanie is probably very 11:28:43  
16 annoyed. 11:28:46

17 Q. Did you ever observe feedback -- [REDACTED] 11:28:46  
18 [REDACTED] Kaitlin getting any feedback about being late? 11:28:50

19 A. Not that I can recall. 11:28:54

20 Q. How do you think the demands of 11:29:06  
21 working in the Executive Chamber personally 11:29:08  
22 affected you? 11:29:10

23 A. Well, I lost a lot of friends in my 11:29:13  
24 personal life. You know, you can't really see 11:29:16  
25 them, you know. So you're always working. 11:29:18

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 You're always at work. You're always blowing off 11:29:20  
3 everything, you know. So it takes a toll on your 11:29:23  
4 personal life. That's for sure so... 11:29:26

5 Q. Were you able to reconnect with those 11:29:28  
6 folks after you left the Executive Chamber? 11:29:30

7 A. No. 11:29:32

8 Q. Any other aspects of it -- of working 11:29:34  
9 at the Executive Chamber that took a toll on your 11:29:36  
10 personal life? 11:29:39

11 A. Just all of your personal time. 11:29:51

12 Q. Were there any occasions on which you 11:29:53  
13 were taking personal time and someone from the 11:29:55  
14 Executive Chamber was being invasive about that? 11:29:57

15 A. Yes. 11:30:00

16 Q. Can you tell us about that? 11:30:00

17 A. So it was at [REDACTED] and I 11:30:09  
18 just remember -- sorry. 11:30:11

19 Q. It's okay. Why don't I feed it to 11:30:18  
20 you, okay. 11:30:21

21 Were you at [REDACTED]? 11:30:21

22 A. Yeah. 11:30:23

23 Q. Did you tell people at the Executive 11:30:23  
24 Chamber that you were at [REDACTED]? 11:30:26

25 A. I told Stephanie. 11:30:28

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q. Ms. Benton?                   11:30:29

3                   A. Yes.                   11:30:30

4                   Q. And while you were at [REDACTED]                   11:30:30

5                   [REDACTED], were people from the Executive Chamber                   11:30:31

6                   trying to reach you?                   11:30:32

7                   A. Yes.                   11:30:33

8                   Q. Persistently?                   11:30:33

9                   A. Yes.                   11:30:35

10                  Q. Did you answer them eventually?                   11:30:35

11                  A. Yes.                   11:30:37

12                  Q. And told them you were at [REDACTED]                   11:30:38

13                  [REDACTED]?                   11:30:40

14                  A. Yes.                   11:30:41

15                  Q. Did that stop them from trying to                   11:30:41

16                  contact you?                   11:30:43

17                  A. Yes.                   11:30:43

18                  Q. Okay. You want to take a break?                   11:30:44

19                  A. I'm sorry.                   11:30:47

20                  Q. It's okay.                   11:30:47

21                  MS. KENNEDY-PARK: Just go off the                   11:30:48

22                  video please.                   11:30:49

23                  THE VIDEOGRAPHER: Okay. The time                   11:30:51

24                  is, approximately, 11:30. We're going off the                   11:30:52

25                  video record.                   11:30:55

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   (Recess taken 11:30 to 11:33 a.m.)                   11:33:01

3                   THE VIDEOGRAPHER: Okay. The time                   11:33:01

4                   is, approximately, 11:33. We are back on the                   11:33:02

5                   video record.                   11:33:05

6                   Q. Okay. If you could turn to the                   11:33:06

7                   binder in front of you and what is at Tab 7.                   11:33:09

8                   (Deposition Exhibit 4, 5/10/19 text                   11:33:09

9                   message chain between Walsh and Witness, was                   11:33:09

10                  marked for identification.)                   11:33:20

11                  Q. We'll, mark this as the next exhibit.                   11:33:20

12                  This is a text message chain between you and                   11:33:22

13                  Annabelle Walsh on May 10th, 2019.                   11:33:26

14                  As of May 10th, 2019, what was                   11:33:30

15                  Annabelle Walsh's role in the Executive Chamber?                   11:33:33

16                  A. I'm sorry. What was the date again,                   11:33:35

17                  as of what year?                   11:33:37

18                  Q. May 10th, 2020.                   11:33:37

19                  A. She was the scheduler.                   11:33:38

20                  Q. Okay. And so, as the scheduler, did                   11:33:39

21                  you report to her?                   11:33:42

22                  A. Well, I still reported to Jill at                   11:33:46

23                  that point, like, on paper. But, like, yes, I                   11:33:48

24                  mean, Annabelle would tell me things to do and I                   11:33:51

25                  would do it.                   11:33:54

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Okay. And did Ms. Bennett report to 11:33:54  
3 Ms. Walsh? 11:33:59

4 A. You know, I don't know who they 11:34:00  
5 reported -- I don't know who she reported to at 11:34:02  
6 that point. She may have. 11:34:04

7 Q. Okay. Let me step back from the 11:34:05  
8 document for a second. 11:34:07

9 A. Sure. 11:34:08

10 Q. In the Executive Chamber, was there 11:34:08  
11 an org chart of any sort? 11:34:10

12 A. Maybe, not one that I was ever given, 11:34:13  
13 you know. 11:34:15

14 Q. And if you were you going to find out 11:34:16  
15 sort of what your reporting lines were, who would 11:34:19  
16 you go talk to? 11:34:23

17 A. Probably -- me personally, I would 11:34:25  
18 have gone and talk to Jill, who, like, to who I 11:34:27  
19 reported to. 11:34:29

20 Q. Okay. And was there an HR function 11:34:29  
21 in the Executive Chamber? 11:34:32

22 A. Well, I mean, like, there was an HR 11:34:36  
23 rep, I believe, in Albany. It was like Lauren 11:34:41  
24 Grasso, I think, who handled a lot of that stuff. 11:34:44  
25 But, like, if I had questions about like vacation 11:34:47

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 time or, you know, sick policy or anything like, 11:34:50  
3 it would usually be [REDACTED] that I would 11:34:52  
4 reach out to in the office. 11:34:55

5 Q. And if you had, let's say, a 11:34:57  
6 workplace complaint, let's say your -- you had 11:34:59  
7 experienced violation in the workplace, who would 11:35:06  
8 you go to? 11:35:09

9 A. I would have gone to Jill. 11:35:10

10 Q. Okay. Do you know what "GOER" is? 11:35:11

11 A. Governor's Office's of Employee 11:35:13  
12 Relations, I believe. 11:35:16

13 Q. And what did you understand the 11:35:16  
14 purpose of GOER was? 11:35:18

15 A. I don't -- I don't know that I ever 11:35:20  
16 dealt with GOER so... 11:35:23

17 But, I think, it's supposed to be 11:35:24  
18 like HR-type office. 11:35:26

19 Q. Did you get any training or had any 11:35:28  
20 training that talked about GOER and what GOER was 11:35:31  
21 there for? 11:35:33

22 A. I don't know if GOER did like the 11:35:33  
23 SLMS training that the State does. I don't know 11:35:36  
24 if they were in charge of that. If they were 11:35:39  
25 then, yes. But, you know, that would be the 11:35:41



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 cutout. It was like a printed version of it and 11:36:27  
3 she would receive that and it would have a signed 11:36:30  
4 -- where you can sign on it. So I would give her 11:36:32  
5 the printed versions of those to read and sign. 11:36:34

6 Q. Okay. Did you observe Ms. DesRosiers 11:36:37  
7 actually reading the trainings? 11:36:39

8 A. No. 11:36:41

9 Q. Do you know if she did or didn't? 11:36:41

10 A. I don't know. 11:36:43

11 Q. Did she sign the forms on the 11:36:43  
12 occasions in which you gave her the binder and 11:36:45  
13 the form -- 11:36:47

14 A. Right. 11:36:47

15 Q. -- did you sign the form? 11:36:48

16 A. Yes. 11:36:49

17 Q. And who did you get the binder from? 11:36:49

18 A. I believe it was [REDACTED]. 11:36:51

19 Q. And did you have to return the signed 11:36:54  
20 form to [REDACTED]? 11:36:56

21 A. Yeah, [REDACTED] would normally come 11:36:58  
22 around. I think there was a deadline where the 11:37:00  
23 whole, like, Chamber had to be in compliance by a 11:37:03  
24 certain point. So there reminders. And I think 11:37:05  
25 there was a deadline of which the compliance date 11:37:06



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           yourself, "out of my hands now."                   11:37:59

3                   And why were you updating Ms. Walsh           11:38:01

4           on what was going on?                   11:38:05

5                   A. It was -- sometimes Annabelle would           11:38:08

6           check in, but I would also let her know, like, it   11:38:10

7           was a courtesy thing of what he was doing.           11:38:13

8           Because sometimes when senior staff wasn't in the   11:38:15

9           office, they would ask, how are things going?       11:38:18

10                   And then I would do it as courtesy to           11:38:21

11           her. I think this was close to when I was           11:38:23

12           leaving. So I wanted to let her know what he was   11:38:25

13           doing and, you know, that Charlotte was with him.   11:38:27

14                   Q. Okay. And was Ms. Walsh someone who           11:38:28

15           was in the New York City office, that's where she   11:38:30

16           was located?                   11:38:33

17                   A. Yes.                   11:38:34

18                   Q. And then she wrote back, "Oh, Jesus."           11:38:34

19                   And you wrote, "laughing out loud. I           11:38:37

20           know."                   11:38:39

21                   Do you know why you wrote I know in           11:38:40

22           response to her saying, "Oh, Jesus"?           11:38:43

23                   A. I think because it's pretty soon to           11:38:45

24           have somebody staffing him alone.           11:38:47

25                   Q. And why is it "pretty soon to have           11:38:50

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 somebody staffing him alone"? 11:38:53

3 A. Because when you're new there, it's a 11:38:54

4 really hard thing to do. I mean, but it's not 11:38:57

5 uncommon for him for like to have to staff alone. 11:38:59

6 Because I can remember there were instances where 11:39:03

7 Stephanie would leave and it would be a late 11:39:05

8 night and I would sit the cube and everyone would 11:39:06

9 be gone. It's like a precautionary thing, like, 11:39:09

10 Christmas Eve or like right before Christmas, I 11:39:12

11 was the only one in the office with him. He 11:39:14

12 didn't really need me anything, but it was a 11:39:16

13 precautionary thing, just in case he did need 11:39:19

14 something. So, you know, it wouldn't be weird 11:39:21

15 for him to be like, Stephanie, go home, keep [REDACTED] 11:39:24

16 out there. I thought it was a little early thing 11:39:27

17 for him to happen, but it's not an uncommon thing 11:39:30

18 to happen. 11:39:33

19 Q. So somebody needs to be there when 11:39:33

20 the Governor is there, essentially? 11:39:35

21 A. Correct. 11:39:37

22 Q. And you don't believe unless the 11:39:37

23 Governor leaves? 11:39:39

24 A. Correct. 11:39:39

25 Q. And unless he tells you you can? 11:39:40

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2 A. Correct. 11:39:42

3 Q. Okay. And on those occasions -- 11:39:43

4 actually, are there any occasions in which you 11:39:43

5 observed that the Governor was alone in his 11:39:45

6 office with another member of the staff? 11:39:47

7 A. So you mean like just two people in 11:39:58

8 his office -- 11:40:00

9 Q. Yes. 11:40:01

10 A. -- and I'm the only one staffing him? 11:40:01

11 Q. Correct. 11:40:03

12 A. Yeah. Like, Melissa would hang out 11:40:03

13 all the time after work. 11:40:05

14 Q. Okay. Anyone else? 11:40:06

15 A. Sometimes Annabelle, Steph sometimes 11:40:08

16 if it was like earlier in the week, later in the 11:40:10

17 week. She tended to go back to Albany. 11:40:13

18 Q. What about other senior staffers, 11:40:14

19 were there other senior staffers whoever had 11:40:16

20 one-on-one meetings with the Governor? 11:40:17

21 A. Robert Mujica sometimes had 11:40:24

22 one-on-one meetings. I'm trying to think. Maybe 11:40:27

23 Alfonso would want to have one-on-one meetings 11:40:41

24 sometimes too. But it -- from what I remember, 11:40:44

25 it was -- usually, the people who would hang out 11:40:46



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   Which is Tab 8.                   11:41:25

3                   A.   Okay.                   11:41:26

4                               (Deposition Exhibit 5, 5/10/19 text           11:41:26

5                   message chain between Bennett and Witness, was           11:41:26

6                   marked for identification.)                   11:41:27

7                   Q.   Let's mark this as the next exhibit.           11:41:27

8                               So this is on the same day. This is           11:41:32

9                   also on May 10th, 2019 and this is between you           11:41:33

10                  and Charlotte Bennett.                   11:41:36

11                  Do you see that?                   11:41:39

12                  A.   Uh-huh.                   11:41:40

13                  Q.   So this looks like to me you are           11:41:40

14                  checking on Charlotte Bennett while she was alone           11:41:42

15                  staffing the Governor; is that right?           11:41:45

16                  A.   Yeah, yeah, I think so.           11:41:52

17                  Q.   Okay. And so let's start at the top.           11:41:54

18                  It says -- she says, "You're right. Everyone           11:41:56

19                  knows."                   11:41:59

20                  And you say, "Told you. Don't make           11:41:59

21                  that mistake again."                   11:42:01

22                  Do you remember what that's in           11:42:02

23                  reference to.                   11:42:04

24                  A.   Yeah. I think about her sitting up           11:42:04

25                  there and, like, that she would be the one to           11:42:06







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2 I did it pretty well when I started. 11:44:42

3 Q. What were the things you had observed 11:44:45

4 that people didn't do well when they did that 11:44:47

5 role? 11:44:50

6 A. It was usually not showing up on 11:44:50

7 time. It was not being by the phones. It was 11:44:55

8 letting the phones ring. That's a -- right there 11:44:57

9 you get yelled at. You know, if you walk away 11:45:00

10 from the desk, there was, at least, a call 11:45:03

11 forwarding button. If you hit the call 11:45:05

12 forwarding button, it was better than nothing. 11:45:08

13 Those were the biggest things. The phones was 11:45:10

14 kind of drilled into you. You always have to be 11:45:14

15 there for the phones. 11:45:16

16 Q. Okay. So why don't we turn to the 11:45:18

17 next document, which is on the same day. We'll 11:45:20

18 mark this as the next exhibit. 11:45:23

19 A. Is this nine? 11:45:25

20 Q. So this is nine. 11:45:26

21 (Deposition Exhibit 6, 5/12/19 text 11:45:26

22 message chain between Bennett and Witness, was 11:45:26

23 marked for identification.) 11:45:32

24 Q. This is, again, between you and Ms. 11:45:32

25 Bennett and at 7:48 p.m. UTC time. So this is -- 11:45:34



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2 going on, but there was something in Albany that 11:46:31  
3 you could either go to or not go to, but I can't 11:46:33  
4 remember what it was. And I was asking her if 11:46:36  
5 you were going to go to it or not. I don't know 11:46:37  
6 if it was a cabinet meeting. You would have to 11:46:42  
7 check the public schedule and see what aligned 11:46:42  
8 with that day at the Capital building. 11:46:44

9 Q. And who is "[REDACTED]"? 11:46:45

10 A. [REDACTED]. 11:46:47

11 Q. And what was [REDACTED]'s role? 11:46:48

12 A. She worked on the scheduling team. 11:46:50

13 Q. Did you ever observe her interact 11:46:52  
14 with the Governor? 11:46:54

15 A. She's been about -- I remember 11:46:56  
16 bringing her into like one or two meetings with 11:46:58  
17 me, like, but they were event prep meetings, but 11:47:01  
18 I think that was the only time that she 11:47:03  
19 interacted. She might have sat there once or 11:47:05  
20 twice, but I think she only interacted. 11:47:07

21 Q. Did you ever observe the Governor 11:47:09  
22 treat her disrespectfully? 11:47:11

23 A. No. 11:47:13

24 Q. Did she ever tell you anything about 11:47:13  
25 her interactions with the Governor? 11:47:15



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2 Q. When I say, "different schedule," I 11:48:12  
3 mean, if the Governor is going to be in the New 11:48:14  
4 York office, you need to be in the New York 11:48:17  
5 office when he gets there or around the time he 11:48:18  
6 gets there, right? 11:48:20

7 A. Yeah. 11:48:20

8 Q. And that could be before nine? 11:48:21

9 A. Right. 11:48:23

10 Q. But if the Governor is not going to 11:48:23  
11 be in the New York City office, there is a 11:48:24  
12 different time, potentially? 11:48:26

13 A. It's more casual. 11:48:26

14 Q. Okay. 11:48:26

15 THE VIDEOGRAPHER: Pardon the 11:48:26  
16 interruption -- 11:48:28

17 Q. If the Governor is not in the New 11:48:28  
18 York office, is it also more -- 11:48:32

19 THE VIDEOGRAPHER: Sorry. Can I ask 11:48:35  
20 the witness to just adjust the microphone a 11:48:36  
21 little bit. Thank you so much. 11:48:39

22 THE WITNESS: Can you hear me? 11:48:41

23 THE VIDEOGRAPHER: Yes. It's just 11:48:42  
24 when you turn your head away from the microphone, 11:48:43  
25 it does not pick up so... 11:48:46

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Sorry for the interruption.                   11:48:49

3                   A. This way I can't or which way?                   11:48:49

4                   THE VIDEOGRAPHER: Whatever way                   11:48:50

5                   you're generally facing.                   11:48:51

6                   Q. Turn your whole bad towards me.                   11:48:53

7                   A. Okay, sorry.                   11:48:55

8                   Q. I told you this was going to be                   11:48:56

9                   complicated.                   11:48:59

10                  A. Yeah.                   11:48:59

11                  Q. I think we're good now.                   11:48:59

12                  A. It's okay now.                   11:49:02

13                  THE VIDEOGRAPHER: Pardon my                   11:49:02

14                  interruption. Thank you.                   11:49:04

15                  Q. Alright. I think we're good now.                   11:49:04

16                  That's good. That's what I was asking before.                   11:49:07

17                  So, when you were in the New York                   11:49:10

18                  City office and the Governor wasn't there, what                   11:49:11

19                  would you wear to work?                   11:49:13

20                  A. Sometimes I would wear like, you                   11:49:15

21                  know, just a button down T-shirt and pair of                   11:49:18

22                  slacks, you know, maybe a pair of, you know, more                   11:49:21

23                  comfortable shoes, pullover vest, something like                   11:49:23

24                  that, if he wasn't there.                   11:49:26

25                  Q. And when the Governor is in the New                   11:49:26

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           York City office, how do you dress?                   11:49:29

3                   A.   Suit and tie.   11:49:30

4                   Q.   How did you come to understand you                   11:49:31

5           had needed to be in a suit and tie if the                   11:49:33

6           Governor was in the office?                                   11:49:35

7                   A.   Well, I kind of inferred it from when                   11:49:36

8           I was going to be working there that it seemed           11:49:38

9           like a suit and tie place.  But, you know, I               11:49:40

10          believe there was an instance where I think it           11:49:42

11          was, I guess, a staffer said, like, we're a real           11:49:44

12          suit and tie place, you know, remarking that.  So   11:49:48

13          it was kind of expected.                                   11:49:51

14                  Q.   And were you part of any discussions           11:49:52

15          where any of the women staff of the Executive           11:49:55

16          Chamber talked about their views on the dress           11:49:57

17          code for them?   11:49:59

18                  A.   Not that I can recall no.                   11:50:00

19                  Q.   Did you ever hear any woman in the           11:50:02

20          office talk about an expectation to wear high           11:50:04

21          heels?   11:50:08

22                  A.   Not that I can recall, no.                   11:50:09

23                  Q.   And going back you said you had never           11:50:12

24          observed the Governor comment on a woman's           11:50:14

25          appearance, I think, you said, right?                   11:50:18

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2 A. Not that I can recall. Yeah, no, I 11:50:20  
3 don't recall him saying that. 11:50:23

4 Q. Do you ever remember the Governor 11:50:24  
5 asking a woman to twirl around in a dress, 11:50:26  
6 wearing a dress and he said, twirl around for me? 11:50:28

7 A. No, I don't know that I can remember 11:50:35  
8 that. I -- I mean, there were times where, you 11:50:37  
9 know, for a late event, senior staffers would 11:50:41  
10 change into dresses. So -- but I don't ever 11:50:45  
11 remember him asking to twirl around or anything. 11:50:48

12 Q. Did you ever remember hearing the 11:50:50  
13 Governor comment on or telling a woman she should 11:50:51  
14 show more leg or show leg? 11:50:55

15 A. No. 11:50:56

16 Q. Okay. We can go back to the text 11:50:57  
17 messages. 11:51:00

18 A. Sure. 11:51:00

19 Q. So you send Ms. Bennett a Twitter 11:51:01  
20 link. And if you turn to the next page, that 11:51:07  
21 Twitter link is a posting of a New York Post 11:51:10  
22 story about Governor Cuomo living apart from Ms. 11:51:14  
23 Lee. 11:51:18

24 Do you see that? 11:51:19

25 A. I do. 11:51:20

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Okay. And why did you send that to 11:51:20  
3 Ms. Bennett? 11:51:22

4 A. Just to give her a heads up what it 11:51:31  
5 would be like in the office. And I think I 11:51:34  
6 talked about all the events would be pulled down. 11:51:36  
7 Plus she worked for the guy. She should probably 11:51:38  
8 see it herself too but, yeah. 11:51:41

9 Q. Sorry. I don't think they could hear 11:51:42  
10 that last thing you said. 11:51:43

11 A. Well, just she was working for the 11:51:43  
12 guy. So it's something that she should know and, 11:51:45  
13 like, start piecing together how things work. 11:51:47  
14 You know, like a story came out and, like, you 11:51:47  
15 know, he pulled down an event, you know, stuff 11:51:51  
16 like that. 11:51:52

17 Q. When you say, "pull down an event," 11:51:53  
18 what do you mean? 11:51:54

19 A. Do not have any event anymore. 11:51:55

20 Q. And so there was some event where the 11:51:57  
21 Governor after this article pulled out of events? 11:52:00

22 A. I think so. 11:52:01

23 Q. Is that what you're saying? 11:52:02

24 A. I think so, yeah. 11:52:03

25 Q. Can you turn to the next tab. We'll 11:52:06



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   -- you know, if you're going to get sad or                   11:52:59  
3                   something, just turn into anger. It's an                   11:53:00  
4                   incredible motivator sometimes. I got through                   11:53:03  
5                   two years working there. So, you know, kind of                   11:53:05  
6                   use that. Don't get upset, kind of push yourself                   11:53:08  
7                   through it.                   11:53:11

8                   Q. And then she expressed that she has a                   11:53:12  
9                   "high tolerance."                   11:53:15

10                                   And you wrote, "You'll do." And then                   11:53:17  
11                   you said, "Now all you need is friends to make                   11:53:19  
12                   yourself valuable and hard to move and in the                   11:53:23  
13                   gossip. That's your currency now."                   11:53:25

14                                   What do you mean by that?                   11:53:27

15                   A. Well, just that it's a lot easier to                   11:53:28  
16                   get along and last with -- if you have a rapport                   11:53:31  
17                   with people, you know. You kind of want to know                   11:53:36  
18                   -- like, it's easier to call just Staffer X for                   11:53:39  
19                   whatever reason and say, hey, can you come over                   11:53:42  
20                   and help me with this, and they know you already,                   11:53:43  
21                   you know, and you want to do that. It's just                   11:53:46  
22                   make friends. I always found it to be very                   11:53:47  
23                   helpful thing for me when I was there.                   11:53:50

24                   Q. And then the part about the "gossip"                   11:53:52  
25                   and the gossip "that's currency now," what did                   11:53:54



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   This is another text message chain           11:54:53  
3                   between you and Ms. Bennett.   This is from two           11:54:56  
4                   days later.   So now we're on the 16th of May.           11:54:58

5                               (Deposition Exhibit 9, 5/16/19 text           11:54:58  
6                   message chain between Bennett and Witness, was           11:54:58  
7                   marked for identification.)           11:55:01

8                   Q.   And you wrote to her and said, "Just           11:55:01  
9                   remember the little you see of how they treat           11:55:03  
10                  me."           11:55:06

11                               What did you mean by that?           11:55:07

12                  A.   I don't -- I can't say for certain.           11:55:10  
13                  I mean, I don't know.   I -- I don't know what I           11:55:13  
14                  was talking to.   Something that bothered me, I           11:55:29  
15                  guess, I don't know.           11:55:31

16                  Q.   In the next text message you wrote,           11:55:32  
17                  "They won't always be nice to you."           11:55:34

18                               Did you observe the senior staff was           11:55:37  
19                  being nice to Ms. Bennett at the beginning of her   11:55:38  
20                  time staffing the Governor?           11:55:41

21                  A.   I must have, yeah, if I said that           11:55:42  
22                  but...           11:55:44

23                  Q.   Do you remember observing that?           11:55:44

24                  A.   Not that I can remember, no.           11:55:49

25                  Q.   And you wrote, "You'll learn to           11:55:51



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   a good rule to adhere to, try not to make the           11:56:59

3                   same mistake twice. I don't remember that I           11:57:03

4                   could remember anything specific about this.           11:57:04

5                   Q. Do you ever remember making the same           11:57:06

6                   mistake twice?   11:57:10

7                   A. I don't know; not that I can think           11:57:12

8                   of.   11:57:18

9                   Q. And while the parade goes by outside           11:57:21

10                  with bagpipes, why don't we turn to the next tab.   11:57:23

11                  This is Tab 13. We'll mark this as           11:57:27

12                  the next exhibit.                                   11:57:30

13                  (Deposition Exhibit 10, 5/17/19 text           11:57:30

14                  message chain between Bennett and Witness, was   11:57:30

15                  marked for identification.)                   11:57:34

16                  Q. This is from May 17th. So this is           11:57:34

17                  the next day. And you're clearly having a           11:57:37

18                  meeting of some sort with Jill.           11:57:43

19                  Do you remember the meeting you had           11:57:45

20                  with Jill?   11:57:46

21                  A. I do.   11:57:47

22                  Q. And tell us about that meeting.           11:57:47

23                  A. This was my like good-bye meeting           11:57:54

24                  with Jill on my last day, so -- which it was           11:57:56

25                  actually a good meeting. She actually cried when   11:58:00



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           remember, but I just -- I don't think it was at       11:59:05

3           that point, but I don't really know why.               11:59:07

4                   Q.   Is there a lot of turnover in the               11:59:10

5           Executive Chamber?                                       11:59:12

6                   A.   Yes.   11:59:12

7                   Q.   And tell us about that.                                   11:59:13

8                   A.   What, specifically, about that?                           11:59:14

9                   Q.   What's the turnover rate, like, how                       11:59:16

10          long do people stay?  Are you an anomaly for       11:59:19

11          staying for four years?                                   11:59:22

12                  A.   Probably.                                       11:59:23

13                  Q.   What do you think is the average               11:59:25

14          tenure of someone on the junior staff of the       11:59:26

15          Executive Chamber?                                       11:59:29

16                  A.   Probably about a year, you know, six       11:59:34

17          months to a year.                                       11:59:36

18                  Q.   And what's your impression of why the       11:59:37

19          people stay six months to a year?                     11:59:40

20                  A.   Well, I think, it's kind of twofold.       11:59:45

21          I sometimes don't think that it's the right fit     11:59:48

22          for the type of office.  But I also don't think     11:59:51

23          that's very much training as to how to get -- you   11:59:54

24          know, how to get started when you're there.  So I   11:59:56

25          think it's kind of a twofold thing.                     11:59:59

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   A little bit sink or swim?                   12:00:01

3                   A.   Yeah, I'd a say.                                   12:00:03

4                   Q.   The beginning of this text message,               12:00:05

5                   Ms. Bennett referred to "Jill/Black Sheep."       12:00:07

6                               Was that a nickname for Ms.                   12:00:11

7                   DesRosiers?   12:00:12

8                   A.   No.   That was my favorite bar that               12:00:12

9                   she was asking me how was Jill/Black Sheep, how's   12:00:15

10                  the Black Sheep.                                   12:00:20

11                  Q.   Meaning, you went to the Black Sheep           12:00:21

12                  with Jill?   12:00:22

13                  A.   No.   I met Jill in her office.   She           12:00:22

14                  was asking me how was my meeting Jill, and then   12:00:23

15                  how was the bar you went to later the Black       12:00:25

16                  Sheep.   12:00:28

17                  Q.   So Ms. DesRosiers' nickname was not           12:00:28

18                  "Black Sheep"?                                   12:00:31

19                  A.   Not that I had for her, no.                   12:00:31

20                  Q.   Oh, you never know.                           12:00:34

21                               When we talked about who the "Mean           12:00:36

22                  Girls" you didn't include Ms. DesRosiers, right?   12:00:39

23                  A.   Maybe -- I don't know, maybe I did or   12:00:42

24                  didn't.   Did I not?                           12:00:45

25                  Q.   You didn't.                                   12:00:46

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2 A. Okay. 12:00:47

3 Q. Do you remember Ms. DesRosiers being 12:00:47  
4 someone who people discussed as being part of the 12:00:49  
5 "Mean Girls"? 12:00:52

6 A. Yeah, I think that people would have 12:00:55  
7 included her too. 12:00:56

8 Q. And why is that? 12:00:57

9 A. Just cause she was friends with all 12:00:59  
10 of, like, Melissa, Annabelle, Stephanie, Dani. 12:01:01  
11 They were, like, all friends. 12:01:07

12 Q. Do you think Ms. DesRosiers treated 12:01:08  
13 people similarly to those parts of -- those other 12:01:11  
14 people in that group? So, for example, did you 12:01:14  
15 treat people the same way Ms. DesRosiers treated 12:01:17  
16 people from your perspective? 12:01:20

17 A. No. I don't think that they were -- 12:01:23  
18 I don't they Melissa and Jill were the same in 12:01:25  
19 that regard. 12:01:28

20 Q. Okay. Can you tell us from your 12:01:29  
21 perspective what the difference was? 12:01:30

22 A. First off, I think, Jill was much 12:01:33  
23 more approachable. She had a much more, like, 12:01:35  
24 welcoming nature to her. If you needed to talk 12:01:37  
25 to her -- I'm not saying it was easy to get a 12:01:40

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2 meeting scheduled with her, but it's 12:01:44

3 significantly easier than having Melissa to talk 12:01:45

4 to. And, you know, I only think back towards the 12:01:47

5 end, you know, just interactions with her. She 12:01:59

6 was very kind to me on my way out, you know. 12:02:01

7 Q. Did Ms. DesRosiers ever talk to you 12:02:03

8 about the expression "Mean Girls" and her view on 12:02:05

9 that expression? 12:02:07

10 A. No. 12:02:08

11 Q. Did you ever say words or in 12:02:08

12 substance, I'm not a "mean girl"? 12:02:11

13 A. Not that I can remember, no. 12:02:14

14 Q. Did you ever actually have any 12:02:16

15 one-on-one interactions with Ms. DesRosiers? 12:02:18

16 A. I think so. Like, if he went down to 12:02:24

17 docks -- like it would be mostly on the weekends, 12:02:27

18 because she would sometimes come in if he was 12:02:30

19 there and I would, obviously, be there and like 12:02:33

20 if he was down to docks and if he's coming back, 12:02:35

21 she would sometimes hang out on the couch in 12:02:37

22 Stephanie's office and we would talk, but other 12:02:39

23 than that, not too many, no. 12:02:41

24 Q. Meaning, they would include you in 12:02:43

25 their conversation? 12:02:44

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2 A. No, no, no, meaning while -- like, if 12:02:44  
3 the Governor was coming back from an event, 12:02:45  
4 Melissa would get to the office before him. She 12:02:47  
5 would be waiting in Stephanie's office for him to 12:02:49  
6 come up. So it would just be the two of us. 12:02:51

7 Q. Okay. And you sat at the -- when you 12:02:52  
8 sat at desk outside of the Governor's office, 12:02:56  
9 did you see her going in and out? 12:02:58

10 A. Yeah. 12:03:00

11 Q. And did she acknowledge your 12:03:01  
12 presence? 12:03:03

13 A. Sometimes. 12:03:05

14 Q. If you look at that text message on 12:03:10  
15 the second page, the back, it says, "Jill,  
16 Annabelle, [REDACTED] and [REDACTED] cried." 12:03:19

17 Who is [REDACTED]? 12:03:20

18 A. [REDACTED]. 12:03:21

19 Q. And what was [REDACTED] role? 12:03:23

20 A. Oh, I don't know her exact title. 12:03:26  
21 She was a dep sec, I believe, for, like -- I 12:03:30  
22 don't know what the exact role was, but it was 12:03:36  
23 for like public services, like she worked -- not 12:03:39  
24 for profits, that's what it was. She worked in 12:03:42  
25 the not for profits. 12:03:44

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2                   Q. Do you know if she's still in the                   12:03:46

3                   Executive Chamber?                   12:03:48

4                   A. I don't know if she is.                   12:03:48

5                   Q. Let's turn to the next tab, which is                   12:03:50

6                   Tab 14. And we'll mark this as the next exhibit.                   12:03:54

7                                   (Deposition Exhibit 11, 5/19/19 text                   12:03:54

8                   message chain between Bennett and Witness, was                   12:03:54

9                   marked for identification.)                   12:04:02

10                  Q. And this is from May 19th and                   12:04:02

11                  May 20th. It seems like now you were on paid                   12:04:05

12                  vacation.                   12:04:08

13                  A. Right.                   12:04:08

14                  Q. You're talking about spending a lot                   12:04:09

15                  of time laying in the sun.                   12:04:11

16                                   And then you asked Ms. Bennett, "How                   12:04:12

17                  is the indentured servitude life?"                   12:04:15

18                                   What did you mean by that?                   12:04:18

19                  A. I think I was trying to be funny.                   12:04:20

20                  But I don't know exactly what I was thinking at                   12:04:22

21                  that point.                   12:04:24

22                  Q. And are you describing what an                   12:04:25

23                  "indentured servitude life" is working in the                   12:04:28

24                  Executive Chamber?                   12:04:31

25                  A. Well, I don't know that I know the                   12:04:32

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2           exact definition of it. So I think I was just           12:04:34

3           trying to be funny of "indentured servitude." I   12:04:36

4           don't know if I know the exact definition of           12:04:40

5           "indentured servitude."           12:04:42

6                   Q. But Ms. Bennett at that time was           12:04:42

7           working in the Executive Chamber?           12:04:45

8                   A. Yes.           12:04:46

9                   Q. Okay. And she was staffing the           12:04:46

10          Governor?           12:04:48

11                  A. Yes.           12:04:48

12                  Q. And so your words about "indentured           12:04:48

13          servitude," whatever they mean, were about being   12:04:51

14          a staff member in the Executive Chamber?           12:04:52

15                  A. Yes.           12:04:54

16                  Q. Why don't we turn to the next tab.           12:04:59

17          And we'll mark this as the next exhibit. This is   12:05:04

18          Tab 15.           12:05:07

19                   (Deposition Exhibit 12, 5/21/19 text           12:05:07

20          message chain between Bennett and Witness, was   12:05:07

21          marked for identification.)           12:05:08

22                  Q. This is from the next day. So you're   12:05:08

23          still on paid vacation.           12:05:10

24                   And Ms. Bennett writes, "They seem           12:05:15

25          nervous FOR ME, which is not helpful."           12:05:16

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   And you wrote, "Who?"                   12:05:21

3                   And she wrote, "[REDACTED] and [REDACTED]."                   12:05:22

4                   And you told me [REDACTED] " is [REDACTED]                   12:05:26

5                   [REDACTED] ?                   12:05:29

6                   A. I'm sorry.                   12:05:29

7                   Q. I'm sorry. Are we not -- tab 15.                   12:05:30

8                   A. Oh, I'm sorry.                   12:05:33

9                   Q. You want me to start over?                   12:05:34

10                   A. Yeah.                   12:05:35

11                   Q. So this is a text message when you're                   12:05:35

12                   still paid vacation between you and Ms. Bennett.                   12:05:37

13                   And she writes, "they seem nervous FOR me, which                   12:05:39

14                   is not helpful."                   12:05:44

15                   You asked, "Who?"                   12:05:45

16                   And she wrote, "[REDACTED] and [REDACTED]."                   12:05:45

17                   Is that [REDACTED] ?                   12:05:47

18                   A. Yes.                   12:05:50

19                   Q. Is that [REDACTED] ?                   12:05:51

20                   A. Yes.                   12:05:51

21                   Q. And you wrote, "Oh, well they are                   12:05:52

22                   scaredy cats."                   12:05:54

23                   Why don't you look over the rest of                   12:05:55

24                   the text message and tell me what you remember                   12:05:57

25                   about this communication.                   12:05:58

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A.   Everything after that on?                   12:06:00

3                   Q.   Yeah.  It goes on for a bit.                   12:06:03

4                   A.   Okay.                   12:06:32

5                   Q.   Having reviewed the text message, do           12:06:33

6                   you remember anything about this communication?   12:06:35

7                   A.   Well, I think just that I was trying           12:06:39

8                   to like motivate her into doing the job and I       12:06:41

9                   think other people were nervous for her just       12:06:44

10                  because -- like, the way I remember it, I don't   12:06:46

11                  think they ever had really done it with him.  So,  12:06:50

12                  like, I was trying to tell her, what do you       12:06:54

13                  worried about what they think.  They've never   12:06:55

14                  done it.  You're already doing it.               12:06:55

15                  Q.   Did you have a perspective on why it           12:06:56

16                  is that [REDACTED] and [REDACTED] had not       12:06:58

17                  been asked to staff the Governor?               12:07:00

18                  A.   No, I think, I told you that [REDACTED]       12:07:03

19                  did once or twice.  But, no, I don't know why.   12:07:05

20                  Q.   And then you wrote -- if you look at           12:07:09

21                  second page of the text message.               12:07:10

22                  A.   Yep.                   12:07:13

23                  Q.   You wrote, "You have had more face           12:07:14

24                  time with him already than they have."           12:07:16

25                  What did you mean by that?                   12:07:18

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A.   That you had seen him more.                   12:07:20

3                   Q.   And that's because she was sitting                   12:07:22

4                   outside his office?                   12:07:24

5                   A.   Yes.                   12:07:25

6                   Q.   Where did [REDACTED] sit?                   12:07:26

7                   A.   Way around the corner, if you went                   12:07:31

8                   straight out of his office and made aright, half                   12:07:34

9                   way up. And so out of eyesight from his office.                   12:07:37

10                  Q.   Out of eyesight of the Governor's                   12:07:38

11                  office?                   12:07:39

12                  A.   Yes.                   12:07:39

13                  Q.   And Charlotte's desk?                   12:07:39

14                  A.   Yes.                   12:07:40

15                  Q.   And what about [REDACTED]?                   12:07:41

16                  A.   Same area as [REDACTED]. It was like the                   12:07:43

17                  scheduling area.                   12:07:45

18                  Q.   And if you go to the fifth page, it                   12:07:46

19                  starts at the top, "It's simple." It should be                   12:07:50

20                  on your right-hand side.                   12:07:53

21                  A.   Uh-huh.                   12:07:54

22                  Q.   And you wrote, "Be like them or be                   12:07:55

23                  better than them."                   12:07:57

24                  Who is the "them" you were referring                   12:07:58

25                  to?                   12:07:58

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A. I believe it was [REDACTED] and [REDACTED].                   12:08:00

3                   Q. Okay. And so what's -- help me                   12:08:02

4 understand what the advice was you were giving                   12:08:04

5 her was.                   12:08:06

6                   A. Don't be scared. You can do this                   12:08:06

7 job, you know. They were trying -- I felt as if                   12:08:08

8 they were trying to make her nervous, like, being                   12:08:11

9 nervous for her and that wasn't going to be a                   12:08:14

10 productive thing for her, if everybody else was                   12:08:17

11 nervous for her. And I felt as if she could do                   12:08:19

12 it and I was trying to give her the confidence to                   12:08:21

13 do it.                   12:08:24

14                   Q. Let's turn to the next tab and we'll                   12:08:24

15 mark this -- it's Tab 16 -- as the next exhibit.                   12:08:26

16                   (Deposition Exhibit 13, screen shot                   12:08:26

17 of Lindsey Boylan tweet from 5/21/19, was marked                   12:08:26

18 for identification.)                   12:08:32

19                   Q. This screen capture of a tweet from                   12:08:32

20 Ms. Boylan in which she said, "I was the only                   12:08:34

21 mother of young children on senior staff in my                   12:08:38

22 last job at politics. They didn't even get it                   12:08:40

23 even with all the right policies. It was a toxic                   12:08:43

24 and demoralizing experience."                   12:08:46

25                   Do you see that?                   12:08:48





1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   never really taught to do it. And so I wanted to 12:10:51  
3                   turn it back in kind, you know, I was just a 12:10:53  
4                   little worried that she hadn't got enough 12:10:55  
5                   training yet. 12:10:56

6                   Q. Let's turn to the next tab. 12:10:59

7                                 (Deposition Exhibit 15, 5/22/19 text 12:10:59  
8                   message chain between Bennett and Witness, was 12:10:59  
9                   marked for identification.) 12:11:04

10                  Q. Another text message between you and 12:11:04  
11                  Ms. Bennett. We'll mark this as the next 12:11:07  
12                  exhibit. This is actually on the same day. And 12:11:09  
13                  Ms. Bennett says, overall -- it seems like it was 12:11:14  
14                  towards the end of the day -- "Overall positive 12:11:17  
15                  though. I got a fist bump on his way out." 12:11:20

16                                 Did the Governor ever "fist bump" 12:11:23  
17                  you? 12:11:26

18                  A. I don't think so. I think, no, I 12:11:29  
19                  don't think so. 12:11:33

20                  Q. And on the second page you wrote, "I 12:11:34  
21                  always beat him in." 12:11:36

22                                 Is that what you were describing to 12:11:37  
23                  me earlier, you always try to make sure you were 12:11:39  
24                  in before the Governor was in? 12:11:42

25                  A. Yes. 12:11:42

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. And then you went on to say at the 12:11:42  
3 bottom of the page, "Don't slack on the little 12:11:44  
4 things." 12:11:46

5 What did you mean by that? 12:11:46

6 A. Well, like, we were talking about 12:11:48  
7 before. Like, it may seem a little stupid, but 12:11:50  
8 the phones, like, you can get the hang of there. 12:11:53  
9 You can be the best assistant he ever had, but if 12:11:56  
10 the phones go unanswered, it doesn't matter how 12:11:56  
11 good you are, you know, that's, like, the big 12:12:00  
12 thing. That seems like a little thing when I say 12:12:01  
13 it to you, but it's, like, a big think and some 12:12:04  
14 people forget that when they sit there. 12:12:06

15 Q. Did you ever let the phones go 12:12:07  
16 unanswered? 12:12:09

17 A. No, I don't think I ever did. 12:12:10

18 Q. Did you ever observe someone else who 12:12:11  
19 sat in that seat let the phones go unanswered? 12:12:14

20 A. Yes. 12:12:16

21 Q. And who was that? 12:12:16

22 A. It was a couple of people, Kaitlin 12:12:18  
23 [REDACTED] and [REDACTED]. 12:12:23

24 Q. And tell us about the occasion on 12:12:24  
25 which you observed [REDACTED] Kaitlin let the phones go 12:12:27



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           very long, not that I can remember.                   12:13:15

3                   Q. Do you ever observe how the senior                   12:13:17

4           staff treated [REDACTED]?                   12:13:18

5                   A. Not that I can remember, no.                   12:13:19

6                   Q. Did you ever observe how the Governor                   12:13:21

7           treated [REDACTED]?                   12:13:23

8                   A. No.                   12:13:24

9                   Q. Why don't we turn to the next tab and                   12:13:27

10          we'll mark it as the next exhibit.                   12:13:30

11                   A. It's 19, right?                   12:13:31

12                   Q. 19.                   12:13:32

13                                (Deposition Exhibit 16, 5/22/19 text                   12:13:32

14          message chain between Bennett and Witness, was                   12:13:32

15          marked for identification.)                   12:13:35

16                   Q. This is from same day May 22nd and it                   12:13:35

17          begins with Ms. Bennett saying, "[REDACTED] EA #2 just got                   12:13:38

18          booted from the back sharing the cube with her."                   12:13:42

19                                And you wrote, "WTF is going on                   12:13:45

20          laughing out loud."                   12:13:47

21                                Can you review the text message and                   12:13:48

22          look up when you're done?                   12:13:49

23                   A. (INAUDIBLE.)                   12:13:57

24                   Q. Yeah. Why don't you turn to the next                   12:13:59

25          tab and we'll mark it as the next exhibit.                   12:14:11

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   (Deposition Exhibit 17, 5/22/19 text           12:14:11

3           message chain between Bennett and Witness, was           12:14:11

4           marked for identification.)                                   12:14:16

5           Q.   And read them together.                               12:14:16

6           A.   Okay.   12:14:41

7           Q.   Do you know who Executive Assistant #2 is?           12:14:42

8           A.   Yes.   12:14:43

9           Q.   Who was Executive Assistant #2?                       12:14:43

10          A.   She was an assistant in Albany.                   12:14:44

11          Q.   Okay.  And do you remember anything           12:14:48

12          about this communication about EA #2?                   12:14:50

13          A.   Not really.  I just read it now.  I               12:14:55

14          mean, I can think of maybe why she had a hard           12:14:57

15          time using the phones but, you know.                   12:15:00

16          Q.   When you left the Executive Chamber,           12:15:02

17          how long had EA #2 been a staff member of           12:15:03

18          the Executive Chamber?                                   12:15:10

19          A.   I think a couple of months.                       12:15:10

20          Q.   And had you she ever been to the New           12:15:11

21          York office before?                                       12:15:13

22          A.   Yeah, I think she was down there on           12:15:13

23          her first day.   12:15:15

24          Q.   And what do you remember how she               12:15:16

25          ended up in the New York office on the first day?   12:15:17



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Can you recall any other occasion in 12:15:59  
3 which you observed someone getting sent home 12:16:01  
4 because they made mistake with the phones? 12:16:03

5 A. No. I mean, in -- there's two 12:16:12  
6 different -- at the time, I think, there were two 12:16:14  
7 different systems of phones they used. So maybe 12:16:17  
8 that's why. But I don't know that anybody from 12:16:20  
9 Albany came dawn to staff after that. I don't 12:16:23  
10 know. 12:16:25

11 Q. How many times did you see EA 12:16:26  
12 #2 in the New York City office? 12:16:28

13 A. I really can only remember that one 12:16:30  
14 time, the first time. 12:16:32

15 Q. That one occasion? 12:16:33

16 A. Yeah. 12:16:34

17 Q. When she flew on the helicopter? 12:16:35

18 A. Yes. 12:16:36

19 Q. Did you see her interact with the 12:16:36  
20 Governor on that occasion? 12:16:38

21 A. Not that I can remember, no. I mean, 12:16:46  
22 I don't know. I can't really remember the two of 12:16:47  
23 them interacting. Because I think when she did 12:16:50  
24 come down, I sat at the back desk and she sat at 12:16:53  
25 the outside desk and when you're at Stephanie's 12:16:56

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           desk, you deal with him a lot more.                   12:16:59

3                   Q.   Okay.   But you didn't observe their           12:17:00

4           interactions while [REDACTED] EA #2           was sitting at the           12:17:02

5           desk outside the Governor's office?           12:17:04

6                   A.   No, not that I can remember.           12:17:04

7                   Q.   Okay.   Let's turn to the next exhibit           12:17:08

8           -- next tab, which we'll mark as the next           12:17:10

9           exhibit.           12:17:12

10                   (Deposition Exhibit 18, 5/30/19 text           12:17:12

11           message chain between Bennett and Witness, was           12:17:12

12           marked for identification.)           12:17:19

13                   Q.   You don't have to look at the whole           12:17:19

14           thing.   I'll just proffer to you that some of           12:17:21

15           this is about Ms. Bennett's relationships.           12:17:23

16                   But at the beginning it says -- this           12:17:26

17           is May 30th.   "I'm assuming you heard about           12:17:28

18           [REDACTED]."

19                   And you said, "Oh, boy did I."           12:17:30

20                   What was this about?           12:17:32

21                   A.   If I remember correctly is that she           12:17:36

22           was leaving.           12:17:38

23                   Q.   And when you say, "Oh, boy did I,"           12:17:39

24           did you speak to [REDACTED]?           12:17:41

25                   A.   Yeah, maybe.           12:17:46

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Do you remember what [REDACTED] told 12:17:47  
3 you? 12:17:49

4 A. I don't know. I don't remember if I 12:17:49  
5 spoke to her or not. I do remember before I 12:17:52  
6 left, she had talked about going to work for Beto 12:17:54  
7 on Beto's campaign in Texas. So I think that's 12:17:58  
8 what that's referring. 12:18:01

9 Q. Did you ever talk to [REDACTED] about 12:18:02  
10 her views on her experience in the Executive 12:18:04  
11 Chamber? 12:18:07

12 A. Maybe. There's nothing really I can 12:18:10  
13 recall about talking to her about that. 12:18:13

14 Q. Nothing specific you recall? 12:18:14

15 A. No. 12:18:16

16 Q. Do you remember her telling you 12:18:16  
17 anything about whether the experience was 12:18:18  
18 negative or positive? 12:18:19

19 A. No, not that I can recall. 12:18:24

20 Q. Why don't we turn to the next tab and 12:18:29  
21 we'll mark this as the next exhibit. 12:18:31

22 (Deposition Exhibit 19, 6/12/19 text 12:18:31  
23 message chain between Bennett and Witness, was 12:18:31  
24 marked for identification.) 12:18:35

25 Q. And this is almost a month that goes 12:18:35

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           by between this and the last one.   So this is           12:18:40

3           June 12th.   And you wrote -- it's kind of out of   12:18:42

4           context.   So your help with the context would be   12:18:48

5           good -- "It's just there.   Isn't really a team   12:18:51

6           there now.   I talked to █████ yesterday."   12:18:53

7                   Who is "█████" ?   12:18:55

8           A.   That would be █████ .   12:18:56

9           Q.   And you text, "He said in three   12:18:58

10          months, 25 people left."   12:19:01

11                   Did you hear that from █████ ?   12:19:04

12          A.   I said it there, yeah.   12:19:06

13          Q.   Do you remember the conversation with   12:19:07

14          █████ ?   12:19:08

15          A.   I don't.   12:19:09

16          Q.   Do you remember any conversation?   12:19:10

17          A.   I don't, no.   12:19:16

18          Q.   Okay.   And when you wrote, "Just   12:19:19

19          there isn't really a team there now," what did   12:19:20

20          you mean?   12:19:22

21                 A.   Well, I think it was -- with the high   12:19:26

22          turnover rate, there wasn't a lot of hiring of   12:19:31

23          people that kid of meshed and, like, nobody was   12:19:35

24          really friends and worked together anymore.   I   12:19:36

25          think that's what I meant, you know.   12:19:38



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 A. Oh, wait. This is right after his 12:20:34  
3 election. So it could be. 12:20:37

4 Q. This is about maybe six months, 12:20:40  
5 eight months after an election, right? 12:20:43

6 A. Yeah. So it could be. 12:20:44

7 Q. You don't think it was about 12:20:45  
8 something else? 12:20:47

9 A. You know, I really -- I can't 12:20:48  
10 remember. It could be right after the election. 12:20:49  
11 People agreed to stay through session, which, you 12:20:51  
12 know, that would kind of make sense. I think 12:20:53  
13 session runs until June so... 12:20:57

14 Q. Is it true that junior staffers too? 12:20:57

15 A. What? 12:20:59

16 Q. That the junior staffer's tenure is 12:20:59  
17 tied in some part in being in session or to 12:21:02  
18 election cycles, or is it just senior staffers? 12:21:06

19 A. What do you mean? I'm not sure. 12:21:07

20 Q. You're saying that people come in 12:21:09  
21 "waves," right? 12:21:11

22 A. Right. 12:21:11

23 Q. And that that "wave" is either tied 12:21:11  
24 to -- typically, tied to an election or tied to a 12:21:13  
25 legislative session, right? 12:21:17



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. And this is a text message between 13:17:22  
3 you and Ms. Bennett from July 9th, 2019. It's 13:17:24  
4 not clear what came before this. But you said, 13:17:30  
5 "the Gov clearly likes you." 13:17:32

6 Do you know remember why you told Ms. 13:17:34  
7 Bennett that the Gov clearly liked her? 13:17:39

8 A. I think because she was still there. 13:17:40

9 Q. Meaning, she had lasted in the 13:17:42  
10 role -- 13:17:44

11 A. Yeah. 13:17:44

12 Q. -- for about two months? 13:17:44

13 A. Yes. 13:17:46

14 Q. And was that uncommon for someone to 13:17:46  
15 last in that role that long? 13:17:49

16 A. Well, I don't know if it was uncommon 13:17:53  
17 for so long. But uncommon to be content and 13:17:55  
18 still doing it, like, happy with it, you know. 13:17:58

19 Q. And did Ms. Bennett convey to you -- 13:18:01  
20 do you remember conveying to you that she was 13:18:03  
21 happy doing the role? 13:18:05

22 A. I think so, yeah. I think I remember 13:18:07  
23 her saying things were going okay with him. 13:18:09

24 Q. Did you understand at the time that 13:18:12  
25 Ms. Bennett was doing the staffing role for the 13:18:14



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. When you say "the two of them had" -- 13:19:11

3 A. The Governor and Stephanie. 13:19:13

4 Q. Okay. So Governor and Stephanie had 13:19:14  
5 "good cop/bad cop routine"? 13:19:16

6 A. That's what I think, yeah. 13:19:18

7 Q. And when you wrote in this text 13:19:18  
8 message, "One of them always mean and one of them 13:19:20  
9 is always nice," were you referring to the 13:19:22  
10 Governor and Ms. Benton? 13:19:24

11 A. Yes. 13:19:24

12 Q. Can you give me an example of what 13:19:24  
13 the "good cop/bad cop routine" looks like? 13:19:26

14 A. I can remember one time we were in 13:19:30  
15 the office and I had -- the Governor made me call 13:19:34  
16 somebody and, you know, like, leave a message for 13:19:38  
17 him and I forgot the person's name. 13:19:42

18 So he was just, like, you know, get 13:19:44  
19 angry and was just like, you know, talk to 13:19:46  
20 Stephanie, learn how to make a phone call. 13:19:48

21 And Stephanie was just like, it's 13:19:50  
22 okay, you know, so stuff like that. 13:19:52

23 Q. Alright. And were there occasions 13:19:55  
24 where it was opposite where the Governor was 13:19:57  
25 "good cop"? 13:19:59

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A. I don't know about "good cop." But           13:20:01  
3                   Stephanie would be maybe a little bit more           13:20:03  
4                   irritated with me and the Governor wouldn't       13:20:06  
5                   really bother me at that moment, you know. He       13:20:08  
6                   would, like -- you know, Stephanie would ask me     13:20:10  
7                   to do something and she could be irritated with       13:20:13  
8                   me and the Governor would understand I'm doing     13:20:15  
9                   something for Stephanie right now and then kind     13:20:17  
10                  of defer to her to do things.                         13:20:20

11                  Q. Let's flip To tab 34.                                 13:20:22

12                                 (Deposition Exhibit 21, 8/9/19 text           13:20:22  
13                   message chain between Bennett and Witness, was     13:20:22  
14                   marked for identification.)                             13:20:38

15                  Q. This is another text message between           13:20:38  
16                   you and Ms. Bennett on August 8th [sic], 2019.     13:20:39  
17                   And there's a discussion in here where she says,     13:20:44  
18                   what did -- you say, "What did she get mad at you   13:20:49  
19                   for?"   13:20:49

20                                 And she said, "The mansion print."           13:20:52

21                                 What is the "mansion print"?                     13:20:54

22                  A. I think to print the book in the                 13:21:01  
23                   mansion reading the context of this.                 13:21:04

24                  Q. Say it again.                                     13:21:05

25                  A. Print the book, which is like the             13:21:06



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           Bennett wasn't telling the truth about that?           13:22:01

3                   A.    I mean, no.   13:22:03

4                   Q.    Are you familiar with any of the                   13:22:05

5           procedures that were used regarding the               13:22:08

6           Governor's Mansion?   13:22:10

7                   A.    No.   13:22:11

8                   Q.    Including sort of who had to be                               13:22:12

9           pinned about who was coming in and out of the           13:22:14

10          Governor Mansion?   13:22:17

11                  A.    No.   13:22:17

12                  Q.    Did you ever hear Ms. Benton or Ms.           13:22:18

13          DesRosiers talk about getting pinned for people       13:22:22

14          entering or exiting the Executive Mansion?           13:22:25

15                  A.    No.   13:22:28

16                  Q.    Did you ever talk to any members of       13:22:29

17          the PSU about their experience in the Executive       13:22:34

18          Chamber?   13:22:43

19                  A.    What do you mean, like, after we all       13:22:43

20          left or...   13:22:43

21                  Q.    Okay.  Let's start with after.           13:22:44

22                               Did you ever talk to any members of       13:22:46

23          the PSU after you left about their experience in       13:22:47

24          the Executive Chamber?                                   13:22:49

25                  A.    No, not really.                               13:22:50

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Did you talk to any of them before 13:22:51  
3 you left about their experience in the Executive 13:22:53  
4 Chamber? 13:22:56

5 A. Well, I mean, I don't know if we 13:22:56  
6 talked about -- I mean, I guess. Like, I was 13:22:58  
7 really close to the PSU guys. We were really 13:23:00  
8 good friends when we were at work. But, you 13:23:04  
9 know, I don't know if we -- you know, I don't 13:23:06  
10 know how much we talked about our experiences 13:23:09  
11 other than just, you know, joking around with 13:23:11  
12 each other a lot. 13:23:16

13 Q. Which members of PSU were you friends 13:23:16  
14 with? 13:23:17

15 A. It was Senior Investigator #2 and SI 13:23:18  
16 #1 . 13:23:20

17 Q. Did you ever talk to either Mr. -- 13:23:22  
18 I'm not going to -- 13:23:27

19 A. You can call him SI #2 He's... 13:23:27

20 Q. I'll call him SI #2 I'll get with 13:23:28  
21 the lingo. 13:23:30

22 (Continuing.) With SI #2 or SI #1 13:23:31  
23 about the qualifications to be a member of PSU? 13:23:33

24 A. No, just that you had -- like, I 13:23:43  
25 think, there is an age requirement for being a 13:23:43

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 State Trooper, in general. Like, I think you can 13:23:47  
3 get aged out a certain point without a waiver, 13:23:48  
4 but I don't know that we ever talked about what 13:23:50  
5 it takes to be a PSU member. 13:23:51

6 Q. Do you remember talking to him about 13:23:52  
7 how many years you had to be in the New York 13:23:54  
8 State Troopers before you could join PSU? 13:23:57

9 A. No. 13:23:59

10 Q. Ever talk to him about any change in 13:23:59  
11 that policy? 13:24:02

12 A. No. 13:24:03

13 Q. Did you ever know any of the female 13:24:03  
14 Troopers? 13:24:05

15 A. I think I knew one of the -- the 13:24:13  
16 guards at the gate, like, I think her name was 13:24:16  
17 [REDACTED]. I was friendly with her when I 13:24:19  
18 walked in. And she was a uniformed. 13:24:21

19 Q. Sorry. You said she was "uniformed"? 13:24:23

20 A. She was a uniform. 13:24:25

21 Q. When you say, "guard[s] at the gate," 13:24:26  
22 what do you mean by that? 13:24:28

23 A. Like, when you get to [REDACTED] 13:24:29

24 [REDACTED] 13:24:31

25 [REDACTED]es and she was one of the 13:24:34



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 (Deposition Exhibit 22, 10/14/19 text 13:25:24  
3 message chain between Bennett and Witness, was 13:25:24  
4 marked for identification.) 13:25:43

5 Q. This is a text message between you 13:25:43  
6 and Ms. Bennett on October 14th, 2019. And it 13:25:46  
7 begins with Ms. Bennett saying, "Also as an 13:25:50  
8 update, he just made me do 20 pushups." 13:25:52

9 Do you see that? 13:25:56

10 A. Yes. 13:25:57

11 Q. Did you ever communicate with Ms. 13:25:57  
12 Bennett about these "pushups," other than in text 13:25:58  
13 message? 13:26:01

14 A. No. 13:26:02

15 Q. When you say -- when you see the 13:26:03  
16 word, "he," did you understand her to be 13:26:05  
17 referring to the Governor? 13:26:07

18 A. Yes. 13:26:09

19 Q. Do you have any reason to believe 13:26:10  
20 that Ms. Bennett was not telling you the truth 13:26:12  
21 about the "pushups"? 13:26:14

22 A. No. 13:26:15

23 Q. If you turn to the second page about 13:26:23  
24 halfway down -- well, actually, at the top, you 13:26:30  
25 wrote, "I remember why I left again." 13:26:35

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Do you see that? 13:26:37

3 A. Uh-huh. 13:26:38

4 Q. Does that refresh your recollection 13:26:39

5 about the reasons you left the Executive Chamber? 13:26:40

6 A. Yeah, I think, I was referring to how 13:26:50

7 Columbus Day is normally a state holiday and we 13:26:53

8 had to come in and work as if it was a normal 13:26:57

9 day. But it is only like a few people. And if 13:27:02

10 he's in, I would have been one of the few people 13:27:04

11 in and it's not really a day off. 13:27:06

12 Q. So meaning sort of never having time 13:27:08

13 off; is that what you're referring to? 13:27:11

14 A. Correct. 13:27:11

15 Q. Okay. And then later on in that same 13:27:12

16 page, Charlotte says, "Also, he's been kind of 13:27:13

17 salty with me the last week or so." 13:27:18

18 And then you responded, "Yeah, it 13:27:19

19 always come. The charm offensive will wear off 13:27:21

20 and then he's a [REDACTED]" 13:27:24

21 What did you mean by that? 13:27:27

22 A. I think that I meant that he was, 13:27:29

23 like, being nice and patient with her while she 13:27:33

24 was learning to do the job and then he becomes a 13:27:35

25 little bit more expecting you to know what to do 13:27:38



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 probably a public documented thing, because I was 13:28:37  
3 well out of the office at that point. So 13:28:40  
4 whatever happened on that date, I would have to 13:28:42  
5 double-check. But I can't really remember what 13:28:44  
6 this is referring to. 13:28:48

7 Q. And then Ms. Bennett said, "My jaw 13:28:50  
8 dropped. Honestly, of course, he did. Of 13:28:53  
9 course, he would say that. He is so out of 13:28:55  
10 touch." 13:28:58

11 Do you have a view as to whether the 13:28:58  
12 Governor was "out of touch"? 13:28:59

13 A. I mean, again, I can't really 13:29:02  
14 remember what he said. 13:29:04

15 Q. Putting this incident aside, were 13:29:08  
16 there occasions in which you were the Executive 13:29:11  
17 Chamber where you felt like the Governor said 13:29:13  
18 things that indicated that he was "out of touch"? 13:29:15

19 A. I don't know. Nothing specific that 13:29:22  
20 I can think of. 13:29:27

21 Q. Did you ever hear the Governor use 13:29:27  
22 racially offensive language? 13:29:30

23 A. No. 13:29:31

24 Q. Racially pejorative language? 13:29:32

25 A. No. 13:29:34

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   Okay.  Let's turn to the next tab and       13:29:35  
3                   mark it as Tab 44.  And mark that as the next       13:29:41  
4                   exhibit.   13:29:46

5                               (Deposition Exhibit 24, 10/24/19 text       13:29:46  
6                   message chain between Bennett and Witness, was       13:29:46  
7                   marked for identification.)                               13:29:50

8                   Q.   This is from October 24th, 2019.               13:29:50  
9                   It's a text message chain between you and Ms.       13:29:52  
10                  Bennett.  And you wrote, "Just wait until he asks   13:29:56  
11                  for your personal phone and you go through text   13:29:58  
12                  and delete and gchat people not to chat you and   13:30:01  
13                  don't text me."                                       13:30:04

14                               Why were you giving Ms. Bennett that       13:30:06  
15                  advice?   13:30:09

16                  A.   Well, because I remember he would       13:30:09  
17                  ask, like, if he wanted to have something       13:30:14  
18                  transcribed, he would, like, ask for your phone   13:30:16  
19                  just to talk into it and, like, if you had a       13:30:19  
20                  alert that went off on your phone, he would   13:30:22  
21                  sometimes pull the phone back and look at it and   13:30:26  
22                  read it.  And, you know, I don't -- that's an   13:30:28  
23                  etiquette thing that you don't -- you shouldn't   13:30:31  
24                  really do that.  At least, I felt that way.  So   13:30:33  
25                  that's why I advised her, you know, if he asks to   13:30:35

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           transcribe your phone, you know, don't let him           13:30:38

3           look at your personal stuff, you know.                   13:30:40

4                   Q. Did the Governor ever do that to you?           13:30:41

5                   A. Did he look at the things I did?                   13:30:43

6                   Q. Look at your personal phone.                   13:30:45

7                   A. He may have. He may have. I gave it           13:30:46

8           to him record. But I don't -- I mean, typically,           13:30:49

9           I took precautions not to have him so...           13:30:53

10                  Q. But you go on to write later down,           13:30:54

11           "And he loves to look through people's phones."           13:30:56

12                          What did you mean by that?           13:30:59

13                  A. I think I was talking about Dani           13:31:02

14           where he had done that with Dani Lever's once           13:31:04

15           before.                   13:31:06

16                  Q. And tell us about what happened with           13:31:06

17           Ms. Lever.                   13:31:09

18                  A. Just remembering being like, oh, stop           13:31:10

19           going through my phone, you know, like, joking           13:31:13

20           around with him. I think that's the only time I           13:31:14

21           can remember that.           13:31:17

22                  Q. Did you ever witness the Governor           13:31:18

23           asking someone if he could look through their           13:31:19

24           social media accounts?           13:31:23

25                  A. No.                   13:31:24



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 you, "I have spent too long dealing with abusive 13:34:48  
3 assholes. The Gov has no idea what kind of web 13:34:51  
4 he has stepped into LMAO." 13:34:53

5 What did you understand by saying 13:34:56  
6 "the Gov has no idea what kind of web he has 13:34:58  
7 stepped into"? 13:35:01

8 A. I really don't know what I thought of 13:35:01  
9 that at the time. 13:35:03

10 Q. And you wrote, "good for you." 13:35:10

11 Do you remember why you wrote back, 13:35:13  
12 "good for you." 13:35:15

13 A. Because she was motivating herself to 13:35:15  
14 just leave, if she didn't like it. Because it's 13:35:17  
15 hard place to leave if you don't like it, you 13:35:20  
16 know. If you need the income, it's hard to walk 13:35:23  
17 away from a job. 13:35:25

18 Q. And you wrote -- after that you 13:35:26  
19 wrote, "I told you that you that you're better 13:35:28  
20 than me. You're doing the right thing for 13:35:29  
21 yourself faster than I could. Just don't tell 13:35:30  
22 ANYONE what you're doing. You'd be very 13:35:33  
23 surprised to see how quickly shit leaks here." 13:35:37

24 Why did you tell Ms. Bennett not to 13:35:40  
25 tell "anyone" she was doing? 13:35:44

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 A. I believe in that same vein of 13:35:46  
3 leaving. Because if you were going to leave, 13:35:47  
4 again, it's that same thought process that if 13:35:49  
5 you're going to go somewhere, they may find out 13:35:51  
6 where you're going and try and stop you from 13:35:52  
7 going there. Plus you don't want, like, the 13:35:54  
8 attention of them thinking that you're leaving or 13:35:56  
9 anything like that. You kind of want to do it on 13:35:58  
10 your own terms. So, I think, I was talking to 13:36:01  
11 her about that. 13:36:02

12 Q. Did you ever actually speak to Ms. 13:36:02  
13 Bennett after this about whether she was going to 13:36:04  
14 leave the Executive Chamber? 13:36:06

15 A. No. I don't think I did. 13:36:07

16 Q. Do you understand that she did not, 13:36:09  
17 in fact, at that time leave the Executive 13:36:12  
18 Chamber? 13:36:13

19 A. Yeah, I think so. 13:36:13

20 Q. Let's look at Tab 53 and we'll mark 13:36:18  
21 this as the next exhibit. 13:36:24

22 (Deposition Exhibit 26, 1/1/20 text 13:36:24  
23 message chain between Bennett and Witness, was 13:36:24  
24 marked for identification.) 13:36:26

25 Q. We're into 2020. So this is New 13:36:26

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           Year's Day 2020. It's a text message chain           13:36:29

3           between you and Ms. Bennett.           13:36:34

4                   When you're done looking at it, just           13:36:54

5           let me know.           13:36:57

6                   A. Okay.           13:37:00

7                   Q. And in this text message chain, Ms.           13:37:01

8           Bennett tells you that the Governor just made her           13:37:03

9           sing "Bohemian Rhapsody."           13:37:05

10                   Do you see that?           13:37:07

11                   A. Yes.           13:37:09

12                   Q. Do you have any reason to believe           13:37:09

13           that Ms. Bennett wasn't telling you the truth           13:37:11

14           about that?           13:37:12

15                   A. No.           13:37:13

16                   Q. Do you remember an occasion on which           13:37:13

17           there was -- Ms. Bennett was asked to learn the           13:37:15

18           lyrics to "Danny Boy"?           13:37:18

19                   A. Yes.           13:37:19

20                   Q. And tell us about that.           13:37:20

21                   A. I think it was either my last -- the           13:37:25

22           end of my second to last week or my last week in           13:37:28

23           the office with her. I can't remember which one           13:37:30

24           it was. I don't think he was there my last week,           13:37:32

25           so, I guess, my second to last week there. We           13:37:35





1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A. Whenever the news story came out.           13:39:07

3                   Q. You mean the New York Times story?           13:39:10

4                   A. Yeah.           13:39:12

5                   Q. Did you reach out to Ms. Bennett           13:39:12

6 after that?           13:39:13

7                   A. No.           13:39:14

8                   Q. Did she reach out to you?           13:39:14

9                   A. No.           13:39:15

10                  Q. Did you discuss Ms. Bennett's           13:39:18

11 allegations that were made in that New York Times   13:39:20

12 article with anyone?           13:39:22

13                  A. I think, like, [REDACTED] and I talked   13:39:28

14 about it. I, like, to add -- that's pretty much   13:39:31

15 -- not a lot of people.           13:39:35

16                  Q. Did anyone you spoke to about it give   13:39:37

17 you any information to discredit Ms. Bennett?   13:39:40

18                  A. What do you mean, I'm sorry?           13:39:42

19                  Q. Meaning, telling you a fact that was   13:39:44

20 inconsistent with what she reported in the New   13:39:45

21 York Times story?           13:39:48

22                  A. No, not that I can recall, no.           13:39:49

23                  Q. Is there anything you think that we   13:40:02

24 need to know about your communications with   13:40:04

25 Charlotte Bennett that we haven't covered today?   13:40:06





1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   you witnessed from the senior staff of the                   13:41:57

3                   Executive Chamber to be verbally abusive?                   13:42:00

4                   A.    What do you mean, I'm sorry, like?                   13:42:02

5                   Q.    Well, I'll ask a different question.                   13:42:05

6                   So, when someone told you that                   13:42:08

7                   Lindsey Boylan was being "verbally abusive," what   13:42:09

8                   did you understand that to mean?                   13:42:12

9                   A.    That she was yelling a lot.                   13:42:13

10                  Q.    Okay.  And are there other people                   13:42:15

11                  within the senior staff of the Executive Chamber   13:42:16

12                  who you saw "yelling a lot"?                   13:42:19

13                  A.    Yes.                   13:42:20

14                  Q.    And who was that?                   13:42:21

15                  A.    Melissa.                   13:42:22

16                  Q.    Did there come an occasion in which                   13:42:29

17                  you had to deliver flowers to members of the           13:42:31

18                  Executive Chamber staff?                   13:42:34

19                  A.    Yes.                   13:42:35

20                  Q.    Tell us about that, how that came                   13:42:36

21                  about.                   13:42:38

22                  A.    So I believe it was -- I think it was               13:42:40

23                  Valentine's Day, if not the day before, but I           13:42:43

24                  think it was Valentine's Day.  I was in the New       13:42:45

25                  York City office sitting at the cube and               13:42:49

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           Stephanie called me and said, can you get some           13:42:52

3           Roses for the staffers, you know. And she said,           13:42:55

4           for every woman on the 39th floor, some of the           13:43:00

5           women on the 38th floor and Lindsey Boylan.           13:43:03

6                   Q. What floor was Lindsey Boylan on?           13:43:06

7                   A. I think 36 or 37.           13:43:07

8                   Q. And did you understand Ms. Benton's           13:43:09

9           direction to be coming from the Governor?           13:43:12

10                  A. I did.           13:43:14

11                  Q. And how did you come to that           13:43:15

12           understanding?           13:43:16

13                  A. Because she called and asked me to do           13:43:16

14           it and, like, saying from the Governor when they           13:43:19

15           were giving them out.           13:43:22

16                  Q. And did you go buy the Roses?           13:43:23

17                  A. Yes.           13:43:26

18                  Q. And how much did they cost?           13:43:26

19                  A. I don't know. There weren't cheap.           13:43:29

20                  Q. Ballpark it 100, 200?           13:43:33

21                  A. 80, \$100. I went to like a bodega on           13:43:35

22           the corner.           13:43:38

23                  Q. Did you get reimbursed for them?           13:43:39

24                  A. Virtually.           13:43:42

25                  Q. Okay. And did you follow the           13:43:43

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           instructions that Ms. Benton had given you?           13:43:45

3                   A.   Yes.   13:43:47

4                   Q.   Do you remember who the 38 floor got           13:43:47

5           the Roses?   13:43:49

6                   A.   I think only person I can think of is           13:43:58

7           maybe I gave one to the receptionist on the 38th           13:44:01

8           floor, but I can't really remember who else a the           13:44:04

9           38th floor that I gave one to.                   13:44:06

10                  Q.   Did Ms. Benton tell you specifically           13:44:08

11           who the 38th floor to give the Roses to?           13:44:10

12                  A.   I think the way that she said it was           13:44:13

13           just like, you know, people that have interacted           13:44:14

14           with him before, people that he's met before, if           13:44:16

15           that makes sense, like.                           13:44:19

16                  Q.   So, to be clear, it's every woman on           13:44:20

17           the 39th floor, right?                           13:44:23

18                  A.   Yes.   13:44:24

19                  Q.   Not men --                                   13:44:25

20                  A.   Yes.   13:44:25

21                  Q.   -- right?                                   13:44:26

22                           And then it's certain women on the           13:44:26

23           38th floor?                                   13:44:28

24                  A.   Yes.   13:44:28

25                  Q.   And they were women who were -- say           13:44:29



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           my head. I can't really remember if I did.           13:45:18

3                   Q. And you did, in fact, give Ms. Boylan           13:45:20

4           a rose, correct?           13:45:22

5                   A. Yes.           13:45:23

6                   Q. Do you remember if you gave it to her           13:45:23

7           personally or left it on her desk?           13:45:25

8                   A. I believe I left it in her office.           13:45:27

9                   Q. Did you see her at all after that?           13:45:29

10                  A. No, I don't think so.           13:45:31

11                  Q. Did you ever talk to her about having           13:45:32

12           dropped a rose from the Governor for her?           13:45:34

13                  A. I think she asked where like where it           13:45:37

14           came from and I told her it's from the Governor.           13:45:40

15                  Q. And that was the same day, around the           13:45:42

16           same...           13:45:44

17                  A. I think it was the next week, if I           13:45:45

18           remember.           13:45:47

19                  Q. Not recently?           13:45:48

20                  A. What do you mean?           13:45:49

21                  Q. Meaning, that conversation didn't           13:45:50

22           occur recently, that's a conversation that           13:45:51

23           occurred closer in the time when the flower --           13:45:54

24                  A. Yeah, exactly, the week after I gave           13:45:56

25           it to her.           13:45:58

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q. Did you ever talk to anybody else           13:45:58

3                   about the delivery of the flowers?           13:46:00

4                   A. Not that I can recall, no.           13:46:03

5                   Q. Have you ever spoken to any member of   13:46:05

6                   the press --           13:46:07

7                   A. No.           13:46:08

8                   Q. -- about -- I'll finish asking a       13:46:08

9                   different question.           13:46:12

10                  Have you ever spoken to a member of       13:46:13

11                  the press about the delivery of the flower to Ms.   13:46:15

12                  Boylan?           13:46:17

13                  A. No.           13:46:17

14                  Q. Have you ever spoken to a member of       13:46:17

15                  the press about any of the allegations of sexual   13:46:19

16                  harassment against Governor Cuomo?       13:46:22

17                  A. No.           13:46:23

18                  Q. Okay.           13:46:24

19                  A. Sorry I jumped the gun.           13:46:26

20                  Q. No, that's okay.           13:46:28

21                  How did you first become aware that       13:46:30

22                  Ms. Boylan had made claims of sexual harassment   13:46:32

23                  against Governor Cuomo?           13:46:34

24                  A. I think it was the Medium article       13:46:36

25                  that she released and I think it was December of   13:46:38





1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   A. I don't know; well before this.                   13:50:11

3                   Q. Did you know that she had run for                   13:50:14

4 Congress?                   13:50:17

5                   A. Yes.                   13:50:18

6                   Q. Did you ever speak to her about her                   13:50:18

7 run for Congress?                   13:50:19

8                   A. No.                   13:50:20

9                   Q. After Ms. Boylan tweeted or you                   13:50:21

10 became aware that Ms. Boylan had tweeted                   13:50:29

11 allegations of sexual harassment at the Governor,                   13:50:31

12 did you ever become aware that the Executive                   13:50:34

13 Chamber was preparing a letter in response to Ms.                   13:50:36

14 Boylan's allegations?                   13:50:41

15                   A. Yes.                   13:50:41

16                   Q. How did you become aware of that?                   13:50:42

17                   A. My girlfriend was one of the people                   13:50:45

18 that was asked about the letter to sign.                   13:50:47

19                   Q. And who is your girlfriend?                   13:50:49

20                   A. [REDACTED]                   13:50:51

21                   Q. And what did [REDACTED] tell you                   13:50:53

22 about the letter?                   13:50:56

23                   A. Just that she was asked if she would                   13:50:57

24 sign it.                   13:51:00

25                   Q. Did she tell you what kind of letter                   13:51:00





1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 A. I think she had told me that there 13:52:37  
3 were other people asked, but she didn't tell she 13:52:39  
4 is recruiting people. 13:52:42

5 Q. Did she tell you she was asking other 13:52:43  
6 people to sign it? 13:52:46

7 A. No, she didn't. 13:52:46

8 Q. Did she tell you that Ms. Benton had 13:52:48  
9 asked her to ask other people to sign it? 13:52:50

10 A. No, she didn't. 13:52:52

11 Q. Do you know if [REDACTED] ever 13:52:54  
12 received a copy of the letter? 13:52:56

13 A. No, I don't think she ever did. 13:52:57

14 Q. Do you have any conversations with 13:52:59  
15 [REDACTED] in December of 2020? 13:53:04

16 A. May have. 13:53:07

17 Q. Did you have any conversations with 13:53:08  
18 [REDACTED] in December of 2020 about the 13:53:09

19 allegations of sexual harassment against Governor 13:53:12  
20 Cuomo? 13:53:15

21 A. Maybe. I don't know that I can 13:53:18  
22 recall a specific instance of talking to her. 13:53:20

23 Q. Are there any other members of the 13:53:23  
24 staff of the Executive Chamber current or former 13:53:25  
25 that you spoke to in December of 2020 about the 13:53:28

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           allegations of sexual harassment against the           13:53:31

3           Governor?           13:53:33

4                   A. I think just [REDACTED], like, I           13:53:41

5           think he and I chatted and...           13:53:44

6                   Q. What do you remember about the chat           13:53:47

7           with [REDACTED]?           13:53:49

8                   A. That he had never seen anything. And           13:53:51

9           then we talked about like a bunch of other things           13:53:54

10           too, like, we're in a fantasy football league           13:53:57

11           but...           13:53:59

12                   Q. "Never seen anything," what does that           13:53:59

13           mean?           13:54:02

14                   A. Like, the Governor sexually           13:54:02

15           assaulting anyone. That's what I'm...           13:54:04

16                   Q. "Sexually assaulting anybody"?           13:54:05

17                   A. Yeah.           13:54:08

18                   Q. Between the tweets in December and           13:54:09

19           the Medium post, which is at Tab 58, which was           13:54:18

20           February 24th, 2020, did you have contact with           13:54:22

21           any members current or former of the Executive           13:54:25

22           Chamber other than your girlfriend?           13:54:27

23                   A. I'm sorry. When did this come out           13:54:35

24           again?           13:54:37

25                   Q. February 24th, 2021. I'm sorry, my           13:54:37







1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Did you ask her why you thought [REDACTED] 13:57:35

3 [REDACTED] Kaitlin had left unhappily? 13:57:38

4 A. Yes. 13:57:39

5 Q. And do you remember what you told 13:57:40

6 her? 13:57:41

7 A. I believe I told her, it was sour 13:57:41

8 grapes. 13:57:43

9 Q. And what did you mean by "sour 13:57:43

10 grapes"? 13:57:46

11 A. That she didn't have a good 13:57:46

12 experience there because she didn't work hard 13:57:48

13 enough for it and was now spiteful about that. 13:57:50

14 Q. What was the basis for that 13:57:57

15 impression that it was "sour grapes"? 13:57:58

16 A. Well, I don't think she worked very 13:58:02

17 hard when she was there and, you know, she left 13:58:05

18 and got, I believe, what she wanted working for 13:58:07

19 [REDACTED]. So I don't really understand what the 13:58:12

20 angle would have been to be angry, unless it was 13:58:15

21 like a "sour grapes" thing. 13:58:17

22 Q. Did you read the New York Magazine 13:58:22

23 article about Governor Cuomo and the Executive 13:58:24

24 Chamber staff? 13:58:26

25 A. Yes. 13:58:26

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   There is a woman in there that is                   13:58:26

3                   only identified as "Kaitlin."                                   13:58:29

4                   Do you understand who that is?                               13:58:31

5                   A.   I think so.   13:58:32

6                   Q.   Who do you think it is?                                     13:58:33

7                   A.   I think it's Kaitlin [REDACTED].                           13:58:34

8                   Q.   Did you know any of the things that                       13:58:36

9                   are reported in that article about Kaitlin                     13:58:38

10                  [REDACTED]'s experience in the Executive Chamber           13:58:41

11                  before you spoke to Ms. Benton?                             13:58:43

12                  A.   Do I -- can you repeat that question                     13:58:47

13                  again?   13:58:49

14                  Q.   Sure, it's a loaded question.                             13:58:49

15                  A.   Sure.   13:58:51

16                  Q.   Lots of words there.                                       13:58:51

17                  There are some allegations that are                         13:58:54

18                  made in that article --                                       13:58:55

19                  A.   Right.   13:58:55

20                  Q.   -- by the woman named Kaitlin --                       13:58:56

21                  A.   Right.   13:58:58

22                  Q.   -- about her experience in the                         13:58:58

23                  Executive Chamber.                                       13:59:00

24                  A.   Okay.    13:59:00

25                  Q.   Do you remember that?                             13:59:01

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 A. Well, I am aware that the article 13:59:01  
3 exists. I don't know if there is a copy here you 13:59:03  
4 can show me to refresh my memory. 13:59:06

5 Q. I'll give you some examples. 13:59:07

6 A. Okay. 13:59:09

7 Q. So, in the article, the person who 13:59:10  
8 identifies herself as Kaitlin says that the 13:59:12  
9 Governor referred her as a "lumberjack." 13:59:14

10 Do you remember that? 13:59:17

11 A. I don't remember that but... 13:59:17

12 Q. Before the conversation with Ms. 13:59:19  
13 Benton, do you know -- did you know that Kaitlin 13:59:20  
14 [REDACTED] had described the Governor referring to her 13:59:23  
15 as a "lumberjack"? 13:59:26

16 A. No, I didn't. 13:59:27

17 Q. And then you said the other name you 13:59:35  
18 gave was [REDACTED]? 13:59:37

19 A. Yes. 13:59:39

20 Q. Okay. And what did you tell Ms. 13:59:40  
21 Benton about [REDACTED]? 13:59:42

22 A. I don't think I told her anything. I 13:59:44  
23 think I was just like listing off names and, 13:59:46  
24 like, she would stop and be like, yeah, hey, what 13:59:49  
25 do you think she's angry about. 13:59:50

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   But I don't think we said anything                   13:59:53

3                   about [REDACTED].                   13:59:54

4                   Q. So Ms. Benton was listing off names?                   13:59:55

5                   A. No, I was listing off names.                   13:59:57

6                   Q. You were listing off names?                   13:59:59

7                   A. Yeah.                   14:00:00

8                   Q. Okay. And [REDACTED] was someone you                   14:00:01

9                   identified as having left the Chamber from your                   14:00:03

10                  perspective unhappy?                   14:00:06

11                  A. No. It was a question who sat at                   14:00:07

12                  that desk.                   14:00:09

13                  Q. Okay.                   14:00:10

14                  A. So it wasn't about happiness or not.                   14:00:10

15                  But as I would say names, she would be, oh, yeah,                   14:00:12

16                  hey, what do you think is with this person.                   14:00:15

17                  Q. Do you remember any other person you                   14:00:18

18                  discussed other than [REDACTED] Kaitlin?                   14:00:19

19                  A. Not really, no.                   14:00:26

20                  Q. Between December the tweets between                   14:00:31

21                  Ms. Boylan and February 24th, which is the date                   14:00:36

22                  of the Medium article Ms. Boylan wrote, did you                   14:00:38

23                  talk to Melissa DeRosa?                   14:00:41

24                  A. No.                   14:00:42

25                  Q. Did you talk to Jill DesRosiers?                   14:00:43



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   mark that as the next exhibit.                   14:01:44

3                                 (Deposition Exhibit 30, 2/26/21                   14:01:44

4                   message chain between Boylan and Witness, was                   14:01:44

5                   marked for identification.)                   14:01:50

6                   Q.    So while you're turning the pages,                   14:01:50

7                   the call you had with Ms. Benton in December of                   14:01:52

8                   2020 about people who had sat in the seat outside                   14:01:54

9                   the Governor's Office, do you know if she was                   14:01:58

10                   recording that call?                   14:02:01

11                   A.    I don't know.                   14:02:01

12                   Q.    Okay.  Alright.  So we'll mark Tab 62                   14:02:02

13                   as the next exhibit.                   14:02:04

14                                 Is this the e-mail that you were just                   14:02:05

15                   referring to that Ms. Boylan sent to you?                   14:02:07

16                   A.    Yes.                   14:02:09

17                   Q.    Okay.  Now, you said this bears some                   14:02:10

18                   relationship to you speaking to people in the                   14:02:13

19                   Executive Chamber.  So tell us how that came                   14:02:15

20                   about.                   14:02:17

21                   A.    So, when Lindsey e-mailed me to talk,                   14:02:19

22                   I called the Chamber.  I called Stephanie and                   14:02:24

23                   just said, you know, hey, I got an e-mail from                   14:02:26

24                   Lindsey.  I don't want to get involved, you know,                   14:02:29

25                   just giving you a heads up, a courtesy, letting                   14:02:31

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 you know what's going on. 14:02:33

3 And she said, okay, thanks. She 14:02:37

4 called me back and when she called me back, it 14:02:44

5 was on speaker phone in a room with a lot more 14:02:46

6 staff members. And she was like, we think it's 14:02:49

7 okay if you engage with her and talk to her, just 14:02:54

8 see what she wants and then just report back and 14:02:57

9 let us know. 14:03:00

10 Q. You said it was "more staff members." 14:03:02

11 Who, to your knowledge, was in that 14:03:05

12 room? 14:03:06

13 A. I believe they were all announced. 14:03:06

14 It was Linda Lacewell, Rich Azzopardi, Rob 14:03:08

15 Mujica, Beth Garvey, Judy Mogul and Stephanie. 14:03:15

16 Q. Was Melissa DeRosa there? 14:03:23

17 A. Yes, yes, she was. 14:03:24

18 Q. Anyone else? 14:03:27

19 A. I think that's it. 14:03:28

20 Q. Okay. Did they tell you what to say 14:03:29

21 when you spoke to Ms. Boylan? 14:03:34

22 A. They told me, like, just figure out, 14:03:38

23 like, what she wants to talk to you about. If 14:03:40

24 she wants to talk to you, like, she reached out 14:03:43

25 to you. It's fine that you can just see what she 14:03:45

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           wants from you and that's it, you know.                   14:03:47

3                   Q.    In that conversation, was there any                   14:03:50

4           other discussion or that's all that was said?                   14:03:52

5                   A.    What do you mean, like?                   14:03:54

6                   Q.    Meaning, you called, you alerted them                   14:03:56

7           to the fact that -- you alerted Ms. Benton to the                   14:03:59

8           fact that Lindsey Boylan had reached out to you,                   14:04:01

9           right?                   14:04:02

10                  A.    Right.                   14:04:02

11                  Q.    And then Ms. Benton calls you back?                   14:04:03

12                  A.    Right.                   14:04:05

13                  Q.    And she's in a room with all these                   14:04:05

14           people we just talked about?                   14:04:07

15                  A.    Yes.                   14:04:07

16                  Q.    And the conversation is them saying,                   14:04:07

17           you should call her back, find out what she                   14:04:09

18           wants?                   14:04:11

19                  A.    Right.                   14:04:11

20                  Q.    Anything else said?                   14:04:12

21                  A.    Not that I can remember in that                   14:04:16

22           conversation, but Stephanie had called me. I                   14:04:18

23           called her, like, we played phone tag a couple                   14:04:20

24           more times after that to continue the                   14:04:22

25           conversation.                   14:04:24

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   I believe -- I'm trying to remember           14:04:26

3                   the order of the phone calls.                   14:04:31

4                   Oh, I called her back and I said, you           14:04:33

5                   know, okay, I will set a call with Lindsey. Can   14:04:36

6                   I have a witness for this?                   14:04:40

7                   And she said, let me check with the           14:04:41

8                   lawyers. I'll call you right back.           14:04:43

9                   And then she called me back and said,           14:04:44

10                  yes, you can have a witness.                   14:04:47

11                  I told her, it would be [REDACTED].           14:04:48

12                  And she said, okay. And she's like,           14:04:51

13                  as a matter of fact, have [REDACTED] record it.   14:04:53

14                  So I said, okay.                           14:04:56

15                  And then she was like, report back to           14:04:57

16                  me.   14:04:57

17                  Q. She's the sequence of events?           14:04:58

18                  A. Right.                                   14:05:00

19                  Q. And during that sequence of           14:05:00

20                  conversations, did you understand Ms. Benton   14:05:02

21                  remained in a room with all those other people?   14:05:03

22                  A. No, I wasn't aware if she was in a           14:05:06

23                  room with all those other people or not.       14:05:09

24                  Q. Okay. In the room, I think, you said   14:05:11

25                  -- did you say Judy Mogul was there?       14:05:13



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           things, just be abrupt with her and just tell           14:06:13

3           her, like, look, you reached out to me, what do           14:06:16

4           you want from me? Like, that's the advice that           14:06:19

5           Melissa gave.           14:06:21

6                   Q. Do you remember any advice that Linda           14:06:22

7           Lacewell gave?           14:06:24

8                   A. No, I don't.           14:06:26

9                   Q. Do you remember any advice that Rich           14:06:28

10          Azzopardi gave?           14:06:30

11                  A. No, I don't think he said anything.           14:06:31

12                  Q. Do you think Ms. Lacewell said           14:06:33

13          anything?           14:06:37

14                  A. I think she was talking, but I can't           14:06:37

15          remember what she said.           14:06:39

16                  Q. Other than the advice about recording           14:06:40

17          the call, what did Ms. Mogul say?           14:06:43

18                  A. I think that was it. That's all I           14:06:47

19          can remember.           14:06:50

20                  Q. What about Mr. Mujica?           14:06:51

21                  A. I don't think he said anything.           14:06:53

22                  Q. Did you place a call to Ms. Boylan?           14:06:58

23                  A. No. She called me.           14:07:01

24                  Q. How did you arrange for her to call           14:07:04

25          me?           14:07:04



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           The time is, approximately, 2:07 we are going off   14:07:50

3           the video record.   14:07:52

4                   (Recess taken 2:07 to 2:22 p.m.)               14:22:50

5                   THE VIDEOGRAPHER: Okay. The time                   14:22:50

6           is, approximately, 2:22. We are back on the           14:22:54

7           video record.   14:22:57

8                   Q. So we're going to mark the next                   14:22:58

9           exhibit, which is an audio file, and Charlotte is   14:23:01

10          going to play that for us. You need to put your   14:23:08

11          headset on.   14:23:11

12                   (Deposition Exhibit 31, audio file,

13          was marked for identification.)

14                   (Playing of audio recording between

15          Boylan and Witness commences.)

16                   WITNESS 7-7-21: Hello.

17                   LINDSEY BOYLE: Hey. Sorry to bother           14:23:19

18          you. I know you got a busy life and whatnot.       14:23:20

19          But I appreciate you taking the time.           14:23:23

20                   WITNESS 7-7-21: No, it's all good.           14:23:25

21                   What's going on?                                   14:23:26

22                   LINDSEY BOYLAN: Are you still -- are           14:23:27

23          you still with -- where did you go again, Port   14:23:28

24          Authority or where?                           14:23:28

25                   WITNESS 7-7-21: Yeah, yeah, I went           14:23:32



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   LINDSEY BOYLAN: I mean, I don't know       14:24:16  
3                   what you observed. I know I remember, like, you   14:24:17  
4                   were the one who brought me the rose. And I       14:24:20  
5                   would assume, like, other people who had been on   14:24:22  
6                   the, you know, 39th floor had seen a lot of stuff   14:24:25  
7                   even in just in terms of like how he is. And if     14:24:28  
8                   you had, I would so appreciate, you know, even    14:24:33  
9                   off the record in a safe way so it couldn't be     14:24:39  
10                  identifiable as you. There are two different       14:24:42  
11                  people that would love to hear that, that, you     14:24:46  
12                  know, they wouldn't even have to know --         14:24:49

13                  WITNESS 7/7/21: Yeah.                               14:24:52

14                  LINDSEY BOYLAN: -- like, who you are             14:24:53  
15                  per se, but it would be very helpful.             14:24:54

16                  And I think something has to change             14:24:58  
17                  or else, you know -- what I experienced people    14:25:00  
18                  after me experienced. So I feel like I had to do   14:25:04  
19                  something to, at least, make it clear that that's   14:25:08  
20                  happening. Do you know what I mean?             14:25:10

21                  WITNESS 7/7/21: Yeah, yeah, I                   14:25:11  
22                  understand. But, you know, I never saw anything   14:25:12  
23                  like that, you know.                             14:25:15

24                  LINDSEY BOYLAN: Got it.                           14:25:17

25                  It's okay. I understand. Okay. I                 14:25:18











1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 A. No. 14:31:43

3 Q. Did you want to record the call? 14:31:47

4 A. Not really. 14:31:55

5 Q. How did the idea come about again 14:32:00

6 that [REDACTED] would record the call? 14:32:03

7 A. Cause [REDACTED] talked to me about 14:32:05

8 being a witness for the phone call. So I called 14:32:08

9 Stephanie and said, could I have a witness, and I 14:32:10

10 told her it would be [REDACTED]. 14:32:14

11 And she said, okay, fine. And then 14:32:15

12 she actually said, as a matter of fact, you 14:32:16

13 should have [REDACTED] record the phone call too. 14:32:18

14 Q. Was there any discussion with Ms. 14:32:21

15 Benton or other members of the Executive Chamber 14:32:22

16 staff as to whether [REDACTED] or you would 14:32:27

17 record the call? 14:32:28

18 A. I think she told [REDACTED] to do it 14:32:29

19 while I was having the phone call. 14:32:32

20 Q. And before you decided on [REDACTED], 14:32:34

21 was there any discussion over whether you or she 14:32:36

22 should do it? 14:32:39

23 A. Not that I can remember. 14:32:40

24 Q. Was there any discussion about 14:32:41

25 whether if you recorded the call, you wouldn't be 14:32:43

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           able to tell Ms. Boylan that you were not           14:32:45

3           recording the call, if she asked?           14:32:47

4                   A.   Yeah, that was in the text message           14:32:48

5           you saw.           14:32:49

6                   Q.   But did that discussion happen with           14:32:50

7           the Executive Chamber?           14:32:52

8                   A.   No, it didn't.           14:32:53

9                   Q.   That was just between you and [REDACTED]           14:32:54

10           [REDACTED] and [REDACTED]?           14:32:56

11                   A.   Correct.           14:32:57

12                   Q.   And [REDACTED] on the page that's           14:32:58

13           Bate stamped 761 at the bottom, she says, "Steph           14:33:02

14           called and talked him off the ledge a bit."           14:33:11

15                   You're the "him," right?           14:33:13

16                   A.   Correct.           14:33:15

17                   Q.   What was your understanding of why           14:33:16

18           [REDACTED] was saying were you on the "ledge"           14:33:19

19           and had to be talked off?           14:33:20

20                   A.   Because I didn't want to get involved           14:33:22

21           in this.           14:33:24

22                   Q.   Why didn't you want to get involved?           14:33:24

23                   A.   Well, I don't know. I just don't           14:33:27

24           like being involved in big media things, you           14:33:31

25           know, big media stories. I didn't want to get           14:33:33



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   It does make sense.                   14:34:51

3                   A.   Okay.   14:34:51

4                   Q.   Did you leave believe her?                   14:34:52

5                   A.   Yes.   14:34:54

6                   Q.   And then you wrote on 776, "But that           14:34:57

7                   that they suspected it."                           14:35:00

8                                 What did Ms. Benton say about                   14:35:02

9                   "suspecting" it?                                   14:35:04

10                  A.   I think that they suspected that           14:35:09

11                  Lindsey was reaching out.                       14:35:11

12                  Q.   But that no one had told them that           14:35:12

13                  that had actually happened?                   14:35:15

14                  A.   From what she told me, yes.               14:35:16

15                  Q.   Okay.   And then you go on you wrote,       14:35:18

16                  "And the fact that she's reaching out to me" --   14:35:21

17                  flip the page -- "██████████" totally believed   14:35:23

18                  that."   But you continue to write, "Probably   14:35:25

19                  means she hasn't gotten much."               14:35:27

20                                 Do you see that?                               14:35:30

21                  A.   Yes.   14:35:30

22                  Q.   Is that what Ms. Benton stated to you   14:35:31

23                  or was that your view?                       14:35:33

24                  A.   You know, I can't remember.   I think   14:35:38

25                  that's paraphrasing what Stephanie said, like,   14:35:40

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 you know, she's reaching out to me. You know, 14:35:43  
3 why is she reaching out to you, she must not have 14:35:46  
4 much. I'm paraphrasing it, but it was something 14:35:50  
5 like that, I think. 14:35:52

6 Q. Okay. In the recorded phone 14:35:54  
7 conversation, Ms. Boylan twice refers to there 14:35:56  
8 being other people who had similar experiences to 14:36:00  
9 her. 14:36:03

10 Do you remember that? 14:36:04

11 A. Yes. 14:36:05

12 Q. Okay. Did you have any idea who she 14:36:05  
13 was referring to at that time? 14:36:09

14 A. If I can remember remembering who she 14:36:10  
15 was referring to. 14:36:13

16 Q. Did anyone in the Executive Chamber 14:36:14  
17 ask you who you thought Ms. Boylan was referring 14:36:15  
18 to? 14:36:18

19 A. No. 14:36:18

20 Q. Did you discuss with anyone who you 14:36:19  
21 thought those two people might be? 14:36:21

22 A. No. 14:36:22

23 Q. Not even with [REDACTED]? 14:36:25

24 A. No. 14:36:27

25 Q. If you turn to Page 792. 14:36:36



1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. Ms. Benton told you you didn't need 14:38:17

3 to do that -- 14:38:19

4 A. Yes, yes. 14:38:19

5 Q. -- if she wanted you to have those 14:38:20

6 conversations? 14:38:22

7 A. Yes, yes. 14:38:22

8 Q. And then there's a series of -- it 14:38:23

9 goes on for quite a while about you guys 14:38:26

10 discussing whether the Executive Chamber was a 14:38:28

11 hostile environment and you say, no. 14:38:32

12 Then if you go to 794 and then it 14:38:34

13 continues on. You wrote, "It's not hostile. 14:38:39

14 It's hard," on 796. 14:38:43

15 And [REDACTED] and 799 says, "she wants to 14:38:51

16 paint hostile." 14:38:56

17 And then you say after that, "Yes, 14:38:56

18 it's not. It's definitely hard to work there but 14:38:58

19 it's not hostile." 14:39:01

20 Is that your view of your experience 14:39:03

21 in the Executive Chamber? 14:39:04

22 A. Yeah, I mean, I don't know that 14:39:06

23 "hostile" is the right word for it. It's a tough 14:39:08

24 place to work. But, I mean, you know, I don't 14:39:11

25 know that "hostile" is the right word for it. 14:39:14

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q.   You understand that "hostile" has a           14:39:16

3                   legal meaning?   14:39:17

4                   A.   I don't.   14:39:18

5                   Q.   When you wrote these text, you didn't           14:39:19

6                   understand that?                                       14:39:21

7                   A.   No, I didn't.                                       14:39:21

8                   Q.   Okay.   You can put the binder aside.           14:39:22

9                                You earlier told me that the first           14:39:35

10                   occasion on which you became aware of Charlotte   14:39:44

11                   Bennett's accusations of sexual harassment       14:39:46

12                   against the Governor was when the New York Times   14:39:49

13                   article came out; is that right?                   14:39:52

14                   A.   Yes.   14:39:53

15                   Q.   Okay.   And after the New York Times           14:39:54

16                   article came out -- and I apologize if I've asked   14:39:56

17                   you this before, but I don't have real time       14:39:58

18                   transcript in front of me.                           14:40:00

19                   A.   It's okay.   14:40:01

20                   Q.   (Continuing.) Did you speak to anyone       14:40:02

21                   about Ms. Bennett's allegations?                   14:40:04

22                   A.   No, I think we said -- I talked to           14:40:07

23                   ██████████ a little bit, my dad a little bit, but I   14:40:09

24                   don't recall talking to anybody else about that.   14:40:10

25                   Q.   So no one in the Executive Chamber?           14:40:10

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 A. No. I hadn't spoken -- that was the 14:40:12  
3 last time I spoke to anyone. 14:40:14

4 Q. Did anyone try to reach out to you? 14:40:16

5 A. No. 14:40:18

6 Q. Did you know Alyssa McGrath when you 14:40:34  
7 were working in the Executive Chamber? 14:40:36

8 A. I think I knew of her. 14:40:38

9 Q. Do you have any personal knowledge -- 14:40:40  
10 you're aware that Ms. McGrath has made 14:40:42  
11 allegations of inappropriate behavior against 14:40:45  
12 Governor Cuomo? 14:40:48

13 A. Yeah, I think so. 14:40:49

14 Q. Do you have any personal knowledge of 14:40:49  
15 those allegations? 14:40:51

16 A. I do not. 14:40:51

17 Q. You sent some text messages and we 14:40:53  
18 can -- why don't we just mark them at. It's 14:40:57  
19 Tab 66. Let's mark this as the next exhibit. 14:41:00

20 (Deposition Exhibit 33, 3/10/21 text 14:41:00  
21 message chain between [REDACTED] and Witness [REDACTED]00757 14:41:00  
22 to [REDACTED]00757, was marked for identification.) 14:41:00

23 Q. Why don't you look through them and 14:41:13  
24 let me know when you're done. 14:41:15

25 Okay. These text refer to an article 14:41:47

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2           that came out that alleged that the Governor had   14:41:49

3           sexually assaulted someone in the Executive       14:41:53

4           Mansion.   14:41:55

5                   Do you remember that article?                   14:41:55

6           A. Vaguely.   14:41:56

7           Q. Okay. Do you know who that article           14:41:57

8           is about?   14:42:00

9           A. Not that I can recall, no.                       14:42:04

10          Q. Has anyone ever tell you who they           14:42:05

11          think that that article is about?               14:42:08

12          A. Not that I can recall.                       14:42:10

13          Q. Okay. So you have no personal               14:42:11

14          knowledge of who that complainant is or any basis   14:42:13

15          to say that complainant's allegations are true or   14:42:16

16          not true; is that right?                       14:42:19

17          A. Right.   14:42:20

18          Q. Okay. Do you know Jessica Bakeman?       14:42:21

19          A. No, I don't.                                   14:42:28

20          Q. Never met her?                               14:42:30

21          A. Never even heard of her.                   14:42:31

22          Q. Never seen her interact with the           14:42:33

23          Governor?                                       14:42:35

24          A. No.   14:42:35

25          Q. Do you know Anna Ruch?                   14:42:36





1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. How much did you make? 14:44:12

3 A. At the time she was making that, I 14:44:14

4 think in the [REDACTED]. 14:44:16

5 Q. Okay. Did you ever have any 14:44:17

6 discussions with anyone about why there's a 14:44:19

7 salary differential between you and Kaitlin? 14:44:21

8 A. I -- maybe. 14:44:23

9 Q. Did you ever raise that to Jill 14:44:25

10 DesRosiers? 14:44:27

11 A. I don't know if I ever compared my 14:44:28

12 salary to Kaitlin's to Jill. But I've certainly 14:44:31

13 brought up raises to Jill several times. 14:44:34

14 Q. Okay. But you don't remember using 14:44:36

15 Kaitlin as an illustration of why you should get 14:44:39

16 a raise? 14:44:41

17 A. I don't remember. I may have, but I 14:44:41

18 really don't remember. 14:44:43

19 Q. Did you ever have any discussions 14:44:44

20 with anyone about why Kaitlin [REDACTED] was being 14:44:46

21 paid around hundred thousand dollars? 14:44:48

22 A. I mean, I'm sure I have. But I don't 14:44:54

23 know that I can remember anything specific, you 14:44:57

24 know. I mean, she told me that she was -- or I 14:44:59

25 think Kaitlin told me. I remember I heard a 14:45:04

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 rumor. I can't remember if it's from Kaitlin or 14:45:06  
3 not, but that Kaitlin was working two jobs and 14:45:08  
4 leveraged both of those jobs combined salary to 14:45:12  
5 meet the salary that she was making right now, 14:45:15  
6 but then I don't think she actually had the 14:45:17  
7 second job. So she kind of lied on the interview 14:45:19  
8 to get to the salary that she wanted. 14:45:21

9 Q. And who did you hear that from? 14:45:23

10 A. I really can't remember that either. 14:45:25

11 Q. Probably not from Kaitlin, right? 14:45:27

12 A. I really don't know. I really don't 14:45:33  
13 know. 14:45:35

14 Q. When you took over her role staffing 14:45:35  
15 the Governor, what was your salary? 14:45:37

16 A. something like that. 14:45:40

17 Q. Did you ever raise to anybody when 14:45:43  
18 you were taking over her role that you should 14:45:45  
19 make the equivalent of what she was making? 14:45:47

20 A. I don't know if I ever brought that 14:45:50  
21 up. I asked for raises, but I don't know if I 14:45:53  
22 ever brought that up. 14:45:57

23 Q. When you were in the Executive 14:46:07  
24 Chamber, did you have a BlackBerry? 14:46:09

25 A. Yes. 14:46:11

1 HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2 Q. That you could pin the Governor? 14:46:11

3 A. No. 14:46:13

4 Q. Who did you use pins with? 14:46:16

5 A. I used it -- like, the detail would 14:46:18

6 send me a pin when he was leaving. Sometimes I 14:46:20

7 would send Stephanie pins, but I never really 14:46:23

8 like communicated via pin with the Governor. 14:46:27

9 Q. Is there a reason for that? 14:46:29

10 A. Never had his pin. 14:46:31

11 Q. No one ever gave it to you? 14:46:32

12 A. No. 14:46:34

13 Q. Did you have an understanding as to 14:46:35

14 why pins were being used -- strike that. 14:46:37

15 Did you ever talk to anyone in the 14:46:43

16 Executive Chamber about why pins were being used? 14:46:44

17 A. Well, I believe it was like a 14:46:48

18 security thing, like, you know, cause for most of 14:46:51

19 what I used it for it was like the security of 14:46:53

20 conversation, like about his movements and stuff 14:46:56

21 like that. You know, like, you would get 14:46:58

22 arriving 633 now in elevator, stuff like that. 14:47:01

23 So I believe that there was a security level to 14:47:04

24 this. 14:47:05

25 Q. And how did you come to that 14:47:06



1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   romantic relationship or any nature of that sort? 14:47:57

3                   THE WITNESS: No, I don't recall 14:48:00

4                   anything like that. 14:48:01

5                   BY MS. KENNEDY-PARK: 14:48:06

6                   Q. Have you seen in the press there have 14:48:06

7                   been articles referring to Ms. Boylan's -- 14:48:08

8                   complaints made against Ms. Boylan while she was 14:48:13

9                   in the Executive Chamber? 14:48:16

10                  A. I'm sorry? 14:48:17

11                  Q. Sorry. Have you seen articles that 14:48:18

12                  referred to complaints being made against Ms. 14:48:20

13                  Boylan while she was in the Executive Chamber? 14:48:22

14                  A. Maybe. I mean... 14:48:26

15                  Q. Did you ever make a complaint against 14:48:28

16                  Ms. Boylan while you were in the Executive 14:48:30

17                  Chamber? 14:48:32

18                  A. No. 14:48:32

19                  Q. Did anyone ever tell you that e-mails 14:48:32

20                  that you exchanged regarding Ms. Boylan ended up 14:48:34

21                  in her personnel file? 14:48:37

22                  A. No. 14:48:40

23                  Q. And they ended up in her personnel 14:48:40

24                  file as part of a complaint? 14:48:43

25                  A. No. 14:48:44

1                   HIGHLY CONFIDENTIAL - WITNESS 7/7/21

2                   Q. Did you ever tell anyone that Ms.                   14:48:44

3                   Boylan had been disrespectful to you?                   14:48:47

4                   A. No.                   14:48:49

5                   Q. That she had harassed you?                   14:48:49

6                   A. No.                   14:48:51

7                   Q. That she was abusive to you?                   14:48:51

8                   A. No.                   14:48:53

9                   Q. I think we're at the end.                   14:48:58

10                   Is there anything that you want to                   14:49:01

11                   clarify about the answers -- you want to take a                   14:49:03

12                   break and talk about that?                   14:49:05

13                   A. Yeah.                   14:49:07

14                   MS. KENNEDY-PARK: Why don't we go                   14:49:07

15                   off the record.                   14:49:08

16                   MS. CHUN: If we can go off the                   14:49:12

17                   record.                   14:49:14

18                   THE VIDEOGRAPHER: It's,                   14:49:14

19                   approximately, 2:49. We are off the video                   14:49:15

20                   record.                   14:49:18

21                   (Recess taken 2:49 to 3:00 p.m.)                   15:01:00

22                   THE VIDEOGRAPHER: Okay. The time                   15:01:00

23                   is, approximately, 3 o'clock. We're back on the                   15:01:01

24                   video record.                   15:01:03

25                   Q. Before the break, I asked you if                   15:01:06





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HIGHLY CONFIDENTIAL - WITNESS 7/7/21

We can close out he record, Mike. 15:02:20

THE VIDEOGRAPHER: My apologies. The 15:02:20  
time is, approximately, 3:02. We're going off 15:02:21  
the record.

(Time noted: 3:02 p.m.)

\_\_\_\_\_

WITNESS 7/7/21

Subscribed and sworn to before me

this \_\_ day of \_\_\_\_\_, 2021.

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Notary public

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HIGHLY CONFIDENTIAL - WITNESS 7/7/21

C E R T I F I C A T E O F R E P O R T E R

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

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



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