

APPENDIX VOLUME II OF III

TO THE REPORT OF INVESTIGATION INTO ALLEGATIONS OF SEXUAL HARASSMENT BY GOVERNOR ANDREW M. CUOMO



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
LETITIA JAMES

Anne L. Clark
Yannick Grant

Joon H. Kim
Jennifer Kennedy Park
Abena Mainoo
Rahul Mukhi

Vladeck, Raskin & Clark, P.C.

Cleary Gottlieb Steen & Hamilton LLP

August 3, 2021

EXHIBIT 38

[REDACTED] Charlotte Bennett	[REDACTED] Staffer #5	10/14/2019 1:13:26 PM(UTC-4)	Also as an update he just made me do 20 push-ups
[REDACTED] Charlotte Bennett	[REDACTED] Staffer #5	10/14/2019 1:13:31 PM(UTC-4)	Loved "A woman after my heart ??"
[REDACTED] Charlotte Bennett	[REDACTED] Staffer #5	10/14/2019 1:13:37 PM(UTC-4)	So it's that kind of day
[REDACTED] Staffer #5	[REDACTED] Charlotte Bennett	10/14/2019 1:13:44 PM(UTC-4)	Oh great
[REDACTED] Staffer #5	[REDACTED] Charlotte Bennett	10/14/2019 1:13:56 PM(UTC-4)	So he's in with nothing to do but pick on you

EXHIBIT 39

iMessage
10/14/19, 3:48 PM

Charlotte Bennett

Did the pushups for him today

He freaked out

He looks scared now

And I just kept going until he told me to stop and didn't slow down

Mom [REDACTED]

Hahahahaha. Hahaha. I love this so much

He looked like 😳

He said ok stop stop

I got yo and he was like ok I'm intimidated. Not many women can do pushups like that. Actually, not many MEN can do pushups like that. I'm... i...

Mom [REDACTED]

He hasn't quite figured out who he's messing with yet

And then before he left he was like that was scary. I'm officially scared

Hahahaha

He's getting there

He didn't know what to say

Mom [REDACTED]

Hahahahaha.

Dumbfounded

Mom [REDACTED]

Were u in work clothes?

Yes 😳



EXHIBIT 40

Nov 18, 2019, 7:18 PM

Charlotte Bennett

he only spoke to me twice today and both times it was to tell me he didn't like how I did my hair so

Definitely quitting lol

Staffer #5

Tony?? Wtf

Gov

Genuinely quitting as soon as possible it's taking everything in me to deal w this calmly

Oh

Thank god.

Lol ikr

Well not thank god

Better but also worse

Lmao no. It's just literally all bad

Hahaha

All bad



iMessage



Apple Pay



< 226

Lmao no. It's just literally all bad

Hahaha

All bad

100%

Was he just being a dick?

I don't know I think he thinks he's funny or something

Steph was in?

But also don't speak to me like that so

Yeah

Not that it's any consolation but he basically roasted my hair cut in front of senior staff too

I feel your pain

Hahaha

He likes the jokes. Can't take em tho

I think I'm just going to wear my hair in a bun every day I see him until I leave

The bun was what he had a problem w



iMessage



Apple Pay



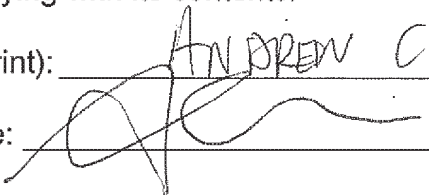
EXHIBIT 41

2019 Mandatory Training Attestation Form

I hereby attest that I have completed the following mandatory training courses
(check all that apply):

All staff:	
<input checked="" type="checkbox"/>	Sexual Harassment in the Workplace
<input checked="" type="checkbox"/>	Equal Employment Opportunity
<input checked="" type="checkbox"/>	Prevention of Violence in the Workplace
<input type="checkbox"/>	Fire Safety
<input checked="" type="checkbox"/>	Information and Cyber Security Awareness
<input type="checkbox"/>	Internal Controls
<input checked="" type="checkbox"/>	NYS Right to Know
<input checked="" type="checkbox"/>	Ethics for New York State Employees
<input type="checkbox"/>	

I have read and understand the material and acknowledge that I am responsible
for complying with its contents.

Name (print): ANDREW CUOMO
Signature:  Date: 10/8/19

Return the completed and signed form to dob.sm.training@budget.ny.gov.

EXHIBIT 42

6:50



< 223



Mom >

Jan 19, 2020, 2:54 PM

Charlotte Bennett

Had a really long convo w gov today

Talked about career etc

Go on.....

Good?

Really good

2 hours

Told him about SMART

Wow

More wow

He responded so well. Really impressed

He had a lot to say and was very emotional and serious but also asked a lot of questions

Triple wow

Told him that's why I'm here and that's why I'm doing this

What he say to that



iMessage



6:50



< 223



Mom >

What he say to that

He asked me if I liked what I was doing for work and I said yes and he said that he liked that I did the book because he thinks I'll find other things I'll like too and won't just decide my whole career based on experiences from my past

He said law degrees aren't what they used to be. I asked him what he thought about the joint degrees - told him some of the programs I was thinking about - he seemed more interested in that and said it made more sense but he doesn't know much about it

Said being a lawyer isn't necessarily the go-to and that I have to decide if I want to do personal one on one work or social change or policy or what

Got emotional about Hamilton. Told him I still bug them about it. Told him I even called them two months ago

A real heaaarrt. To heart

He was impressed and said he was proud

Definitely

He * got emotional

Not me



iMessage



EXHIBIT 43



iMessage
1/19/20, 7:36 PM

Dad [redacted]
Everything ok?

Charlotte Bennett

All good. Crazy weekend

You?

Dad [redacted]
[redacted]
Sounds like a whirlwind for you

Total whirlwind

been going 100 mph for a week

Had a long chat w gov today though. I kinda hate that it helps, but it does. An hour or two w him shouldn't erase all the bullshit but it helps

Dad [redacted]
It's good he took the time. I doubt he'd do that for everybody.

Sat and watched cnn and espn while we chatted/ while he was editing stuff for this week that I came there to pick up

It was a long and emotional convo. He also wanted to know if I liked the work I was doing etc

Definitely not the usual

Dad [redacted]
Good

Dad [redacted]
Are you in office still?

No left at 7

But still on call

Had to do a drop at 730



EXHIBIT 44

	<p>[REDACTED]</p> <p>Charlotte Bennett</p>	<p>[REDACTED]</p> <p>Staffer #5</p>	<p>1/28/2020 9:21:30 PM(UTC-5)</p>	<p>So she's just mad</p>
	<p>[REDACTED]</p> <p>Staffer #5</p>	<p>[REDACTED] Charlotte Bennett</p>	<p>1/28/2020 9:23:07 PM(UTC-5)</p>	<p>Yea, holding their feet to the fire is the ONLY way to get what you want there</p>
	<p>[REDACTED]</p> <p>Staffer #5</p>	<p>[REDACTED] Charlotte Bennett</p>	<p>1/28/2020 9:23:12 PM(UTC-5)</p>	<p>You'll actually walk?</p>
	<p>[REDACTED]</p> <p>Charlotte Bennett</p>	<p>[REDACTED]</p> <p>Staffer #5</p>	<p>1/28/2020 9:42:07 PM(UTC-5)</p>	<p>Yeah I think so honestly</p>
	<p>[REDACTED]</p> <p>Charlotte Bennett</p>	<p>[REDACTED]</p> <p>Staffer #5</p>	<p>1/28/2020 9:42:16 PM(UTC-5)</p>	<p>Tough too because things w gov have been really good</p>

EXHIBIT 45

Fri, May 15, 7:46 AM

Charlotte Bennett

He asked about you

WHAT

I said you were doing like 17 jobs

"Yeah? He working hard?"

Asked where [redacted] have been.
Where your team is

WHAT THE FUCK

Asked if you were hitting on me

Lol

OH MY GOD

Said "you were raped. You were raped and abused. You were raped and abused and assaulted" maybe 17 times in a row and wouldn't stop

WHAT THE FUCKKKKKK

NOT DOING WELL LOL

CHARLOTTE



iMessage



Apple Pay



8:53



< 225



iMessage



"So who are you hitting on" was one of the first questions he asked me

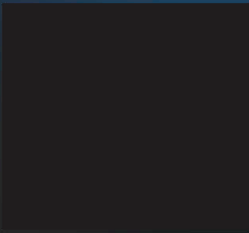
Asked about hilton life etc etc

as you're like, 8% awake

YEP

Like standing over him still haven't brushed my teeth my hair is basically a ball of string taped to my forehead

Asked about you and what you were doing



YEP

Like standing over him still haven't brushed my teeth my hair is basically a ball of string taped to my forehead

Asked about you and what you were doing and then when i denied interest in you he asked if i was going to marry [REDACTED]

??

obvs said yes

Yes of course. I told him it's quite serious

we should all be so lucky

Asked after my parents of course

And then we got to the speech and he really fucking took off

he is dad. literally dad

The way he was repeating "you were raped and abused and attacked and assaulted and betrayed" over and over again while looking me directly in the eyes was something out of a horror movie

It was like he was testing me

225

The way he was repeating "you were raped and abused and attacked and assaulted and betrayed" over and over again while looking me directly in the eyes was something out of a horror movie

It was like he was testing me

It just kept going

he's probably so bored. he hasn't seen anyone other than the same five people in weeks

was just psyched to talk to you for hours

I actually dont understand what happened it just all of a sudden started and i just sat there saying "yes" for like three minutes

For sure yes

oh he was 100% testing you

Also then he was like here's what your speech should be

And then repeated back to me

oh my god

The speech that i had just explained



iMessage



Apple Pay





oh my god

The speech that i had just explained

you have to be like, wow thank you, such insight from the master

YEP

Somehow we are making the same point but you are still disagreeing

He was just like

Using synonyms

Lmao

And then i tried to turn it around on him and started asking him personal questions and he got rly weird

And wanted me to outright ask him if he was running for president which I'm not dumb enough to ask

We talked about which celebrities he wanted

For his dream scenario

Which is to hop on the back of his bike w a lady and head for the mountains



We talked about which celebrities he wanted

For his dream scenario

Which is to hop on the back of his bike w a lady and head for the mountains

And some other things....



iMessage

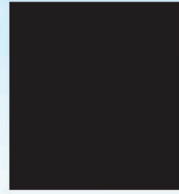


EXHIBIT 46

1:33



< 248



i doubt that but OKAY

no way you're just being paranoid

Charlotte Bennett

Talked about age differences in relationships

can you write it on a piece of paper take a picture of it and then burn the paper

oh FUCK

WAIT WHAT

DID HE DO SOMETHING

No but it was like the most explicit it could be

OH MY GOD

OHHHH MY GOD

LIKE HIM HIM

THE HIM

Him him him

Oh my god are you in the office

oh my fucking god



iMessage





Him him him

Oh my god are you in the office

oh my fucking god

Yes like shaking

charlotte you need to leave

you need to get out right fucking now

i know it feels like you can't but even just say you're taking a walk

I'm so upset and so confused

Fuck you're right

please try to leave

say you're getting a coffee or talking a walk or calling your mom

please please please leave the office

just at least for a few minutes

Leaving

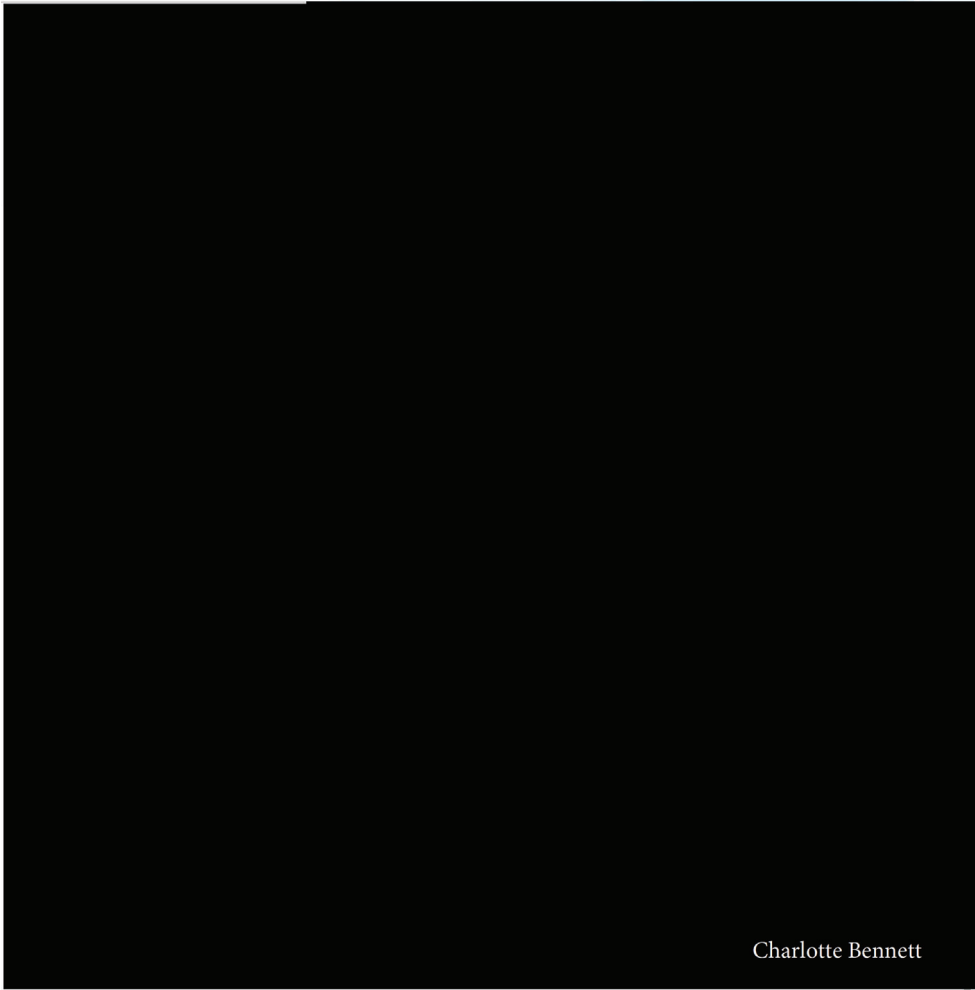
okay great

EXHIBIT 47

1:35



< 249



Charlotte Bennett

This is grooming

WHAT

omfg

oh my fucking god

we talked about my relationships and why I am skeptical of monogamy and my past and my tattoos and his ex etc etc



iMessage



Apple Pay



1:35



< 249



we talked about my relationships and why I am skeptical of monogamy and my past and my tattoos and his ex etc etc

oh my FUCKING GOD

GROOMING

He said he was really lonely all alone can't meet anyone work sucks for him right now he can't even hug anyone

Who did I last hug

omfg

nope

no

Told him to have a party and get drunk

He said then what

Anything under 22 isn't ok but other than that it's fine

this is actually terrifying

Told him I dated someone 25 years older

oh my GOD



iMessage



1:35



< 249



this is actually terrifying

Told him I dated someone 25 years older

oh my GOD

He said age doesn't matter

Asked me if it made a diff for me

holy shit

holy fucking shit

If I was fucking other ppl while in my recent relationships and how we talked about monogamy

WHAT THE FUCK IS FUCKING GOING ON

And whether they hooked up w other ppl too or if it was just me

WHAT THE FUCK IS HAPPENING

THIS IS 10000000000% GROOMING

Told me to put tattoo on my butt

Not my shoulder



iMessage



EXHIBIT 48

1:36



< 249



he's just trying to be like fuck you i can control you but he CAN NOT and he WILL NOT

Charlotte Bennett

We had an entire conversation yesterday about how I have to control my relationships

And like control the situation

In order to feel safe and comfortable

Post rape

holy fucking shit

dude WHAT IS GOING ON

WHAT HAS HAPPENED

DUDE I DO NOOOOOOOT KNOW

also we were straight up whispering

i'm so confused

jesus fucking christ

He asked me to turn off my tape recorder

OBVIOUSLY

OH OKAY



iMessage



Apple Pay

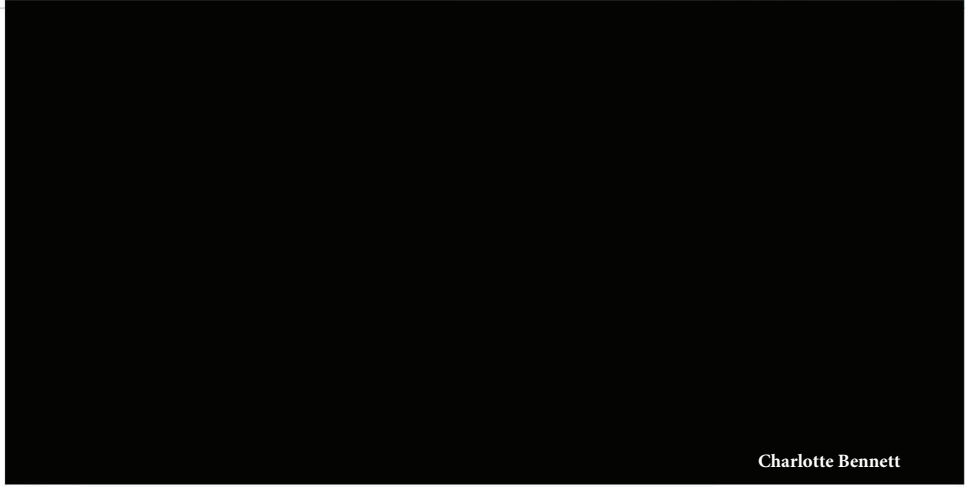


EXHIBIT 49

1:35



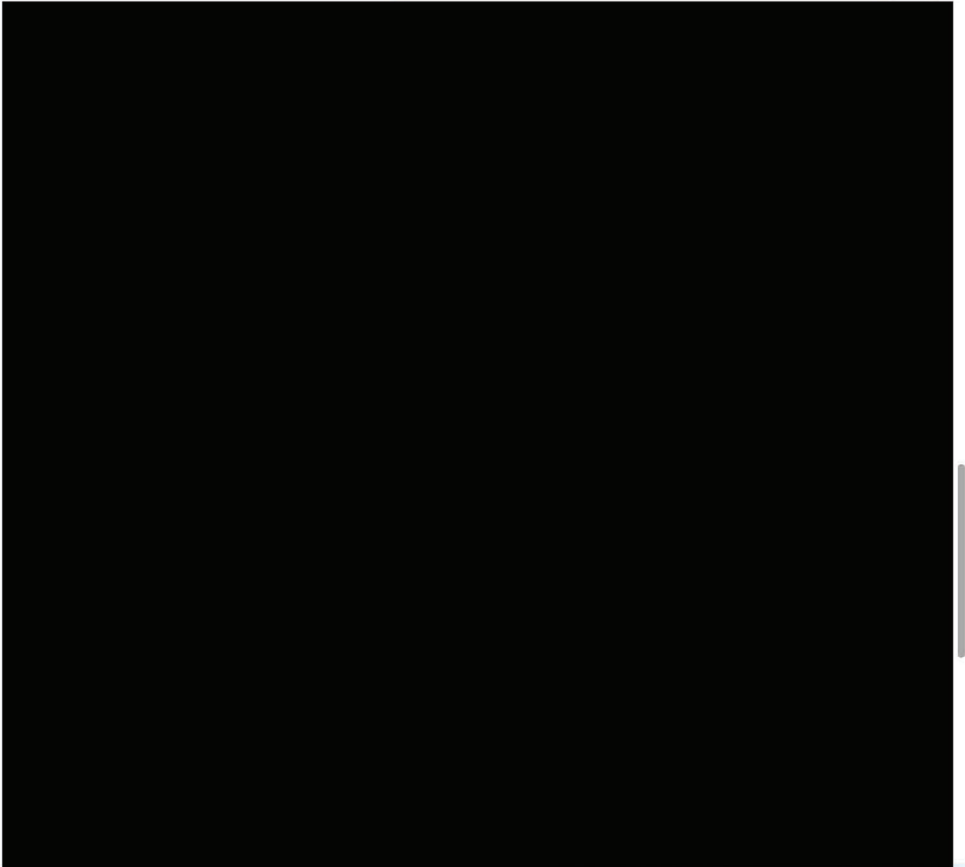
< 249



Charlotte Bennett

Dude I don't even know

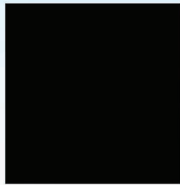
I need to talk to Jill IMMEDIATELY



iMessage



EXHIBIT 50



Charlotte Bennett

LOL HE JUST LEFT

said two words was friendly told me I looked like daisy dukes and then left

OMFG

FLEE

FLEEEEEEEE

RUN TO KATONAH

FLEEEEEEEEEING

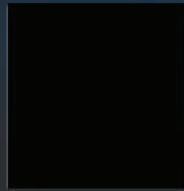


EXHIBIT 51

8:40



< 227



Charlotte Bennett

Basically I leave w a new job or no job

YES



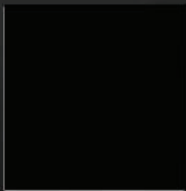
iMessage



Apple Pay



< 227



omfg

She was like I'm so sorry are you okay

You can always come to Me

I'm sorry you're dealing with this

How can we do this? Do you want to stay or should we find something outside ?

For job

OH MY GOD YESSS

wait she means she could find you a job outside of the admin???

Inside admin like just not interacting w him

AMAZING

THIS IS ALL AMAZING NEWS

would women's be in albany or ny

I mentioned women's affairs and she was like that's too much outreach and handholding w constituents

So I was like what could be more in the weeds

iMessage

< 227

I mentioned women's affairs and she was like that's too much outreach and handholding w constituents

So I was like what could be more in the weeds

She was like let me find out, maybe you can work w the health team

So it's policy based

YES

YES

I'm assuming wherever but who KNOWS

LITERALLY ANYWHERE BUT THAT OFFICE

how are you feeling

i feel like that could NOT have gone better

did you talk at all about what you would tell the gov

BEST CASE

No but she told me she would tell Steph I'm going to be working on some other things now



iMessage



Apple Pay





No but she told me she would tell Steph I'm going to be working on some other things now

And I just said I didn't want him to find out and get mad



iMessage



Apple Pay



EXHIBIT 52



Charlotte Bennett

I might be switching roles/jobs

Staying in the executive chamber but switching jobs

a specific person was maybe not so appropriate to me



EXHIBIT 53



thank you for telling me. i hope you feel safe to tell me more things in the future. whatever those things may be.

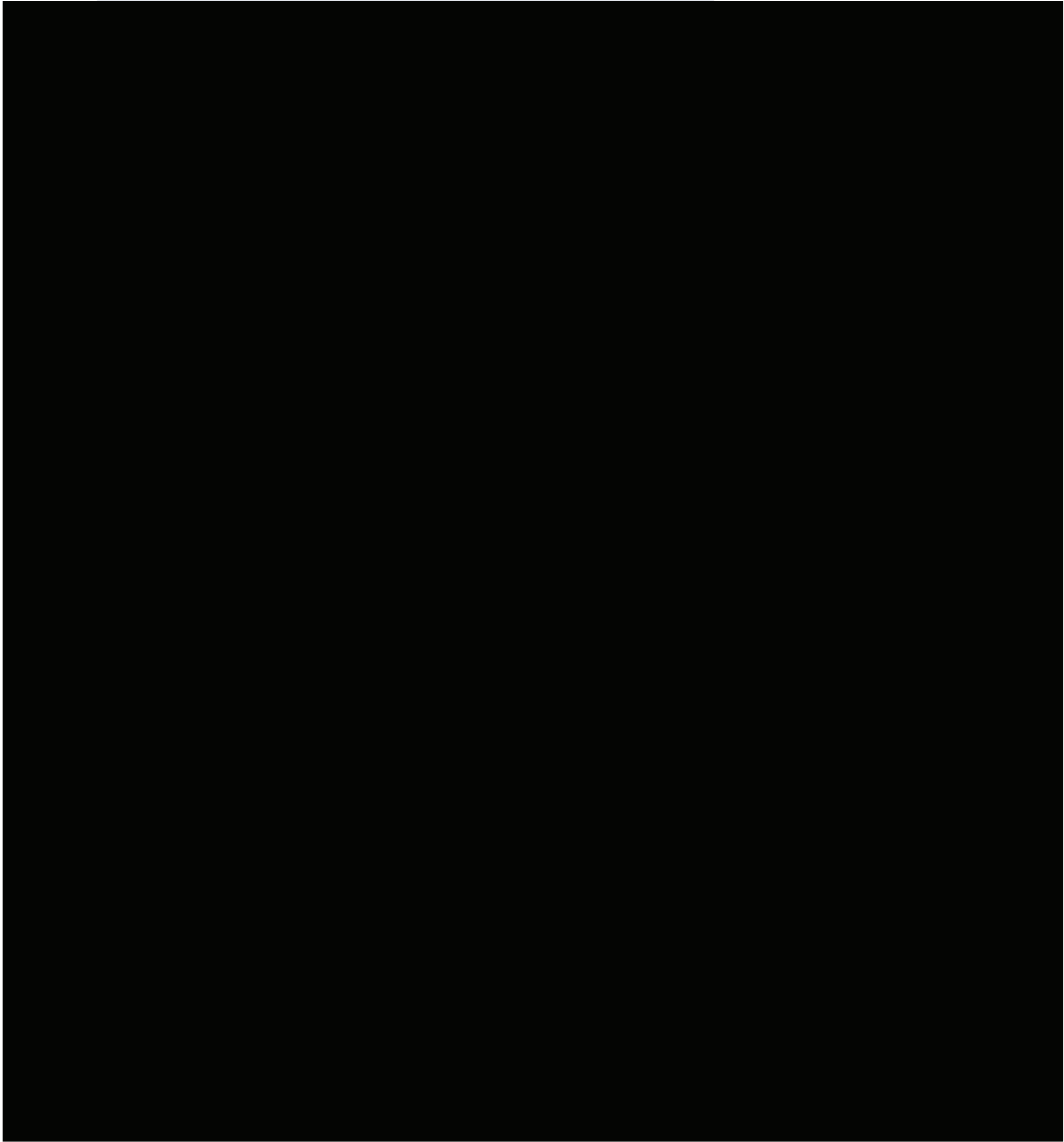


EXHIBIT 54

< 13



REPEAT THAT SORRY WHAT DID YOU SAY

OKAY

HAHAHAHAHAHAHAHAHAHAHA

TOXIC POSITIVITY

Charlotte Bennett

Dude Jill just pulled me

Into her office

Megan said she had never seen Jill even in the heAlth team's office before

She comes in

She pulls me

Says she needs me to tell Judy (chamber lawyer) everything from the beginning

We started from when I started my job and the first meetings I had

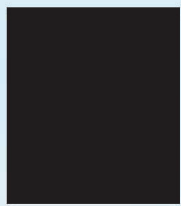
OH MY GOD WHAT

Went through every memorable convo I've ever had w the Governor E V E R

took two hours

Just ended

iMessage input area with camera, app store, and voice recording icons



Just ended

WITH THE CHMABER LAWYER?????

HOLY SHIT

YEAH

WHAT IS SHE GOING TO DO

OMFG

OH FUCKKK

HOW ARE YOY FEEING do you trust her or what's the deal

/ do you need your own lawyer

NO idea but she was nice and she is very well respected and I really appreciated the way she went about it. And I just said I will do anything to make it not a problem

So they'll let me know

Yeah I guess

are they like preparing for a PR defense or what the fuck is she trying to do

No idea



iMessage



EXHIBIT 55



Messages



Lindsey Boylan @LindseyBoylan



- Home
- Explore
- Notifications
- Messages
- Bookmarks
- Lists
- Profile
- More

Tweet

Lindsey Boylan @LindseyBoylan
 Mom. Progressive New Yorker Fighting 4 a Livable City. Fmr State Govt Official & Urban Planner. Candidate 4 Manhattan Borough Prez. (She/Her)
 6,002 Following 61.7K Followers
 Joined November 2016

Thank you for speaking up about Gov. I just left last month (the privilege of being able to leave is so real — currently unemployed) after two years in the chamber. I was his assistant and senior briefer (two sep roles for little \$, couldn't even afford to move out of my parents' house even though I held two positions). The verbal abuse, intimidation and living in constant fear were all horribly toxic — dehumanizing and traumatizing. And then he came onto me. I was scared to imagine what would happen if I rejected him, so I disappeared instead. My time in public service ended because he was bored and lonely. It still breaks my heart. Thank you for sharing truth that others are scared to share. I am still healing. It is nice to hear that I am not alone.

Dec 8, 2020, 10:02 AM ✓

Always. I am here for you [redacted] and will never divulge. Lmk how I can help. Much love.

Dec 8, 2020, 10:15 AM

This is exactly what he does to every woman

I am so sorry.

Call or text any time



I am here for you

Dec 8, 2020, 10:29 AM

Thank you so much. It's nice to know I'm not alone in this - it was such an alienating experience

You are so brave - we need women like you in leadership positions!!! I will text you so you have my number. Please let me know if I can help with your campaign in any way - or with anything at all. ❤️



Dec 8, 2020, 10:36 AM ✓

Ty for amplifying my story. Two updates: I know both Ronan Farrow and Rebecca Traister are writing about. It would really help if you were comfortable talking to one. Would certainly help me. On your own terms. I had a woman [redacted] who is between our age help me along way. She would be happy to help you.

[Redacted]

[redacted] is great. And she can connect you to both Ronan and Rebecca if yoh are open to it.

Feb 26, 2021, 7:29 PM

I'm glad you heard. Word gets around



Feb 26, 2021, 7:29 PM ✓

Once it's out, it is *OUT*

So I'm open to it

Feb 26, 2021, 7:29 PM ✓

Yes. And he is very wounded

Bigger problem s

Which is why I did this week

Feb 26, 2021, 7:30 PM

Charlotte Bennett
 @_char_bennett_

EXHIBIT 56

From: Zemsky, Howard (ESD)
Sent: Wednesday, November 2, 2016 6:55 AM EDT
To: DesRosiers, Jill (CHAMBER)
Subject: Re: Tomorrow

Ha! She's gonna be at the siats in albany..but it will be hard for her to concentrate on the presentations while worrying about how the Gov's day is going in Rochester..

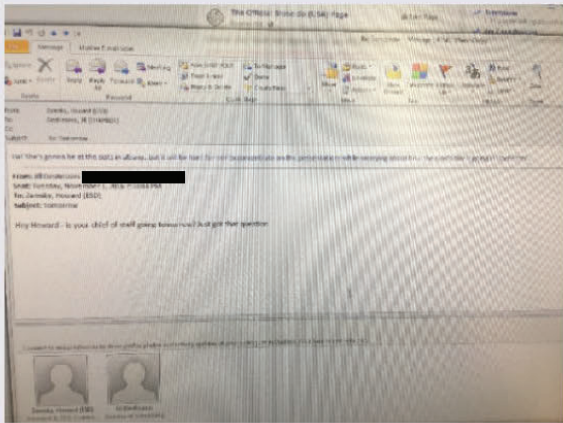
From: Jill DesRosiers [REDACTED]
Sent: Tuesday, November 1, 2016 7:38:44 PM
To: Zemsky, Howard (ESD)
Subject: Tomorrow

Hey Howard - is your chief of staff going tomorrow? Just got that question

EXHIBIT 57

11/4/16, 4:25 PM

Lindsey Boylan [REDACTED]



11/4/16, 4:25 PM

Lindsey Boylan [REDACTED]

This is why I don't trust gov

11/4/16, 4:25 PM (Viewed 11/4/16, 4:26 PM)

Lindsey Boylan [REDACTED]

This is his executive deputy asking if I would be at an even

11/4/16, 4:25 PM (Viewed 11/4/16, 4:26 PM)

Lindsey Boylan [REDACTED]

Event

11/4/16, 4:25 PM (Viewed 11/4/16, 4:26 PM)

Lindsey Boylan [REDACTED]

This is from the governor to my boss

11/4/16, 4:27 PM

Crazy! What is the event? Any reason that he would think you need to be there?

11/4/16, 4:28 PM

Lindsey Boylan [REDACTED]

There is no reason

11/4/16, 4:28 PM

Lindsey Boylan [REDACTED]

He was asking Bc he wanted to see me

11/4/16, 4:28 PM

Lindsey Boylan [REDACTED]

Although as chief of staff I go w my boss

11/4/16, 4:28 PM

Lindsey Boylan [REDACTED]

He was just being creepy

11/4/16, 4:28 PM

Lindsey Boylan [REDACTED]

He has a crush on me

11/4/16, 4:28 PM

He is a sexist pig and you should avoid being alone with him!

11/4/16, 4:28 PM (Viewed 11/4/16, 4:29 PM)

Lindsey Boylan [REDACTED]

He is a player

11/4/16, 4:28 PM (Viewed 11/4/16, 4:29 PM)

Lindsey Boylan [REDACTED]

Yes.

11/4/16, 4:29 PM

Lindsey Boylan [REDACTED]

I'm no dummy

11/4/16, 4:29 PM

Lindsey Boylan [REDACTED]

I know what he wants

11/4/16, 4:29 PM

It means he is not trust worthy, government can be trustworthy

11/4/16, 4:29 PM

Yuck, hope he gets voted out soon

11/4/16, 4:30 PM

Lindsey Boylan [REDACTED]

I love my boss and he basically defending me

11/4/16, 4:30 PM

Lindsey Boylan [REDACTED]

And I like what we are doing

11/4/16, 4:30 PM

Lindsey Boylan [REDACTED]

So that's all good

11/4/16, 4:30 PM

Lindsey Boylan [REDACTED]

I just think it's so silly

11/4/16, 4:31 PM (Delivered 11/4/16, 4:30 PM)

[REDACTED]
That's because a relationship to him is about sex not about a real relationship with someone his own age. Yes CREEPY

11/4/16, 4:31 PM

Lindsey Boylan [REDACTED]

How some men are so from another era

11/4/16, 4:31 PM

Lindsey Boylan [REDACTED]

Yes.

11/4/16, 4:31 PM

Lindsey Boylan [REDACTED]

Don't worry mom

11/4/16, 4:31 PM

Lindsey Boylan [REDACTED]

I'm no dummy

11/4/16, 4:31 PM

[REDACTED]
I'm not, I think if he tried something you would clobber him - ha ha

11/4/16, 4:34 PM

[REDACTED]
Pity him too because he is obviously incapable of carrying on a satisfying relationship in his own life. Heck women of worth of my age wouldn't waste time on him!

11/4/16, 4:35 PM

Lindsey Boylan [REDACTED]

Yes. It's gross

11/4/16, 4:36 PM

[REDACTED]
Sorry you have to deal with this :|

11/4/16, 4:38 PM

Lindsey Boylan [REDACTED]

It's fine.

11/4/16, 4:38 PM (Viewed 11/4/16, 4:39 PM)

Lindsey Boylan [REDACTED]

I just wish I could be told how great I am based on my intelligence and abilities rather than some dumb thing

11/4/16, 4:41 PM

I agree! Susan & I had lunch and were talking about Melania and how her worth is valued solely on her looks to her husband. Not a healthy message to women.

11/4/16, 4:42 PM

You're a tough cookie and do a darn good job at work!!!

11/4/16, 5:45 PM (Viewed 11/4/16, 5:47 PM)

Lindsey Boylan

:)

11/4/16, 5:45 PM (Viewed 11/4/16, 5:47 PM)

Lindsey Boylan

Don't tell anyone

11/4/16, 5:48 PM

No I will not

EXHIBIT 58

10:53



December 14, 2016

7:48 PM

Edit

< Inbox (194)

3 Messages



See More



Found in Exchange Inbox



Stephanie Benton

3:28 PM



To: Lindsey Boylan

Details

He said look up Lisa Shields. You could be sisters. Except you're the better looking sister.

Stephanie,

It was a great trip – particularly interesting at the GM plant this am.

Thanks for all of your help and, if possible, please relay my thanks to the Governor for letting me join again.

Hope to see you one of these days after work

All my best,
Linds

Lindsey Boylan

Chief of Staff

Empire State Development

633 Third Avenue, New York, NY 10017

(212) 803-3752 | [REDACTED]

www.esd.ny.gov

EXHIBIT 59

From: [REDACTED]
Sent: Tuesday, February 14, 2017 5:45 PM EST
To: Boylan, Lindsey (ESD)
Subject: Re: Thanks

I serve at his pleasure

Have a happy valentine's day!

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

Original Message
From: Boylan, Lindsey (ESD)
Sent: Tuesday, February 14, 2017 5:43 PM
[REDACTED]
Subject: Re: Thanks

I did too! Very nice. Sorry you got roped in though!

Sent from my iPhone

> On Feb 14, 2017, at 5:43 PM, [REDACTED] wrote:

>

> Thank the chief executive!

>

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

> Original Message

> From: Boylan, Lindsey (ESD)

> Sent: Tuesday, February 14, 2017 5:42 PM

> [REDACTED]

> Subject: Thanks

>

>

> Sorry you had to bring that all the way down for me. Thank you though!

>

> Happy V day!

>

> Linds

>

> Sent from my iPhone

> IMPORTANT: This e-mail message and any attachments contain information intended for the exclusive use of the individual(s) or entity to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information may be subject to legal restriction or sanction. Please immediately notify the sender by electronic mail or notify the System Administrator by telephone (518)292-5180 or e-mail (administrator@esd.ny.gov) and delete the message. Thank you.

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EXHIBIT 60

Alphonso David

From: Alphonso David
Sent: Thursday, September 20, 2018 2:41 PM
To: Melissa DeRosa
Cc: Linda Lacewell; Jill DesRosiers
Subject: RE: I have to jump off call I apologize can someone fill in for our SOTS

Privileged and confidential
Attorney client communication
Attorney work product

We manage all allegations/claims using the same process and applying the same standard. Accordingly, given that this was independently forwarded to counsel's office, we have already begun compiling information regarding this and other allegations regarding this employee. Thanks.

Alphonso

From: Melissa DeRosa
Sent: Thursday, September 20, 2018 2:34 PM
To: Alphonso David [REDACTED]
Cc: Linda Lacewell [REDACTED]; Jill DesRosiers <[REDACTED]>
Subject: FW: I have to jump off call I apologize can someone fill in for our SOTS

Alphonso pls create a file for lindsey
Pls put this in it

From: Cathy Calhoun
Sent: Wednesday, September 19, 2018 3:55 PM
To: Linda Lacewell [REDACTED]; Melissa DeRosa [REDACTED]; Jill DesRosiers
Subject: Fw: I have to jump off call I apologize can someone fill in for our SOTS

[REDACTED]

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

From: Lindsey Boylan [REDACTED]
Sent: Wednesday, September 19, 2018 12:21 PM
To: Barbara Rice; Barika Williams
Cc: Kate Dineen; Cathy Calhoun
Subject: Re: I have to jump off call I apologize can someone fill in for our SOTS

EXHIBIT 61

To: 'Caruso, David' [REDACTED]
From: Richard Azzopardi [REDACTED]
Sent: Sun 12/13/2020 2:29:13 PM Eastern Standard Time
Subject: paperwork and statement
Attachment: 202012131419.pdf

From Press Secretary Caitlin Girouard: "There is simply no truth to these claims."

Memorandum

To: Alphonso David, Counsel to the Governor

From: 

Re: Confidential Personnel Matter

Date: September 20, 2018

On September 20, 2018, I spoke with *ESD Official 1* and *ESD Official 2* and *ESD Official 3* of Empire State Development (ESD), respectively. Below please find a summary of my conversation.





Draft, privileged and confidential - Attorney Client Privileged Communication
Intra-Agency Communication
Memo to File

MEMORANDUM TO FILE

To: Alphonso David, Counsel to the Governor
From: [REDACTED]
Date: September 26, 2018
Subject: Employment Counseling for Lindsay Boylan

1. Purpose

[REDACTED]
[REDACTED] During the course of this counseling session, Ms. Boylan tendered her resignation voluntarily.

Draft, privileged and confidential - Attorney Client Privileged Communication
Intra-Agency Communication
Memo to File



3. Ms. Boylan's Resignation

During the meeting Mr. David was clear that she was not being asked to resign, fired, or pushed out in any way. In no uncertain terms he said that she was simply being counseled in response to the complaints that have been made about her from multiple sources.

Towards the close of this meeting Ms. Boylan voluntarily tendered her resignation, indicated that she would be leaving the office for the day and consulting with her own counsel regarding her next steps in Executive Chamber. She was clear that she intended to resign but she wished to think through the timing of her departure. Ms. Boylan expressed that she did not feel she could be effective in the Executive Chamber and as a result wished to move on. She expressed that her main priority was to leave her team -- consisting of the two deputies she had hired -- to be left in good stead in the Executive Chamber and suggested that they be elevated in position and rank here. Mr. David asked that Ms. Boylan advise him when she wished her resignation to be effective and offered the new year as a possibility.

Within four hours of the meeting, Ms. Boylan sent an email to staff within and outside of the Executive Chamber indicating that she had resigned and that her resignation was effective immediately.

I wrote this memorandum on September 26, 2018 based on contemporaneous notes taken during my personal attendance at the above described meeting on September 26, 2018.

/s



From: Alphonso David
Sent: Sunday, September 30, 2018 12:29 PM
To: [REDACTED]
Subject: Lindsey Boyland Follow-up

Privileged and confidential
Attorney client communication
Attorney work product



[REDACTED] Further, she has notified practically all state employees and many external stakeholders of her voluntary resignation, which was accepted. We will need to think about whether that issue can be effectively managed. I advised her I would get back to her with a formal response to her request.

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

EXHIBIT 62

< 379



3 People >

Lindsey Boylan @LindseyBoylan · 11h
 I've been getting all these messages from people I won't be sharing, because it's their truth, but I must say, @NYGovCuomo will go down as one of the biggest abusers of all time.
 ...

MD

Alphonso I need to see her full file

MD

Emails etc

All of that is in possession of the state. Judy should be able to get you the file for the time while she was in chamber. There will be an esd component as well but you can start with chamber.

Melissa DeRosa

MD

Linda do u see this?!?!

Linda Lacewell

Yes

Talking to Judy now



Judy has the file -



iMessage



9:39



< 379



3 People >

MD

Emails etc

All of that is in possession of the state. Judy should be able to get you the file for the time while she was in chamber. There will be an esd component as well but you can start with chamber.

Melissa DeRosa

MD

Linda do u see this?!?!

Linda Lacewell

Yes

Talking to Judy now

Judy has the file -

Everything should be in that file. Emails regarding harassment at esd, counseling memo etc.

Linda Lacewell

Yup



iMessage



EXHIBIT 63



Explore

Settings

Thread

Lindsey Boylan @LindseyBoylan

Most toxic team environment? Working for @NYGovCuomo.

Jerry Avenaim @avenaim · Dec 5, 2020
Name the worse job you've ever had.

1:00 PM · Dec 5, 2020 · Twitter for iPhone

1,252 Retweets 311 Quote Tweets 9,293 Likes



Lindsey Boylan @LindseyBoylan · Dec 5, 2020
Replying to @LindseyBoylan
I've had many jobs. Waitressing at @Friendlys as a teenager was an infinitely more respectful environment. Even when I had bad customers who tipped poorly.

24 54 884

Lindsey Boylan @LindseyBoylan · Dec 5, 2020
If people weren't deathly afraid of him, they'd be saying the same thing and you'd already know the stories.

26 85 1K

Lindsey Boylan @LindseyBoylan · Dec 5, 2020
Seriously, the messages and texts I receive when I speak the truth about this...it's a whole book of people who have been harmed.

9 53 860

Lindsey Boylan @LindseyBoylan · Dec 5, 2020
Don't be surprised that it's the same small group of white people sitting alongside him at every presser. The same group that he has had by him the whole time, doing his dirty work. If you're not one of those handful, your life working for him is endlessly dispiriting.

13 70 914

Lindsey Boylan @LindseyBoylan · Dec 5, 2020
I tried to quit three times before it stuck. I've worked hard my whole life. Hustled - fake it till you make it style.

That environment is beyond toxic. I'm still unwrapping it years later in therapy!

20 39 776

Lindsey Boylan @LindseyBoylan · Dec 5, 2020
And I'm a privileged person. I could opt out and eventually did. I shudder to think what happens to others. It pisses me off so much.

7 26 672

Lindsey Boylan @LindseyBoylan · Dec 5, 2020
Yes I did not sign whatever they told me to sign when I left. Nope!

29 30 936

Marcella L. Simonetta @marcellalaluna · Dec 5, 2020

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Relevant people

Lindsey Boylan @LindseyBoylan
Mom. Progressive P
4 a Livable City. Fm
& Urban Planner. C
Manhattan Boroug

Andrew Cuomo @NYGovCuomo
Father, fisherman, n
enthusiast, 56th Go

Jerry Avenaim @avenaim
Award winning pho
Fashion, Celebrity, /
-Chicago Native -Lc
Mental Health Advc

What's happening

Entertainment · LIVE
Happy birthday, Tom Holla
Trending with Tom Holland

Music · Trending
JUST ANNOUNCED
17K Tweets

Trending in United States
HELP THE BEAR
People react to a viral TikTok
fearlessly pushing a bear awa
before running inside to pro
4,843 Tweets

COVID-19 · LIVE
**New York: COVID-19: New
updates for New York**

Holidays · 1 hour ago
**Pride Month celebrations k
across the world**
Trending with #pride LGBTQ

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People on Twitter are the first to know.

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EXHIBIT 64



Explore

Settings

Thread

Lindsey Boylan @LindseyBoylan · Dec 8, 2020
Yesterday was an extremely weird day, responding to the news world finally waking up about the whispers they have heard about @NYGovCuomo over the years. It's worse than the gossip, by far.

My hope is he is on notice and won't harm more people, especially women.

22 174 1.1K

Lindsey Boylan @LindseyBoylan · Dec 8, 2020
I have very important work to do getting elected so I can help my city recover and my people be heard.

I will not be spending my days responding to the trauma men like @NYGovCuomo have caused every day in power.

Instead I'm getting back to my work.

4 20 265

Lindsey Boylan @LindseyBoylan · Dec 8, 2020
But, you better believe I'll be listening to what I hear out there, @NYGovCuomo. And if other women decide to come forward I will back them up and elaborate.

For now, I am getting back to my important work that made me willing to live in hell so long working for you.

5 40 335

Lindsey Boylan @LindseyBoylan · Dec 8, 2020
When we let our abusers, or onlookers, dictate the conversation we lose. I will not be stopped. I will not be deterred. I will not be minimized and truncated in history as someone that was victimized by a famous and powerful man the world kept elevating.

I will fight.

20 55 442

Replies

D'Abbey-Bonacci @lordgrand7 · Dec 8, 2020
Replying to @LindseyBoylan and @NYGovCuomo
I hope things go well for you @LindseyBoylan. There are women across the globe that have suffered trauma from powerful men. Sadly, it's an enduring reality for too many women. I don't know your story, but I'm acutely aware what trauma inflicted by powerful men can do. Stay strong

1 2 27

Sandra Rios @sabulosaa · Dec 8, 2020
Replying to @LindseyBoylan and @NYGovCuomo
?????? unbelievable #StrongerTogether

3

Roger @Roger2dot0 · Dec 8, 2020
Replying to @LindseyBoylan @es_indivisible and @NYGovCuomo
What are you talkin about?

1

View more replies

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Relevant people

Lindsey Boylan @LindseyBoylan
Mom. Progressive M
4 a Livable City. Fmi
& Urban Planner. C
Manhattan Borough

Andrew Cuomo @NYGovCuomo
Father, fisherman, n
enthusiast, 56th Go

What's happening

Music · LIVE

It's Travis Scott's birthday

Trending with Travis Scott, Astro

Trending in United States

BOYFRIEND REVEAL

4,131 Tweets

Trending in United States

Josh Duggar

Former reality television star
arrested by federal agents in
Thursday, TMZ reports

Trending with 19 Kids and Count

COVID-19 · LIVE

COVID-19: News and upda
New York

The New York Times · Ye:
'Disaster Girl' is 21 now an
made \$500,000 off the me

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EXHIBIT 65



Explore

Settings

Thread

Lindsey Boylan @LindseyBoylan

My first experience of workplace sexual harassment was when my mom got her first real office job after graduating from college when I was in high school.

She was so excited to be taken "seriously." Her bossed isolated her and kissed her. She never had that type of job again.

8:49 AM · Dec 13, 2020 · Twitter for iPhone

1,085 Retweets 375 Quote Tweets 7,614 Likes



Lindsey Boylan @LindseyBoylan · Dec 13, 2020
Replying to @LindseyBoylan

It was then how I learned how hard it is for women. How hard this world can be for us when we are trying to be taken seriously and help our community. How easily jerks can destroy the lives of women.

58 327 3.7K

Lindsey Boylan @LindseyBoylan · Dec 13, 2020

And I promised myself I would never let those kind of guys win. I would work hard my whole life to put myself in positions of power to change things. To end the violence & corruption. Give voice to the voiceless.

I am not stopping. I refuse. I will never give up.

110 378 3.8K

Lindsey Boylan @LindseyBoylan · Dec 13, 2020

Yes, @NYGovCuomo sexually harassed me for years. Many saw it, and watched.

I could never anticipate what to expect: would I be grilled on my work (which was very good) or harassed about my looks. Or would it be both in the same conversation? This was the way for years.

2.5K 13.8K 27.6K

Lindsey Boylan @LindseyBoylan · Dec 13, 2020

Not knowing what to expect what's the most upsetting part aside from knowing that no one would do a damn thing even when they saw it.

No one.

And I *know* I am not the only woman.

203 1K 7.5K

Lindsey Boylan @LindseyBoylan · Dec 13, 2020

I'm angry to be put in this situation at all. That because I am a woman, I can work hard my whole life to better myself and help others and yet still fall victim as countless women over generations have. Mostly silently.

I hate that some men, like @NYGovCuomo abuse their power.

714 2K 11.1K

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Relevant people

Lindsey Boylan @LindseyBoylan
Mom. Progressive M
4 a Livable City. Fm
& Urban Planner. C
Manhattan Borough

What's happening

World news · Yesterday
**Chinese government says t
first human case of H10N3
flu is unlikely to spread**

Trending in United States
Concorde
1,700 Tweets

Music · Trending
Olamide
24.2K Tweets

COVID-19 · LIVE
**New York: COVID-19: New
updates for New York**

BuzzFeed News · Last nig
**Tulsa Raised Millions of Do
To Memorialize The 1921
Massacre. Not Much Went
The Black Community.**

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Tweet



Lindsey Boylan @LindseyBoylan

To be clear: I have no interest in talking to journalists.

I am about validating the experience of countless women and making sure abuse stops.

My worst fear is that this continues. And as @FKAtwigs said yesterday, my second worst fear is having to talk about and relive this.

10:00 AM · Dec 13, 2020 · Twitter for iPhone

111 Retweets 63 Quote Tweets 1,396 Likes



Chris Bold @fingertrick · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

Sometimes you need to do you. I hope you feel and others are helped by you sharing with your platform.

1



2



Erick From Twitter (Sifting through reality) @Er... · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

Valid point.

Either way, journalists will want to hesitate discussing certain stories like these even when the truth is in front of their face.

That's how others go on to relive certain experiences in the dark.

2



5



Show replies



Marissa Vonáye @marissavonaye_ · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

I believe you of course, but won't it be hard to get around talking about it since you're running for office? Especially since it's a serious allegation against one of the most well-known political figures in the country?



Victims Rights NY PAC @victimsrightsNY · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

Are there other reports of this? 💔

1



4



Dmkorpiable @korpiable · Dec 13, 2020

Me thinks she has some explaining to do.



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Sign up

Relevant people



Lindsey Boylan @LindseyBoylan

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



FKA twigs @FKAtwigs

What's happening

Gaming · LIVE

Summer Game Fest 2021

Trending with Elden Ring, #SummerGameFest

Video games · Trending

Call of Duty

27.6K Tweets

Video games · Trending

IT'S REAL

96.5K Tweets

COVID-19 · LIVE

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

The New York Ti... · 2 h

Starbucks is running low on ingredients

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Don't miss what's happening

People on Twitter are the first to know.

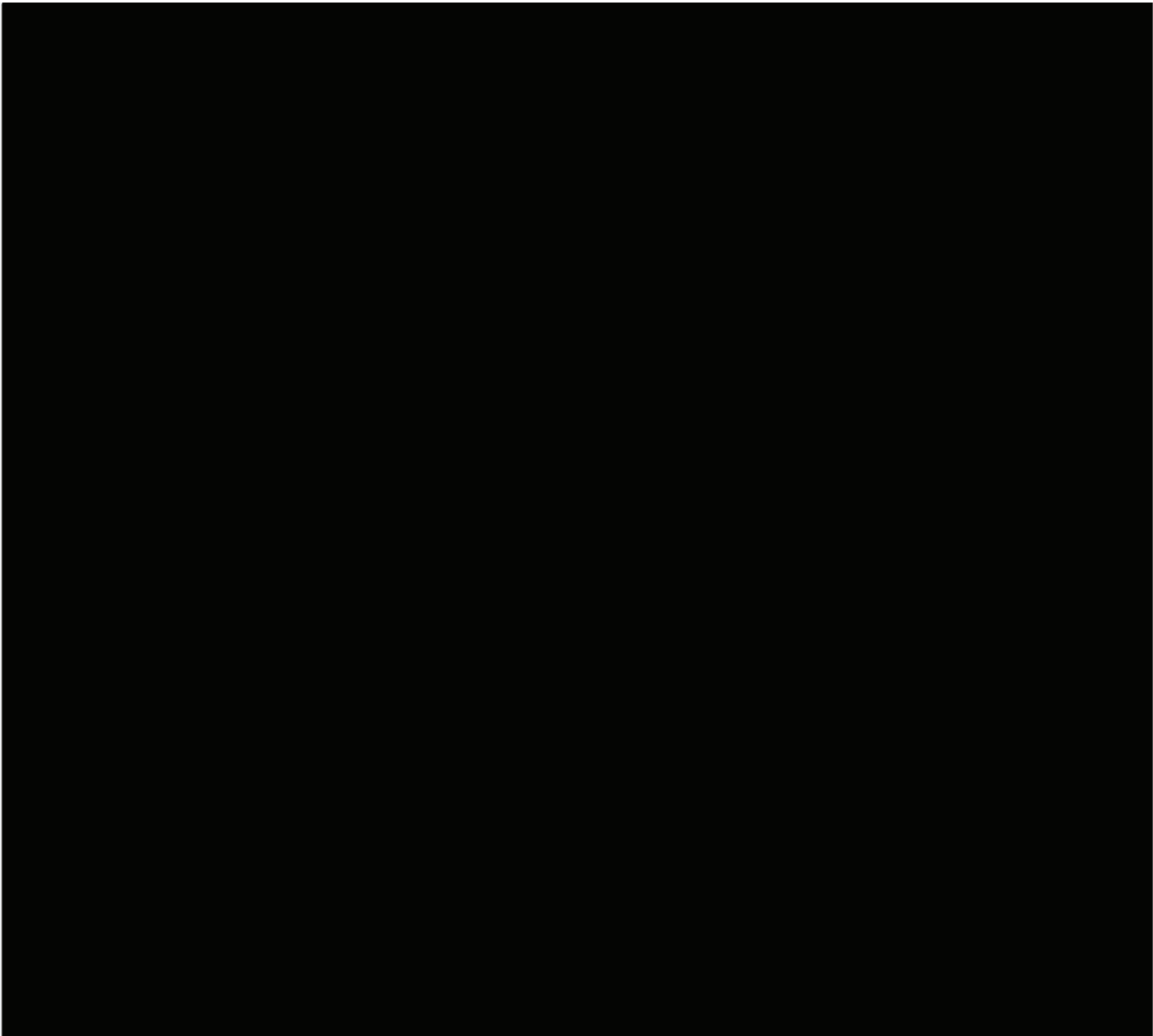
Log in

S

EXHIBIT 66



EXHIBIT 67



Jill DesRosiers

^ Sent

12/13/2016 8:41:00 PM

can we ask if this is who he meant

Jill DesRosiers

^ Sent

12/13/2016 8:41:02 PM

<http://dhclegal.com/attorneys/kaitlin> [REDACTED]



EXHIBIT 68

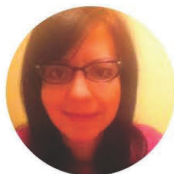


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31 profile viewers in the past 90 days
+200% since last week



3 found you via LinkedIn Search



38m

Linda Lacewell · 2nd
Superintendent of Financial
Services, New York State Dep...
44 mutual connections

Connect



1h

Annabel Walsh · 2nd
Chief Of Staff at CLEAR
(clearme.com)
36 mutual connections

Connect

EXHIBIT 69

Conversation Between Former Staffer and Kaitlin

December 17, 2020

This transcript has been prepared by the investigative team and reflects an attempt to best capture the substance of the conversations. The exact words reflected in the transcript may not always be accurate. We have also endeavored to identify the names of individuals on the recordings, but this information may not always be accurate.

Kaitlin: “Hey [Former Staffer]”

Former Staffer: “Hey, how are you?”

Kaitlin: “Good, how are you?”

Former Staffer: “Good, so it’s sort of weird circumstances for sure. But, I just wanted to reach out because like your tweets are definitely making the rounds with reporters and I wasn’t sure if you know or—I definitely wanted to let you know. And I’m not sure if it’s like folks are reaching out because they know we shared an office or what. It’s just definitely weird circumstances. But, I have also just had sort of folks reach out in the wake of Lindsey’s tweets and I’ve just been kind of like it’s definitely a tough place to work. Expectations are really high. I know—I know you know that. But, I really, you know, have never seen anything like sexual harassment.”

Kaitlin: “So—the reporters reached out to you?”

Former Staffer: “Yeah.”

Kaitlin: “Because you think that they know that we shared an office?”

Former Staffer: “Yeah, I mean—the tweet “I worked for the Governor for many years.” And I was one of his flaks [not sure if this is what was said here]. And, you know, I have had people call me for stories dating back since I left the administration looking for like dirt and, you know, digging up stuff. I think like it’s fairly normal that—yeah I am not surprised. I am just letting you know that this is happening. Again, I haven’t seen anything like that. But, I wanted to make you aware.”

Kaitlin: “Who reached out to you? Are you able to say?”

Former Staffer: “Um, sure. Yeah, folks have definitely reached out, like the Times Union, other reporters as well. But—”

Kaitlin: “I don’t know anybody in that world so I am just as surprised as you that—”

Former Staffer: “Ok, so, got it. Are like talking to them? Or—”

Kaitlin: “No, I don’t. I don’t know anybody who works at the Times Union. I don’t—No. I don’t know anybody there.”

Former Staffer: “Ok.”

Kaitlin: “The only experience I ever had—excuse me—is sitting in that office with you. But, like, I never spoke to anybody so I don’t know how I would be on their radar.”

Former Staffer: “Well, the tweet.”

Kaitlin: “Right, but how would they find my account? Like I—nobody followed me. You know? It didn’t tag anybody. It didn’t say—”

Former Staffer: “I think the reporter like also flagged that Biaggi liked it.”

Kaitlin: “Oh. That’s interesting.”

Former Staffer: “So, I—listen, just letting you know. I mean, again, you know, if like, I think it would be fairly clear, you know, if like an elected official liked it. And, in the wake of the Lindsey stuff, obviously everybody knew that you worked there could easily surmise that. So—”

Kaitlin: “I mean, Alessandra worked there too. Right, during that time?”

Former Staffer: “Totally. Totally.”

Kaitlin: “Has she been contacted? Have you guys talked to her? Or, have you talked to her?”

Former Staffer: “I haven’t talked to Alessandra. No, I don’t know if she has been contacted. I just wanted to reach out to you. But, uh—”

Kaitlin: “Thank you.”

Former Staffer: “No idea.”

Kaitlin: “No, I have not talked to anybody at the Times Union. I don’t know anybody who is there.”

Former Staffer: “Ok. Well, um, glad to have let you know. You know, thanks for chatting. And, definitely hope you are well and all that stuff. It’s definitely a weird time.”

Kaitlin: “Yeah, you too [Former Staffer].”

Former Staffer: “Ok, bye.”

Kaitlin: “Ok.”

EXHIBIT 70

Date: Sunday, February 28 2021 03:20 PM

Subject: Re: statement final

From: Josh Vlasto [REDACTED]

To: Chris Cuomo [REDACTED]

Dani Lever [REDACTED] Jeffrey Pollock <[REDACTED]> Linda A Lacewell

CC: [REDACTED] <[REDACTED]>; Lis Smith [REDACTED] Melissa DeRosa

<[REDACTED]>; Peter Ajemian <[REDACTED]>; Richard Azzopardi

<[REDACTED]>; Steven Cohen [REDACTED] <[REDACTED]>;

I can't seem to dial back in

C

On Sun, Feb 28, 2021 at 3:13 PM Chris Cuomo <[REDACTED]> wrote:

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

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

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

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

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



EXHIBIT 71

[REDACTED] declares under penalty of perjury, pursuant to 28 U.S.C. § 1746

that the following is true and correct:

[REDACTED]

2. In May 2017, I attended a public event [REDACTED]

[REDACTED]

5. After Governor Cuomo completed the signing ceremony, he and a group of reporters and onlookers moved closer to [REDACTED]. It is my understanding that the Governor was interacting with people in a receiving line [REDACTED]

6. I chose not to participate in the receiving line, and stayed back with some of my colleagues near the area where the audience had been seated during the ceremony.

7. After some time had passed, Virginia returned to the area where I was standing. She had been [REDACTED] in the group with the Governor. She appeared to be upset. She was red in the face and looked shocked. I did not know Virginia particularly well at the time, but it was evident by her demeanor and facial expression that something was wrong and she was disturbed and upset.

8. I immediately asked Virginia if everything was OK. Although I do not remember the precise words she used, she conveyed to me that something very strange had just happened, and went on to describe it.

9. In sum and substance, Virginia conveyed to me that moments before, she had interacted with the Governor after having waited in the receiving line. She described how Governor Cuomo placed his finger on the logo of Virginia's [REDACTED] t-shirt and dragged his finger across the logo, which was located on her chest, at breast-level. Governor Cuomo said something to the effect of "I know that company," and then said something about brushing a bug off of Virginia's shirt. This seemed like odd behavior in my view.

10. Observing her in distress, I asked Virginia if there was anything I could do to help. I suggested she take a moment and offered her some water to drink. I stayed with her for a few minutes to make sure she did not need anything else.

11. In the time since, as new reports about Governor Cuomo's behavior with other women have come to light, I have thought about that day in May 2017. The incident made an impression on me because of how upset Virginia looked and acted right after interacting with the Governor, and because her contemporaneous report of her experience with him, I was left with the impression that he acted inappropriately towards her.

EXHIBIT 72

[REDACTED] declares under penalty of perjury, pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. [REDACTED]

[REDACTED] I am the older sister of Virginia Limmiatis.

2. In May 2017, approximately 1-2 days following [REDACTED]

[REDACTED] Virginia attended on behalf of her employer, [REDACTED] Virginia called me to report a disturbing incident she had experienced.

3. Virginia told me on the phone that she had been standing with a pool of

reporters near to where Governor Cuomo was performing official duties as part of [REDACTED]

[REDACTED] and was making his way through a receiving line, shaking hands with individuals who waited to greet him.

4. Virginia was wearing a [REDACTED] t-shirt, and the letters [REDACTED]

[REDACTED] were written across her chest, covering her breast area.

5. Virginia recounted that after shaking her hand, Governor Cuomo pressed

his finger against each letter of the [REDACTED] logo, tracing the words and saying them out loud, slowly. He touched her breasts as he made this physical contact.

6. Virginia told me she felt shocked that the Governor was touching her in

this manner, and looked around her to confirm that others in the receiving line had seen the unwanted and inappropriate physical touching he had just subjected her to.

7. No one appeared to notice, as they were all awe-struck by their proximity

to the Governor.

8. After he moved his finger across her chest, pressing against her body, Governor Cuomo leaned in to whisper in Virginia's ear, "I'll just say that I was flicking a spider off of you."

9. I understood the Governor's comment to be making clear to Virginia that if he was asked about his inappropriate touching of her, he would use the "spider" as an excuse for his behavior. Virginia confirmed that there was no spider or insect on or near her body.

10. Virginia told me that she walked to where some colleagues of her stood, some distance from where the receiving line was, and relayed to them what the Governor had done to her.

11. Virginia was very upset when we spoke. I could tell from the tone and pitch of her voice that she was emotional, trembling with the shock, embarrassment, and confusion caused by the Governor's unwarranted and offensive touching of her.

12. I was very upset to hear that someone – anyone – but especially someone as powerful as Governor Cuomo had taken advantage of his power to assault my sister in this way.

13. In the time since the May 2017 incident, my sister underwent treatment for cancer. Our family's focus was on helping her overcome her health challenges. We also presumed that there would be no point in escalating what the Governor had done to Virginia; he was such a powerful person, what could she possibly do?

14. Approximately two months ago, my sister called me to tell me that she had read a news report that Governor Cuomo stated that he had never touched anyone inappropriately. Her reaction was visceral. She was thrown immediately back to the moment he

had touched her inappropriately. It seemed clear to me that she was experiencing a kind of PTSD.

15. My sister told me that she decided that she understood – finally – that what Governor Cuomo had done was wrong and that it was important that she stand up for herself in the hope that she could contribute to a societal change that makes such abuse of power and influence unacceptable.



EXHIBIT 73

Sep 16, 2019, 1:18 PM



This fucking guy

I'm so pissed

Me too

I lost the photographers card but don't want the photo of us on the wedding photos. Yuck.

Or curious to see what they are almost but yuck.



iMessage



72

AR

Anna >



Walked in to work and CNN was talking about his e cigarette ban

ALSO if you google Cuomo harassment it's all praising some workplace harassment policy he put in place

I wish I'd said or tried to do something

Oh wow

I wish I'd said something more too

But it's so weird when it happens

Yeah. Fuck

Who was that cool girl who also had a weird interaction

Don't know

Love was in the air for him I guess you

Guess*

Sorry last thing, he kissed me on the cheek right? Because I remember

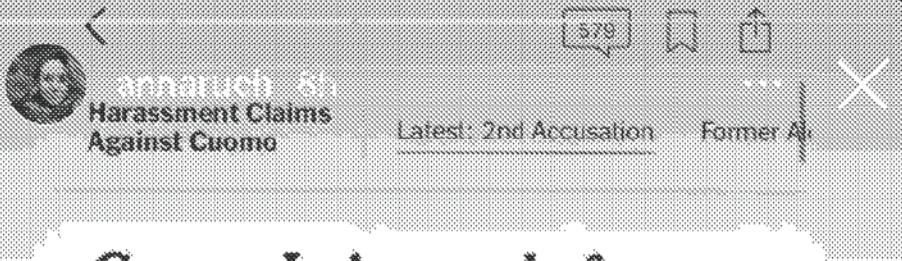


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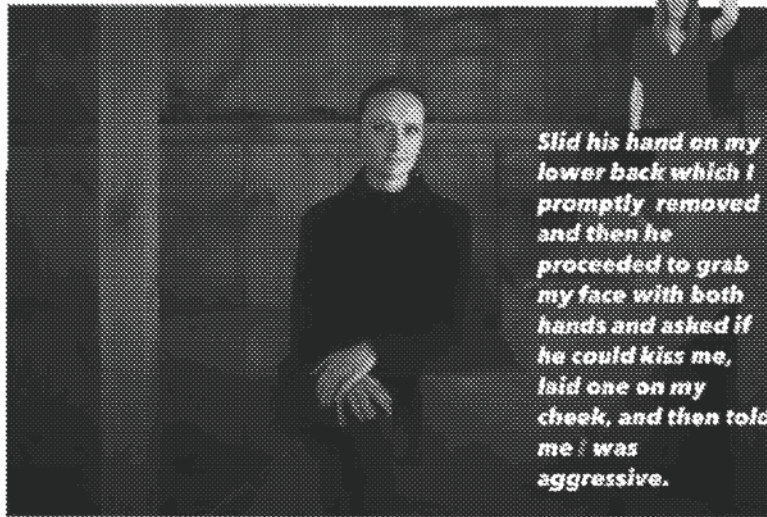
EXHIBIT 74





Cuomo Is Accused of Sexual Harassment by a 2nd Former Aide

The woman, 25, said that when they were alone in his office, Gov. Andrew Cuomo asked if she "had ever been with an older man."



Charlotte Bennett said she decided to make her allegations public in part because she wanted to counter the way Mr. Cuomo "wields his power." Elizabeth Frantz for The New York Times



By [@jessemckinley70](#)

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