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IN THE MATTER OF INDEPENDENT INVESTIGATION

UNDER EXECUTIVE LAW 63(8)

----- x

May 19, 2021

9:00 a.m.

VIRTUAL ZOOM INVESTIGATION, before
Brittany Saline, a Notary Public of the States
of New York and New Jersey.

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A P P E A R A N C E S :

CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Battery Plaza
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BY: HYATT MUSTEFA, ESQ.

-and-

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Attorneys for Witness
600 Fifth Avenue, 10th floor
New York, New York 10020

BY: ZOE SALZMAN, ESQ.

ALSO PRESENT:

MARCO SOZIO, Videographer

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Witness 5/19/21

THE VIDEOGRAPHER: Good morning. We are going on the record at 9 a.m. on May 19th, 2021.

Please note that the microphones are sensitive and may pick up whispering, private conversations and cellular interference. Please turn off all cell phones or place them away from the microphones as they can interfere with the deposition audio.

Audio and video recording will continue to take place unless all parties agree to go off the record.

This is media unit one of the recorded interview of witness, May 19th, 2021, taken by Special Deputy for the New York Attorney General's Office in the matter of The Independent Investigation Under the New York State Executive Law Section 63(8).

The deposition is being held at remote virtual zoom located in Kansas City, Missouri 64111.

My name is Marco Sozio from the firm

Witness 5/19/21

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A Yes.

Q Are you taking any medications or drugs that might make it difficult for you to understand my questions today?

A No, no, I don't know what that would be, but no.

Q Okay. Have you had any alcohol today?

A No.

Q Is there any reason why you would not be able to answer my questions fully and truthfully?

A No.

Q Can you state your name, date of birth and your current home address?

A My name is Kaitlin [REDACTED]. My date of birth is [REDACTED]. I don't -- I don't have a home address. I'm staying this week with my boyfriend's parents at [REDACTED] [REDACTED]. I -- the zip code I think is [REDACTED]. I don't know. I can look it up.

Q It's okay. What state do you claim residency in?

Witness 5/19/21

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A [REDACTED].

Q Have you ever given testimony before?

A No, I don't -- no, no.

Q Other than conversations with your attorney, did you do anything to prepare for your testimony today?

A I reviewed notes that I had and then read the Rebecca Traister article again, just to make sure I remembered everything.

Q And when you're talking about the Rebecca Traister article, are you talking about an article from New York Magazine?

A Yes, sorry, yep.

Q You should have a Koteworks site that we sent to you last night that contains the exhibits for your testimony today. Can you please go ahead and access that site?

A Yes, I have access to the site and downloaded the documents. I have not opened them.

Q Great. That was going to be my next question. Perfect. Can you please open what is labeled, I believe, Exhibit 1 in the folder

Witness 5/19/21

1
2 Q Is this the testimony subpoena you
3 received from the New York Attorney General's
4 Office?

5 A Yes.

6 Q Did you read the subpoena before
7 today?

8 A Yes.

9 Q And you understand that your
10 testimony is being taken pursuant to that
11 subpoena?

12 A Yes.

13 Q You can go ahead and just move that
14 screen aside for a little bit.

15 Kaitlin, can you tell us how far you
16 got in school?

17 A I finished a Master's Degree at [REDACTED]

18 [REDACTED]
19 Q And after you finished your Master's
20 Degree, did you begin working?

21 A Yes, I was working throughout my
22 Master's Degree and then I took another job
23 after my Master's Degree.

24 Q Please tell us about your employment
25 history following your Master's Degree.

Witness 5/19/21

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2 A Following my Master's Degree, I was
3 working at [REDACTED] at [REDACTED]
4 [REDACTED]. I continued to hold that job. I
5 also -- during my last semester was -- I had an
6 internship with Congressman [REDACTED], so
7 after I graduated, I went from an intern status
8 to a full time position. I don't know the
9 date, but I'm sure we could find it.

10 So after my Master's Degree, I was
11 working for former Congressman [REDACTED]
12 Monday to Friday, 9:00 to 5:00. And then I
13 would go to [REDACTED], Monday through
14 Thursday for the 5:45 shift. On Friday's I
15 could not make it by 4:30, so I didn't ever
16 work Friday nights and then on weekends, I
17 would work a shift in the morning or the night
18 or doubles, depending on what the restaurant
19 needed.

20 Q Did there come a time when you
21 stopped working at [REDACTED] and the
22 internship for former Congressperson [REDACTED]
23 [REDACTED] office?

24 A Was there a time after when I sat --
25 when I didn't work as an intern and then I

Witness 5/19/21

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Q Had you met Governor Andrew Cuomo before December 12th, 2016?

A I had thought I had met him briefly somewhere, just in passing or attending an event, but I -- maybe I didn't. I don't know. It wasn't like I -- I didn't have this interaction with him. That was the first time I ever spoke to the Governor.

Q And on this occasion, on December 12th, who spoke to whom first?

A He -- he approached me. I didn't approach him.

Q And what did he say when he approached you?

A I don't remember word for word what he said to me. I don't know. I don't know how the conversation started. I just remember distinctly that he said -- that I said I used to work for [REDACTED]. I now work at [REDACTED] and introduced myself and he said that I was going to come back and work in government at the state level and that stands out because --

Q How long did --

A Sorry. It's just something that

Witness 5/19/21

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Q On December 12th -- sorry, keep going?

A Sorry. I just -- I don't remember who specifically. I just know it was said.

Q On December 12th, did -- did Governor Cuomo, to your knowledge, take individual photos with others of your colleagues?

A I don't know. If he did, I would guess [REDACTED]. They have a closer relationship and they would be in this photo album that [REDACTED] has.

Q Did you see the Governor on this occasion take a photograph with anyone and hold them in a similar way to the way he held you?

A At this occasion, no, I didn't see that.

Q How did you come to have these photographs?

A I -- so -- they usually send photographs out after every event. I never received a copy of these. I had access to them when I was working in his office and so I had screen shot and saved these to show my friends

Witness 5/19/21

1
2 to call back. I believe that was the executive
3 chamber line.

4 Q Who did you speak to?

5 A I believe it was Stephanie Benton.

6 Q Tell us about that conversation with
7 Ms. Benton.

8 A I -- I think I just said I received
9 your call and asked who was calling back and
10 then she had asked me to come in for an
11 interview and I was kind of taken aback by that
12 and I had to go and so I agreed to it and I
13 went -- I went and interviewed. I think I -- I
14 think it was a short conversation.

15 Q And between the conversation with
16 Ms. Benton and the date of your interview, did
17 you speak to anybody else about interviewing
18 with the executive chamber?

19 A Yes. Again, I don't know if it was
20 before or after, but I spoke with former
21 Congressman [REDACTED] and I spoke to my old
22 Chief of Staff, [REDACTED]. I spoke to
23 friends, family, my ex-boyfriend at the time,
24 I -- I likely spoke to management at the
25 restaurant as well.

Witness 5/19/21

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Q Tell us about the conversation with [REDACTED].

A I went to [REDACTED] and [REDACTED] both asking advice and -- and guidance on what to do. I had a very frank conversation with them about how we knew why he was hiring me and it was because of what I looked like.

The -- they said that the Governor is known to be a very tough person to work for and the environment is very difficult and I made the comment that I wasn't going to sleep with the Governor and they said no, that you should not do that and I said okay, great. We're on the same page.

It was never implied that I would -- it was just like -- yes, we know that he's hiring you because of what you look like. Don't be inappropriate. I'm not going to be inappropriate conversation and I had to go to the interview and I had to take the job.

Q Why did you think you were given an interview with the executive chamber because of what you looked like?

A Because of the interaction that I

Witness 5/19/21

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2 had at the Friars Club with the Governor. I
3 didn't give him any contact information. They
4 found me on -- I believe they found me on [REDACTED]
5 website and that's how they got ahold of me.
6 We never talked about my qualifications or the
7 job or I never spoke to them about an interest
8 I had in working for the Governor.

9 He just -- it seemed that he liked
10 me, liked what I looked like and that is why I
11 was being pulled over to interview and then
12 being offered the job.

13 Q Did either [REDACTED] or [REDACTED] disagree
14 with your view that you were being hired
15 because of what you -- you were being
16 interviewed because of what you looked like?

17 A I don't think anybody that I spoke
18 to disagreed with that assumption. I think
19 that they probably all thought that before I
20 had said it as well.

21 Q And they told you -- and then you
22 said in the conversation with [REDACTED], [REDACTED]
23 that you -- you weren't going to sleep with the
24 Governor. Why did you say that?

25 A Because I knew I -- I knew that I

Witness 5/19/21

1 was being hired because of what I looked like
2 and I didn't want to -- I didn't -- I didn't
3 know what I was getting myself into and I
4 didn't -- I was uncomfortable. I was like I'm
5 not going to sleep with the Governor because he
6 likes what I look like. This is too much. I
7 don't want to do this. I don't want to go over
8 there.
9

10 Q But [REDACTED] and [REDACTED] told you you
11 had to?

12 A Everybody told me that I had to take
13 the job. If the Governor is asking for
14 something, you don't say no to the Governor.

15 Q Did anybody tell you why you don't
16 say no to the Governor?

17 A I think it was just implied that
18 he's the Governor. You don't say no to him.
19 He's a very powerful man in New York.

20 Q Did [REDACTED] and [REDACTED] -- sorry, say
21 that again?

22 A And beyond New York and beyond, he's
23 a very powerful man.

24 Q Did [REDACTED] or [REDACTED] say anything
25 more specific about Mr. Cuomo being tough and

Witness 5/19/21

1
2 difficult or the chamber being tough and
3 difficult?

4 A [REDACTED] did. [REDACTED] said that
5 and the Governor tried to bring her on board to
6 his staff and she said -- she said no. She was
7 in a position to do so because she wouldn't
8 lose her job with [REDACTED]. She had been working
9 for [REDACTED] for years. I was early in my career
10 and didn't have that network.

11 Q Were you concerned that if you -- if
12 you told the executive chamber you did not want
13 to interview, that you would lose your job at
14 [REDACTED] ?

15 A Yes.

16 Q Is there anything else that you
17 remember about your conversations with your
18 ex-boyfriend or friends or family that is
19 different than your conversations that you had
20 with [REDACTED] and [REDACTED] ?

21 A I was probably a little more blunt
22 with my friends, but it was the same -- the
23 message, it was the same. It was -- it was an
24 uncomfortable situation. I can't believe this
25 is happening. I don't want to take this job,

Witness 5/19/21

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2 but the salary was appealing, so I didn't have
3 to work two jobs anymore, but beyond that, I
4 didn't feel like I had a choice.

5 Q And when you say you were probably
6 more blunt with your family and friends, do you
7 recall specifically anything you said to your
8 family and friends that was more blunt?

9 A No. I just know how I speak to my
10 friends and family and how I speak to
11 professionals is very different, so I just
12 would assume that I was a little more forward
13 in my personal conversations.

14 Q So you did interview for a position
15 in the executive chamber, right?

16 A I did, yep.

17 Q When was the interview?

18 A I -- I believe it was that Friday,
19 so the 16th, right.

20 Q And with whom did you interview?

21 A I went over to 633. I was in Jill
22 DeSrosiers's office. I believe it was
23 Stephanie Benton and Annabel and I believe that
24 [REDACTED] was in and out because the Governor was --
25 it was in his office. The door is shut, so

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Witness 5/19/21

yeah, I am pretty sure she was in and out.

Q When you say Annabel, do you mean
Annabel Walsh?

A Yes.

Q Tell us about what happened in the
interview.

A They -- I don't remember everything
that happened. They asked questions. I --
they described a role that I didn't understand.
I remember leaving and people asking me what I
was -- what my job was and I was like, I don't
know. I don't know what I'm going to be doing.
I was -- I had -- they had asked about
salary -- I think maybe I had asked about
salary and I believe asked what my number was
and I said 120 and they laughed and they said
that's probably not going to happen and then
they had a -- when they called to tell me that
I was hired, they agreed to that salary. They
told me that they had agreed to that salary. I
think that the Governor actually agreed to that
salary.

Q During the interview with Ms. Benton
and Ms. Walsh, with Ms. DeSrosiers coming in

Witness 5/19/21

1
2 given your resume to anyone in the executive
3 chamber?

4 A Yeah, to my knowledge, yes.

5 Q So what happens after the interview?

6 A I walked -- the [REDACTED] and [REDACTED] are
7 [REDACTED]. So I
8 walked back to my office and went back to work.
9 And then I told the team I --

10 Q And --

11 A Yeah.

12 Q And what did you tell the team?

13 A What happened in the interview --
14 interview -- I don't know if it was an
15 interview. What happened in the meeting, the
16 interview. The conversation about salary, I
17 know we talked about and I know at some point
18 [REDACTED] had talked about if I were to get hired,
19 I would get cool swag, like a sweatshirt or
20 something. I don't remember the specifics.
21 I'm sorry.

22 Q It's okay. When did you get offered
23 the position?

24 A What time?

25 Q When, what day? So you interviewed

Witness 5/19/21

1 on a Friday and what day did you get offered
2 the position?
3

4 A I don't -- I think -- I think I -- I
5 think I interviewed on a Wednesday and then I
6 got offered the position on a Friday.

7 Q Okay. So about 48 hours later?

8 A Yeah, it was that same week.

9 Q And who called you to offer you the
10 position?

11 A I think it was Stephanie. I don't
12 remember. Stephanie or Jill. I don't know.

13 Q What do you remember about the call
14 offering you the position in the executive
15 chamber?

16 A The salary, I think and that it was
17 happening. I was very happy to not work in the
18 restaurant. It was a way out that I didn't
19 think I would have for a while.

20 Q And you said they offered you
21 \$120,000; is that right?

22 A That's correct.

23 Q And you recall in that conversation
24 they said that the Governor had agreed to that
25 salary?

1 Witness 5/19/21

2 A I -- I remember that the Governor
3 had agreed to it. I don't know if it was in
4 that conversation, but I remember that he
5 agreed to that salary.

6 Q You remember being told that the
7 Governor had agreed to your salary at some
8 point?

9 A Yep.

10 Q When did you start working in the
11 executive chamber?

12 A The -- I gave two weeks at [REDACTED]
13 [REDACTED] and my start date I believe
14 was December 30th, I think.

15 My first like real workday was New
16 Year's Eve and it was the Second Avenue subway
17 opening, but like when I -- the first day in
18 the office, I just went in and did the
19 paperwork and then was told that I could leave
20 and to show up for the subway event.

21 Q Between December -- the interview
22 and the day you were told that you got the
23 position and the first day you show up in the
24 executive chamber, who did you talk to, if
25 anyone, about working in the executive chamber?

Witness 5/19/21

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A In the -- before -- in the two weeks before I started?

Q Yes.

A I don't know. I'm sure I told a lot of people that I was going to work in the Governor's office. I couldn't tell you every single person.

Q Do you remember getting any advice about working in the executive chamber between the time you were offered the position and the time you started the position?

A Yeah, yes, of course. I don't know --

Q What --

A -- specific advice like who gave it to me, but I talked to █████. I talked to █████ I talked to the restaurant. I talked to friends, family. One of the questions I asked is what do I call the Governor? I didn't know do I call him Andrew? It was so informal with █████ I keep saying █████, with the Congressman. I was told to call him Governor, to be professional, dress professional.

1 Witness 5/19/21

2 I got tips on how to buy clothes
3 that were -- could be a staple and you could
4 change it up with an accessory to make it more
5 affordable, various things to succeed. I don't
6 know.

7 Q And what were you told to call the
8 Governor?

9 A Governor, Governor Cuomo, Governor.

10 Q And were you told anything more
11 specific about what dressing professional meant
12 in the executive chamber?

13 A I don't recall them ever telling me
14 what I needed to wear. It was implied that you
15 dress well and that you -- all the women wore
16 heels. All the women had heels under their
17 desk and you looked nice, nicer than what I had
18 to wear at ██████████ office or at the lobbying
19 firm.

20 Q So after you began working in the
21 executive chamber, you observed that women in
22 the executive chamber kept high heels under
23 their desk?

24 A Yes, everybody had -- yeah, yep.

25 Q And when -- after you started

1 Witness 5/19/21

2 working in the executive chamber, what did you
3 observe about when women would put on their
4 high heels?

5 A Whenever the Governor is around, you
6 had to dress nice. You had to dress well in
7 heels. It's -- it's possible I was told that
8 you had to dress well. Was it in the
9 requirements of the job description? No, not
10 that I remember, but it -- everybody knew that
11 you wore heels and dressed well around the
12 Governor.

13 Q Anything else you remember about
14 advice you were given about working in the
15 executive chamber before December 30th of 2016?

16 A I -- nothing is coming to mind right
17 now, but I can follow up if I remember specific
18 advice.

19 Q Great. Before December 30th, did
20 you find out what your title would be?

21 A I -- I think that they told me
22 before I started, yes, I -- I think so, yes,
23 yes, they had to --

24 Q What was your title?

25 A It was deputy director of Governor's

1 Witness 5/19/21

2 offices and then director of the New York
3 office.

4 Q What was your background check
5 process?

6 A A series of paperwork and then I had
7 to go to Roosevelt Island, I believe, to do
8 fingerprints with the state troopers and
9 then --

10 Q To your knowledge, was your
11 background check complete before you began
12 working in the executive chamber?

13 A I don't remember. I don't think it
14 was, but I -- I don't remember. I'm sure there
15 are dates I can show if it was or not.

16 Q You said you started on
17 December 30th, 2016. When did you finish
18 working in the executive chamber?

19 A I don't know my last official date
20 and when I went over to ██████████. I don't know.
21 It's in the paperworks. I'm sorry.

22 Q Okay. Was it sometime around
23 January 2018?

24 A Yes, it was in January 2018.

25 Q During that time period, when you

1 Witness 5/19/21

2 were working in the executive chamber, did you
3 learn anything about how long it normally took
4 for someone to complete an interview process
5 with the executive chamber and then begin
6 working at the executive chamber?

7 A It is my understanding now that if
8 the Governor wants to hire somebody, they will
9 be brought on quickly, across all state
10 agencies that the hiring process takes a long
11 time. It takes a while to get somebody on
12 board. But the -- when the Governor has an
13 interest in bringing somebody into the
14 executive chamber, things are expedited.

15 Q Can you tell us about anyone else
16 who, while you were in the executive chamber,
17 you knew had an expedited process because the
18 Governor wanted to bring them on board?

19 A I don't -- I was not privy to every
20 conversation they had with people from start to
21 finish. There was the young woman at the Super
22 Bowl event. I don't remember her being brought
23 on as full time staff, but I was told that she
24 was. That happened quickly. I -- I don't -- I
25 don't know.

1 Witness 5/19/21

2 Q When you say the young woman at the
3 Super Bowl event, tell us what event you're
4 talking about and what happened.

5 A In January of 20 -- no, sorry,
6 February of 2017, the -- there was -- the Super
7 Bowl, they rented out Dorrian's, on the upper
8 east side. They have -- the Governor's
9 campaign office has a buyout to a certain time.
10 A buyout means they -- nobody else could go in.
11 They pay a fee to keep it closed off to the
12 public. And there was a -- I believe she was
13 an intern in the campaign office. She had a
14 dove tattoo on -- I thought it was her hands.
15 Somebody said it was her forearm. She had a
16 dove tattoo and he was sitting in the back
17 having -- close to her. There -- it was an
18 intimate setting. In my eyes, there was no
19 other people at the table. They had been
20 drinking and this is towards the end of the
21 evening. The bar was going to start letting
22 the general public in and so I had walked in
23 the back room. I saw that, went back to the
24 troopers, the state troopers, his protective
25 service unit, and I had said that the Governor

1 Witness 5/19/21

2 should probably go. He's a little close to
3 that young woman and the doors were opening and
4 they kind of like yeah, I hear you, but that's
5 not -- we can't do that. When he's ready,
6 we'll go or when somebody tells us we'll go and
7 then he left sometime shortly after that.

8 And then the next -- that was
9 Sunday. So the next day, Monday morning in
10 the -- the team meeting, with the -- the inner
11 circle, he had made the comment that he
12 wanted -- he was interested in that girl. He
13 wanted to know more about her. Who knew about
14 her and then wanted -- directed staff to find
15 her.

16 Q Throughout that description you just
17 gave, when you say "he," are you talking about
18 Governor Cuomo?

19 A Yes, sorry. The Governor gave
20 that -- the direction to either Stephanie
21 Benton, Jill DeSrosiers or Annabel Walsh to
22 find the young woman with the dove tattoo on
23 Monday.

24 Q And to your knowledge, was the woman
25 with the dove tattoo located and hired by the

Witness 5/19/21

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executive chamber?

A That -- that's what I'm told. I -- I don't remember. I thought she had turned down the position, but I was told that she accepted the position and that she was doing like [REDACTED] maybe, but it wasn't something that she had done and then she left shortly thereafter and took a job, I think, in [REDACTED]. That's what I'm told. I don't know how accurate that is.

Q Who told you that?

A [REDACTED] -- I don't know his last name.

Q And at the Super Bowl event at Dorrian's, you said they had been drinking. Was the "they" the Governor and others?

A The Governor was drinking. Everybody was drinking. People were watching the game.

Q And you said that the Governor was getting close to the woman with the dove tattoo. What do you mean by close to?

A They're sitting in the back room at a table and his arm was kind of like up against

1 Witness 5/19/21

2 the wall, like around the top of his seat there
3 and they were close. They were sitting
4 closely.

5 Q You -- you said that you believed
6 her tattoo was on her hand, but you told -- you
7 have been told -- or you thought it was on her
8 forearm and you were told by somebody that it
9 was on her hand. Who told you that?

10 A I thought it was on her hand and
11 then I was told it was on her forearm. ■■■■■ ,
12 ■■■■■ told me that.

13 Q Are there any other occasions on
14 which you understood during your time at the
15 executive chamber that the process for becoming
16 an employee of the state was expedited because
17 the Governor wanted someone to have a position?

18 A I don't recall if somebody said
19 those exact words. I -- a lot of the
20 information or additional information I
21 received about like the true inner workings was
22 from **Staffer #5** . I believe
23 that's how you say his last name. He had
24 worked in the Governor's office for I don't
25 know how many years at the time, but he was

1 Witness 5/19/21

2 there throughout when Joe Percoco was there and
3 he was there after I left and I believe he
4 staffed Joe Percoco, so he had knowledge of
5 that inner circle and then I believe he
6 transitioned to work for Jill DeSrosiers. And
7 then after I left, he transitioned to work and
8 staff the Governor because they couldn't find a
9 replacement.

10 Q And did Staffer #5 tell you
11 anything about other individuals being
12 identified by the Governor as someone he wanted
13 to work in executive chamber and the process of
14 hiring them being expedited as a result
15 thereof?

16 A I don't recall if he ever said that
17 to me directly, but a lot of the information
18 that I found out, the true operations and how
19 things went behind the scenes was from Staffer #5.
20 He had the knowledge that -- of how -- how
21 things went there.

22 Q And what did Staffer #5 tell you about how
23 people got hired into the executive chamber?

24 A He -- I know he spoke about how --
25 the young woman who was -- who worked there

1 Witness 5/19/21

2 before me, [REDACTED], and how she was brought
3 on and how the -- the mean girls, Jill,
4 Annabel, Stephanie, Andrew Ball, who's not a
5 female, but was looped into the mean girls, how
6 they were all mean to her and Melissa, sorry,
7 because of how she was brought on to work for
8 the Governor and how it was similar to my
9 situation and the Governor liked her, so they
10 were not kind to her. Bless you.

11 Q Thank you. So [REDACTED] told you
12 that [REDACTED] had been brought onto the
13 executive chamber staff in a way similar to
14 you. When you say similar to you, what do you
15 mean?

16 A He had met her somewhere and -- and
17 brought her on shortly thereafter.

18 Q Is there anyone else that you came
19 to learn of that had been brought onto the
20 staff of the executive chamber in a way similar
21 to you?

22 A I believe there was a speechwriter
23 who had a similar situation. I -- I don't
24 remember her name. I think it was [REDACTED]. She
25 had short blonde hair. I am trying to think --

1 Witness 5/19/21

2 meetings, made phone calls. I sent
3 correspondence on behalf of the Governor.
4 Eventually I switched roles and started doing
5 the -- the thank you letters and the photo
6 process. I had asked ██████████ if she had
7 anything I could do because I didn't have any
8 real substantive work to do, so I helped do
9 lighting schedule for the bridge in Queens, but
10 that was not a role that I was hired to do.

11 I also had reached out, when I was
12 there, to ██████████ and asked him if he
13 had anything I could help with because I didn't
14 have real work to do. This is after a few
15 months. Not right away. And there was some
16 event tracking, but nothing ever really came
17 from that deliverable or with -- from that
18 assignment. I don't recall other things that I
19 was supposed to do.

20 Q So let's go back to the very
21 beginning. So your role is to be sort of
22 gatekeeper for the Governor. Where was your
23 desk in relation to the Governor?

24 A So I would either sit at the desk
25 that I was assigned to, right outside of his

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1 office. The setup of the -- the floor was that
2 the -- they had offices along the perimeter and
3 doors to go in, so his was the corner office
4 and then Stephanie's was right next to his and
5 then so I sat in that -- my desk was outside in
6 that corner and so I would sit there or I would
7 sit at Stephanie's desk when she wasn't in New
8 York.

9
10 Q Were you in a cubicle?

11 A Yeah, yeah, it was -- yeah, it was a
12 cubicle.

13 Q Were you on the 39th floor of 633
14 Third Avenue?

15 A Yes.

16 Q As part of your on-boarding to the
17 chamber, did you receive any training?

18 A The -- the training was sitting with
19 Stephanie and her telling me what she does day
20 to day and me taking notes. I don't know if I
21 would call that training. She -- that -- I
22 guess you can say that was training, but it
23 wasn't like -- like a specific write out
24 description of my role and what I should be
25 doing day to day.

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2 what is labeled as Exhibit 6?

3 A I don't know. I can read and see
4 that it says handbook, but I don't know if -- I
5 never -- I don't think I ever received a hard
6 copy of this. Maybe it was a link on a sheet
7 of paper that [REDACTED] gave me. I don't
8 think I have ever looked at this before.

9 Q Why don't you turn to pages 31 and
10 32 of that exhibit, which is the Handbook for
11 Employees of New York State Agencies.

12 A The prior arrest records.

13 Q Sorry, say that again, Kaitlin?

14 A Is page 31 the prior arrest records
15 and youthful offender?

16 Q No. Page 31 of my document, on the
17 bottom, the page numbers are on the bottom.

18 A Oh, that's 25.

19 Q And the top of my page 31 says
20 General Prohibition Harassment?

21 MS. SALZMAN: It's page 37 of the
22 PDF.

23 Q Thank you.

24 A Okay.

25 Q Do you remember ever reading during

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your time at the executive chamber this section
of the handbook that defines harassment?

A No.

Q Do you remember taking any trainings
while you were a member of the executive
chamber staff of sexual harassment?

A I don't. It's possible that I did.
I don't remember taking them.

Q Why don't you open what is in your
electronic exhibit binder labeled Exhibit 5.

(Whereupon document was marked
Exhibit 5 for identification as of this
date.)

Q When you open it, the title of the
document, it should say at the top, Governor's
Office of Employee Relations Equal Employment
Opportunity Rights and Responsibilities E
Learning Course, December 2017.

A Yep.

Q Why don't you page through that and
tell us if you remember ever doing this
training or something similar to it while you
were a member of the executive chamber staff?

A I don't -- I don't remember taking

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1
2 this. I remember the -- I'm now remembering
3 that -- there was an in-person training and
4 provided by -- I can't think of her name. I
5 think she leads JCOPE right now. I don't know.
6 I can't think of her name, but I -- it was in
7 person. We had to attend. It wasn't when I
8 was hired. It was -- I think over the summer.

9 Q Was the JCOPE training that you're
10 recalling on the Public Officers Law or was it
11 on something else?

12 A Yes, yep. It was the Public
13 Officers Law. That's what that was, yep. I
14 cannot think of her name.

15 Q [REDACTED] ?

16 A Nope. It was not her. She just --
17 she left -- I think she was the ethics officer,
18 maybe. She left -- she's a lawyer. She left
19 some time after I left to go to the private
20 sector and she came back and I think she was
21 recently appointed to lead JCOPE.

22 Q Okay. Can you remember any other
23 training that you -- you received?

24 A Her name was Camille. I can't
25 remember the last name.

1 Witness 5/19/21

2 Q Camille Varlack?

3 A Yes. Yes. Sorry. She did the
4 JCOPE training. That's the only training I
5 remember having to do. I don't -- it's
6 possible I did that. I don't -- I don't
7 remember.

8 Q Do you remember any training on
9 record retention and learning what a state
10 record was?

11 A No, no.

12 Q Were you issued electronic devices
13 by the executive chamber?

14 A Yes.

15 Q Which devices did you get?

16 A I had a Blackberry and then I had my
17 desk computer.

18 Q Did you get any training on the use
19 of state issued devices or personal devices for
20 state issued business?

21 A I don't recall. I don't think so.
22 It's possible. I don't remember.

23 Q Why don't you open Exhibit 8? Let's
24 see if this refreshes your memory at all.

25 (Whereupon document was marked

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Exhibit 8 for identification as of this date.)

MS. SALZMAN: Jen, can I ask at some point in the next minutes if we can take a short restroom break?

MS. PARK: Yeah, we are going to end the tape shortly anyway, so let me finish up this and then we can take a break.

MS. SALZMAN: Perfect, yeah, thanks.

BY MS. PARK:

Q So what is marked Exhibit 8 says State of New York Executive Chamber Records Retention and Disposition Schedule.

Can you flip through it and tell us if you have ever seen this document before?

A I don't -- I -- it's possible. I -- I don't remember. If I did receive it, I don't remember anybody reviewing it with me or me being told that I had to review it. It's possible that it was one of the links on a page, if that was provided, I -- I don't remember this.

Q And you referred to someone named [REDACTED] earlier. Who is [REDACTED]?

1 Witness 5/19/21

2 A I don't know her title. I don't
3 remember her title, but she was like the office
4 manager, I guess. She helped -- whatever the
5 Governor needed, she helped set up. If it was
6 like a meeting, she would get water, the table
7 tent things. She would help with any issues
8 that came up with IT. She would connect you to
9 the team. She went over the paperwork for me.
10 She helped me get my badge, gave me my
11 Blackberry. She might have helped me set up
12 the -- the background check with the state
13 police, but I don't remember, she -- she did --
14 I think office manager.

15 Q Okay. Why don't we go off the
16 record, take a break?

17 THE VIDEOGRAPHER: Standby to go off
18 the record. This is the end of media unit
19 number one. We are now off the record at
20 10:26 a.m. for break.

21 (Brief recess taken.)

22 THE VIDEOGRAPHER: This is the
23 beginning of media unit number two. We
24 are now on the record at 10:35 a.m. back
25 from break.

1 Witness 5/19/21

2 BY MS. PARK:

3 Q And before we took a break, we were
4 talking about [REDACTED] role and that she
5 was essentially an office manager. Who in the
6 executive chamber was part of the human
7 resources function?

8 A I believe the human resources office
9 was in Albany in a different -- not in the
10 capitol building, in one of the taller
11 buildings across the street and I don't
12 remember their names.

13 I did -- I spoke to -- I think her
14 name is [REDACTED], about my retirement and some of
15 like my benefits when I first started. I think
16 that's the only HR office function that I can
17 recall. Maybe [REDACTED] -- maybe that was part of
18 her role. I -- but -- I went over my benefits
19 with somebody in the office in Albany.

20 Q If you had experienced something
21 that was sexual harassment or discriminatory,
22 who were you supposed to raise that complaint
23 to?

24 A I don't know who I was supposed to
25 go to. That was never discussed to -- to my

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1
2 recollection. I don't know.

3 Q Let's talk a little bit more about
4 your role and -- and when you started. So you
5 started on, you said, you went in on
6 December 30th. You filled out some paperwork
7 and your first real day of work was December
8 31st. Tell us about that day.

9 A It was the Second Avenue subway
10 opening. I don't recall if I went into the
11 office before the event, but I had to go to the
12 event. I just attend and meet people. My job
13 is just to be there. There was no direction on
14 anything -- any one specific task I was
15 supposed to do, just -- just show up.

16 Q What did you actually do at the
17 event?

18 A I -- I tried to have a conversation
19 with people who I knew were on staff and then I
20 had asked [REDACTED] -- I can't recall her last
21 name, [REDACTED], I don't remember her last name
22 right now, but just like who was who and she
23 was working the event, so she didn't have a lot
24 of time to -- to chat and then [REDACTED] was
25 invited to the event, so I met him when he

1 Witness 5/19/21

2 arrived and I spent a little time with ■■■■■ and
3 then just kind of was there, I don't know,
4 until I was able to leave.

5 Q Was that ■■■■■
6 (spellling)?

7 A Yes, it was ■■■■■ .
8 Thank you.

9 Q And after that event, did you --
10 when was the -- the next time you went into the
11 physical office, you went to 633 Third Avenue
12 to work?

13 A It would have been Monday. If we
14 weren't in Albany -- I don't remember if we
15 were in New York or Albany on Monday, but it
16 would have been the next workday, business day.

17 Q And when you began working in the
18 office, whichever office it was, how often were
19 you interacting with the Governor?

20 A In the beginning, my job was to be
21 there whenever he was there and to be there
22 before him. So every day and then on the
23 weekends if they needed staff, I had to go in
24 on the weekends to staff him.

25 Q In the beginning, what were your

Witness 5/19/21

interactions with the Governor like?

A They were -- it was -- excuse me. In the beginning, the -- my -- my relationship with the Governor was -- was good. It was -- he was kind. He had an interest in me and he liked me, so he brought me to different events with him and I flew in the helicopter and in the airplane to various events across the state.

I was in the motorcade with him and he gave some direction on the office dynamics and what to think about and to do and then he would ask me about the mean girls. He called them the mean girls. That's not a name I gave them. And how they were treating me and how I was handling it and my reaction was you're not -- you're not wrong, they're mean. I was like, but I grew up with two sisters who were mean, like it was fine. My sisters weren't mean. They were older sisters. But it was -- it was fine. I was just -- they -- I would be fine. Everything was fine.

And then shortly after that, that's like when I noticed things started to change.

1 Witness 5/19/21

2 The -- the -- I hate to say mean girls, but
3 it's just the easiest way to refer to that
4 group of people. The mean girls, they all
5 started to -- to be short with me because the
6 Governor had an interest and was bringing me
7 around with him to events and I was staffing
8 meetings with him and sitting with him and I
9 was close to the Governor.

10 Q When -- when you say the Governor
11 called a group of people the mean girls, who
12 did you understand the Governor to be referring
13 to?

14 A Jill DeSrosiers, Stephanie Benton,
15 Annabel Walsh, Melissa DeRosa and Andrew Ball,
16 who I noted is not a female. I don't think he
17 identifies himself that way, but he was grouped
18 into that group.

19 Q Why did you -- or what did you
20 understand about why the Governor referred to
21 that group as the mean girls?

22 A My understanding was -- I hate --
23 silly, but what they -- how they're depicted in
24 the movie, that they're just a group of catty,
25 mean, manipulative individuals.

1 Witness 5/19/21

2 Q When you say the movie, you're
3 talking about the movie Mean Girls featuring
4 Lindsay Lohan?

5 A Yes, sorry, yes.

6 Q And you said that the -- at this
7 point you were traveling with the Governor.
8 What kind of modes of transportation did you
9 travel with him?

10 A I have been in the motorcade with
11 him. I have been in the state police airplane,
12 I think that's what it's called, and the state
13 police helicopter.

14 Q And on those occasions, how close
15 were you sitting to the Governor?

16 A It depends on the event, but there
17 were times I would sit in the -- there are two
18 cars in the motorcade, there are times where I
19 would sit in the front car -- the first car
20 with him, so he would be in the passenger seat
21 and I would be in the back seat.

22 Depending -- I don't know how they
23 determined who went where, but sometimes a
24 trooper would be next to me in the back seat of
25 the motorcade with the Governor. It -- so

1 Witness 5/19/21

2 other times, when I was riding along in the
3 motorcade, I would be in the second car and
4 there would be staff in the back seat with me.

5 In the helicopter, it's not big.
6 It -- so you would have the pilot and I think
7 there was a copilot and then the Governor was
8 sitting across from me and there's a trooper,
9 yeah, I think there's just one trooper in the
10 helicopter and then whatever staff he decided
11 to bring along. Usually Melissa was always
12 there.

13 In the plane, the pilot, copilot, I
14 think there's a copilot, so the plane had -- it
15 was small. It was seats on both sides. The
16 Governor sat with his back to the pilot, right
17 behind -- right behind the pilot and then there
18 was a seat directly across from the Governor
19 and then I believe there was a fourth row on
20 that same side and then on the other side, it
21 was the copilot, the door to get in, a seat and
22 then I believe a fourth row.

23 Q When you were traveling with the
24 Governor, did you ever sit next to him, such
25 that your -- any part of your bodies were

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touching?

A Not to my recollection, no.

Q Who decided when you would travel with the Governor?

A I don't know. That was never clear to me. It was the Governor, Melissa, Jill or Stephanie. Based on how he made other decisions, I would assume it was the Governor who said who else he wanted in the -- whatever we were traveling in.

Q On any occasions other than the photographs that we have looked at together, did the Governor touch you?

A No, well --

Q Did the Governor ever --

A He never grabbed me like that.

Q Kaitlin, can you start your answer over again?

A Yes, my apologies. The -- the -- if the Governor had touched me after the December 12th event, it was a handshake. It wasn't anything more than that. The Governor never placed his hands inappropriately on my body besides that one photo.

1 Witness 5/19/21

2 Q And in that photo, did you think the
3 Governor was inappropriately placing his hands
4 on your body?

5 A Yes.

6 Q On any occasions after that
7 photograph where the Governor was shaking your
8 hand, did he ever pull you in close to his
9 body?

10 A I don't remember. I just would hate
11 to say he didn't shake my hand any other time
12 because I'm sure he did. I just -- nothing
13 stands out where he ever touched me
14 inappropriately.

15 Q After that photograph, did the
16 Governor ever hug you?

17 A Not to my recollection.

18 Q Did the Governor ever kiss you?

19 A The Governor never kissed me on the
20 lips, no. To my recollection, he never kissed
21 me. Is it possible he did that Italian thing,
22 maybe, I -- no, I don't think the Governor ever
23 kissed me in any way.

24 Q Did the Governor ever speak Italian
25 to you?

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2 A He said -- he's said like a word or
3 two. I wouldn't call that speaking Italian.

4 Q Did you understand what the words
5 meant?

6 A Yeah, it would have been ciao or
7 bella or something like that.

8 Q That does bella mean?

9 A Beautiful, I think.

10 Q Did the Governor -- okay. Did the
11 Governor ever say any other words to you that
12 were terms of endearment, things like honey,
13 darling, sweetheart, et cetera?

14 A I don't recall the Governor -- my
15 nickname from the Governor was sponge. He told
16 me to be a sponge and to take everything in and
17 absorb everything.

18 Q The Governor called you sponge?

19 A Yes, the Governor called me a
20 sponge.

21 Q Did he call you a sponge in front of
22 other people?

23 A Yes.

24 Q Did you -- how did you feel about
25 being called a sponge?

1 Witness 5/19/21

2 A I did not like the nickname sponge.
3 It's a -- not the best nickname I've ever had.
4 It's embarrassing. I did not like that
5 nickname.

6 Q And why didn't you like it? Why is
7 it embarrassing?

8 A Sponge, it -- I mean, I thought it
9 was condescending or demeaning. I -- I didn't
10 like that nickname.

11 Q Did you ever ask the Governor not to
12 call you a sponge?

13 A No.

14 Q And why not?

15 A Because he's the Governor and if
16 that's what he wanted to call me, then that is
17 what he could call me.

18 Q What did you think would happen if
19 you asked him not to call you a sponge?

20 A It would not be good for my career
21 or my job or my relationship with the Governor.

22 Q And what do you base that on?

23 A My experience in his office.

24 Q Can you tell me anything more
25 specifically?

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A I -- I saw how he treated individuals when -- how he and his inner circle treated individuals when anybody spoke up or spoke out or pushed back. They -- that was not -- I -- I recognize that that was not the right way to do things if I wanted to try to maintain good relationships and so I did not do those things.

Q How would the Governor treat people who spoke up to him?

A It would -- it depends on who you are. If you are -- if you were [REDACTED], if you were [REDACTED], Alphonso, Melissa, Rob or Jill, you -- I don't want to say fine, but you were fine, like you -- it was more tolerable than it was for anyone else.

One example, [REDACTED], he was, I believe, the [REDACTED] when I was there and he would push back or he would let his phone -- wouldn't turn off the sound on his phone on the Monday meetings or he was just a little bit too causal with the inner circle and the Governor and when he was not around, they would speak about him and then

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slowly I saw that he was pushed out. That was a common way to deal with anything that the inner circle and the Governor did not like or went against their norm.

Q Other than sponge, did the Governor use any other nicknames for you?

A Not that I remember.

Q Did the Governor ever say anything to you that had sexual content or had sexual -- or was sexual innuendo?

A Not that I remember.

Q Do you remember offering the Governor your personal cell phone number?

A I do, yes.

Q Can you tell us what happened?

A Yes. It was when I first started. I -- we were exchanging Blackberry pins. I was saving him in my phone and saving my pin in his phone. The Governor communicates using a -- he did then, using a pin -- like a message, a private message. And I had, in his -- we were in his office on the 39th floor at 633 Third Avenue and I had asked if he wanted my personal number as well because my job at that time was

1 Witness 5/19/21

2 I had to be there whenever the Governor was
3 there, but before him, so I thought it was
4 normal to give your boss your number anyway,
5 but I assumed that he would want to get ahold
6 of me any way that he could and that's how he
7 would reach other people as well. It wasn't
8 uncommon for the Governor to have personal
9 numbers for anybody. But when I said that he
10 kind of like reacted in like a -- a way that
11 made me feel uncomfortable in how he looked at
12 me and asked like why I -- I would give him my
13 personal number.

14 I felt like -- it made me feel like
15 I was coming onto the Governor and I -- that
16 was not my intention. I just -- considering my
17 role and what I had known at the time, I
18 thought it was appropriate to offer my personal
19 number to the Governor.

20 Q What about what he said or how he
21 reacted made you think he was implying that you
22 were coming onto him?

23 A It was the look he gave me and the
24 tone in his voice when he asked why he would
25 need my personal number.

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Q We're on video. So can you do your best to replicate the tone of voice that he used?

A Sure. Yes. He -- he was kind of like leaning back and when I asked, he kind of just looked at me intently and was like why would I like need your -- I don't -- it was -- I'm not going to do a great job at this, but -- mimicking what he looked like, but it was -- it was a slow question. It was like inquisitive like a -- like it meant something more like I don't -- I'm not doing a great job of explaining this. I apologize. I don't know.

Q How did it make you feel when the Governor had that reaction to you offering to give him your personal cell phone number?

A I was uncomfortable. I -- I regretted asking him that question because of his reaction.

Q Did you tell anybody -- because you said because of his reaction. Did you tell anybody about that experience with the Governor?

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2 A Immediately after or recently?

3 Q Before December of 2020, did you
4 tell anybody about that incident?

5 A I'm sure. I'm sure I told my
6 friends, but I -- I don't know.

7 Q Do you remember --

8 A -- who I would have told
9 specifically, sorry.

10 Q Do you remember telling anyone in
11 the executive chamber about that incident?

12 A It's possible I told Stephanie, but
13 I don't -- I don't remember.

14 Q While you were in the executive
15 chamber, did you ever hear the Governor making
16 comments about your clothing?

17 A Yes.

18 Q And what did he say about your
19 clothing?

20 A The -- there was one time
21 specifically I had a Gap black and red button
22 down and a black skirt. I thought the outfit
23 was nice and cute and he said I looked like a
24 lumberjack.

25 There were times when I would have

1 Witness 5/19/21

2 to get to the office -- well, I would -- I had
3 to be there before him, but when he would leave
4 early from Mount Kisco and I would get a note
5 from the troopers, the PSU, saying that they
6 were on their way and so I would have to rush
7 out of the shower, rush to throw things
8 together in a bag and run over to the office.

9 I lived on [REDACTED]
10 [REDACTED] and the office was on -- was 633 Third
11 Avenue, so if I could get a cab in the morning
12 across town, I would, but often I just kind of
13 ran over there and he would come in and say
14 like oh, I see you didn't get dressed -- or I
15 see you didn't get ready today. I see you
16 didn't put makeup on.

17 He would always comment on what I
18 looked like when I had to show up however I
19 was, but not put together.

20 Q How did those comments about your
21 appearance make you feel?

22 A Terrible. Defeated. I remember the
23 first time I was just like taken aback, like
24 what did he just say to me. I remember the
25 first time I remember it was very upsetting and

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2 I know that a trooper -- I thought a trooper
3 had overheard what he said and I had asked him
4 about it later and they -- they sat across from
5 my desk behind glass and basically said just
6 don't worry about him.

7 Q What occasion was that where you
8 thought the trooper had overheard the comment?
9 What was the comment from the Governor?

10 A It was -- it was the first time --
11 it was that I didn't get ready or didn't put
12 makeup on because it shocked me that he would
13 say that to me, but then after that, I just --
14 I wasn't as surprised how he would address me
15 sometimes.

16 Q Who was the trooper who you thought
17 overheard that first occasion?

18 A I thought it was [REDACTED], but I'm not
19 100 percent sure it was [REDACTED].

20 Q Have you spoken to [REDACTED] about that?

21 A Recently?

22 Q Yes.

23 A No.

24 Q Is there any reason you're -- you're
25 not sure it's [REDACTED]?

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2 before, whatever the working day was, yes.

3 Q And what year was that?

4 A That would have been 2017.

5 Q Everyone got the roses. What do you
6 mean by everyone?

7 A I probably should not have said
8 everyone, every or at least I thought it was
9 everyone that was on the 39th floor there that
10 was a women that I saw, it was [REDACTED], Annabel,
11 [REDACTED], Annabel Walsh, Stephanie Benton,
12 Jill DeSrosiers, Dani Lover, Staffer #6 [REDACTED],
13 who I -- is Staffer #6 [REDACTED] now. I don't know if
14 the men received one. I don't know if Andrew
15 Ball did or Alphonso. I don't know if
16 executive assistants received them. I guess
17 when I said everyone, I meant his inner circle.

18 Q The women in his inner circle?

19 A Yeah.

20 Q Who gave you the roses?

21 A I don't know. I know -- I don't
22 know. It was just one.

23 Q Was it one rose or -- one rose,
24 okay. How did you know it was from the
25 Governor?

1 Witness 5/19/21

2 A Somebody I think said it. It -- I
3 don't -- I'm not sure.

4 Q Do you have any knowledge about
5 anyone not on the 39th floor getting a rose
6 from the Governor on that Valentine's day?

7 A Lindsey, but I think she said that
8 in her meeting.

9 Q Other than reading about it, do you
10 have any personal knowledge about anyone not on
11 the 39th floor getting a rose on that
12 Valentine's Day?

13 A I don't recall. It is possible that
14 someone on the 38th floor did because that was
15 part of the executive chamber, but Lindsey was
16 at ESD and I think she's on the 37th floor.

17 Q Do you have any personal knowledge
18 of Lindsey Boylan getting a rose on Valentine's
19 Day 2017 from the Governor?

20 A Besides what I read, I don't
21 remember her receiving a rose. It would not --
22 I believe that that is true. I believe that
23 she -- she was probably a recipient of a rose
24 from the Governor on Valentine's Day.

25 Q And why do you believe that to be

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2 true?

3 A Because the Governor had an interest
4 in Lindsey. He -- Lindsey was not in that
5 inner circle in the executive chamber. Lindsey
6 worked for Howard Zensky at ESD, but he liked
7 Lindsey. I don't know if it was because of
8 what she looked like or because of her skill
9 set, but I saw the way that he would summon her
10 to his office that was different from everyone
11 else, the way that he interacted with her, the
12 way that he spoke to her was different. He --
13 he had an interest in her that was different
14 from others and that is why I had -- I support
15 and believe what Lindsey is saying is true. I
16 did not see him harass her, but I believe her.

17 Q We will come back to Lindsey a
18 little bit later, okay. So then you said there
19 were gifts from the Governor on Christmas. I
20 couldn't hear you. What gift did you say you
21 received?

22 A I think it was Christmas. I don't
23 know when else it would have been, but I
24 received a New York State Governor's office
25 like quarter zip, sweatshirt. I believe others

1 Witness 5/19/21

2 received them. I don't know who, but the
3 Governor gave out very nice perfume to the
4 women in that inner circle.

5 Q And by the women in the inner circle
6 who received the perfume, who do you mean?

7 A He -- Staffer #6
8 received the perfume, Dani Lover, Annabel
9 Walsh, Stephanie Benton, I believe Jill
10 DeSrosiers did, I believe Melissa DeRosa did
11 and I don't recall anybody else, maybe
12 ██████████

13 Q Did -- did any of the men's inner
14 circle receive cologne?

15 A I don't know.

16 Q Did the Governor ever ask you about
17 your relationship status?

18 A Yes, he did, at the beginning. I
19 don't -- I didn't remember this at first and
20 then as I started reading the stories and
21 seeing the stories I remember that he did ask
22 me about my relationship status and he did ask
23 me if I had been with an older man. I don't
24 remember a lot of that conversation. I just
25 remember receiving those questions and being

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uncomfortable when he asked me.

Q Can you pinpoint anywhere in time when those conversations happened?

A It was in the -- when he asked me about my relationship status, it was when I had first started. At the time, [REDACTED]

[REDACTED]

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[REDACTED] [REDACTED]
[REDACTED] around
Valentine's Day because he had sent flowers to
the Governor's office for me, so I know that it
was in that window.

Q And -- and what do you recall the
Governor saying to you?

A He asked about my relationship
status [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

Q Was anything else said in that
conversation?

A That -- I think it was in that same
conversation that he asked me about if I had
been with an older man.

Q Did he use those words, have you
been with an older man?

A I don't remember word for word what
he said, but I do -- I do think that he did, I
just -- I can't say with 100 percent certainty,
but I remember him asking that question because
I remember not knowing how to answer it and if

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it would impact my job because that was right after I had just talked to everybody about why he hired me and it was because of what I looked like and if I should -- that I was not going to do anything with the Governor, but if I should conduct myself in a way where I accepted his flirtation.

I don't want to say accepted, but tolerated is probably a better word to use. And then I remember being uncomfortable and not knowing how to answer those questions.

Q Do you remember how you answered?

A I think with the relationship question I said that -- I always tried to be honest with the Governor because I am a terrible liar and I saw that other people when they're dishonest with him that he always found out and I don't understand why people would be dishonest with him because he always found out and he always got angry at them and would yell at them, so it just -- I didn't -- I was truthful. When he asked me about the mean girls, I said yeah, they're mean, they're not kind. So I think I said what my relationship

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2 status was and I think when he asked me about
3 the older man question, I said that [REDACTED]

4 [REDACTED]
5 [REDACTED]
6 Q When he asked you if you have been
7 with an older man, did you understand him to be
8 asking you whether you had dated an older man,
9 slept with an older man or both?

10 A I don't -- I don't know what I
11 thought at the time. I'm sorry.

12 Q You told him [REDACTED]

13 [REDACTED]
14 [REDACTED] ?
15 A Yes.

16 Q Was that true?

17 A Yeah, yep.

18 Q Anything else you remember about
19 that conversation with the Governor?

20 A No.

21 Q You said you remember having
22 conversations about whether you should tolerate
23 the Governor's flirtation. Did the Governor
24 flirt with you?

25 A I don't -- if I said I had

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2 conversations with others about whether I
3 should tolerate that, I -- I had those internal
4 conversations. I don't know if I should be
5 tolerant of that behavior and I -- I was --
6 because I didn't want to lose my job or that
7 salary and go back to the restaurant, but he --
8 I think the -- I know I didn't do a good job of
9 explaining this, but when he -- the person --
10 the phone number, the personal phone number, I
11 thought that that was flirtatious. I thought
12 that was inappropriate, the way -- his tone and
13 his -- how he looked at me and sometimes he
14 just looks at you so intently, it's -- it's
15 different. I don't know how to explain it.

16 It's just -- when somebody is
17 interested in you, it's a different look than
18 if they're not. At least I think so. And so
19 there were times when he just made that eye
20 contact with me that made me uncomfortable.

21 Q Intently kind of starring at you?

22 A Yes.

23 Q Are there other things that the
24 Governor did other than what you described that
25 you consider to be flirtatious?

1 Witness 5/19/21

2 A I -- according the definition of
3 flirtatious, right, I don't know. The
4 situation with the car parts and the computer,
5 that was inappropriate. Was it flirting? I
6 don't know. I don't know -- that's my -- I
7 wouldn't say that's my definition of
8 flirtatious, but it was inappropriate.

9 The time in Albany when he brought
10 me into that -- the room adjacent to his
11 office, I don't think it was flirtatious. I
12 think that it was inappropriate and that he was
13 close to me and made me uncomfortable. There
14 were times in the mansion that I remember
15 feeling uncomfortable. I just don't know if I
16 would define them as flirtatious.

17 Q So just keep in mind, Kaitlin, that
18 this transcript and our conversation today is
19 coming on the back of us having informally met
20 before, so when you say the car parts, what do
21 you mean by the car parts incident?

22 A There was one day when we were in
23 the New York City office. He had called me
24 into his office to look up car parts on e-Bay
25 and he was sitting at his desk and then he --

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2 his computer would have been right behind him
3 and so he had swivelled his chair. I was
4 between the computer and him and I was wearing
5 a skirt and heels and I was looking at car
6 parts for the Governor on e-Bay. That's --
7 that was what I meant by car parts, sorry.

8 Q So on that occasion, was Ms. Benton
9 in the office?

10 A I'm doubting myself. I recognize
11 that. I just -- I don't -- I don't think so.
12 I don't -- I don't believe so.

13 Q And how did the Governor ask you to
14 come into his office?

15 A He just would yell. Where I sat, I
16 could hear him. So he would just tell me to
17 come in. Call my name.

18 Q And when you went into his office,
19 what did he ask you to do?

20 A To turn on the computer and pull up
21 e-Bay and I don't remember the car part he
22 asked me to search for, but it was a car part.
23 I know it was.

24 Q To your understanding, is there any
25 reason why the Governor could not have done

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that himself?

A I don't know why the Governor could not have done that himself unless he does not know how to turn on a computer, which I just don't think that that is true.

Q Have you ever seen the Governor turn on a computer?

A I have never seen the Governor send an email or turn on a computer, but he's 60 something years old. I'm sure he's turned a computer on at some point in his life.

Q Have you ever understood that the Governor knew how to use the internet?

A That's -- my understanding is that the Governor knows how to use the internet, yes.

Q So the Governor asked you to look for -- turn on the computer and go to e-Bay and look for car parts. You said you don't remember what car parts he asked you to look for?

A That's correct.

Q Okay. And when you were standing at the Governor's computer, were you facing a

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wall?

A The computer -- it was a wall or a window. There was a window on that wall, but it -- there's a photo. There's an article that shows that setting, so whatever -- yes, a wall, window wall.

Q And you were facing away from the Governor looking at the computer?

A Yes. My backside was to the Governor.

Q And your -- was he directly behind you?

A Yes.

Q Could he see the computer from where he was sitting?

A I don't know what it looked like from his vantage point, but maybe. I don't know what he saw. I know that --

Q Was he --

A Sorry.

Q Nope, go ahead?

A I know that the computer was in front of me. I was looking up car parts on e-Bay and he was directly behind me. I don't

Witness 5/19/21

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2 know if he situated himself so he could see the
3 computer. I don't -- I don't know. I wasn't
4 looking at him.

5 Q Was he saying anything about what
6 you were doing on the computer while you were
7 doing it?

8 A Not that I recall.

9 Q Did he comment at all on your
10 appearance while you were searching on the
11 computer?

12 A No.

13 Q How far away from you was the
14 Governor while you were doing this search?

15 A It's a tight space. I don't know
16 the distance. It's not a big space. It was
17 between the table and the desk and so it's --
18 the chair and my -- my person, I don't -- I
19 don't know how big that space is. The photo --

20 Q Less than a foot?

21 A I really -- I'm not great with
22 measurements or distances. I -- the photo
23 shows how close that is and if you have access
24 to the floor, you can see, I'm sure the set up
25 was the same.

1 Witness 5/19/21

2 Q So why don't you open on the
3 electronic exhibit binder, Exhibit 11.

4 (Whereupon document was marked
5 Exhibit 11 for identification as of this
6 date.)

7 A Yes, that's it.

8 Q Okay. So this is an article that's
9 titled "It's The Cuomo Way" from March 4th,
10 2021 and this photograph of the Governor seated
11 at his desk. Is this the photograph you were
12 just referring to?

13 A Yep, that's -- that is -- this is
14 it, yep.

15 Q And this is the -- the desk where
16 you were standing behind the desk working on
17 the computer that's pictured in this
18 photograph?

19 A Yes.

20 Q And you told me earlier that you
21 considered -- that you were uncomfortable on
22 this occasion. Why were you uncomfortable?

23 A Because the Governor was -- my
24 backside was to the Governor and I was in a
25 skirt and heels and I felt uncomfortable in

Witness 5/19/21

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that situation.

Q Did you print out anything for him
or order any car parts?

A No.

Q Kaitlin, did you hear the question?

A Yeah, I said no. I'm sorry, did
you -- did I have audio?

Q I didn't hear your answer. There
you go. Maybe it was just me. I didn't hear.

A No, I did not print out -- what --
the question was did I print out anything or
order anything? No, no.

Q So how does this interaction end?

A I pulled up what he wanted and then
eventually I just asked if he needed anything
else and he said no and I left.

Q Did you tell anyone at that time
about the Governor calling you into his office
and having you search for car parts on e-Bay?

A I don't -- I don't think I would
have told anybody in the office, but it's
possible I did tell friends.

Q You told us there was another
occasion in which the Governor made you

1 Witness 5/19/21

2 uncomfortable when you said he got you alone in
3 the room adjacent to his office. Tell us about
4 that incident.

5 A That was in the capitol building in
6 Albany. It was the second floor. His office
7 is the corner office. He -- I don't know why
8 we were in Albany, but he had brought me back
9 to show me the -- his office and the different
10 things that were in there from previous
11 Governors and his father and then you come in
12 through the main door, but then on the other
13 side there is, I believe, a bathroom and then
14 the door to go into the next room. He had
15 brought me into that next room and was showing
16 me a room. I mean I don't think that there was
17 any -- it wasn't set up for anything. If there
18 was furniture in there, it was in the corner.
19 It -- it wasn't like a statue or anything
20 monumental in there, but I remember there was
21 something about the walls or the ceiling that
22 he was showing me, but we were very close and
23 it was very cold and I was shaking and I was
24 uncomfortable and it was dimly lit and it was
25 just odd. I don't know why we were there and

Witness 5/19/21

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2 then we had left. I don't remember exactly how
3 it ended, but it was uncomfortable.

4 Q When the Governor showed you some of
5 the memorabilia in his office, did he point out
6 a cigar box?

7 A Maybe. Maybe, I -- I don't
8 remember. I'm sorry.

9 Q Do you remember, maybe this will
10 help, a cigar box that was gifted to him by
11 President Bill Clinton?

12 A Yeah, I saw that in Lindsay's media
13 piece, it -- it's possible that that was there.
14 I don't remember every specific thing that was
15 in his office. I -- the things that I remember
16 were things of his father's. He just -- he
17 adores his father and so everything that I
18 remember him pointing out was -- was his dad
19 and then the -- I know I should know this, the
20 Governor who was in the wheelchair, I remember
21 him saying certain things about him and things
22 in the office that were related to him. I
23 can't remember that Governor's name, sorry.

24 Q And then you went through the
25 bathroom and into the room that was adjacent.

Witness 5/19/21

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2 inner circle. But it just -- it -- I didn't --
3 it was uncomfortable to be over there. I don't
4 know.

5 Q Can you tell us more about -- was
6 there anything that the Governor did at the
7 executive mansion that made you uncomfortable
8 being there?

9 A Just how he interacted, with not
10 only myself but others, how close he was to
11 some of the women. I just -- it didn't feel
12 right. It just -- I didn't like being over
13 there.

14 Q What do you mean by how close he was
15 to some of the other women?

16 A There were, people like -- the words
17 I want to describe this. It was -- they were
18 like jealous of each other. Everybody was
19 competing for his attention. Everybody wanted
20 the Governor to like them and pay attention to
21 them and there were times when some women would
22 just be very casual and close to him, sitting
23 closely on like the couch or with their arm
24 around him. It just to me I felt -- it felt
25 inappropriate and cult-ish and -- that those

1 Witness 5/19/21

2 car, what he commented on me -- on my attire,
3 what I look like. He wanted me to email
4 commissioners one time asking if they -- more
5 than once, asking if they liked their job and
6 wanted to keep their job because they did
7 something that he didn't like or didn't follow
8 his directions and that made me uncomfortable.
9 The way I had to communicate some of his
10 messages made me uncomfortable to others.

11 Q And just to be clear, the
12 communications of those messages, it was the
13 aggressive tone about them?

14 A Yeah, I would never ask the
15 commissioners if they liked their job and
16 wanted to keep their job. I don't agree with
17 that.

18 Q Did the Governor ever yell at you?

19 A Yes.

20 Q Tell us about that.

21 A They're -- I mean, it was on more
22 than one occasion, so I also felt uncomfortable
23 here. He -- there was -- there were -- the
24 phones would stick and so sometimes the calls
25 couldn't -- wouldn't transfer and they would

1 Witness 5/19/21

2 drop or -- and he would -- he had said that if
3 I couldn't figure out the fucking phones, he
4 would end my career. If photos got into the
5 thank you note process or pile that he didn't
6 look good in or you could see his bald spot or
7 something was wrong, I would get yelled at.

8 If we couldn't get somebody -- if he
9 wanted to speak to somebody on the phone, he
10 would say get so and so. If he couldn't get
11 them in a timely manner maybe because they
12 weren't available, I would get yelled at.

13 It just depended on the day and the
14 mood he was in, but it -- it was not uncommon
15 for me to get in trouble for something
16 ridiculous, in my opinion.

17 Q Did the Governor ever say anything
18 to you that you found to be belittling other
19 than calling you a sponge?

20 A How he would speak to me. The --
21 I -- telling me he would end my career over
22 transferring the phone is belittling, I think.
23 The whole -- how I got the job and came on
24 board and worked in the executive chamber is
25 belittling to me. They're -- I -- there was no

1 Witness 5/19/21

2 you have different experiences with different
3 members of that group?

4 A It was Stephanie Benton, Annabel
5 Walsh, Melissa DeRosa and Andrew Ball. Jill
6 DeSrosiers I wouldn't bucket into that, but she
7 just -- I wouldn't say that she like went above
8 and beyond to try and be helpful. She just
9 didn't play into those games, I would say.

10 Q And so you -- you described that
11 group of the mean girls minus Jill as being
12 dismissive. Did anyone in that group ever yell
13 at you?

14 A They used aggressive tones with me.
15 I wouldn't say like yelled at me like how the
16 Governor would yell at me. Maybe Andrew Ball,
17 but I wouldn't say -- I wouldn't classify it as
18 yelling, but they got aggressive in their tone.

19 Q Can you remember any specific
20 occasions in which the members of the
21 Governor's senior staff that kind of stick out
22 in your mind as an exemplar of them being
23 dismissive with you or aggressive with you?

24 A The one time with Andrew, I rode out
25 in the motorcade with the Governor to a press

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2 conference out on Long Island. I left my purse
3 in the motorcade because I assumed I would be
4 riding back with the Governor, after the press
5 conference. I don't know what happened
6 outside, but Andrew yelled at me because my
7 purse was in there and the Governor was leaving
8 and that I wasn't going back with him. I -- I
9 yelled back at Andrew that time, but that was
10 after him treating me poorly prior to that too.

11 There would be times when I would
12 try to ask Stephanie questions about how to do
13 my job or how to do anything that any number of
14 things that the Governor had asked me to do
15 where she wouldn't look up from her computer or
16 acknowledge my presence. She had to be very
17 short and not give a detailed response.
18 Annabel and Melissa would do similar things.

19 It was -- it wasn't uncommon, so I
20 mean it seemed like every day there for a
21 little while that's just what life was, but
22 there were sometimes that I was more aggressive
23 than previous, like the Long Island incident
24 and then -- I can't think of any other specific
25 event right now, but that was the norm.

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2 Q Did your role in the executive
3 chamber change at any point?

4 A It did.

5 Q When and how did it change?

6 A When was sometime after the State of
7 the State in 2017 -- no, I'm sorry, the budget
8 in 2017. And I -- he -- they had wanted me to
9 report to [REDACTED] instead of the Governor and
10 when I had the conversation with the Governor
11 and I asked him why, had I done something
12 wrong? He tried to say that it was because he
13 wanted me to learn from [REDACTED], but it -- they
14 just didn't like me anymore.

15 Q And -- and when you say [REDACTED]
16 who?

17 A [REDACTED]. Sorry, [REDACTED].

18 Q And how was your role going to
19 change from going -- from reporting to the
20 Governor versus reporting to [REDACTED]?

21 A It wasn't clear. I had no idea what
22 I was supposed to be doing for [REDACTED]. She -- I
23 don't think she knew what I was supposed to be
24 doing for her. It was just he was done with me
25 and pushed me over to [REDACTED], but there was

Witness 5/19/21

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2 still times when I had to staff the Governor
3 and sit there, so it was -- I was on call for
4 whatever he wanted. So then there were times
5 when I would leave on the weekends, sorry, I
6 would go upstate or do something different, I
7 would be in New York, and they would ask me to
8 come into the office and I wouldn't be there
9 and then I would get yelled at for not being
10 available for the Governor.

11 Q This is when you were reporting to

12 [REDACTED] ?

13 A This was throughout the whole time,
14 but I felt like I was -- I had more liberty to
15 leave when I was working for [REDACTED], but I
16 didn't -- I was supposed to be wherever the
17 Governor was or in New York.

18 Q And you said it was your
19 understanding that you were being moved between
20 roles because they didn't like you. Who is
21 they and how did you come to that
22 understanding?

23 A They would be that same inner
24 circle, Andrew, Melissa, Stephanie, Annabel,
25 the Governor. I don't think Jill cared one way

Witness 5/19/21

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2 or the other. I think she just did what she
3 was told. And I came to the understanding
4 because of what I had experienced in how he
5 treats other people and how he pushes them
6 aside when he's done, how they do that, how
7 they talk about people behind their backs and
8 then I went to **Staffer #5** a lot to ask
9 questions about his past experience in and
10 workplace knowledge and history about how
11 people operated and would -- based on his
12 feedback or response came to that conclusion as
13 well.

14 Q When was the State of the State in
15 2017?

16 A The State of the State is in
17 January. It was -- it was after the budget,
18 yeah.

19 Q Okay. That's in April. Okay. And
20 what had changed about the way the Governor was
21 interacting with you?

22 A He just -- I was -- I wasn't going
23 on as many trips with him. I wasn't staffing
24 him like I used to. I wasn't in meetings.
25 Something happened where I upset somebody. I

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1 did something and that was -- that was it.

2 I had to leave for one weekend
3 during budget season in Albany because a

4 [REDACTED] --

5 [REDACTED] --

6 they like didn't want me to go. I didn't think
7 I was actually going to be able to go at first
8 and it was after all of that.

9
10 Q But you did go?

11 A Yeah -- no -- yeah, I went, yes.

12 Q And what do you recall discussing
13 with Staffer #5 [REDACTED] about your change in role?

14 A I just -- I don't recall a specific
15 conversation. Staffer #5 [REDACTED], I have had many
16 conversations with Staffer #5 [REDACTED] throughout my time in
17 the Governor's office about how one person
18 operates or does something and got his opinion
19 or advice or guidance on things. He's a -- he
20 is a very knowledgeable guy and knows how the
21 whole office operates.

22 Q When you began reporting to
23 [REDACTED], did your physical desk location
24 change?

25 A Yes. I went around the corner and I

Witness 5/19/21

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2 sat in the same perimeter office with Staffer #6
3 Staffer #6 and [REDACTED].

4 Q So how many doors down from the
5 Governor were you at that point?

6 A When you come up the stairs to the
7 39th floor, right when you walk up, there is
8 the wall with all the offices. He's in that
9 corner, so if you were to turn that corner, I
10 was right around the corner, not halfway down,
11 so seven doors, I don't know, that's a quick
12 guess. I can spend more time to try to count
13 that if you would like.

14 Q Okay. When you were reporting to
15 [REDACTED] what work were you doing?

16 A That was when I went and asked Kelly
17 Cummings if she had something that I could do.
18 That's when I asked [REDACTED] if he had
19 something I could do. That was the thank you
20 notes. I had assumed that -- a larger role
21 with those. And then whenever the Governor
22 needed to be staffed, that's what I would do.

23 I don't recall a task that [REDACTED]
24 gave me. I don't think she was being unkind or
25 demeaning or anything in that. I just don't

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1 think she expected that or knew what to do.
2 She was more of a communications chief of
3 staff, if you will. I think that was her role
4 at the time. So I -- and I didn't do anything
5 with comms, so it just didn't fit.
6

7 Q When you say thank you notes, what
8 do you mean?

9 A After a Governor's event, he sends a
10 thank you note to people who attended. And
11 then if there's a photo, the photo goes with
12 the thank you note and they all get sent out
13 and they're drafted in Albany and sent to
14 wherever he is to -- after the photos and the
15 letters are matched to review and then I would
16 review them, pass them on to Stephanie and
17 Stephanie would give them to the Governor to
18 review and that's where he would see a photo
19 that he didn't like or pay attention to anyone,
20 attendee, and either personalize the letter or
21 the note or the photo and then send it -- give
22 them back to Stephanie, give it to me to send
23 out. Well, I would give them to somebody else
24 and they would send them out.

25 Q But the letters and the pictures

1 Witness 5/19/21

2 came to you already prepared?

3 A They were -- the letters were
4 drafted and printed and then the photos I had
5 to select which ones to print and then match
6 them and send them.

7 Q So at some point you -- you left the
8 executive --

9 A I'm sorry, the -- the -- the
10 regional rep. There are ten regions in New
11 York. The regional rep in that region where
12 the event was, they matched the photo -- the
13 number of the photo to the person in the event
14 and I got the matching and then I printed and
15 matched the photos. Sorry, I misspoke.

16 Q That's helpful. At some point you
17 left the executive chamber. How did that come
18 about?

19 A That was right before the State of
20 the State in January 2018. Jill DeSrosiers
21 approached me and said that what they were
22 doing was not fair to me and that -- asked if I
23 would take a role in a state agency or
24 authority and I said that I was looking at
25 other jobs and that I wanted to leave and that

1 Witness 5/19/21

2 I would -- I would look or consider if I could
3 pick out the agency and if everything would
4 transfer laterally.

5 Q Before that conversation with Jill,
6 had you expressed to anyone in the executive
7 chamber a desire to leave the chamber?

8 A I likely expressed that to people
9 that I had a better relationship with, so that
10 would have been like ██████████ or Staffer #5. I
11 wouldn't say I was close with ██████████,
12 but we both wanted to leave, so I would have
13 said that to her. I would have said that to
14 Alessandra Biaggi because she was close -- I
15 can't think of her name, but there was another
16 woman, ██████████ and another woman who came
17 from I think the Obama world who were close and
18 would come into our office.

19 I would -- I would not have told
20 anybody in the Governor's inner circle that I
21 was looking for a job because it was well known
22 that they would contact that employer and have
23 them rescind their job offer.

24 Q How did you come to the
25 understanding that members of the Governor's

1 Witness 5/19/21

2 senior staff would contact someone's future
3 employer to have offers rescinded?

4 A I -- I think I heard it from Andrew
5 Ball and I think it was confirmed by Staffer #5
6 Staffer #5 . It was -- it was one of the two or
7 both.

8 Q When you heard that from Andrew
9 Ball, did you hear that -- was that his
10 personal experience or was he sharing someone
11 else's experience?

12 A He didn't -- I don't think he said
13 it directly to -- I think I overheard him say
14 that to somebody outside because they would all
15 gather at my desk and talk until the
16 Governor -- until they went into the Governor's
17 office and when he wanted them to come.

18 I'm fairly certain that is what I
19 heard and then I am pretty sure I talked to
20 Staffer #5 about it.

21 Q And when you overheard it, was Mr.
22 Ball talking about his own experience or was he
23 talking about someone else?

24 A I don't remember. I'm sorry.

25 Q It's okay. So when Ms. DeSrosiers

1 Witness 5/19/21

2 said to you something along the lines of it's
3 not fair what they're doing to you, what did
4 you understand her to mean?

5 A That they had -- how they brought me
6 on and then pushed me off to [REDACTED] and how I
7 didn't have a real job.

8 Q Was there anything in the
9 conversation with Jill that day or your prior
10 discussions with Jill that made you think
11 that's what she meant?

12 A I think we just both understood that
13 that was what it was and that was the situation
14 and I likely made a comment about how I was --
15 I didn't do anything.

16 Q And when you told her that you would
17 want to -- I think you said pick the agency and
18 transfer everything laterally, what did she
19 say?

20 A She was open to it. She may have
21 hesitated at first, but she agreed to let me do
22 that.

23 Q Did she ask you what kind of
24 agencies you might be interested in or what
25 type of work you might be interested in?

Witness 5/19/21

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2 A She may have asked about the type of
3 work, yeah, because my [REDACTED]
4 [REDACTED], so I think we had the conversation
5 about where I could use my degree. But I -- I
6 can't say for certain if that happened. I -- I
7 think it did.

8 Q Do you remember in that first
9 conversation with Jill discussing any
10 particular agency?

11 A No, I'm sorry, I don't think we
12 talked -- discussed any in that first
13 conversation.

14 Q Why don't you open the electronic
15 exhibit binder.

16 A Mm-hm.

17 Q And look at what is marked as
18 Exhibit 7.

19 (Whereupon document was marked
20 Exhibit 7 for identification as of this
21 date.)

22 Q And this will be a little
23 complicated, Exhibit 7 has a lot of pages.

24 A Mm-hm.

25 Q And Hyatt might be able to help us,

1 Witness 5/19/21

2 but I want you to look at what, at least in my
3 binder is labeled page 186. It's an email from
4 Jill to you on December 27th, 2017.

5 MS. PARK: Hyatt, do you have the
6 page number of the PDF for that?

7 MS. MUSTEFA: I believe it's 187 in
8 the PDF.

9 MS. PARK: Thank you.

10 MS. MUSTEFA: But it should have the
11 page number that says 186.

12 BY MS. PARK:

13 Q And just so the record is clear,
14 we're going to mark this as Exhibit 7.

15 A Okay.

16 Q Do you remember this email chain
17 with Jill?

18 A When I found it I recalled, yes.

19 Q Okay. What do you remember about
20 this email chain?

21 A This was after we had the
22 conversation in person about this and I was
23 miserable and I just wanted to know when I
24 could -- when my last day was, so I could
25 leave.

Witness 5/19/21

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2 Q And she proposes -- she says because
3 you referenced [REDACTED] being an area of
4 interest, we did some looking into [REDACTED]
5 positions. Do you remember referencing [REDACTED]
6 [REDACTED] as an area of interest in your
7 conversation with Jill?

8 A I thought that I had done research
9 on the agencies and asked her for the -- for
10 the -- the three, but maybe it -- we talked
11 about a topic, I -- I thought that I had
12 said -- I remember looking up where the
13 agencies were located because I didn't want to
14 be based in Albany and I wanted to stay in New
15 York and have something convenient and that's
16 how I landed on [REDACTED] because it was a seven
17 minute walk from my apartment, but I had wanted
18 something that was -- something to do with my
19 degree, so I thought I had suggested [REDACTED] and
20 then [REDACTED] was important to me, in trying to
21 [REDACTED], so I thought I could get experience
22 at [REDACTED], [REDACTED] and learn
23 something there. That's what I remember, but
24 it's possible I'm not remembering correctly.

25 Q Okay. So at some point you think

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affairs team, reporting to [REDACTED].

Q And is that the role you eventually accepted?

A Yes.

Q And any other conversations or -- or communications you remember with Jill prior to you moving over to [REDACTED]?

A We had one or two, maybe three in person conversations when I would -- when she first approached me about this, a follow up and then maybe after my trip up after the interview, but if it was an email correspondence, I feel like I would have printed it since I printed those, but I -- I don't -- I don't think that I have any -- I don't.

Q Do you know who Jill was speaking to, to work on your transition to [REDACTED]?

A I think it was [REDACTED] based on that email and then based on a conversation I had with [REDACTED], the current president CEO, when I had first asked [REDACTED] to speak with her about what was happening with the situation back in December, she said -- she

Witness 5/19/21

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made a comment about how [REDACTED] had told [REDACTED] that I had come from the chamber and was kind of pushed onto [REDACTED], but she didn't know -- if she knew, she didn't tell me much more than that, so -- but [REDACTED] was saying that as she knew there was something there, so I think --

Q Do you feel --

A Sorry.

Q [REDACTED]. That's okay. Did you deal where anyone else in the executive chamber as part of your transfer or transition to [REDACTED]?

A If I did, it would have been [REDACTED] or -- I forgot the woman's name. I think [REDACTED] maybe.

Q [REDACTED]

A Yep. She would have been involved in the paperwork side of things, but just Jill.

THE VIDEOGRAPHER: Excuse me.

Q And -- we're at time I think, so why don't we go ahead and go off the record.

THE VIDEOGRAPHER: Let's switch the media unit out. Standby, please. Thank you. This is the end of media unit number

1 Witness 5/19/21

2 two. We are now off the record at
3 12:21 p.m.

4 (Brief recess taken.)

5 THE VIDEOGRAPHER: This is the
6 beginning of media unit number three. We
7 are now on the record at 12:31 p.m. Back
8 from break.

9 BY MS. PARK:

10 Q As you were leaving the executive
11 chamber, Kaitlin, did you send a farewell
12 email?

13 A I sent a -- to only the people that
14 I had a better relationship with.

15 Q Did that include some members of the
16 Governor's protective detail?

17 A Yes. That was --

18 Q Why did you send?

19 A Sorry?

20 Q Sorry.

21 A There were two. One was to staff in
22 the executive chamber that I was close to and
23 the other was to the detail.

24 Q Why did you sent it to certain
25 members of the Governor's protective detail?

Witness 5/19/21

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2 A The -- their office was across from
3 where I sat and so I had been -- I mean they
4 looked at me all day, so I had become friendly
5 with them and whenever I was with the Governor,
6 they were always there and they were just kind
7 people as well, so they were at times the only
8 people who I could speak to or felt like I was
9 a person, I could be, I existed to somebody.
10 We -- we just -- they knew how tough that role
11 was and we became friendly.

12 Q Did any of the members of the
13 Governor's protective detail ever offer you
14 advice about working in the executive chamber?

15 A Yes.

16 Q Okay. Who was that and what was the
17 advice?

18 A He's no longer there, but he was
19 Captain [REDACTED]. He had -- I don't remember
20 everything that he wrote down, but he -- after
21 an event, somewhere upstate, he tore a Wegmans
22 to go box that had our lunches in it and wrote
23 down things to remember or to think about or
24 what to do to survive in that office.

25 I -- I thought I had saved it, but

Witness 5/19/21

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2 I -- I didn't. It was basically -- don't say
3 you don't know something, always make sure you
4 will find out the answer and don't take things
5 personally was one of them, it's not me and
6 then some other advice, I just -- I don't
7 recall, but it was the gesture and the kindness
8 was meaningful.

9 Q Let's talk about your time at
10 [REDACTED]. When you were at [REDACTED], did you
11 tell anyone about your experiences working for
12 the executive chamber and interactions with the
13 Governor?

14 A Yes, eventually. In the beginning I
15 didn't -- and I didn't -- I don't think I ever
16 disclosed every detail about what happened, but
17 in the beginning it was just -- it was, I
18 think, very clear to some people that I -- I
19 didn't like the Governor. I thought he was an
20 asshole. I have said -- I have likely said an
21 asshole. And that it was a difficult time and
22 some people would say be careful who you say
23 that around. I refuse to go to Governor's
24 events. I didn't want to be anywhere near him.
25 I -- I wasn't shy about my dislike of the

Witness 5/19/21

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2 Governor.

2

3

Q Did you ever -- apologies, go ahead,
4 Kaitlin.

4

5

A Sorry. It's just eventually, when I
6 was -- so I was on the government affairs team
7 and then eventually [REDACTED], who was

7

8

the [REDACTED], I

9

10

think he's now just the chair of the [REDACTED]
board, but he -- his team needed support, so

11

they had asked me to split my time between his

12

team and the [REDACTED] government affairs team,

13

so I had assumed that role and -- but before I

14

accepted, I said that like I didn't want to

15

have any sort of communication with the

16

Governor's team.

17

If the Governor were to call, I

18

wasn't going to answer the phone, like I

19

just -- there needed to be a separation. And

20

they didn't really understand why because I

21

didn't disclose everything at that time at

22

first, but they were fine with it and they were

23

helpful and -- and understanding and then there

24

were a couple of occasions where we needed to

25

have a meeting at 633 Third Avenue, the

1 Witness 5/19/21

2 Governor's office and I -- I didn't want to go
3 and I refused to go prior, but then eventually
4 I asked if we knew if the Governor was there
5 and if he wasn't there, I would be more likely
6 to go over there.

7 So after one meeting on the 38th
8 floor, the Governor wasn't in the building, but
9 [REDACTED], [REDACTED] and I stepped
10 into the side office next to where the detail
11 sits on the 38th floor and I -- I told them
12 about the computer, the commentary on my
13 outfits and what I look like, and just how
14 toxic that environment was.

15 Q Why did you tell them on that
16 occasion about your experience with the
17 Governor and the executive chamber?

18 A I think it was because I was so
19 anxious, I was shaking when we were there and
20 then I just started crying, so we went into the
21 room and it just came out. I -- I don't -- I
22 don't know. Sometimes I get a little nervous
23 and do things like that.

24 Q And when you say the car story, are
25 you talking about the occasion in which the

1 Witness 5/19/21

2 Governor had you at his computer looking on
3 eBay for car parts?

4 A Yes, that's what I meant, sorry.

5 Q And what did they say in response to
6 you telling them about your experience?

7 A They apologized. They were sorry.
8 They just -- they knew that he was mean and
9 difficult to work for, but they just -- they
10 didn't know the extent of how bad it was for
11 me.

12 Q Did they tell you anything about
13 reporting your experience?

14 A I don't -- I don't know.

15 Q Do you have any knowledge as to
16 whether they told anyone else at that time what
17 you had told them?

18 A No, I don't.

19 Q Is there anyone else you
20 specifically remember at ████████ before
21 December of 2020 telling the details of your
22 experience in the chamber?

23 A I -- I had conversations with my
24 current boss about my experience in the
25 chamber, but I don't -- I never went into the

Witness 5/19/21

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2 details with him on certain things. I -- I
3 don't even know now if he knows some of the
4 stories, but he -- I have had conversations --
5 he knows that I dislike the Governor. He's
6 aware. I don't remember everything I've told
7 him. It's possible.

8 Q Who is your current boss?

9 A [REDACTED].

10 Q And how did it come to be that you
11 started reporting to [REDACTED]?

12 A So I was splitting my time working
13 with [REDACTED] and the government affairs team.
14 [REDACTED] was retiring, I think in February of
15 2019, and so the conversation was that I needed
16 to stay and get some more experience in the
17 [REDACTED] world to help my career and that
18 if I stayed another year, he would -- [REDACTED]
19 would help me find a job after and -- because I
20 didn't -- I didn't want to be there.

21 I didn't want to work for the state
22 because I didn't want to work for the Governor.
23 I was fine with [REDACTED]. And that I would have
24 to go to a program team. I didn't want to go
25 to a program team, so we decided on -- [REDACTED] was

1 Witness 5/19/21

2 working on this road map project, the [REDACTED]
3 [REDACTED] team. They needed help and
4 then the [REDACTED] because I had that same
5 thought about finance and make some money one
6 day and I interviewed with each of the teams
7 and I just -- I picked [REDACTED] team because [REDACTED]
8 is a very relaxed -- he's not like a micro
9 manager. He's pretty easy going and so I -- I
10 kind of thought that that would best suit my
11 needs in a boss, management.

12 Q Let's go to December of 2020. So
13 how did you become aware of Lindsey Boylan's
14 tweets about her experience in the executive
15 chamber?

16 A My boyfriend and I were at the dog
17 park and he asked if I saw the article or the
18 news and I didn't at the time and so I had
19 looked it up.

20 Q And earlier you had told us that you
21 had seen Lindsey Boylan during your time at the
22 executive chamber and that you had observed
23 that the Governor had treated her differently
24 from other people. Can you tell us more about
25 that?

Witness 5/19/21

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2 A Yes. The Governor was interested
3 in -- so the -- it wasn't common for the
4 Governor to interact closely with other
5 agencies' staff at Lindsey's role, in her
6 position.

7 He worked closely with Howard and
8 Lindsey and maybe [REDACTED] and [REDACTED] --
9 [REDACTED] and [REDACTED].

10 But the -- I don't know how many agencies there
11 are, but it was -- the relationship he had and
12 how he called Lindsey in was very unique, like
13 any other agency it was through the
14 commissioner of the presidency or whoever the
15 lead -- the head of the agency was. And
16 Lindsey was who he would go to most of the time
17 instead of Howard and so it would be get
18 Lindsey and so get -- and not get Howard and so
19 when he would travel sometimes it would be
20 Lindsey with him or Lindsey in the meetings
21 with him. It was -- that wasn't the norm or
22 consistent with how he did things with other
23 agencies and he had an interest in Lindsey.
24 Lindsey was -- is always put together. Always
25 looks very nice and kind of fit the mold for

Witness 5/19/21

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him.

Q Did you ever see the Governor engage in flirtation with Ms. Boylan?

A The definition of flirtation. This is tough for me to answer, I'm sorry. He treated her differently. I -- flirtation to me is something you do with your partner, right. It's not -- I think it's different, but he had an interest in her. He -- he -- he wanted her around him. When he had something going on, he wanted her present. He wanted her at events. He wanted her in the meetings. He -- he wanted her around.

The way he spoke to her was often in a different tone than other people. He was kinder. He had -- it seemed like more respect for her than others and maybe that's just because he was interested. It was -- it was different and I noticed that and then so I -- not having that support structure or team, comradery with the -- the mean girls, I had noticed Lindsey and had been kind to her to, you know, to try and seek guidance for other things in the office and just how to get by day

1 Witness 5/19/21

2 to day. That never really came -- turned into
3 anything. We didn't sit on the same floor and
4 I couldn't really leave my desk, so it was just
5 whenever she was there waiting to go into his
6 office when we connected, but it just wasn't
7 the norm.

8 Q Prior to Ms. Boylan's tweets in
9 December 2020, when was the last time you had
10 communicated with her?

11 A I think I sent her -- yes, there was
12 like a screen shot of my ballot for the primary
13 when she was voting against Nadler. She was my
14 district. I voted for Lindsey, though I just
15 sent it to her on Twitter and then prior to
16 that, it was when I was leaving the chamber,
17 she connected me to ██████████ who used to
18 work -- or at ██████████, maybe in the chamber
19 side. He was on ██████████ team, so I don't
20 know who paid him, if it was chamber or
21 ██████████, but she connected me to him to ask him
22 for advice and to have somebody there who kind
23 of knew both worlds. I -- I don't think I had
24 connected with Lindsey two times.

25 Q Lindsey tweets, your boyfriend

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pointed it out to you and then what happens?

A I tweeted in support of -- I was angry. I was just -- I believed her. I -- it was -- I just got worked up and angry with the Governor again and tweeted in support of Lindsey saying that I believed her.

Q And then what happened?

A So I tweeted in support of Lindsey and then I believe it was the next week when I started noticing Linda Lacewell and Annabel Walsh looking at my LinkedIn and then Staffer #6 Staffer #6 had called me. I missed her call. I was on a work call and then she texted me saying it was her and that she wanted to talk to me about my tweet. Then she -- I spoke to Staffer #6 and she had said that -- I played dumb on the phone with Staffer #6 to try to figure out what she knows --

Q Kaitlin, why don't you pause just for a second, okay? So you -- you tweet in support of Lindsey?

A (Indicating).

Q Right. Did you leave that tweet up?

A I deleted it. I don't -- I deleted

Witness 5/19/21

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2 it maybe when I saw Linda and Annabel looking
3 at my LinkedIn or after Staffer #6 and I spoke. I
4 deleted it in that timeframe because I was
5 worried about getting fired. I deleted it. I
6 told my boss what happened. I told [REDACTED]
7 [REDACTED] what happened. The conversation
8 was this is what I did. I would do it again.
9 I don't regret it, but I -- the tweet has been
10 deleted and I accept whatever happens because
11 of this.

12 Q Can we -- can you just slow down
13 just a little bit, okay? So you -- you deleted
14 the tweet. Had you ever, previous to that,
15 delete -- tweeted negative things about
16 Governor Cuomo?

17 A Probably. I don't -- I don't know.
18 Did I -- I don't -- I don't know every single
19 tweet. I screen shot tweets. If there was a
20 negative one in there and it was before that,
21 then yes. That was December. Over the summer
22 I had issues where I lived in midtown because
23 Covid and the situation in Midtown just got
24 dangerous and I tried to get support from my
25 City Council member and when I couldn't, I

1 Witness 5/19/21

2 started tweeting at him and I think I've tagged
3 Cuomo in some of those, but that was not
4 related to anything to do with this. It was --
5 it was dangerous where I was living in midtown.

6 It -- there could have been other
7 tweets that I deleted when I deleted that tweet
8 in support of Lindsey as well, sure, probably,
9 but I don't -- I don't know. I would tweet in
10 support of him when I worked there. I couldn't
11 tweet bad tweets about my boss at the time,
12 right.

13 Q The Covid tweet that you're talking
14 about or the tweets about midtown and what was
15 going on in midtown, did anyone at [REDACTED] ever
16 talk to you about those?

17 A No, nobody ever mentioned my
18 Twitter. The -- the Covid tweets were after
19 January -- well, the -- the living situation in
20 midtown was over the summer of 2020 and then
21 there was the tweet about Lindsey in
22 December 2020 and then there was the tweets in
23 2021 that talked about how I disagreed with his
24 handling of Covid.

25 Q So between the time Lindsey Boylan

Witness 5/19/21

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2 tweets in December 2020 and the time you see --
3 you speak to someone at [REDACTED] about the
4 tweets, had you been in contact with any
5 lawyers? I don't know what you talked about.
6 I just want to know if you were in contact with
7 any lawyers.

8 A That's okay. So I had reached out
9 to Lindsey telling her that I supported her and
10 that if she needed anything to let me know and
11 Lindsey had asked if I would speak to her
12 lawyer to corroborate her story and I had a
13 conversation with -- I don't think she -- she
14 was actually Lindsey's lawyer at the time. I
15 don't know. I don't know the dynamics. I know
16 that her lawyer that represented her then is
17 not the same person who represents her now. I
18 don't know the details of what happened between
19 the two.

20 She -- I had told -- I said that I
21 didn't see the Governor harass Lindsey, but I
22 could talk about my experience in his office
23 and then whatever she does with that, she --
24 she does, I -- I don't -- whatever they needed
25 from that they could do, but I didn't want my

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Witness 5/19/21

Staffer #6 had recorded that phone call?

A That she -- I was in the State of California and technically she can't use that for anything, but I didn't say anything that I would be worried about or upset if it were shared.

Q She didn't tell you she was recording it, did she?

A I -- I am not -- I don't -- the thought of her recording that conversation has never crossed my mind until you just asked me about it, so I -- I don't think she told me that she recorded it. No, she wouldn't have. No, she didn't say that.

Q So after the call with **Staffer #6**, you said you reached out to someone at **██████████**. Who did you reach out to?

A I told my boss what was happening and then we had agreed that I should tell **██████████**, just for awareness because I didn't want her to be caught off guard by the executive chamber and then eventually I told **██** what was happening to get his advice.

Witness 5/19/21

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well?

A He was not on that first call with [REDACTED]. So I had from -- additional background, my -- my boyfriend worked for [REDACTED] [REDACTED] and he has a very good relationship with her. They have -- and so it was -- I didn't want her to be caught off guard by chamber and I just have a lot of respect for her and my partner and I wanted to not put anybody in that situation. And so I had -- I think it -- I think the number I received was her personal number and I tried to do it all after work hours and get her on the phone and tell her what was going on.

We ended up connecting on a Friday after work and I told her what the situation was. I told her about the tweet. So I said I can tell you the same thing -- what I have said consistently, I can tell you about my experience. I don't consider it sexual harassment. And then --

Q Did you tell her about your experience? Did you give her any details?

1 Witness 5/19/21

2 A It is possible I told her about
3 something. I don't -- I did not -- I don't
4 believe that I went into -- into details like I
5 did with [REDACTED] in that moment. She had
6 called me late and I was trying to get off the
7 phone because I had a tee time. I was at the
8 golf course trying to go play golf and we were
9 late, so I was -- I was trying to be quick with
10 it and tell her what was happening and get off
11 the phone.

12 Q You said you told her what you
13 experienced, you didn't consider it to be
14 sexual harassment. Why don't you consider what
15 happened to you to be sexual harassment?

16 A Because my experience with sexual
17 harassment is very different and so I don't
18 think of it as sexual harassment.

19 Q And when you say that, and I don't
20 want to pry into other experiences, but have
21 you had another experience that you would
22 consider to be sexual harassment that was worse
23 than what this was?

24 A [REDACTED]

25 [REDACTED]

Witness 5/19/21

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2 A No because I could -- I didn't think
3 I needed one and I couldn't afford one. It was
4 never something I had entertained because I --
5 I knew right away that I couldn't afford it.

6 Q Did you tell [REDACTED] anything
7 about having spoken to Ms. Boylan's lawyers?

8 A I don't -- I don't think so, but I
9 don't know how else that they would have gotten
10 to that conclusion, so maybe.

11 Q And in that conversation, did
12 [REDACTED] say anything to you about her
13 obligations to report what she had told you,
14 what you had told her?

15 A I think I brought it up and I said I
16 understand that you have to do whatever you
17 need to do on your end, but -- because I didn't
18 want to involve our [REDACTED],
19 [REDACTED] -- I
20 don't know if he's in the chamber now, but he
21 was in the chamber when I was there and it's
22 not that I dislike [REDACTED], I just didn't
23 want to put [REDACTED] in that situation.

24 Q And did she say anything to you on
25 that call about you being protected from

Witness 5/19/21

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retaliation?

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A She reiterated that I couldn't lose my job and I said that if the Governor wanted me gone, I would be gone. Thanks for -- for believing that that is true, but I didn't -- if he wanted me gone, I would be gone.

8

9

Q Anything else you remember about that first conversation with [REDACTED]?

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A I -- I said I didn't want anything from her. I didn't -- I wasn't asking for any favors or to keep my job. I just wanted her to be aware of the situation.

14

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Q And what happens after you speak to [REDACTED]?

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A We hung up and then the following week she had called me back and said that she had to report it to counsel because -- she asked if it would be okay if she connected him, and dialed him into that conversation and so I said it was fine and then he got on the phone with [REDACTED] and they had reiterated that I cannot lose my job, I'm protected and I said I hear what you're saying. If the Governor wants me gone, I will be gone.

Witness 5/19/21

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2 I don't want anything from you guys.
3 I don't need anything. I appreciate you
4 calling. I don't consider it sexual
5 harassment. This is -- I will tell you about
6 my experience and that -- I -- like I did what
7 I did and I accept responsibility for whatever
8 happens because of it.

9 Q And when you're saying you did what
10 you did, you're talking about the liking
11 Lindsey's tweet?

12 A The tweet that I had tweeted. I
13 liked -- I probably liked her tweet and then
14 tweeted in support of --

15 Q I'm not a tweeter, so it sounds like
16 you wrote a tweet, at least that's what you
17 were referring to, okay. And then what happens
18 after that?

19 A The tweet had been deleted and so
20 this is right before the holidays and I didn't
21 hear anything and then so in January my boss
22 had asked me if I had heard anything or if
23 anything was happening with the chamber and I
24 said no, it's been quiet, but I wouldn't be
25 surprised if there is some other stuff

Witness 5/19/21

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2 happening that I didn't know about and he told
3 me that Judith Mogul had reached out to him to
4 ask about me and then he said that she asked if
5 I had retained counsel and if I had said --
6 that I had told someone in chamber that I said
7 the Governor sexually harassed me. Both we're
8 not true.

9 And so I was worked up over that
10 because those were false statements and ██████
11 had said that he didn't think that those were
12 true and that he told her that and I didn't --
13 I didn't know what to do. I don't remember if
14 I asked him if I should talk to ██████ or if
15 we should talk to ██████. I don't remember how
16 that conversation ended, but I reached out to
17 ██████ and I told him what was going
18 on and he said that I needed to get ██████,
19 ██████ and ██████ on the phone to clear the air
20 for the record and so we got -- we scheduled a
21 call. We were on the phone and ██████ had told
22 them what had happened with Judith and so --
23 sorry, ██████ had also mentioned that -- he was
24 trying to make light of it. Look, if it makes
25 you feel better, I told her you were a good

Witness 5/19/21

1
2 worker and I said thanks, [REDACTED]. I appreciate
3 you. But when we got on the phone with [REDACTED]
4 and [REDACTED], we -- they had said that they had to
5 report it. I asked who they reported it to,
6 like what was required and he said that he
7 could not tell me who they reported it to, but
8 it had to be reported up and I said that the
9 only way that Judith would know is if it came
10 from [REDACTED], [REDACTED] or [REDACTED] because I don't
11 know how else it would have gotten there and
12 then I pieced it together on the call and
13 because -- sorry.

14 When [REDACTED] told her that I was a good
15 worker, she had said that she had heard that
16 from somebody else, so I used that as well to
17 put together that it could have been [REDACTED],
18 [REDACTED] or [REDACTED] and I said it couldn't have
19 been [REDACTED] because she's at [REDACTED],
20 like she has nothing to do with this. So it
21 was one of you two and then [REDACTED] had said that
22 he -- that he -- that he did it, that he spoke
23 and he could reach out to Judith to set the
24 record straight and I said no, [REDACTED], you've
25 done enough and then I asked if [REDACTED] and I

1 Witness 5/19/21

2 could speak to Judith and sort this out because
3 I didn't say that and that could have ruined my
4 life, my career if it went around that I said
5 that the Governor sexually harassed me when I
6 never said that and we hung up.

7 Everybody said it was fine and then
8 █████ reached out to Judith. She said that she
9 would get on the phone and I could set the
10 record straight and I -- there was a mixup with
11 the first call. We got disconnected and the
12 second call -- the second -- a minute, two
13 minutes, I don't know, later, she said that
14 there was somebody in the room with her. I
15 heard her writing things down with a pencil or
16 pen and a piece of paper. I don't remember who
17 the other person was in the room with her and
18 that I -- I apologized. She -- I said I don't
19 know how it got -- it escalated to this. I
20 don't know where the miscommunication was. I
21 felt guilty for taking everybody's time and I
22 didn't have counsel. I didn't plan on having
23 counsel at the time, which was true. I
24 couldn't afford it and that I never said that
25 the Governor sexually harassed me.

1 Witness 5/19/21

2 want any information from you?

3 A It was a short conversation. It was
4 a -- no, these things aren't true. I want this
5 to be over with. I think that she got what she
6 needed from them.

7 Q Are there any other conversations
8 that you have had -- that you haven't told us
9 about, after December 2020 with senior staff of
10 the executive chamber?

11 A With the executive chamber, I
12 don't -- I don't think so. The Judith
13 conversation, no, no. And if there is and I'm
14 not remembering, I -- sorry, I don't -- I
15 honestly don't think that there is, no.

16 Q Did Jill DeSrosiers ever reach out
17 to you after December 2020?

18 A No, no, no. I don't think -- no.

19 Q So at some point, Kaitlin, you
20 decided to share the details of your experience
21 in the executive chamber with reporters; is
22 that right?

23 A Yes, yes.

24 Q Why don't you tell us about that and
25 who you spoke to?

1 Witness 5/19/21

2 to anybody else.

3 Q And -- and just to be clear, what
4 did you believe was wrong about the power
5 dynamic?

6 A How he treats people, how that
7 office operates. The -- the -- and not just
8 people in his office. People everywhere
9 that -- everybody is afraid of the Governor and
10 we just -- I -- I strongly believe that we
11 don't do a lot of work in New York that we
12 should be doing because of him and his ego and
13 he holds projects back because of political
14 gain.

15 Q The New York Magazine article
16 published by Rebecca Traister that we looked
17 at -- or maybe we haven't looked at it, but
18 there's a New York Magazine article that she
19 published and it references someone by the name
20 of Kaitlin. Are you that Kaitlin?

21 A Yes.

22 Q Are the things that are described in
23 that article about you accurate?

24 A Yes.

25 Q When you -- can you open Exhibit 7

Witness 5/19/21

1
2 reputation, doing good work and so they pulled
3 her in to work for the Governor. I think her
4 role was mostly to do comms, but she was one of
5 the people who -- she was not in the inner
6 circle right away, but Melissa had known her
7 and so [REDACTED] had felt comfortable contributing
8 to conversations and I think that that made
9 other people upset and treat her poorly,
10 eventually treat her poorly and the Governor
11 liked her and respected her opinions.

12 So the same situation and then I had
13 heard from number four, [REDACTED], that
14 she had described situations to him that were
15 not great. [REDACTED] didn't go into the details
16 and I didn't ask. It wasn't -- not my
17 business. Number two --

18 Q [REDACTED] -- sorry. [REDACTED] had described
19 to who?

20 A [REDACTED] had told me on the phone that
21 [REDACTED] -- so when I -- when I had spoken to
22 [REDACTED] or [REDACTED], it was to think of people
23 that -- like this list, who might have a story
24 or be willing to speak of who we can think of
25 that would go public with the reality, Governor

1 Witness 5/19/21

2 Cuomo in his office.

3 Annabel, I didn't think she would
4 speak, but they had a weird relationship.

5 Sorry. Your other question was
6 about ██████████ and ██████████. They were close and
7 ██████████ had said that ██████████ disclosed to him
8 situations where she was uncomfortable. I
9 didn't ask for the details, but I -- I could
10 see a world where that is true.

11 Annabel, I -- she was a scheduler
12 and I think her role changed several times too.
13 She was the -- the Annabel that I said had
14 drinks and was kind of hanging on him. They
15 had a -- they had weird interactions at that
16 bar, sometimes at the mansion. They were just
17 too close for what I thought was a
18 professional -- should be a professional
19 relationship. I just -- I thought that she had
20 a story. ██████████, she was --

21 Q Can you pause there for a second,
22 Kate -- Kaitlin?

23 A Mm-hm.

24 Q Do you have any knowledge about
25 ██████████ Senior Staffer #3 removing her dress at an event at

Witness 5/19/21

the executive mansion?

A No, no, but I heard that that happened. I don't know if it's true.

Q Who did you hear that from?

A [REDACTED], probably, during this -- yeah.

Q [REDACTED], what do you know about her experience with the Governor in the chamber?

A [REDACTED] was in comms, I believe or the press office, they are the same to me, but when [REDACTED] -- my understanding is that when [REDACTED], number nine, left, they would pull [REDACTED] in to help staff the Governor. I don't know if she did that prior to [REDACTED], but I know that when [REDACTED] left, [REDACTED] stepped in to help.

So she would sit in that chair outside of his office and staff the Governor. I -- I don't know why she left, but she left quickly and quietly and didn't reach out to the Governor and tell that she was leaving, she wouldn't answer their phone calls. I know that because I overheard those conversations, but I couldn't get any details about that. Staffer #5

1 Witness 5/19/21

2 Stephanie to give to the Governor at the end of
3 the day, so we were able to form a relationship
4 and just like how absurd that whole process was
5 and how angry the Governor would get with
6 certain things.

7 ██████████, she's been there for a
8 while, but I never really understood her role.
9 It changed several times. She was an advisor,
10 maybe. I don't know. Then she somehow got
11 connected to doing something with the state
12 police or the investigator's office now I
13 think. I don't know. She was just another one
14 that the Governor had his eye on.

15 She was around, I just -- I truly
16 didn't know what she contributed. She was
17 nice. I just don't know what her role is, so I
18 thought that she could -- would likely have
19 stories because he had an interest in her too.

20 Q When you said he had an eye on her
21 or had an interest in her, what do you mean?

22 A She would be in the room, in Albany
23 mostly, she would be around at events and got
24 pulled into doing -- when I was there, work
25 with the state troopers and the storms. I just

1 Witness 5/19/21

2 genuinely didn't understand her role and what
3 she contributed. I don't know. I just knew --
4 I could tell that he liked her.

5 Executive Assistant #3 and [REDACTED]
6 [REDACTED], they staffed the Governor's office
7 in Albany. I actually think [REDACTED] worked
8 for -- maybe [REDACTED] or [REDACTED] or
9 both. I don't know. They were executive
10 assistants, but they were in the same little
11 wing in Albany on the second floor and had been
12 there for a long time and I just assumed that
13 they would know something or have stories.

14 [REDACTED], she was in the role --
15 the position -- the desk that [REDACTED]. My
16 understanding is she was hired based on what
17 she looked like and that people were mean to
18 her and that she left.

19 [REDACTED]. I -- she probably
20 would have never talked to anybody, but she was
21 close to the Governor and could speak to the
22 power dynamic and the toxic environment and how
23 projects there did not happen more to like the
24 political side.

25 [REDACTED], I believe -- I don't

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Witness 5/19/21

remember [REDACTED] title. [REDACTED], I think was the [REDACTED]. I could be wrong. He was, I think, at the [REDACTED] [REDACTED] being pulled into the chamber, but they were not kind. They were mean to him. They would talk behind his back all the time because he would be too causal around the Governor and they pushed him out. So I thought maybe he would have stories to tell.

The mansion staff, I don't remember their names, but there's a woman and a man there who are very kind.

Q Is it -- when you say there's a man and a woman there, are you talking about [REDACTED] [REDACTED] and [REDACTED]?

A Yeah, yep. Yeah. Thank you. I couldn't remember their names.

[REDACTED], I don't know [REDACTED] story of how she first started at the chamber or where she came from, but my understanding is that he liked her. She was smart. She did a good job and then the inner circle didn't -- the women didn't like her because she -- he

Witness 5/19/21

1 respected her and she was good at what she did.

2 [REDACTED], she was a [REDACTED].

3 She was a [REDACTED]. I don't know how she
4 started. I don't know where she came from, but
5 I know that they were awful to her as well. I
6 figured she might have a story.

7
8 And then [REDACTED], I believe came
9 from the [REDACTED] with [REDACTED] and
10 eventually got pulled in to work in the chamber
11 and they were not kind to her at first, but it
12 seems like towards the end, before she left,
13 that things had -- were different for her, but
14 I guess -- I felt that she would have stories
15 or could speak to the power dynamic too.

16 Q Is there anyone that is not on this
17 list that you think the Governor may have
18 behaved inappropriately with?

19 A [REDACTED Senior Staffer #1] and [REDACTED Senior Staffer #2] but not in a
20 way -- I hate to say this. I can see a world
21 where it was mutual.

22 Q What did you observe about the
23 Governor's interactions with [REDACTED Senior Staffer #1]
24 that you thought was inappropriate?

25 A They were just very close in a way

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Witness 5/19/21

that you would be with somebody you have been intimate with, in my opinion. It just -- I didn't -- they were very close. They're very, very close.

Q And what about Senior Staffer #2; what did you observe that you believe was inappropriate between Senior Staffer #2 and the Governor?

A They both have -- I believe worked for him since he was in the AGs office, so they have been with him forever, but the way the -- they get territorial and I would say jealous of other people. Senior Staffer #2 especially it seems like there could have been something more there at some point.

I never saw anything. The only thing I saw between Senior Staffer #1 and the Governor is the night after the drinks with the shoes off, but that is the impression or feeling I get or I got or my takeaway from my time there.

Q You can put away that exhibit. So there's a number of text messages between you and Ms. Boylan. Can you describe for us after Ms. Boylan's tweets what you were communicating with her about?

Witness 5/19/21

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2 A There was -- I hate to pin -- she
3 would send articles. She would check-in. She
4 would ask if I remembered an event. She would
5 ask if I would speak to -- there was a PR team,
6 maybe they weren't a PR -- ask if I would speak
7 to Ronan and Rebecca or I can't remember his
8 name, some other guy.

9 She would -- I -- I think just that
10 and then recently she let me know that Jill had
11 a baby and then the hiring, I think she sent me
12 recently too, who he just on boarded.

13 Q Who the Governor just hired?

14 A Yeah, yeah.

15 Q Were you communicating with Lindsey
16 Boylan only by text message? Did you ever talk
17 on the phone?

18 A Lindsey and I spoke on the phone and
19 yes.

20 Q And was this the same general topic?

21 A Yes.

22 Q Have you ever met Lindsey in person
23 since December 2020?

24 A No, I -- I have -- I haven't been in
25 New York. I was in New York, I think, for a

Witness 5/19/21

1
2 week recently, but upstate, [REDACTED]

3 [REDACTED].
4 Q Do you know Charlotte Bennett?

5 A I know of her and I have connected
6 with her. I wouldn't say I know her well.

7 Q How did you connect with her?

8 A I think it was Twitter. I think it
9 was a private message on Twitter.

10 Q Were you -- you reached out to her
11 or she reached out to you?

12 A I reached out to Charlotte and I
13 asked to speak with her because her story, it
14 was, to me, when I read it, very similar and
15 she went with the sexual harassment.

16 I hate -- that's not the -- a great
17 way to say that, but and I just wanted to know
18 because people had said I think that what you
19 experienced is sexual harassment, but I don't
20 consider it sexual harassment, so I wanted to
21 know since she had said that very clearly that
22 he sexually harassed her, how similar our
23 situation was and so I had asked to speak to
24 her, to talk to her about that and I -- and
25 then she reached out to her lawyer and

Witness 5/19/21

1
2 connected me to her lawyer and then I got
3 connected to Zoe through Debra Katz.

4 Q And in the conversation you had with
5 Ms. Bennett, what did you discuss?

6 A She -- she told me about her
7 experience, what desk she sat at. I asked her
8 what her salary was. I said I'm just curious
9 because that's a thing for me. She was paid
10 significantly less for what I think is the same
11 role. And she talked about what her time was
12 like and how mean the people were to her and
13 how the -- her relationships with the inner
14 circle changed because the Governor was kind to
15 her and I was like yes, I know what you mean.

16 Q Did you tell Ms. Bennett that the
17 Governor had asked you if you had had -- been
18 in a relationship with someone who was older?

19 A I think that's when I remembered
20 when I -- when we were talking about it and I
21 was like oh, my god, I think I -- I think he
22 said that to me. I think that's when it came
23 back to me. I could be wrong, but --

24 Q And -- and was this conversation
25 with Ms. Bennett after her -- she went public

Witness 5/19/21

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with her allegations?

A Yeah. I didn't know who she was prior to that.

Q Have you been in touch with her since then?

A So we spoke on the phone. There may have been an exchange after that conversation and she had reached out to me and I didn't answer. I was told that I shouldn't be having conversations with the other people.

Q Do you know Alessandra Biaggi?

A Yes. I wouldn't say I know her well, but yes.

Q Have you been in touch with her since December of 2020?

A Yes, I reached out to Alessandra after Lindsey's tweet to see if she had a similar experience and what it was like when she started -- I never connected with her on the phone.

The intent was for me to see if she had a similar experience and to talk to her about when she left the Governor's office and when she ran against Jeff Klein and to see how

Witness 5/19/21

1
2 then I saw a tweet talking about respecting
3 people's privacy and I recognize that what I
4 was doing was not right and so I had stopped
5 inquiring to try and figure out who that was.

6 Q You tried to figure out who it was
7 to give the name to Ronan?

8 A Yes.

9 Q But you never found out who it was?

10 A I think it is in the subpoena.

11 Q Other than in the subpoena, did you
12 find out who it -- do you know who it is
13 sitting here today?

14 A I couldn't tell you her name. I
15 think it's in the subpoena, but I -- I have to
16 look to see what her name was.

17 Q There's a number -- there's a number
18 of names in the subpoena, but other than the
19 subpoena --

20 A Do you want me to pull it up?

21 Q No, it's okay. Other than the
22 subpoena, has anyone told you who that might be
23 or anything about her experience with the
24 Governor?

25 A [REDACTED] and I discussed who it might

1 Witness 5/19/21

2 be, but we never figured out who she was.

3 Q Did you discuss with [REDACTED] any
4 information he had about her experience with
5 the Governor?

6 A He was saying that it could have
7 been a fellow or it could have been -- I think
8 he might have said somebody else, but I think
9 he was getting his information from Alessandra
10 Biaggi and then I think he was also talking to
11 Ronan.

12 MS. PARK: Can we take maybe five
13 minutes and I think we will be able to
14 conclude. I just want to go through my
15 notes for a few minutes, if that's okay.
16 Why don't we go off the record?

17 THE VIDEOGRAPHER: Okay. Standby,
18 please. We are now off the record at
19 1:41 p.m.

20 (Brief recess taken.)

21 THE VIDEOGRAPHER: We are now on the
22 record. The time is 1:48 p.m. Back from
23 break.

24 BY MS. PARK:

25 Q Kaitlin, I asked you a number of

Witness 5/19/21

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2 A They told me at the table that I had
3 to do it.

4 Q And so what did you say?

5 A I -- I don't remember. I just know
6 I was put on the spot to do it and I, at that
7 time, didn't -- well, I probably still wouldn't
8 do well with that, but I didn't do well with
9 pressure like that to do that, to perform like
10 that.

11 Q There are a number of documents that
12 you've produced to us that are emails where you
13 are employed in the executive chamber and you
14 are using your Gmail account to communicate
15 with other people on their Gmail account.

16 What were the circumstances under
17 which you would use personal email while you
18 worked at the executive chamber?

19 A If it had something to do with the
20 campaign office.

21 Q And how did you come to know that
22 you needed to use personal email to work on
23 campaign related work?

24 A I don't know who told me, but
25 somebody told me. It was Stephanie or Jill and

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Witness 5/19/21

I also knew that from when I worked for [REDACTED]
[REDACTED], anything campaign related had to be
separate.

Q Did you volunteer to work on the
Cuomo campaign?

A You had to volunteer. I -- I say I
didn't have because I feel like everybody has a
choice, but I didn't have a choice. You have
to do the work for the -- for the campaign and
sometimes it was during work hours when I
should not have been doing that work. I -- I
actually think I had the conversation --

Q Kaitlin, I don't want you to tell me
any more about that, okay. Thank you. Okay.

Does anyone, other than your lawyer,
know that you're meeting with us today?

A Yeah, yes.

Q Who knows you're meeting with us
today?

A [REDACTED], [REDACTED] [REDACTED]
[REDACTED].

The -- [REDACTED] who lives in this
apartment. He doesn't know the details. He
just knows that I needed space with nobody here

Witness 5/19/21

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2 to do this. And my -- my New York -- I call
3 him [REDACTED]. He's the manager at
4 [REDACTED]. I have become very close with his --
5 him and his wife. He knows that I'm doing this
6 today.

7 Q Is there any answer that you've
8 given today that you would like to clarify?

9 A I don't know. We've -- we've -- I
10 feel like I have given a lot of answers.
11 Nothing that comes to mind right now.

12 Q Okay. And is there any information
13 that you think that would be relevant to our
14 investigation of the allegations of sexual
15 harassment and surrounding circumstances that
16 you have that I have not asked you about today?

17 A Does this include the materials that
18 I have already sent -- I don't -- I don't think
19 I have anything additional to share based on
20 what was sent.

21 Q Can you hear me?

22 A Yes.

23 Q Okay. Sorry, my air pods died. Go
24 ahead.

25 A The question was is there anything

Witness 5/19/21

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additional?

Q Yes.

A That we did not talk about today?

Q Yes.

A I think that I have provided everything that I -- that I have in the documents that we have talked about today.

Q And I meant to say this in the beginning that I would offer you an opportunity to make a brief statement while you're under oath if you would like to.

Would you like to make a statement while you're under oath?

A No, thank you.

Q And I -- before we close, I will just remind you what I said at the beginning, that Executive Law 63(8) makes it a misdemeanor to disclose any information you obtained during the course of this examination. Do you understand?

A I understand.

Q Great. Kaitlin, thank you very much for your time today. We appreciate it.

A Thank you very much.

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Q We can go off the record.

THE VIDEOGRAPHER: Okay. Counsel, should I conclude or take us off the record?

MS. PARK: You can conclude.

THE VIDEOGRAPHER: Okay. Standby. Thank you. We are off the record at 1:55 p.m. And this concludes today's recorded interview of Witness May 19th, 2021.

The total number of media units used was three and will be retained by -- I'm sorry. I have to open my audio. I'm sorry. I apologize. Let me do that again, sorry.

We are off the record at 1:55 p.m. and this concludes today's recorded interview of Witness May 19th, 2021. The total number of media units used was three and will be retained by Veritext New York.

(Time noted: 1:55 p.m.)

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Witness 5/19/21

C E R T I F I C A T E

I, BRITTANY SALINE, a shorthand reporter and Notary Public within and for the State of New York, do hereby certify:

That the within proceeding is a true and accurate record of the stenographic notes taken by me.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.



BRITTANY SALINE