



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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

TO: Elisabeth "Lis" Smith

YOU ARE HEREBY COMMANDED, under Executive Law § 63(8), N.Y. Civil Practice Law and Rules § 2302(a), and/or other statutes, to deliver and turn over to the Special Deputies to the First Deputy Attorney General, on **the 6th day of May, 2021, at 9:30 a.m.**, or any agreed upon adjourned date or time, at One Liberty Plaza, 38th Floor, New York, New York 10006, all documents and information requested in the attached Schedule in accordance with the instructions and definitions contained therein.


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

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

EXHIBIT

1

WITNESS, The Honorable Letitia James, Attorney General of the State of New York, this 26th day of April, 2021.

By: 

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By: /s/ Anne L. Clark

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SCHEDULE

A. General Definitions and Rules of Construction

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

thereof.

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

B. Particular Definitions

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

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

C. Instructions

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

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

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

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

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

instructions that details the specific content of the instructions and any Person(s) to whom the instructions were given.

13. Cover Letter, Index, and Identifying Information. Accompanying any production(s) made pursuant to this Subpoena, You shall include a cover letter that shall at a minimum provide an index containing the following: (a) a description of the type and content of each Document produced therewith; (b) the paragraph number(s) of the Subpoena request(s) to which each such Document is responsive; (c) the Identity of the Custodian(s) of each such Document; and (d) the document control number(s) of each such Document. As further set forth in Attachment 2, information must also be included in the metadata and load files of each production concerning the identity of each Document's custodian, as well as information identifying the particular Document requests and/or information to which each document is responsive.
14. Affidavit of Compliance. A copy of the Affidavit of Compliance provided herewith shall be completed and executed by all natural persons supervising or participating in compliance with this Subpoena, and You shall submit such executed Affidavit(s) of Compliance with Your response to this Subpoena.
15. Identification of Persons Preparing Production. In a schedule attached to the Affidavit of Compliance provided herewith, You shall Identify the natural person(s) who prepared or assembled any productions or responses to this Subpoena. You shall further Identify the natural person(s) under whose personal supervision the preparation and assembly of productions and responses to this Subpoena occurred. You shall further Identify all other natural person(s) able to competently testify: (a) that such productions and responses are complete and correct to the best of such person's knowledge and belief; and (b) that any Documents produced are authentic, genuine and what they purport to be.
16. Continuing Obligation to Produce. This Subpoena imposes a continuing obligation to produce the Documents and information requested. Documents located or created, and information learned, acquired or created, at any time after Your response is due shall be promptly produced at the place specified in this Subpoena.
17. No Oral Modifications. No agreement purporting to modify, limit or otherwise vary this Subpoena shall be valid or binding, and You shall not act in reliance upon any such agreement, unless a Special Deputy to the First Deputy Attorney General confirms or acknowledges such agreement in writing, or makes such agreement a matter of record in open court.
18. Time Period. Unless otherwise specified, the time period covered by this Subpoena shall be from January 1, 2013 forward.

D. Documents to Be Produced

1. Any and all Documents relating to any Complaint concerning the Governor or anyone in the Executive Chamber or the Governor's staff, including but not limited to any Communication relating to any response (whether public or private) to a Complaint.
2. Any and all Documents concerning any Complainant, including but not limited to any Communication relating to any statement made or information provided to the media or the public.
3. Any and all Documents concerning Communications with any current or former member of the Executive Chamber relating to any Complaint concerning the Governor or any public or private response to any such Complaint.

ATTACHMENT 1
Electronic Document Production Specifications

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

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

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

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

A. Relational Databases

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

B. Compression

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

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

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

- hh:mm:ss:mmm

B. ***Extracted or OCR Text Files***

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

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

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

D. ***Opticon Load File***

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

- The comma-delimited Opticon load file must contain the following seven fields (as indicated below, values for certain fields may be left blank):
 - ALIAS or IMAGEKEY – the unique Bates number assigned to each page of the production.
 - VOLUME – this value is optional and may be left blank.
 - RELATIVE PATH – the filepath to each single-page image file on the production media.
 - DOCUMENT BREAK – defines the first page of a document. The only possible values for this field are “Y” or blank.
 - FOLDER BREAK – defines the first page of a folder. The only possible values for this field are “Y” or blank.
 - BOX BREAK – defines the first page of a box. The only possible values for this field are “Y” or blank.
 - PAGE COUNT – this value is optional and may be left blank.
- **Example:**
 ABC00001,,IMAGES\0001\ABC00001.tif,Y,,,2
 ABC00002,,IMAGES\0001\ABC00002.tif,,,,
 ABC00003,,IMAGES\0002\ABC00003.tif,Y,,,1
 ABC00004,,IMAGES\0002\ABC00004.tif,Y,,,1

E. ***Native Files***

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

ATTACHMENT 2
Required Fields for Metadata Load File

FIELD NAME	FIELD DESCRIPTION	FIELD VALUE EXAMPLE¹
DOCID	Unique document reference (can be used for de-duplication).	ABC0001 or ###.#####.###
BEGDOC	Bates number assigned to the first page of the document.	ABC0001
ENDDOC	Bates number assigned to the last page of the document.	ABC0002
BEGATTACH	Bates number assigned to the first page of the parent document in a document family (<i>i.e.</i> , should be the same as BEGDOC of the parent document, or PARENTDOC).	ABC0001
ENDATTACH	Bates number assigned to the last page of the last child document in a family (<i>i.e.</i> , should be the same as ENDDOC of the last child document).	ABC0008
ATTACHRANGE	Bates range of entire document family.	ABC0001 - ABC0008
PARENTDOC	BEGDOC of parent document.	ABC0001
CHILDDOCS	List of BEGDOCs of all child documents, delimited by ";" when field has multiple values.	ABC0002; ABC0003; ABC0004...
DOCREQ	List of particular Requests for Documents to be Produced in the subpoena	1; 2; 3 . . .
INTERROG	List of particular Requests for Information or interrogatories in the subpoena	1; 2; 3 . . .
COMMENTS	Additional document comments, such as passwords for encrypted files.	

¹ Examples represent possible values and not required format unless the field format is specified in Attachment 1.

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

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

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

AFFIDAVIT OF COMPLIANCE WITH SUBPOENA

State of _____ }
County of _____ }

I, _____, being duly sworn, state as follows:

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

9. Attached is a true and accurate statement of those requests under the Subpoena as to which no responsive Documents were located in the course of the aforementioned search.

Signature of Affiant

Date

Printed Name of Affiant

* * *

Subscribed and sworn to before me this _____ day of _____, 20__.

_____, Notary Public

My commission expires: _____



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
SUBPOENA AD TESTIFICANDUM
THE PEOPLE OF THE STATE OF NEW YORK
GREETINGS

TO: Elisabeth "Lis" Smith
c/o Ben Rosenberg
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036

YOU ARE HEREBY COMMANDED, pursuant to Executive Law § 63(8) and New York Civil Practice Law and Rules § 2302(a), to appear and attend before the Special Deputies to the First Deputy Attorney General, on July 2, 2021 at 9:00 AM, or any agreed upon adjourned date or time, at One Liberty Plaza, 38th Floor, New York, New York 10006 to testify in connection with an investigation into allegations of and circumstances surrounding sexual harassment claims made against Governor Cuomo, or any matter that the Attorney General deems pertinent thereto.

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


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

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

EXHIBIT

2

WITNESS, The Honorable Letitia James, Attorney General of the State of New York,
this 24th day of June, 2021.

By: 

Joon-H. Kim
Jennifer Kennedy Park
Abena Mainoo
Special Deputies to the
First Deputy Attorney General
[REDACTED]@ag.ny.gov
[REDACTED]@ag.ny.gov
[REDACTED]@ag.ny.gov

By: /s/ Anne L. Clark

Anne L. Clark
Yannick Grant
Special Deputies to the
First Deputy Attorney General
[REDACTED]@ag.ny.gov
[REDACTED]@ag.ny.gov
[REDACTED]



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Thread



Lindsey Boylan @LindseyBoylan

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

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

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

1,085 Retweets 375 Quote Tweets 7,614 Likes



Lindsey Boylan @LindseyBoylan · Dec 13, 2020

Replying to @LindseyBoylan

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

58

327

3.7K



Lindsey Boylan @LindseyBoylan · Dec 13, 2020

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

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

110

378

3.8K



Lindsey Boylan @LindseyBoylan · Dec 13, 2020

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

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

2.5K

13.8K

27.6K



Lindsey Boylan @LindseyBoylan · Dec 13, 2020

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

No one.

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

203

1K

7.5K



Lindsey Boylan @LindseyBoylan · Dec 13, 2020

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

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

714

2K

11.1K

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Relevant people



Lindsey Boylan @LindseyBoylan

Mom. Progressive N 4 a Livable City. Fm & Urban Planner. C: Manhattan Boroug

What's happening

World news · Yesterday

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

Trending in United States

Concorde 1,700 Tweets

Music · Trending

Olamide 24.2K Tweets

COVID-19 · LIVE

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

BuzzFeed News · Last nig

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

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3



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Tweet



Lindsey Boylan @LindseyBoylan

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

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

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

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

111 Retweets 63 Quote Tweets 1,396 Likes



Chris Bold @fingertrick · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

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

1 retweet 2 likes



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

Replying to @LindseyBoylan and @FKAtwigs

Valid point.

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

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

2 replies 5 likes

Show replies



Marissa Vonáye @marissavonaye_ · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

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

Interaction icons



Victims Rights NY PAC @victimsrightsNY · Dec 13, 2020

Replying to @LindseyBoylan and @FKAtwigs

Are there other reports of this? 💔

1 reply 4 likes



Dmkorpiable @korpiable · Dec 13, 2020

Me thinks she has some explaining to do.



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Lindsey Boylan @LindseyBoylan

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



FKA twigs @FKAtwigs

What's happening

Gaming · LIVE

Summer Game Fest 2021

Trending with Elden Ring, #SummerGameFest

Video games · Trending

Call of Duty

27.6K Tweets

Video games · Trending

IT'S REAL

96.5K Tweets

COVID-19 · LIVE

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

The New York Ti... · 2 h

Starbucks is running low on ingredients

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Thread

Lindsey Boylan @LindseyBoylan

Most toxic team environment? Working for @NYGovCuomo.

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

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

1,252 Retweets 311 Quote Tweets 9,293 Likes



Lindsey Boylan @LindseyBoylan · Dec 5, 2020
Replying to @LindseyBoylan

I've had many jobs. Waitressing at @Friendlys as a teenager was an infinitely more respectful environment. Even when I had bad customers who tipped poorly.

24 replies 54 retweets 884 likes

Lindsey Boylan @LindseyBoylan · Dec 5, 2020

If people weren't deathly afraid of him, they'd be saying the same thing and you'd already know the stories.

26 replies 85 retweets 1K likes

Lindsey Boylan @LindseyBoylan · Dec 5, 2020

Seriously, the messages and texts I receive when I speak the truth about this...it's a whole book of people who have been harmed.

9 replies 53 retweets 860 likes

Lindsey Boylan @LindseyBoylan · Dec 5, 2020

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

13 replies 70 retweets 914 likes

Lindsey Boylan @LindseyBoylan · Dec 5, 2020

I tried to quit three times before it stuck. I've worked hard my whole life. Hustled - fake it till you make it style.

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

20 replies 39 retweets 776 likes

Lindsey Boylan @LindseyBoylan · Dec 5, 2020

And I'm a privileged person. I could opt out and eventually did. I shudder to think what happens to others. It pisses me off so much.

7 replies 26 retweets 672 likes

Lindsey Boylan @LindseyBoylan · Dec 5, 2020

Yes I did not sign whatever they told me to sign when I left. Nope!

29 replies 30 retweets 936 likes

Marcella L. Simonetta @marcellalaluna · Dec 5, 2020

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

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

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

What's happening

Entertainment · LIVE

Happy birthday, Tom Holla
Trending with Tom Holland

Music · Trending
JUST ANNOUNCED
17K Tweets

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

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

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

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

My hope is he is on notice and won't harm more people, especially women.
22 174 1.1K

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

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

Instead I'm getting back to my work.
4 20 265

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

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

5 40 335

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

I will fight.
20 55 442

Replies

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

1 2 27

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

3

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

1

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

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

What's happening

Music · LIVE
It's Travis Scott's birthday
Trending with Travis Scott, Astro

Trending in United States
BOYFRIEND REVEAL
4,131 Tweets

Trending in United States
Josh Duggar
Former reality television star
arrested by federal agents in
Thursday, TMZ reports
Trending with 19 Kids and Count

COVID-19 · LIVE
COVID-19: News and updat
New York

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

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Don't miss what's happening

People on Twitter are the first to know.

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Date: Wednesday, February 24 2021 12:16 PM

Subject: [Chat #4375]

From: Dani Lever [REDACTED]

To: [REDACTED] Joshua Vlasto (owner)"; [REDACTED] [Liz Smith];

The statement they have for Lindsay is bad. Are you guys talking to them?

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:16 PM

Subject: [Chat #4376]

From: Liz Smith [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Dani Lever];

Yes

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:16 PM

Subject: [Chat #4377]

From: Liz Smith <[REDACTED]>

To: [REDACTED] [Joshua Vlasto (owner)]"; [REDACTED] [Dani Lever];

I'm working on it

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:17 PM

Subject: [Chat #4378]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

None of the attacks. Blanket denial. Think of women's groups reaction

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:17 PM

Subject: [Chat #4379]

From: Joshua Vlasto [REDACTED]

To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

What's the current draft?

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:18 PM

Subject: [Chat #4380]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

This is last I got

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:18 PM

Subject: [Chat #4381]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

"This is an ongoing and transparent attempt by Lindsey Boylan to advance her political campaign with false accusations and lies about this administration. Her previous claims that she had tried to quit the administration were already proven false as she resigned after being counseled for abuse and harassment of three different female subordinates after which she unsuccessfully asked for her job back-- beyond that, these are more politically motivated fabrications and we are not going to dignify them."

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:19 PM

Subject: [Chat #4382]

From: Liz Smith [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] Dani Lever];

Yes I think it's too hot

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:19 PM

Subject: [Chat #4383]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

Way way

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM
Subject: [Chat #4384]
From: Joshua Vlasto [REDACTED]
To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

I actually like it

-----METADATA INFORMATION-----

Device Owner:
[REDACTED] Josh Vlasto
ICCID:
[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM
Subject: [Chat #4385]
From: Joshua Vlasto [REDACTED]
To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

I think we need to be direct

-----METADATA INFORMATION-----

Device Owner:
[REDACTED] Josh Vlasto
ICCID:
[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM
Subject: [Chat #4386]
From: Joshua Vlasto [REDACTED]
To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

And firm

-----METADATA INFORMATION-----

Device Owner:
[REDACTED] Josh Vlasto
ICCID:
[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM
Subject: [Chat #4387]
From: Joshua Vlasto [REDACTED]
To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

But you are better judges than me on this

-----METADATA INFORMATION-----

Device Owner:
[REDACTED] Josh Vlasto
ICCID:
[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM
Subject: [Chat #4388]
From: Joshua Vlasto [REDACTED]
To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

She is making this stuff up

-----METADATA INFORMATION-----

Device Owner:
[REDACTED] Josh Vlasto
ICCID:
[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM

Subject: [Chat #4389]

From: Dani Lever [REDACTED]

To: [REDACTED] Joshua Vlasto (owner)"; [REDACTED] [Liz Smith];

Another employee tweeted and said if you wonder what it's like to work here

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM

Subject: [Chat #4390]

From: Dani Lever [REDACTED]

To: "[REDACTED] [Joshua Vlasto (owner)]"; [REDACTED] [Liz Smith];

I think it's too hot to attack her

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:20 PM

Subject: [Chat #4391]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

Which means there will be more

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:21 PM

Subject: [Chat #4392]

From: Liz Smith [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Dani Lever];

I would not attack her

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:21 PM

Subject: [Chat #4393]

From: Liz Smith [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Dani Lever];

What is the tweet?

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:21 PM

Subject: [Chat #4394]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

No me neither

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:21 PM

Subject: [Chat #4395]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]" [REDACTED] [Liz Smith];

It isn't bad but it's still problematic

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:21 PM
Subject: [Chat #4396]
From: Dani Lever [REDACTED]
To: "[REDACTED] [Joshua Vlasto (owner)]"; [REDACTED] [Liz Smith];
Attachments: 0A93C478-8EA5-456D-A602-92834F85EBBD.pluginPayloadAttachment

https://twitter.com/_char_bennett_/status/1364613777023451136?s=10

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]



Date: Wednesday, February 24 2021 12:22 PM
Subject: [Chat #4397]
From: Joshua Vlasto [REDACTED]
To: [REDACTED] [Dani Lever]; [REDACTED] [Liz Smith];

Ugh

-----METADATA INFORMATION-----

Device Owner:
[REDACTED] Josh Vlasto

ICCID:
[REDACTED]

Date: Wednesday, February 24 2021 12:22 PM

Subject: [Chat #4398]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

Also we have issue with her real or imagined but it's a problem

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:23 PM

Subject: [Chat #4399]

From: Liz Smith [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)] [REDACTED] [Dani Lever];

With whom

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:23 PM

Subject: [Chat #4400]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]" [REDACTED] [Liz Smith];

The second tweeted

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:24 PM

Subject: [Chat #4401]

From: Dani Lever [REDACTED]

To: [REDACTED] Joshua Vlasto (owner)"; [REDACTED] [Liz Smith];

Tweeter

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:24 PM

Subject: [Chat #4402]

From: Dani Lever [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]; [REDACTED] [Liz Smith];

This is all to say that I wouldn't go so hot

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Wednesday, February 24 2021 12:32 PM

Subject: [Chat #4403]

From: Liz Smith [REDACTED]

To: "[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Dani Lever];

Yes I told Melissa just to pause for a second

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

From: Melissa DeRosa [REDACTED]@gmail.com>
Sent: Wednesday, February 24, 2021 1:05 PM
To: Elisabeth Smith

"This is an ongoing and transparent attempt by Lindsey Boylan to advance her political campaign with false accusations and lies about this administration. Her previous claims that she had tried to quit the administration were already proven false as she resigned after being counseled for abuse and harassment of three different female subordinates after which she unsuccessfully asked for her job back-- beyond that, these are more politically motivated fabrications and we are not going to dignify them."

Ms. Boylan's blog post opens up with a story about a plane trip that is demonstrably false -- the manifests of all flights from October 2017 can be found below - there was no flight where Lindsey was alone with the Governor, a single press aide, and a NYS Trooper -- below is a quote that can be attributed to John Maggiore, Howard Zemsky, Dani Lever and Abbey Collins who were on the flights with her:

"We were on each of these October flights and this conversation quite simply did not happen."



From: Lis Smith [REDACTED]@gmail.com> on behalf of Lis Smith [REDACTED]@gmail.com>
To: Melissa DeRosa
CC: Dani Lever; richard bamberger; rich.azzopardi; Peter Ajemian; Josh Vlasto
Sent: 2/24/2021 2:59:16 PM
Subject: Re:

i think the tweets with no fingerprints/OTR are fine to pass along.

i would lay off the other stuff b/c it would only point back to the governor's office and reinforce bully storyline.

On Wed, Feb 24, 2021 at 2:47 PM Melissa DeRosa [REDACTED]@gmail.com> wrote:

Lindsey continued to tweet positive things about the administration/the governor -- even after she claims that he kissed her (an accusation the governor's office denies) -- including on:

8/15/18: "proud to work for a governor who takes women seriously",

9/14/18: "so proud of my boss Gov Cuomo and all of Team Cuomo"

11/4/18: "Andrew Cuomo is NY's best Choice for Governor"

2/29/19: "Way to Go, LT Gov Cuomo, Gov Cuomo. Exactly the pragmatic things we need to change outcomes and help families succeed"

9/26/18 at 1030am - Lindsey was confronted about complaints of bullying and harassment three subordinates -- faced with these allegations about her misconduct, she resigned

9/30/18 at 10:06am - Lindsey contacts the Governor's Counsel, Alphonso David, seeking to get her job back; the administration believes it was best to part ways and do not allow her to come back to the Chamber

Below are text messages Lindsey Boylan sent two top members of the administration after the Governor signed an Executive Order truncating the petitioning period in the height of COVID -- she clearly threatens retaliation, including saying "life is long, and so is my memory and so are my resources". In a separate thread to another top Cuomo staffer after the EO was signed she says "I see what the point is here and I will find ways to respond to the message. The future is coming after assholes"

Chat #	From	To	Body	Timestamp: Time
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	We made a mistake yesterday w this entire response	2/25/2021 10:54:08 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	What did you mean by this	2/25/2021 10:54:14 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Jef has talked me off of it but i feel like we didn't go hard enough	2/25/2021 10:54:53 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Oh god	2/25/2021 10:55:04 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	I couldnt diaageee more w u	2/25/2021 10:55:12 AM(UTC-5)

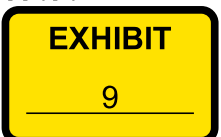
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Going hard has gotten you guys to where you are now	2/25/2021 10:55:32 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Which is a very bad place	2/25/2021 10:55:38 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	You could go hard if you want to keep ruining his reputation	2/25/2021 10:56:21 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	I also agree that the Biaggi thing was idiotic	2/25/2021 10:56:53 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	I know jef told me my instincts have been off on this	2/25/2021 10:56:55 AM(UTC-5)

9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Yes I would agree with him on that	2/25/2021 11:02:46 AM(UTC-5)
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Message

From: Lis Smith [REDACTED]
Sent: 2/26/2021 4:51:17 AM
To: Maggie Moran [REDACTED]@kivvit.com]; Judy Mogul [REDACTED] Steve Cohen [REDACTED] Rich Azzopardi [REDACTED] Josh Vlasto [REDACTED]
[REDACTED] Beth Garvey [REDACTED] Melissa DeRosa [REDACTED] Jeff Pollock [REDACTED]; Maggie
Moran [REDACTED]; Peter Ajemian [REDACTED]; Dani [REDACTED] Stephanie Benton Cell [REDACTED]
Linda Lacewell [REDACTED]
Subject: 2/25/2021 11:51:17 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]
Attachments: IMG_5056.jpeg

MORAN00000434



Charlotte Bennett

434 Likes

Tweets

Tweets & replies

Media

Likes

Kaitlin

· 1d

Replying to @jessemckinley

@NYGovCuomo and @LindseyBoylan

It's very very difficult to hear anything on the helicopter unless you were seated close to the Governor



Kaitlin

· 1d

The emotional reaction I had to this is overwhelming. I admire your bravery @LindseyBoylan and I stand by you in solidarity.



Lindsey Boylan

@Lindsey... · 1d

Today I am telling my story. I never planned to share the details of my experience working in the Cuomo administration, but I am doing so now in hopes that it may make it easier fo...



Jesse McKinley

@jessemckinley · 1d

INBOX: "NYGOVCUOMO ANNOUNCES COMPLETION OF \$4.3 MILLION SUPPORTIVE HOUSING DEVELOPMENT SERVING NEW YORKERS FACING HOMELESSNESS"

I think this is going to be a tough day to get coverage for this



Message

From: Lis Smith [REDACTED]
Sent: 2/26/2021 4:51:49 AM
To: Stephanie Benton Cell [REDACTED]; Dani [REDACTED] Josh Vlasto [REDACTED] Steve Cohen [REDACTED]
Peter Ajemian [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Maggie Moran [REDACTED] Melissa DeRosa [REDACTED]
[REDACTED] Linda Lacewell [REDACTED] Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED] Jeff Pollock [REDACTED] Beth Garvey [REDACTED]
[REDACTED]
Subject: 2/25/2021 11:51:49 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Look at the likes from kaitlin [REDACTED] and charlotte [REDACTED]

Date: Friday, February 26 2021 12:56 PM
Subject: RE: Priv and Confidential
From: Melissa DeRosa [REDACTED]@exec.ny.gov >
To: 'Lis Smith' [REDACTED]@gmail.com >; Jeffrey Pollock [REDACTED]@globalstrategygroup.com >;
Dani Lever [REDACTED]@gmail.com >; Judith Mogul [REDACTED]@exec.ny.gov >; Linda A Lacewell
CC: (dfs.ny.gov) [REDACTED]@dfs.ny.gov >; Steven Cohen (esd.ny.gov) [REDACTED]@esd.ny.gov
>; Josh Vlasto [REDACTED];

Lis look at this draft

Let me address a couple of matters. First, the situation with Ms. Boylan and let me start by establishing the facts. I never physically touched her inappropriately. There was no discussion about strip poker on the plane. There were four people present on the plane, all within earshot, and no one heard the comment because it was not said. As far as knees or feet or legs making contact during the flight, anyone who has been on the state plane knows that you are sitting across from each other and facing each other, making it virtually impossible not to be in incidental physical contact. There are also people sitting less than two feet across the aisle from you.

Ms. Boylan says I gave her a tour of my conference room— I often show people historical artifacts that I have collected overtime including gifts from Bill Clinton, Native Americans, my father, and historical mementos. It is, if you will, a standard tour. Many of you have seen it. The articles' significance is not beyond that which is apparent. The door is always open to my conference room because Stephanie sits about 10 feet away and this way she can hear me and I can hear her so we can communicate. The only time the door is ever closed is when we are having a legislative leaders meeting or a large group meeting.

The door of my office in New York City is always open also for the same reason, whoever is sitting outside is always about 10 feet away and can relay calls, etc. In some ways I do this for myself. If anyone says anything inappropriate, I have a witness.

Ms. Boylan held a significant position and I always thought I had a good, professional and mutually friendly relationship with her. She showed talent and was hardworking. Ultimately, she had a number of issues with colleagues and subordinates which were resolved by the counsel and HR office that led to her departure and subsequently resulted in their decision not to offer Ms. Boylan continued employment. At no time in discussions with anyone, including the HR staff, did Ms. Boylan suggest any inappropriate behavior by me.

I have not spoken to Ms. Boylan since she left 3 years and 5 months ago. She did,

unsolicited, tweet that she supported my reelection and our administration's policies and team after she left the administration. On March 14 of last year, she did text members of my senior staff regarding an Executive Order that she believed negatively impacted her campaign for Congress at the time. The implication was the staff directed the policy at her candidacy directly. She was upset but her perception was not true. They were statewide reforms to address challenges of the pandemic.

Ms. Boylan says I touched her back and arm. I don't remember it but this may very well have been incidental. In general, my customary behavior is to greet people hello or say goodbye with a hug or a kiss. I kiss women and men hello or goodbye. I often greet staff and friends this way. I did an event in Queens the other day. I hugged the Assemblymembers and the pastors. In truth is it my usual custom. I have a picture hanging in my office kissing Al Gore. I've kissed Speaker Heastie and Senate Leader Andrea Stewart Cousins hello. Sometimes I kiss some reporters hello. You can go online and find pictures of me kissing and hugging hundreds of people. At least prior to COVID. A hug does make contact with an arm and back. Sometimes I get a sense when people are standoffish and I respect that. At no time did I kiss Ms. Boylan on the lips.

I spend most of my life at work and colleagues are often also personal friends. At work sometimes I am playful and make jokes that I think are funny. Some people do not find them funny or appropriate — my children tell me it's me being awkward. I do, on occasion, tease people in a good natured way and I do use nicknames. I call Robert Mujica the Sphinx. I call [REDACTED] I say Dr. Malatras is not really a doctor, I call Bcth Bethesda. I do it in public and in private. You have seen me do it at briefings hundreds of times. I have teased people about getting married or not getting married, I've teased men about their choice of ties. I mean no offense and only attempt to add some levity and banter to what is a very serious business.

I also understand that customs change, and that sensitivity has changed and that what might be usual custom in the past is now found by some to be insensitive or too personal. I understand that norms have changed. I want to be hyper vigilant and exemplify that change.

I never meant any disrespect to Ms. Boylan and I am sorry if I made her feel uncomfortable. I am also sorry the relationship with the staff in the office did not work out.

People have commented on my office and staff. My staff are tough, motivated and top quality. My office is not for the faint of heart. It is high pressure, high stress, with high demands, and difficult circumstances. It certainly is not for everyone. There are men and women alike who say that I am a demanding boss and my team is demanding and can be hard charging. They are right. It is a high pressure environment and we work seven days a week — it is very intense, serious, and grueling. And we believe the people of the State of New York deserve the best possible service, and we work obsessively to deliver the best service.

At the same time, I doubt you will find an elected official who has a longer serving staff of higher quality people. Just look at the situation during COVID. Larry Schwartz, former Secretary to the Governor, I've worked with for 30 years. Steve Cohen, former Secretary to the Governor – 30 years, [REDACTED]..... Linda Lacewell came back from California. Jim Malatras, 14 years. Melissa DeRosa, [REDACTED] Rich Azzopardi. They are intensely dedicated and committed to the mission. We are a bipartisan administration and have staff who crossed the aisle to come join my team, including Robert Mujica, Kelly Cummings and Beth Garvey.

##

In terms of conversations with legislators and politicians, I have a different attitude. Government is a serious business. The stakes are very high and making progress is often a fight and I believe I was elected to fight for the people. That's what I told them I would do. Indeed, that was my slogan since my Attorney General days. There is no change without a fight. Overturning the status quo is hard, but people demand change and I promised to deliver it. Marriage equality doesn't pass without a fight. The \$15 minimum wage doesn't pass without a fight. A woman's right to choose doesn't pass without a fight. Passing a budget doesn't happen without a fight. Building an airport is a fight. Fighting racism is a fight. Defeating COVID is a fight. I find some politicians are more interested in preserving the status quo or their own political careers and that some politicians are more interested in making headlines than headway. Conflict between politicians is inevitable if you actually want to get something done. These situations can get heated. That is the nature of the business.

I also hold politicians responsible. A politician who lies or attacks my integrity or accuses my administration of a crime, I will not take lightly. Nor should I. Nor

should society. It is illegal. It is defamation. It does a disservice to the public.

The public doesn't trust politicians as a class – their integrity or capacity – and I try my best to restore the trust.

And to be totally frank, yes I challenge the press. I learned it from watching my father, who spent hours on the phone arguing in a raised voice with Jimmy Breslin and Jack Newfield. Sometimes it's bruising but I grew up believing it was part of the process.

This is not to say rudeness is ever acceptable. One can be direct and straightforward and truthful, but not rude. For any person who felt my staff or myself was rude to them, or for anyone who was offended, I apologize. The heat of battle does not excuse rudeness.

As far as judgement of my leadership is concerned, New Yorkers watched it for 10 years and for hundreds of hours last year. Good, impatient, annoyed, confrontational. They watched it all. I'm not perfect and they know it. But they know who I am – truly, and who I fight for.

These issues today do not operate in a vacuum but rather a vortex. Presidential politics, political extremism, many ongoing campaigns, COVID fatigue, lack of legislative engagement, economic stress.

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Thank you

From: Lis Smith [REDACTED]@gmail.com >
Sent: Friday, February 26, 2021 12:01 PM
To: Jeffrey Pollock [REDACTED]@globalstrategygroup.com >
Cc: Dani Lever [REDACTED]@gmail.com >; Judith Mogul [REDACTED]@exec.ny.gov >; Linda A Lacewell (dfs.ny.gov) [REDACTED]@dfs.ny.gov >; Melissa DeRosa [REDACTED]@exec.ny.gov >; Steven Cohen (esd.ny.gov) [REDACTED]@esd.ny.gov >; Josh Vlasto [REDACTED]@esd.ny.gov >;
Subject: Re: Priv and Confidential

Melissa I thought th plan was now not to do this

On Fri, Feb 26, 2021 at 11:00 AM Jeffrey Pollock [REDACTED]@globalstrategygroup.com > wrote:

This doesn't feel different. I think someone needs to stop and do an outline of what needs to be accomplished. And if it were me, it would start with contrition not Boylan

Jeffrey Pollock
President
D [REDACTED]
M [REDACTED]
My pronouns: he, him, his

From: Melissa DeRosa [REDACTED]@exec.ny.gov >
Sent: Friday, February 26, 2021 10:27:55 AM
To: Linda A Lacewell (dfs.ny.gov) [REDACTED]@dfs.ny.gov >; Judith Mogul [REDACTED]@exec.ny.gov >; Steven Cohen (esd.ny.gov) [REDACTED]@esd.ny.gov >; Josh Vlasto [REDACTED]@gmail.com >; Dani Lever < [REDACTED]@gmail.com >; Lis Smith [REDACTED]@gmail.com >; Jeffrey Pollock < [REDACTED]@globalstrategygroup.com >
Subject: Re: Priv and Confidential

[EXT EMAIL]

My edits:

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Message

From: Melissa DeRosa [REDACTED]@exec.ny.gov]
Sent: 2/26/2021 12:32:21 AM
To: Stephanie Benton [REDACTED]@exec.ny.gov]; Judith Mogul [REDACTED]@exec.ny.gov];
Josh Vlasto [REDACTED]@gmail.com]; Jeffrey Pollock [REDACTED]@globalstrategygroup.com];
Lis Smith [REDACTED]; Dani Lever [REDACTED]@gmail.com]; Linda A Lacewell (dfs.ny.gov)
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[REDACTED]@exec.ny.gov]; Richard Azzopardi [REDACTED]@exec.ny.gov]; Maggie Moran
[/o=ExchangeLabs/ou=Exchange Administrative Group
(FYDIBOHF23SPDLT)/cn=Recipients/cn=2805c61da550463db5e5679e7960c576-mmoran]
Subject: PRIV AND CONFIDENTIAL

External [REDACTED]@exec.ny.gov)

[Report This Email](#) [FAQ](#) [Protection by INKY](#)

Please review - i'll set a call to go through this at everyone's earliest convenience

From: Stephanie Benton
Sent: Thursday, February 25, 2021 7:06 PM
To: Melissa DeRosa; Judith Mogul
Subject: Privileged.

Draft.

Let me address the situation with Ms. Boylan and let me start by establishing the facts. I never contacted her inappropriately. There was never a discussion about strip poker on the plane. There were four people on the plane, all within earshot, and no one heard the comment because it was not said. There are not even any cards on the plane. As far as knees or feet or legs making contact during the flight, anyone who has been on the very small state plane knows that you are sitting across from each other and facing each other, making it virtually impossible not to be in incidental physical contact. There are also people sitting two feet across the aisle from you.

In my conference room which is where Ms. Boylan says I showed her artifacts, I often show people artifacts including gifts from Bill Clinton, Native Americans and my father, and historical mementos. It is, if you will, a standard tour. Many of you have seen it. The articles' significance is not beyond that which is apparent. The door is always open to my conference room because Stephanie sits about 10 feet away and this way she can hear me and I can hear her so we can communicate. I can hear her on the phone so I know who is calling. The only time the door is ever closed is basically when we are having a leaders meeting or a large staff meeting.

Confidential

KVT0000568

EXHIBIT

11

The door of my office in New York City is always open also for the same reason, whoever is sitting outside is always about 10 feet away and can relay calls, etc. In some ways I do this for my protection also. If anyone says anything inappropriate, I have a witness.

Ms. Boylan held an important position and I always thought I had a good, professional and mutually friendly relationship with her. I would have said we were on very good terms. She showed talent. Ultimately, she had issues with a number of female staff members which were beyond my control and resolved by the counsel and HR office. They ultimately decided not to offer Ms. Boylan continued employment. At no time in discussions with anyone, including the HR staff, did Ms. Boylan suggest any inappropriate behavior by me.

Ms. Boylan asked me to intervene on her behalf to get her job back and I could not. I did not speak to Ms. Boylan since she left 3 (?) years ago. She did, unsolicited, tweets that she supported my reelection. Later she did email my staff complaining that election rule changes the state made negatively impacted her campaign for Congress at the time. The implication was the staff directed them at her. That was not true. They were statewide reforms.

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I never meant any disrespect to Ms. Boylan and I am sorry if I made her feel uncomfortable. I am also sorry the relationship with the staff in the office did not work out.

People have commented on my office and staff. There are women who say that I am a demanding boss and my team is demanding and expects excellence. There are men who say that I am a demanding boss and that my team is demanding and expects excellence. They are right. There are ex-employees who say they worked in my office and found it difficult and stressful and they couldn't take it. I understand that. It is a high pressure environment and we work seven days a week. The majority of my senior staff are females – but male or female, it is a very intense, serious, grueling environment. And we believe the people of the State of New York deserve the best possible service, and we work obsessively to deliver the best service.

My staff are tough, motivated and top quality. My office is not for the faint of heart or those who are uncomfortable with high pressure and difficult circumstances. It certainly is not for everyone and, at the same time, my team won't accept working with just anyone. They want a high performing, high producing team. For these people who didn't like working with my team, I understand it. It is very hard.

At the same time, I doubt you will find an elected official who has a longer serving staff of higher quality people. Just look at the situation during COVID. Larry Schwartz, former Secretary to the Governor, I've worked with for 30 years. Steve Cohen, former Secretary to the Governor – 30 years, [REDACTED] Linda Lacewell came back from California. Jim Malatras, 14 years. [REDACTED] Rich Azzopardi. People have left positions in the republican bodies to come join my team, Robert Mujica, Kelly Cummings and Beth Garvey.

##

In terms of conversations with legislators and politicians, I have a different attitude. Government is a serious business. The stakes are very high and making progress is often a fight and I believe I was elected to fight for the people. That's what I told them I would do. Indeed, that was my slogan. There is no change without a fight. Overturning the status quo is hard, but people demand change and I promised to deliver it. Marriage equality doesn't pass without a fight. The \$15 minimum wage doesn't pass without a fight. A woman's right to

choose doesn't pass without a fight. Passing a budget doesn't happen without a fight. Building an airport is a fight. Defeating COVID is a fight. I find some politicians are more interested in preserving the status quo or their own political careers and that some politicians are more interested in making headlines than headway. Conflict between politicians is inevitable if you actually want to get something done.

I also hold politicians responsible. A politician who lies or attacks my integrity or accuses my administration of a crime, I will not take lightly. Nor should I. Nor should society. It is illegal. It is defamation.

Politicians who are incompetent, self-serving or lazy at their jobs are hurting people, I believe they should be called out. I believe that is my job. These situations can get heated. That is the nature of the business. These are elected officials who are go along and get along but then no changes will be made and I believe that brand of politics fails their public duty.

Theodore Roosevelt said,

"Aggressive fighting for the right is the noblest sport the world affords."

"No man is worth calling a man who will not fight rather than submit to infamy or see those that are dear to him suffer wrong."

"It is the doer of deeds who actually counts in the battle for life, and not the man who looks on and says how the fight ought to be fought, without himself sharing the stress and the danger."

Barack Obama said,

"Hope is not blind optimism. Hope is that thing inside us that something better awaits us if we have the courage to reach for it, and to work for it, and to fight for it.

And to be totally frank, yes I challenge the press. When you are misleading the people, I call you on it.

Also, as far as judgement of my leadership is concerned, New Yorkers watched it for 10 years and for hundreds of hours last year. Good, impatient – annoyed. They watched it all. I'm not perfect and they know it. But they know who I am – truly, and who I fight for.

This is not to say rudeness is ever acceptable. One can be direct and straightforward, but not rude. For any person who felt my staff or myself was rude to them, or for anyone who was offended, I apologize.

These issues today do not operate in a vacuum but rather a vortex. Presidential politics, political extremism, many ongoing campaigns, COVID fatigue, lack of legislative involvement, economic stress.

It is all in the mix. COVID is politicized. The March 25 memo and nursing homes is politicized. Medical professionals' endorsements of the strategy are dismissed by political operatives. Party politics is politicized with extremes on both sides. I will work hard to bring down the temperature and focus on what we are elected to do – manage COVID, vaccinate New Yorkers and rebuild New York.

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

FEBRUARY 24, 2021 | Albany, NY

Statement from Press Secretary Caitlin Girouard

STATEMENT

"As we said before, Ms. Boylan's claims of inappropriate behavior are quite simply false."

In Ms. Boylan's latest blog post, she opens up with a story about a plane trip in October 2017 - the manifests of all flights from October 2017 can be found below - there was no flight where Lindsey was alone with the Governor, a single press aide, and a NYS Trooper. Below is a statement that can be attributed to **John Maggiore, Howard Zemsky, Dani Lever and Abbey Fashouer Collins** who were on all of these flights with her:

"We were on each of these October flights and this conversation did not happen."

https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/October_2017.pdf

10/04/17 - Watertown Downtown Revitalization Initiative/Southern Tier Lithium Ion Battery Giga-Factory Announcement/Western New York Smart Growth Community Fund Announcement

Passengers:

Governor Andrew M. Cuomo

John Maggiore, Director of Policy

Dani Lever, Press Secretary

Lindsey Boylan, Chief of Staff, Empire State Development

Howard Zemsky, President and CEO, Empire State Development

10/06/17 - Cortland Downtown Revitalization Initiative/Rochester Train Station Event

Passengers:

Governor Andrew M. Cuomo

John Maggiore, Director of Policy

Lindsey Boylan, Chief of Staff, Empire State Development

Abbey Fashouer, First Deputy Press Secretary

Protective Services incl. Sr. Inv. V. Straface

10/12/17 - Cold Spring Harbor Laboratory Groundbreaking/Staten Island Fentanyl Crisis Announcement

Passengers:

Governor Andrew M. Cuomo

Dani Lever, Press Secretary

Lindsey Boylan, Chief of Staff, Empire State Development

Howard Zemsky, President and CEO, Empire State

10/17/17 - John R. Oishei Children's Hospital Dedication Ceremony/Syracuse Airport Redesign and Reconstruction Announcement/Norsk Titanium USA Announcement

Passengers:

Governor Andrew M. Cuomo

John Maggiore, Director of Policy

Dani Lever, Press Secretary

Howard Zemsky, President and CEO, Empire State Development

Lindsey Boylan, Chief of Staff, Empire State Development

Protective Services incl. Sr. Inv. J. Boyle

Contact the Governor's Press Office

Contact us by phone:

Albany: (518) 474 - 8418

New York City: (212) 681 - 4640

Contact us by email:

Press.Office@exec.ny.gov

Message

From: Melissa DeRosa [REDACTED]
Sent: 2/26/2021 6:00:29 PM
To: Judy Mogul [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Linda Lacewell [REDACTED]; Rich Azzopardi [REDACTED]; Dani [REDACTED]; Stephanie Benton Cell [REDACTED]; Peter Ajemian [REDACTED]; Josh Vlasto [REDACTED]; [REDACTED]; Maggie Moran [REDACTED]; Lis Smith [REDACTED]; Steve Cohen [REDACTED]; Beth Garvey [REDACTED]; [REDACTED]
Subject: 2/26/2021 1:00:29 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

Again this is just to get to agreed upon language

MORAN00000450



Message

From: Melissa DeRosa [REDACTED]
Sent: 2/26/2021 6:00:36 PM
To: Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey [REDACTED] Dani [REDACTED] Josh Vlasto [REDACTED]
[REDACTED] Steve Cohen Lis Smith [REDACTED] Peter Ajemian Rich Azzopardi Maggie Moran [REDACTED]
[REDACTED] Jeff Pollock [REDACTED]; Stephanie Benton Cell [REDACTED] Judy Mogul [REDACTED]; Linda Lacewell
Subject: 2/26/2021 1:00:36 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

That stays in his voice

Message

From: Melissa DeRosa [REDACTED]
Sent: 2/26/2021 7:43:37 PM
To: Rich Azzopardi; Dani [REDACTED]; Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Jeff Pollock [REDACTED];
[REDACTED]; Maggie Moran [REDACTED]; Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED];
[REDACTED]; Steve Cohen; Linda Lacewell; Peter Ajemian; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com]; Judy Mogul [REDACTED]
Subject: 2/26/2021 2:43:37 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

Lis can u do a once over on that draft

Message

From: Lis Smith [REDACTED]
Sent: 2/26/2021 9:00:58 PM
To: Jeff Pollock [REDACTED] Judy Mogul [REDACTED] Beth Garvey [REDACTED] Linda Lacewell [REDACTED] Josh Vlasto [REDACTED]
[REDACTED] Dani [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Steve Cohen [REDACTED] Stephanie Benton Cell
[REDACTED] Rich Azzopardi [REDACTED] Melissa DeRosa [REDACTED]; Maggie Moran [REDACTED];
Peter Ajemian [REDACTED]
Subject: 2/26/2021 4:00:58 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Yes



Explore

Settings

Thread

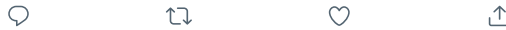


Lindsey Boylan @LindseyBoylan

Just curious, @tomwatson and @Lis_Smith are you participating in the ongoing smear on me from the @NYGovCuomo campaign side?

5:35 PM · Mar 21, 2021 · Twitter for iPhone

130 Retweets 22 Quote Tweets 932 Likes



Lindsey Boylan @LindseyBoylan · Mar 21
Replying to @LindseyBoylan

This is the kind of question that can be answered in the short-term or long-term so no big deal if you're not ready, or this feels hard.

2 12 248



Lindsey Boylan @LindseyBoylan · Mar 21
And what percentage of your time do you spend on sexual harassments and what percentage of your time do you spend on nursing home deaths?



2 15 281



Lindsey Boylan @LindseyBoylan · Mar 21
Can anyone find that series of tweets where I call out @tomwatson for his bullshit artistry on the nursing home stuff?

3 11 204



Lindsey Boylan @LindseyBoylan · Mar 21
An interesting feature of online "political warfare" is these bots that literally repeat the same disinformation. In this case it's about me & how I'm a secret Trump plant, how I'm a liar & fame chaser, how I'm "doing this for the money," etc.

That you @tomwatson & @Lis_Smith?

7 25 194



kristina. @uhmmkristina · Mar 21
Replying to @LindseyBoylan @tomwatson and 2 others
Of course they are.

1 35

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Relevant people



Lindsey Boylan @LindseyBoylan
Mom. Progressive N
Fighting 4 a Livable
Govt Official & Urb:
Candidate 4 Manha
(She/Her)



Tom Watson @tomwatson
Consultant: nonpro:
communications, p
Professor, author, @
player, gardener.



Lis Smith @Lis_Smith
Dem. Fmr Senior Ac
Communications fo

What's happening

Tokyo Olympics · LIVE
US Olympic gymnastics tri
continue in St. Louis
Trending with #GymTrials21

Zendaya · Trending
Zendaya
26.1K Tweets

90 Day Fiancé · Trending
#90DayFiance
Viewers tune in to a new epi:
Fiancé: Happily Ever After? o
Trending with Ronald, Jovi

Awards · LIVE
BET Awards 2021: Cardi B's
bump, Megan Thee Stallio
DaBaby and more light up
BET stage
Trending with #BETAwards

NBA · LIVE
Bucks at Hawks
Trending with #MILvsATL

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People on Twitter are the first to know.

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EXHIBIT

14

Name	Msg #	From	To	Body	Timestamp: Date	Timestamp: Time
Rapid response/Private and Confidential	45	[REDACTED] Josh Vlasto	[REDACTED] Linda Lacewell	Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Jeffrey Pollock Melissa Derosa Steve Cohen Steph Benton Beth Garvey Judy Mogul @gmail.com Dani Lever (owner)	For sure	2/24/2021 2/24/2021 7:29:05 PM(UTC-5)
Rapid response/Private and Confidential	46	[REDACTED] Josh Vlasto	[REDACTED] Linda Lacewell	Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Jeffrey Pollock Melissa Derosa Steve Cohen Steph Benton Beth Garvey Judy Mogul @gmail.com Dani Lever (owner)	I'm not so sure about the public	2/24/2021 2/24/2021 7:29:12 PM(UTC-5)
Rapid response/Private and Confidential	55	[REDACTED] Lis Smith	[REDACTED] Linda Lacewell	Dani Lever (owner) Peter Ajemien Rich Azzopardi Jeffrey Pollock Melissa Derosa Steve Cohen Steph Benton Beth Garvey Judy Mogul @gmail.com Dani Lever (owner)	Just talked to Isaac Dovere at the Atlantic- he is very hard on our side on this	2/24/2021 2/24/2021 8:45:24 PM(UTC-5)
Rapid response/Private and Confidential	56	[REDACTED] Rich Azzopardi	[REDACTED] Linda Lacewell	Dani Lever (owner) Lis Smith Peter Ajemien Jeffrey Pollock Melissa Derosa Steve Cohen Steph Benton Beth Garvey Judy Mogul @gmail.com Dani Lever (owner)	What's he saying?	2/24/2021 2/24/2021 8:46:15 PM(UTC-5)
Rapid response/Private and Confidential	57	[REDACTED] Lis Smith	[REDACTED] Linda Lacewell	Dani Lever (owner) Peter Ajemien Rich Azzopardi Jeffrey Pollock Melissa Derosa Steve Cohen Steph Benton Beth Garvey Judy Mogul @gmail.com Dani Lever (owner)	Total mind meld	2/24/2021 2/24/2021 8:50:47 PM(UTC-5)
Rapid response/Private and Confidential	58	[REDACTED] Lis Smith	[REDACTED] Linda Lacewell	Dani Lever (owner) Peter Ajemien Rich Azzopardi Jeffrey Pollock Melissa Derosa Steve Cohen Steph Benton Beth Garvey Judy Mogul @gmail.com Dani Lever (owner)	I'm on the phone w him	2/24/2021 2/24/2021 8:50:52 PM(UTC-5)

Name	Msg #	From	To	Body	Timestamp: Date	Timestamp: Time
Rapid response/Private and Confidential	59	+ [redacted] Azzopardi Rich	+ [redacted] Linda Laceywell + [redacted] Steve Cohen + [redacted] Steph Benton + [redacted] Beth Garvey + [redacted] Judy Mogul + [redacted] @gmail.com Dani Lever (owner)	Dani Lever (owner) Lis Smith Peter Ajemien Jefrey Pollock Melissa Derosa Ok	2/24/2021	2/24/2021 8:51:00 PM(UTC-5)
Rapid response/Private and Confidential	65	+ [redacted] Smith Lis	+ [redacted] Linda Laceywell + [redacted] Steve Cohen + [redacted] Steph Benton + [redacted] Beth Garvey + [redacted] Judy Mogul + [redacted] @gmail.com Dani Lever (owner)	Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa He says he could be convinced to write something on andrew	2/24/2021	2/24/2021 9:02:56 PM(UTC-5)
Rapid response/Private and Confidential	66	+ [redacted] Smith Lis	+ [redacted] Linda Laceywell + [redacted] Steve Cohen + [redacted] Steph Benton + [redacted] Beth Garvey + [redacted] Judy Mogul + [redacted] @gmail.com Dani Lever (owner)	Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Bc he thinks this whole thing is bullshit	2/24/2021	2/24/2021 9:03:11 PM(UTC-5)
Rapid response/Private and Confidential	67	+ [redacted] Smith Lis	+ [redacted] Linda Laceywell + [redacted] Steve Cohen + [redacted] Steph Benton + [redacted] Beth Garvey + [redacted] Judy Mogul + [redacted] @gmail.com Dani Lever (owner)	Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Just hold- let me chat w him - he's calling me again Friday	2/24/2021	2/24/2021 9:03:28 PM(UTC-5)
Rapid response/Private and Confidential	78	+ [redacted] Jeffrey Pollock	+ [redacted] Linda Laceywell + [redacted] Steve Cohen + [redacted] Steph Benton + [redacted] Beth Garvey + [redacted] Judy Mogul + [redacted] @gmail.com Dani Lever (owner)	Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Why did we got after biaggi?	2/24/2021	2/24/2021 11:37:52 PM(UTC-5)
Rapid response/Private and Confidential	79	+ [redacted] Jeffrey Pollock	+ [redacted] Linda Laceywell + [redacted] Steve Cohen + [redacted] Steph Benton + [redacted] Beth Garvey + [redacted] Judy Mogul + [redacted] @gmail.com Dani Lever (owner)	Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Thought the point was to not engage on that kind of level	2/24/2021	2/24/2021 11:38:03 PM(UTC-5)

From: Lis Smith [REDACTED]@gmail.com> on behalf of Lis Smith [REDACTED]@gmail.com>
To: Melissa DeRosa
Sent: 2/24/2021 4:26:46 PM
Subject: Q's to practice

Q's

Did you forcibly kiss Ms Boylan?

Did you touch her legs/arms/torso?

Did you tell her you wanted to play strip poker?

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

Did you call her Lisa?

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

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

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

Do you think other women will come forward?

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

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

Chat #	From	To	Body	Timestamp: Time
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Hey	2/26/2021 11:15:22 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Have u talked to Andrew abt this	2/26/2021 11:15:35 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	I have nothing but respect for Charlotte and the work she did for the state. Understanding what she survived, I would only want her to feel supported and valued. I believe the best way to get to the truth is through a full, fact-based and independent investigation by an outside counsel who has the expertise to review matters like this one and can recommend remedial steps if warranted.	2/27/2021 1:09:05 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	I think it would be helpful if u talk to him	2/27/2021 10:17:40 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	That convo was so enraging	2/27/2021 10:17:58 AM(UTC-5)

9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	I'm listening to u	2/27/2021 10:18:09 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	That statement is enraging	2/27/2021 10:18:13 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	I'll talk to him with like jef if need be.	2/27/2021 10:27:04 AM(UTC-5)

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

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



By Jesse McKinley

Published Feb. 27, 2021 Updated March 16, 2021

ALBANY, N.Y. — A second former aide to Gov. Andrew M. Cuomo is accusing him of sexual harassment, saying that he asked her questions about her sex life, whether she was monogamous in her relationships and if she had ever had sex with older men.

The aide, Charlotte Bennett, who was an executive assistant and health policy adviser in the Cuomo administration until she left in November, told The New York Times that the governor had harassed her late last spring, during the height of the state’s fight against the coronavirus.

Ms. Bennett, 25, said the most unsettling episode occurred on June 5, when she was alone with Mr. Cuomo in his State Capitol office. In a series of interviews this week, she said the governor had asked her numerous questions about her personal life, including whether she thought age made a difference in romantic relationships, and had said that he was open to relationships with women in their 20s — comments she interpreted as clear overtures to a sexual relationship.

Mr. Cuomo said in a statement to The Times on Saturday that he believed he had been acting as a mentor and had “never made advances toward Ms. Bennett, nor did I ever intend to act in any way that was inappropriate.” He said he had requested an independent review of the matter and asked that New Yorkers await the findings “before making any judgments.”

Ms. Bennett said that during the June encounter, the governor, 63, also complained to her about being lonely during the pandemic, mentioning that he “can’t even hug anyone,” before turning the focus to Ms. Bennett. She said that Mr. Cuomo asked her, “Who did I last hug?”

Ms. Bennett said she had tried to dodge the question by responding that she missed hugging her parents. “And he was, like, ‘No, I mean like really hugged somebody?’” she said.

Mr. Cuomo never tried to touch her, Ms. Bennett said, but the message of the entire episode was unmistakable to her.

“I understood that the governor wanted to sleep with me, and felt horribly uncomfortable and scared,” Ms. Bennett said. “And was wondering how I was going to get out of it and assumed it was the end of my job.”

Ms. Bennett said she had disclosed the interaction with Mr. Cuomo to his chief of staff, Jill DesRosiers, less than a week later and was transferred to another job, as a health policy adviser, with an office on the opposite side of the Capitol, soon after that. Ms. Bennett said she had also given a lengthy statement to a special counsel to the governor, Judith Mogul, toward the end of June.

Ms. Bennett said she ultimately decided not to insist on an investigation because she was happy in her new job and “wanted to move on.” No action was taken against the governor.

In his statement, Mr. Cuomo called Ms. Bennett a “hard-working and valued member” of his staff with “every right to speak out.” He said that Ms. Bennett had spoken to him about being a sexual assault survivor — an experience about which she had been open in the past — and he had tried to be supportive and helpful. “The last thing I would ever have wanted was to make her feel any of the things that are being reported,” the governor said.

The governor did not deny that he asked Ms. Bennett personal questions; he said in the statement that he would have no further comment until the review concluded.

Ms. Bennett’s account follows another detailed accusation published on Wednesday by Lindsey Boylan, a former state economic development official who said that Mr. Cuomo had harassed her on several occasions from 2016 to 2018, at one point giving her an unsolicited kiss on the lips at his Manhattan office.



Lindsey Boylan has accused Mr. Cuomo of harassing her on several occasions while she was employed by the state government. Rob Latour/Shutterstock

Mr. Cuomo's office has called Ms. Boylan's accusations untrue, but they have nonetheless prompted calls for investigations into her claims. In addition to the two women's harassment allegations, the governor, a third-term Democrat, is confronting significant political fallout over his handling of the state's nursing homes during the pandemic.

After seeing Ms. Boylan detail her accusations against Mr. Cuomo, Ms. Bennett shared Ms. Boylan's account on Twitter, suggesting that people read it if they wanted a true picture of "what it's like to work for the Cuomo" administration.

The Times contacted Ms. Bennett, and she agreed to relate her own account of harassment. She said she felt an obligation to other victims of sexual harassment and wanted to counter the way Mr. Cuomo "wields his power."

Ms. Bennett said she had told her parents and friends about the exchange with the governor around the time that it happened, as well as about her growing discomfort with having to work closely with him, and had kept text messages from that period.

The Times reviewed the messages and confirmed their contents with those who received them. Ms. Bennett also retained text messages from Ms. DesRosiers and Ms. Mogul that alluded to their meetings in June, but did not mention the subject matter.

“I have no problem with what they did,” Ms. Bennett said of Ms. DesRosiers and Ms. Mogul, describing both women as sympathetic to her concerns. “I have a problem with what the governor did.”

Ms. Bennett was hired by the administration in early 2019, working out of the governor’s Manhattan office as a briefer, an entry-level position. She had graduated from Hamilton College in 2017, where she was active in women’s issues and founded a sexual misconduct task force. She said her own experience in surviving a sexual attack had prompted her to “help sexual assault survivors be heard and enforce victims’ rights,” according to a bulletin on the college’s website.

By mid-2019, Ms. Bennett had been promoted to senior briefer and executive assistant after an interview with Mr. Cuomo. The two became friendly, she said, and they bonded over shared connections with Westchester County: At the time, he was living with Sandra Lee, a celebrity chef, in Mount Kisco; Ms. Bennett was living with her parents in a neighboring hamlet. She mentioned to Mr. Cuomo that she had played middle-school soccer against one of his daughters, who are also in their mid-20s.

“We got along really well,” she said of the governor. Mr. Cuomo, she said, would sometimes ask questions about her dating life that she said seemed inappropriate but not necessarily unmanageable.

“I saw him more as a father figure,” she said. “I wasn’t thinking about it as anything sexual.”

The accusations against Mr. Cuomo come as he faces fierce criticism over his handling of New York's nursing homes amid the pandemic. Spencer Platt/Getty Images

In January 2020, Ms. Bennett sent her mother a text. "Had a really long convo with Gov today," she wrote, outlining a two-hour conversation about numerous topics, including her career goals.

"He had a lot to say and was very emotional and serious but also asked a lot of questions," she wrote, adding, "He got emotional. Not me."

Ms. Bennett's mother, Jessica, confirmed the text, and her feeling, at the time, that it was reassuring that the governor seemed to be taking on the role of a mentor.

Ms. Bennett said she was asked in late March to begin working in Albany as part of the state's Covid-19 response effort. Two months later, in mid-May, the governor's perception of their relationship seemingly began to change, she said.

On May 15, she said she arrived at the Capitol around 7 a.m. to find Mr. Cuomo already at work. Ms. Bennett was there to drop off some briefing papers, but Mr. Cuomo was chatty, asking about her love life and, in a gossipy way, whether she was involved with other members of the governor's staff. She memorialized the exchange in several texts to another Cuomo staff member that The Times reviewed.

Ms. Bennett said she had mentioned a speech she was scheduled to give to Hamilton students about her experience as a survivor of sexual assault. She said she had been taken aback by Mr. Cuomo's seeming fixation on that element of her life experience.

"The way he was repeating, 'You were raped and abused and attacked and assaulted and betrayed,' over and over again while looking me directly in the eyes was something out of a horror movie," she wrote in a second text to her friend. "It was like he was testing me."

In retrospect, Ms. Bennett said, she viewed the May 15 meeting "as the turning point in our relationship."

"Anything before it I now see differently," she said. "I now understand that as grooming."

Three weeks later, Ms. Bennett said, she was summoned to Mr. Cuomo's second-floor office and was asked to take dictation with another aide.

After the second aide left, Mr. Cuomo and Ms. Bennett continued their work. When they finished, she said, he asked her to turn off her recorder, and he began a winding conversation that touched on the Black Lives Matter protests and his daily news conferences.

But, Ms. Bennett said, the governor also started to ask questions about her personal life, including whether she was romantically involved, whether she was monogamous in her relationships and whether she had ever had sex with older men.

A series of text exchanges with a female friend from that afternoon, June 5, comported with Ms. Bennett's recounting of the story this week. In the texts, she told her friend that she was shaken and upset by the episode and worried about even writing it down.

"Something just happened and I can't even type it out or put it in a video," Ms. Bennett wrote.

Ms. Bennett went on to say to her friend, who confirmed the texts' content and validity but asked not to be identified for fear of retribution, that she and the governor had just spoken "about age differences in relationships."

When her friend asked whether Mr. Cuomo had done anything physical to Ms. Bennett, she responded: "No but it was like the most explicit it could be."

The next day, the women continued to discuss the episode via text. Ms. Bennett wrote that the governor had asked her whether she was having sex with other people "while in my recent relationships."

In the interview, Ms. Bennett said Mr. Cuomo told her he was lonely, particularly since the end of his relationship with Ms. Lee in 2019. He said Ms. Lee was "out of the picture," according to Ms. Bennett, adding that he referred to "wanting a girlfriend, preferably in the Albany area."

Ms. Bennett, who had just turned 25 at the time, said Mr. Cuomo had also asked about her feelings about age differences in relationships, saying "age doesn't matter," according to a text she sent to her friend.

"He asked me if I believed if age made a difference in relationships and he also asked me in the same conversation if I had ever been with an older man," Ms. Bennett reiterated in an interview with The Times.

At one juncture, Ms. Bennett said, the governor also noted that he felt "he's fine with anyone above the age of 22," a point that came up after they discussed her speech at Hamilton on what was her 25th birthday.

Asked if she felt Mr. Cuomo's questions and comments were an entreaty to a sexual relationship, Ms. Bennett said: "That's absolutely how it felt."

Ms. Bennett said that she had felt deeply uncomfortable with Mr. Cuomo's comments and had tried to shift the conversation into more neutral territory — something “not about my sex life,” she recalled — like intellectual theories about monogamy and power dynamics, and even a tattoo she was considering getting.

She said Mr. Cuomo had suggested that perhaps she should put the tattoo on her buttocks, so people would not see it when she wore a dress.

A friend of Ms. Bennett's, a former Cuomo administration official, said he had spoken to her shortly after the June 5 episode. He confirmed the contours of her account, saying that she had made it clear to him that she believed the governor wanted to have sex with her.

Ms. Bennett told her parents about the encounter within days, her mother recalled, saying her daughter had made a special visit home to do so. “She was obviously upset,” Ms. Bennett's mother said.

Ms. Bennett said she spoke to Mr. Cuomo's chief of staff, Ms. DesRosiers, on June 10, five days after the episode.

She said the meeting, in Ms. DesRosiers's office, had lasted about 10 minutes. Ms. Bennett said she had recounted her interaction with Mr. Cuomo and she recalled that Ms. DesRosiers had asked a few questions, been apologetic and asked to speak to her again in two days.

In a text message sent to a friend after the meeting, Ms. Bennett said Ms. DesRosiers had said: “How can we do this?,” asking whether she wanted to stay in the executive branch or move to another part of the state government.

When Ms. Bennett's friend asked what that meant, Ms. Bennett explained that an outside job would still be with the administration, but “just not interacting with him.”

She also told her friend, in the same series of texts, that she trusted Ms. DesRosiers but was worried about Mr. Cuomo's reaction: “I just said I didn't want him to find out and get mad.”

Two days later, on June 12, Ms. DesRosiers told Ms. Bennett she would be transferred to a new position as a health policy adviser, still working in the executive branch, but in a different part of the Capitol. Her new job was announced in a June 17 email to Department of Health officials. “Welcome Charlotte!” it concluded.

Later that month, Ms. Bennett met with Ms. Mogul, a special counsel to the governor, and repeated her claims. She said, however, that she soon decided to “let this go and move on.”

In a statement on Saturday, Beth Garvey, another special counsel to the governor, said that “Ms. Bennett’s concerns were treated with sensitivity and respect and in accordance with applicable law and policy.” She characterized the transfer to a health policy position as fulfilling “a longstanding interest” of Ms. Bennett’s.

Of Ms. Bennett, Ms. Garvey said, “she was consulted regarding the resolution, and expressed satisfaction and appreciation for the way in which it was handled.” Barbara S. Jones, a former federal judge in Manhattan, will lead the outside review into the matter, Ms. Garvey said.

Ms. Bennett left state government last fall and she now lives and works in a neighboring state. She said that her anger about what had happened had continued to percolate and had led to her departure.

“His presence was suffocating,” she said. “I was thinking that I could recover and have distance but that is so naïve.”

She added that she had been committed to her job in the administration, even after her interactions with Mr. Cuomo, and had tried to “not have him ruin this for me.”

But, she said, “I learned that’s not how that works.”

Chat #	From	To	Body	Timestamp: Time
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Will u look at statement at top of ur inbox	2/27/2021 10:32:48 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	It's not I. Correct English and I think should be from him	2/27/2021 10:34:31 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	You currently have it from two different people	2/27/2021 10:34:42 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Josh fixing	2/27/2021 10:34:57 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Can you send me the text of this statement	2/27/2021 1:48:18 PM(UTC-5)

9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	<p>Ms. Bennett has every right to speak out. She was a hardworking and valued member of our team during COVID.</p> <p>When she came to me and opened up about being a sexual assault survivor and how it shaped her and her ongoing efforts to help other survivors, I tried to be supportive and helpful. Ms. Bennett's initial impression was right: I was trying to be paternalistic towards her and help mentor her. I never made advances toward Ms. Bennett nor did I ever intend to act in any way that was inappropriate.</p> <p>This situation cannot and should not be resolved in the press so I believe the best way to get to the truth is through a full, thorough and independent investigation, including Ms. Boylan. My counsel has selected an independent counsel of the highest integrity to lead this review and I am directing all state employees to comply with her team. I am confident that when all the facts are known, my behavior will be vindicated as appropriate. I will have no further comment until the review has concluded.</p>	2/27/2021 1:52:58 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Can you send me latest	2/27/2021 2:02:54 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Ok	2/27/2021 2:06:52 PM(UTC-5)

9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Sent	2/27/2021 2:09:00 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	to whom	2/27/2021 2:09:06 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Should we change the beginning	2/27/2021 2:09:32 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	"Ms Bennett was a hardworking and valued member of our team during COVID. She has every right to speak out."	2/27/2021 2:09:49 PM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Kk	2/27/2021 2:16:55 PM(UTC-5)

9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Will flip	2/27/2021 2:16:57 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Did you see the other texts/notes	2/27/2021 2:17:20 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	PATERnalistic is really creepy	2/27/2021 2:17:32 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	People are gonna pick up on that word as really creepy	2/27/2021 2:17:57 PM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Mentor mentee?	2/27/2021 2:18:07 PM(UTC-5)

9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Something like that	2/27/2021 2:25:21 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	We gotta take out paternalistic in light of push ups	2/27/2021 2:29:53 PM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Use the one I just sent	2/27/2021 2:39:47 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	i'm not sure which one i used	2/27/2021 2:43:07 PM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	can someone else just look at this and fix it for us	2/27/2021 2:43:16 PM(UTC-5)

9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	yOU NEED TO JUMP IN TOO	2/27/2021 8:26:52 PM(UTC-5)
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Name	Msg #	From	To	Body	Timestamp: Date	Timestamp: Time
chat63587501311371 8414	186	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) Josh Vlasto Melissa Derosa Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	I don't love the word paternalistic	2/27/2021	2/27/2021 2:11:12 PM(UTC-5)
chat63587501311371 8414	187	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) Josh Vlasto Melissa Derosa Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	In the statement but Melissa he seemed pretty set on it- I think it sounds creepy retreading	2/27/2021	2/27/2021 2:11:33 PM(UTC-5)
chat63587501311371 8414	194	[REDACTED] Dani Lever	[REDACTED] Josh Vlasto Melissa Derosa Lis Smith Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	Is "reported" here a problem? She spoke to him on the record. It's not just being reported, these are her words. — "The last thing I would ever have wanted was to make her feel any of the things that are being reported."	2/27/2021	2/27/2021 2:16:52 PM(UTC-5)
chat63587501311371 8414	195	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) Josh Vlasto Melissa Derosa Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	I don't love that part but Chris/Andrew wanted in	2/27/2021	2/27/2021 2:27:55 PM(UTC-5)
chat63587501311371 8414	199	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) Josh Vlasto Melissa Derosa Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	Chris wants to make sure we have enough conitron in here	2/27/2021	2/27/2021 4:05:12 PM(UTC-5)
chat63587501311371 8414	200	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) Josh Vlasto Melissa Derosa Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	Do you think we do	2/27/2021	2/27/2021 4:05:16 PM(UTC-5)
chat63587501311371 8414	201	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) Josh Vlasto Melissa Derosa Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	Ok we do	2/27/2021	2/27/2021 4:10:33 PM(UTC-5)
chat63587501311371 8414	229	[REDACTED] Dani Lever	[REDACTED] Josh Vlasto Melissa Derosa Lis Smith Rich Azzopardi Peter Ajemien Jefrey Pollock [REDACTED]@gmail.com Dani Lever (owner)	She posed for a photo	2/27/2021	2/27/2021 6:27:23 PM(UTC-5)

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

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

From: Peter Ajemian
Sent: Saturday, February 27, 2021 3:55 PM
To: Richard Azzopardi; Linda A Lacewell (dfs.ny.gov); Josh Vlasto
Cc: Melissa DeRosa; Christopher Cuomo; Dani Lever; Jeffrey Pollock; Judith Mogul; Lis Smith; Stephanie Benton; Steven Cohen (esd.ny.gov)
Subject: Re: Current Statement

What is the answer to this question?

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
From: Richard Azzopardi
Sent: Saturday, February 27, 2021 3:07 PM
To: Linda A Lacewell (dfs.ny.gov); Josh Vlasto
Cc: Melissa DeRosa; Christopher Cuomo; Dani Lever; Jeffrey Pollock; Judith Mogul; Lis Smith; Peter Ajemian; Stephanie Benton; Steven Cohen (esd.ny.gov)
Subject: Re: Current Statement

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

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.
From: Lacewell, Linda A (DFS)
Sent: Saturday, February 27, 2021 3:04 PM
To: Josh Vlasto
Cc: Melissa DeRosa; Christopher Cuomo; Dani Lever; Jeffrey Pollock; Judith Mogul; Lis Smith; Peter Ajemian; Richard Azzopardi; Stephanie Benton; Steven Cohen (esd.ny.gov)
Subject: Re: Current Statement

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

Sent from my iPhone

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

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

Spoke to MDR
This clause has to come out

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

On Sat, Feb 27, 2021 at 2:56 PM Melissa DeRosa [REDACTED]@exec.ny.gov> wrote:

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

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

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

From: Judith Mogul
Sent: Saturday, February 27, 2021 2:49 PM

To: Peter Ajemian; Jeffrey Pollock
Cc: Richard Azzopardi; Melissa DeRosa; Linda A Lacewell (dfs.ny.gov); Lis Smith; Josh Vlasto; Stephanie Benton; Steven Cohen (esd.ny.gov); Christopher Cuomo; Dani Lever
Subject: Re: Current Statement

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

From: Peter Ajemian
Sent: Saturday, February 27, 2021 2:46 PM
To: Jeffrey Pollock
Cc: Richard Azzopardi; Melissa DeRosa; Linda A Lacewell (dfs.ny.gov); Lis Smith; Josh Vlasto; Judith Mogul; Stephanie Benton; Steven Cohen (esd.ny.gov); Christopher Cuomo; Dani Lever
Subject: Re: Current Statement

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

On Feb 27, 2021, at 2:21 PM, Jeffrey Pollock [REDACTED]@globalstrategygroup.com> wrote:

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

From: Richard Azzopardi [REDACTED]@exec.ny.gov>
Sent: Saturday, February 27, 2021 2:14 PM
To: Melissa DeRosa [REDACTED]@exec.ny.gov>; Linda A Lacewell (dfs.ny.gov) [REDACTED]@dfs.ny.gov>; Peter Ajemian [REDACTED]@exec.ny.gov>
Cc: Lis Smith [REDACTED]@gmail.com>; Josh Vlasto [REDACTED]@gmail.com>; Jeffrey Pollock [REDACTED]@globalstrategygroup.com>; Judith Mogul [REDACTED]@exec.ny.gov>; Stephanie Benton [REDACTED]@exec.ny.gov>; Steven Cohen (esd.ny.gov) [REDACTED]@esd.ny.gov>; Christopher Cuomo [REDACTED]@gmail.com>; Peter Ajemian [REDACTED]@exec.ny.gov>; Dani Lever [REDACTED]@gmail.com>
Subject: Re: Current Statement

[TEXT EMAIL]

Minor grammatical to next to last sentence.

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

From: Melissa DeRosa
Sent: Saturday, February 27, 2021 2:08 PM
To: Linda A Lacewell (dfs.ny.gov); Peter Ajemian
Cc: Richard Azzopardi; Lis Smith; Josh Vlasto; Jeffrey Pollock; Judith Mogul; Stephanie Benton; Steven Cohen (esd.ny.gov); Christopher Cuomo; Peter Ajemian; Dani Lever
Subject: Current Statement

Statement draft:

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

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

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

8:12 ↗

LTE



Lis Smith @



Tweets about kavanaugh, franken, #metoo, weinstein, people resigning ,sexual harassment

<https://twitter.com/search-advanced?lang=en>

Feb 27 2:54 PM

Wont people see we did that?

Feb 27 2:54 PM

@Lis_Smith · Jan 10, 2018

governor #MeToo

@alexburnsNYT · Jan 10, 2018

ing allegations that Gov. Eric GREITENS
Republican, had an extramarital affair – re
woman telling her then-husband that
to circulate compromising pictures of h
ead

5

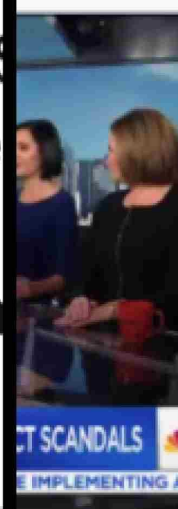


4



@Lis_Smith · Nov 28, 2017

teveKornacki about need for Dems to sho
metoo moment & rid ourselves of the
in our ranks



MSNBC Live With Hallie Jackson
clippituser.tv

1



2



No

Not unless they're looking at your feed in real time

Or have a phtoographic memory of it

How would they see you did that?

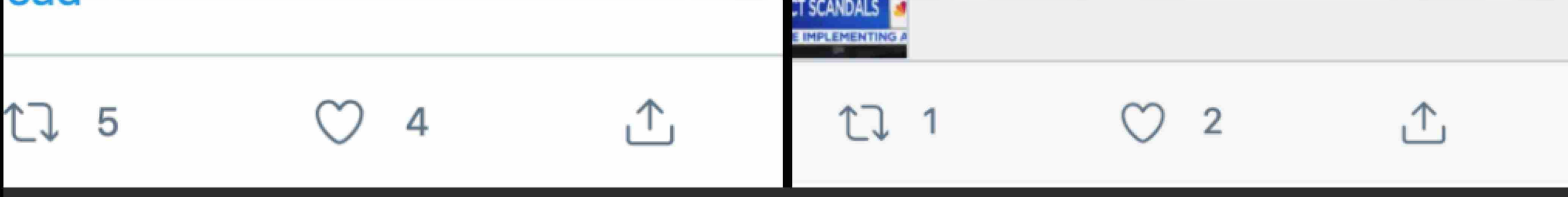
It's not like there's a notification when you delete a tweet

Feb 27 2:55 PM



New Message





\

No

Not unless they're looking at your feed in real time

Or have a phtoographic memory of it

How would they see you did that?

It's not like there's a notification when you delete a tweet
Feb 27 2:55 PM

Don't researchers store tweets in a database and then look back to see if they were deleted?
Feb 27 2:56 PM

Peter- what researchers do you think are storing your tweets
Feb 27 2:56 PM

I assume RNC has that
Feb 27 2:56 PM

No

They don't
Feb 27 2:56 PM

FEBRUARY 27, 2021 | Albany, NY

Statement From Governor Andrew M. Cuomo

STATEMENT

Statement From Governor Andrew M. Cuomo

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

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

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

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

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

"The matter was promptly escalated to special counsel. Ms. Bennett received the transfer she requested to a position in which she had expressed a long-standing interest, and was thoroughly debriefed on the facts which did not include a claim of physical contact or inappropriate sexual conduct. She was consulted regarding the resolution, and expressed satisfaction and appreciation for the way in which it was handled.

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

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

EXHIBIT

23

Translations

Bengali Translation বাংলা অনুবাদ	
Chinese Translation 中文翻譯	
Haitian-Creole Translation Tradiksyon kreyòl ayisyen	
Korean Translation 한국어 번역	
Russian Translation Перевод на русский язык	
Spanish Translation Traducción al español	

Contact the Governor's Press Office

Contact us by phone:

Albany: (518) 474 - 8418
New York City: (212) 681 - 4640

Contact us by email:

PressOffice@exec.ny.gov

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

I can't seem to dial back in
C

On Sun, Feb 28, 2021 at 3:13 PM Chris Cuomo [REDACTED]@gmail.com > wrote:

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

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

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

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

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

On Feb 28, 2021, at 3:11 PM, Melissa DeRosa [REDACTED]@exec.ny.gov > wrote:

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

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

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

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

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

From: Lacewell, Linda A (DFS) [REDACTED]@dfs.ny.gov >

Sent: Sunday, February 28, 2021 3:07 PM

To: Melissa DeRosa [REDACTED]@exec.ny.gov >

Cc: Peter Ajemian [REDACTED]@exec.ny.gov >; Richard Azzopardi [REDACTED]@exec.ny.gov >; Jeffrey Pollock [REDACTED]@globalstrategygroup.com >; Lis Smith [REDACTED]@gmail.com >; Josh Vlasto [REDACTED]@gmail.com >; Dani Lever [REDACTED]@gmail.com >; Steven Cohen (esd.ny.gov) [REDACTED]@esd.ny.gov >; Chris Cuomo ([REDACTED]@gmail.com) [REDACTED]@gmail.com >

Subject: Re: statement final

I now understand (not know)

Sent from my iPhone

On Feb 28, 2021, at 3:05 PM, Melissa DeRosa [REDACTED]@exec.ny.gov > wrote:

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

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

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

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

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

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

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



FEBRUARY 28, 2021 Albany, NY

Statement from Governor Andrew M. Cuomo

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

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

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

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

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

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

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

Contact the Governor's Press Office



**Contact us by
phone:**

Albany: (518) 474 - 8418

New York City: (212) 681 - 4640



**Contact us
by email:**

Press.Office@exec.ny.gov

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/9/2021 5:20:03 PM
To: Josh Vlasto [REDACTED]; Judy Mogul [REDACTED]; Maggie Moran [REDACTED]; Dani [REDACTED];
Linda Lacewell [REDACTED]; Lis Smith [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Rich Azzopardi [REDACTED]; Peter Ajemian [REDACTED];
Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED]; Steve Cohen [REDACTED]; Jeff Pollock [REDACTED]
[REDACTED]
Subject: 3/9/2021 12:20:03 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]
Attachments: Screenshot 2021-03-09 at 12.19.52 PM.jpeg

MORAN00001471

EXHIBIT

26

“Any allegation made – either directly or indirectly – is being forwarded to Joon Kim and Anne Clarke in real time. We are grateful that the AG has chosen two experienced and diligent prosecutors to lead up this review and look forward to cooperating fully so that New Yorkers have all of the facts at its conclusion. The Governor’s previous statement that he has never touched anyone inappropriately stands.”

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/9/2021 5:20:12 PM
To: Peter Ajemian; Beth Garvey [REDACTED] Rich Azzopardi Maggie Moran [REDACTED] Steve Cohen [REDACTED]
Jeff Pollock [REDACTED] StephanieBenton Cell [REDACTED] Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Lis
Smith [REDACTED] Judy Mogul [REDACTED] Josh Vlasto [REDACTED] Linda Lacewell [REDACTED] Dani [REDACTED]
Subject: 3/9/2021 12:20:12 PM -05:00 : Melissa DeRosa <[REDACTED]> -> [13 parties]

what about this

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 5:20:49 PM
To: Beth Garvey [REDACTED]; Rich Azzopardi; Judy Mogul; Steve Cohen; Stephanie Benton Cell [REDACTED]; Jeff Pollock [REDACTED]; Melissa DeRosa [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Dani [REDACTED]; Maggie Moran [REDACTED]; Linda Lacewell; Peter Ajemian
Subject: 3/9/2021 12:20:49 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

I thought we weren't having that last sentence in there

Message

From: Linda Lacewell [REDACTED]
Sent: 3/9/2021 5:23:39 PM
To: Maggie Moran [REDACTED] Stephanie Benton Cell [REDACTED] Beth Garvey [REDACTED]
Steve Cohen [REDACTED] Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Jeff Pollock [REDACTED] Melissa DeRosa [REDACTED]
[REDACTED] Dani [REDACTED] Josh Vlasto [REDACTED] Peter Ajemian [REDACTED] Lis Smith [REDACTED]
Rich Azzopardi; +Judy Mogul [REDACTED]
Subject: 3/9/2021 12:23:39 PM -05:00 : Linda Lacewell [REDACTED] [13 parties]

Clarke isn't a prosecutor

Message

From: Linda Lacewell [redacted]
Sent: 3/9/2021 5:24:05 PM
To: Stephanie Benton Cell [redacted]; Peter Ajemian Rich Azzopardi Maggie Moran [redacted] Maggie Moran [redacted] kivvit.com]; Jeff Pollock [redacted] Lis Smith [redacted] Steve Cohen [redacted] Judy Mogul [redacted]; Melissa DeRosa [redacted] Dani [redacted] Beth Garvey [redacted] Josh Vlasto [redacted]
Subject: 3/9/2021 12:24:05 PM -05:00 : Linda Lacewell -> [13 parties]

Investigators ok

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 5:24:11 PM
To: Maggie Moran [REDACTED] Stephanie Benton Cell [REDACTED] Beth Garvey [REDACTED]
Maggie Moran [REDACTED]@kivvit.com]; Linda Lacewell Peter Ajemian +Rich Azzopardi Jeff Pollock [REDACTED]
[REDACTED] Judy Mogul [REDACTED] Melissa DeRosa [REDACTED]; Dani [REDACTED] Steve Cohen; Josh Vlasto [REDACTED]
[REDACTED]
Subject: 3/9/2021 12:24:11 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Anne clark

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 5:24:12 PM
To: Beth Garvey [REDACTED] Maggie Moran [REDACTED] Rich Azzopardi Jeff Pollock [REDACTED]
Melissa DeRosa [REDACTED] Josh Vlasto [REDACTED] Maggie Moran [REDACTED]@kivvit.com];
Peter Ajemian Steve Cohen Judy Mogul Stephanie Benton Cell [REDACTED]; Dani [REDACTED]
Linda Lacewell
Subject: 3/9/2021 12:24:12 PM -05:00 : Lis Smith <+[REDACTED]> -> [13 parties]

No e

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/9/2021 5:24:34 PM
To: Jeff Pollock [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Judy Mogul [REDACTED]; Beth Garvey [REDACTED]; Linda Lacewell; Peter Ajemian; Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Steve Cohen; Stephanie Benton Cell [REDACTED]; Rich Azzopardi; Maggie Moran [REDACTED]
Subject: 3/9/2021 12:24:34 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

otherwise?

Message

From: Jeff Pollock [REDACTED]
Sent: 3/9/2021 6:17:48 PM
To: Lis Smith [REDACTED] Beth Garvey [REDACTED] Rich Azzopardi [REDACTED] Judy Mogul [REDACTED] Dani [REDACTED]
[REDACTED] Stephanie Benton Cell [REDACTED]; Linda Lacewell; Steve Cohen [REDACTED] Maggie Moran [REDACTED]
Peter Ajemian [REDACTED] Josh Vlasto [REDACTED] Maggie Moran [REDACTED] [REDACTED]kivvit.com]; Melissa DeRosa [REDACTED]
[REDACTED]
Subject: 3/9/2021 1:17:48 PM -05:00 : Jeff Pollock [REDACTED] [13 parties]

What do you want with the last sentence. I don't love it but I don't want them saying we didn't address it

Message

From: Dani [REDACTED]
Sent: 3/9/2021 6:19:19 PM
To: Maggie Moran [REDACTED]; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com]; Steve Cohen [REDACTED]; Josh Vlasto [REDACTED];
[REDACTED]; Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED]; Stephanie Benton Cell [REDACTED]; Peter Ajemian [REDACTED]; Jeff Pollock
[REDACTED]; Lis Smith [REDACTED]; Linda Lacewell [REDACTED]; Beth Garvey [REDACTED]; Melissa DeRosa [REDACTED]
[REDACTED]
Subject: 3/9/2021 1:19:19 PM -05:00 : Dani [REDACTED] -> [13 parties]

I would just direct them to his prior comments no?

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 6:25:50 PM
To: Dani [REDACTED]; Peter Ajemian; Steve Cohen; Judy Mogul; Maggie Moran [REDACTED] [kivvit.com]; Beth Garvey [REDACTED]; Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED]; Linda Lacewell; Melissa DeRosa [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]; Rich Azzopardi
Subject: 3/9/2021 1:25:50 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

saying that seems to confirm the charge

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 6:25:56 PM
To: Linda Lacewell; Beth Garvey [REDACTED]; Judy Mogul; Melissa DeRosa [REDACTED]; Josh Vlasto [REDACTED]; Peter Ajemian; Rich Azzopardi; Maggie Moran [REDACTED]@kivvit.com; Jeff Pollock [REDACTED]; StephanieBenton Cell [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED]; Steve Cohen [REDACTED]
Subject: 3/9/2021 1:25:56 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

I don't even get what you're responding to

Message

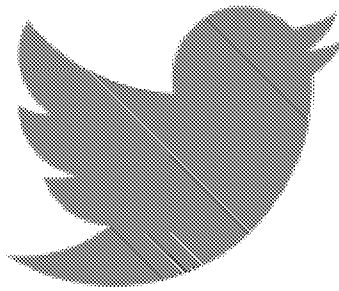
From: Lis Smith [REDACTED]
Sent: 2/28/2021 2:12:08 AM
To: Rich Azzopardi [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey [REDACTED];
[REDACTED] Linda Lacewell [REDACTED]; Judy Mogul [REDACTED]; Melissa DeRosa [REDACTED]; Josh Vlasto [REDACTED]; Maggie
Moran [REDACTED]; Steve Cohen [REDACTED]; Dani [REDACTED]; Peter Ajemian [REDACTED]; Stephanie Benton Cell [REDACTED]
[REDACTED]
Subject: 2/27/2021 9:12:08 PM -05:00 : Lis Smith [REDACTED] > -> [13 parties]
Attachments: __Library_SMS_Attachments_54_04_07725C4F-1EFB-4942-844C-7641BD376EFC_E611D97D-1E64-42BC-BE98-
B6B6CAD5BDB5.pluginPayloadAttachment; 2743CA91-02DC-401B-8168-CBB052EE1D54.pluginPayloadAttachment

<https://twitter.com/emilyngo/status/1365846392867061762?s=20>

MORAN00000553

EXHIBIT

27



Andrew Yang statement

"Anyone who has experienced sexual harassment in any situation should feel empowered to step forward and know they can share the truth of their experiences without fear or retaliation. Albany must show they take all allegations seriously through action. That starts with an aggressive independent investigation and an acknowledgment that harassment has no place in public service."

Message

From: Lis Smith [REDACTED]
Sent: 2/28/2021 2:12:16 AM
To: Melissa DeRosa [REDACTED]; Stephanie Benton Cell [REDACTED] Maggie Moran [REDACTED]
Rich Azzopardi Josh Vlasto [REDACTED]; Dani [REDACTED]; Peter Ajemian; Maggie Moran
[REDACTED]@kivvit.com]; Steve Cohen; Beth Garvey [REDACTED] Linda Lacewell Jeff Pollock ([REDACTED]
[REDACTED] Judy Mogul [REDACTED]
Subject: 2/27/2021 9:12:16 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

THIS WAS fine from yang- they're not gonna do anything else

Message

From: Lis Smith [REDACTED]
Sent: 2/28/2021 2:12:26 AM
To: Peter Ajemian; Maggie Moran [REDACTED]@kivvit.com]; +Rich Azzopardi; Linda Lacewell; Steve Cohen; Beth Garvey
[REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]; Judy Mogul
Melissa DeRosa [REDACTED]; Dani [REDACTED]; Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED]
[REDACTED]
Subject: 2/27/2021 9:12:26 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

I flagged the barbara jones stuff for them

Date: Sunday, February 28 2021 02:11 PM

Subject: [Chat #2343]

From: Liz Smith [REDACTED]

To: [REDACTED] [Joshua Vlasto (owner)]"; [REDACTED] [Dani Lever]; [REDACTED] [Jefrey Pollock];

Just give Tish what she wants

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Sunday, February 28 2021 02:11 PM

Subject: [Chat #2344]

From: Jeffrey Pollock <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Liz Smith];

I actually think they are

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Sunday, February 28 2021 02:11 PM

Subject: [Chat #2345]

From: Jeffrey Pollock <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Liz Smith];

She doesn't want this

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Sunday, February 28 2021 02:11 PM

Subject: [Chat #2346]

From: Liz Smith <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock];

Okay I just heard all the people yelling

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Sunday, February 28 2021 03:57 PM

Subject: [Chat #2347]

From: Liz Smith <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock];

Did they handle Ag thing yet

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Sunday, February 28 2021 04:04 PM

Subject: [Chat #2348]

From: Jeffrey Pollock <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Liz Smith];

No clue

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

From: Peter Ajemian [REDACTED]@exec.ny.gov>
Sent: Sunday, February 28, 2021 10:02 AM
To: Steven Cohen (esd.ny.gov); Melissa DeRosa; Beth Garvey; Linda A Lacewell (dfs.ny.gov); Lis Smith; Josh Vlasto; Richard Azzopardi; Judith Mogul
Subject: Fw: STATEMENT FROM GOVERNOR ANDREW M. CUOMO

Need to deal with this. Gave her [REDACTED] and [REDACTED] Barbara's bio and Beth's updated statement but are we changing course this morning?

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

From: Dana Rubinstein [REDACTED]@nytimes.com>
Sent: Saturday, February 27, 2021 10:29 PM
To: Richard Azzopardi; Peter Ajemian
Subject: Fwd: STATEMENT FROM GOVERNOR ANDREW M. CUOMO

Good evening, Rich and Peter,

On the hook for a morning follow-up to this. Can you comment as to why it makes sense for Barbara Jones, who worked with Steve Cohen, to conduct this investigation, and--more broadly--why it makes sense for the governor to have any role in selecting who conducts the investigation?

Regards,
Dana

----- Forwarded message -----

From: **Press Office** <Press.Office@exec.ny.gov>
Date: Sat, Feb 27, 2021 at 6:41 PM
Subject: STATEMENT FROM GOVERNOR ANDREW M. CUOMO
To: [REDACTED]@nytimes.com>



For Immediate Release: 2/27/2021

GOVERNOR ANDREW M. CUOMO

STATEMENT FROM GOVERNOR ANDREW M. CUOMO

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

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

1

Confidential Treatment Requested

SMITH-NYAG_000098

EXHIBIT

29

was inappropriate. The last thing I would ever have wanted was to make her feel any of the things that are being reported.

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

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

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

"The matter was promptly escalated to special counsel. Ms. Bennett received the transfer she requested to a position in which she had expressed a long-standing interest, and was thoroughly debriefed on the facts which did not include a claim of physical contact or inappropriate sexual conduct. She was consulted regarding the resolution, and expressed satisfaction and appreciation for the way in which it was handled.

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

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

###

Additional news available at www.governor.ny.gov
New York State | Executive Chamber | press.office@exec.ny.gov | 518.474.8418

[UNSUBSCRIBE](#)

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 9:40:34 PM
To: Beth Garvey [REDACTED]; Jeff Pollock [REDACTED]; +Steve Cohen; +Peter Ajemian; Melissa DeRosa [REDACTED]; [REDACTED] Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]; +Linda Lacewell; +Judy Mogul [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; +Rich Azzopardi; Dani [REDACTED]; [REDACTED]
Subject: 3/1/2021 4:40:34 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Peter did you scream at the times

MORAN00000711

EXHIBIT

30

Message

From: +Peter Ajemian [REDACTED]
Sent: 3/1/2021 9:45:58 PM
To: Dani [REDACTED]; +Steve Cohen +Linda Lacewell Lis Smith [REDACTED]; Jeff Pollock [REDACTED];
Beth Garvey [REDACTED] Maggie Moran [REDACTED] +Rich Azzopardi Maggie Moran
[REDACTED]@kivvit.com]; +Judy Mogul Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED]
Melissa DeRosa [REDACTED]
Subject: 3/1/2021 4:45:58 PM -05:00 : Peter Ajemian [REDACTED] > [13 parties]

He's calling me back

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/1/2021 9:59:46 PM
To: Josh Vlasto [REDACTED]; Lis Smith [REDACTED]; +Rich Azzopardi; Maggie Moran [REDACTED]@kivvit.com];
+Steve Cohen; Maggie Moran [REDACTED]; Peter Ajemian; Jeff Pollock [REDACTED]; +Linda Lacewell
Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; +Judy Mogul [REDACTED]
Subject: 3/1/2021 4:59:46 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

What is the story he's writing

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:14:33 PM
To: +Peter Ajemian [REDACTED] Melissa DeRosa [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]
[REDACTED] +Steve Cohen [REDACTED] +Linda Lacewell [REDACTED] Maggie Moran [REDACTED] [REDACTED]kivvit.com]; Stephanie Benton Cell [REDACTED]
[REDACTED] +Judy Mogul [REDACTED] Dani [REDACTED] Jeff Pollock [REDACTED] Beth Garvey [REDACTED]
+Rich Azzopardi [REDACTED]
Subject: 3/1/2021 6:14:33 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Is flegenheimer writing it?

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:14:46 PM
To: Maggie Moran [REDACTED@kivvit.com]; +Linda Laceywell; Jeff Pollock [REDACTED]; +Steve Cohen; Dani [REDACTED]; [REDACTED] Melissa DeRosa [REDACTED]; Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED]; [REDACTED] +Rich Azzopardi; Maggie Moran [REDACTED]; +Judy Mogul; +Peter Ajemian; Beth Garvey [REDACTED]; [REDACTED]
Subject: 3/1/2021 6:14:46 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Can i take a fucking run at him

Message

From: +Peter Ajemian [REDACTED]
Sent: 3/1/2021 11:15:39 PM
To: Stephanie Benton Cell [REDACTED] +Linda Lacewell Maggie Moran [REDACTED] Beth Garvey [REDACTED]
[REDACTED] +Steve Cohen +Rich Azzopardi Dani [REDACTED]; Jeff Pollock [REDACTED]; Lis Smith
[REDACTED]; Josh Vlasto [REDACTED] Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; +Judy Mogul Melissa
DeRosa [REDACTED]
Subject: 3/1/2021 6:15:39 PM -05:00 : +Peter Ajemian -> [13 parties]

Yes please

Message

From: +Peter Ajemian [REDACTED]
Sent: 3/1/2021 11:16:12 PM
To: Jeff Pollock [REDACTED] Stephanie Benton Cell [REDACTED] +Judy Mogul +Linda Laceywell
+Rich Azzopardi Melissa DeRosa [REDACTED] Maggie Moran [REDACTED] Dani [REDACTED]; Josh
Vlasto [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Lis Smith [REDACTED]; +Steve Cohen Beth
Garvey [REDACTED]
Subject: 3/1/2021 6:16:12 PM -05:00 : Peter Ajemian -> [13 parties]

Dean was pretty set but I'll feel like less of a jerk if you call too

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:16:41 PM
To: Melissa DeRosa [REDACTED] Maggie Moran [REDACTED] +Steve Cohen +Linda Lacewell Jeff Pollock
[REDACTED] Stephanie BentonCel [REDACTED] +Rich Azzopardi Dani [REDACTED];
+Judy Mogul Beth Garvey [REDACTED] Josh Vlasto [REDACTED] +Peter Ajemian Maggie Moran
[REDACTED]kivvit.com]
Subject: 3/1/2021 6:16:41 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

is flag the lead writer

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:16:50 PM
To: Maggie Moran [REDACTED] Melissa DeRosa [REDACTED] +Peter Ajemian Jeff Pollock [REDACTED]
[REDACTED] +Rich Azzopardi Maggie Moran [REDACTED] @kivvit.com]; Josh Vlasto [REDACTED] +Steve Cohen
StephanieBenton Cell [REDACTED] Dani [REDACTED]; Beth Garvey [REDACTED]; +Judy Mogul
+Linda Lacewell
Subject: 3/1/2021 6:16:50 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

you guys have turned me into a monster

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:16:58 PM
To: Jeff Pollock [REDACTED] Melissa DeRosa [REDACTED] +Linda Lacewell [REDACTED] Josh Vlasto [REDACTED]
+Judy Mogul [REDACTED] Dani [REDACTED] Stephanie Benton Cell [REDACTED] Beth Garvey [REDACTED];
+Rich Azzopardi [REDACTED] Maggie Moran [REDACTED] kivvit.com]; +Steve Cohen [REDACTED] Maggie Moran [REDACTED];
+Peter Ajemian [REDACTED]
Subject: 3/1/2021 6:16:58 PM -05:00 : Lis Smith [REDACTED] [13 parties]

i screamed at my editor at harper collins today

Message

From: +Peter Ajemian [REDACTED]
Sent: 3/1/2021 11:17:10 PM
To: +Steve Cohen Dani [REDACTED] +Linda Lacewell +Judy Mogul Josh Vlasto [REDACTED]; Lis Smith [REDACTED] Maggie Moran [REDACTED] Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED] +Rich Azzopardi Jeff Pollock [REDACTED] Melissa DeRosa [REDACTED] Beth Garvey [REDACTED]
Subject: 3/1/2021 6:17:10 PM -05:00 : +Peter Ajemian -> [13 parties]

Yes

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:17:18 PM
To: +Peter Ajemian Dani [REDACTED] Jeff Pollock [REDACTED]; +Linda Lacewell Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED] +Judy Mogul Beth Garvey [REDACTED] +Rich Azzopardi Josh Vlasto [REDACTED]; Maggie Moran [REDACTED] Melissa DeRosa [REDACTED] [REDACTED]; +Steve Cohen [REDACTED]
Subject: 3/1/2021 6:17:18 PM -05:00 : Lis Smith [REDACTED] [13 parties]

calling him now

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:26:43 PM
To: +Steve Cohen +Rich Azzopardi Dani [REDACTED]; Beth Garvey [REDACTED] +Judy Mogul Maggie Moran [REDACTED] Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED] Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED] +Peter Ajemian Jeff Pollock [REDACTED] +Linda Lacewell [REDACTED]
Subject: 3/1/2021 6:26:43 PM -05:00 : Lis Smith [REDACTED] [13 parties]

I told him his story was pathetic and an embarrassment to the times and that I looked forward to reading it b/c it would further reduce their credibility on their issue and that i especially looked forward to mocking it and him on twitter

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:27:15 PM
To: Dani [REDACTED]; Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED] Beth Garvey [REDACTED]
[REDACTED] +Peter Ajemian +Rich Azzopardi +Judy Mogul +Steve Cohen +Linda Lacewell Jeff Pollock [REDACTED]
[REDACTED] Melissa DeRosa [REDACTED]; Maggie Moran [REDACTED] Maggie Moran
[REDACTED]@kivvit.com]
Subject: 3/1/2021 6:27:15 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

He took it in stride

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:27:21 PM
To: Stephanie Benton Cell [REDACTED]; +Steve Cohen Maggie Moran [REDACTED] Dani [REDACTED]
[REDACTED] +Peter Ajemian Josh Vlasto [REDACTED]; Beth Garvey [REDACTED] Maggie Moran
[REDACTED]@kivvit.com]; Melissa DeRosa [REDACTED] +Linda Lacewell +Judy Mogul +Rich Azzopardi Jeff
Pollock [REDACTED]
Subject: 3/1/2021 6:27:21 PM -05:00 : Lis Smith [REDACTED] > -> [13 parties]

said he understood- they're not calling it harassment

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 11:32:08 PM
To: +Steve Cohen, Melissa DeRosa [REDACTED], Josh Vlasto [REDACTED]; +Peter Ajemian, +Linda Laceywell, Stephanie Benton Cell [REDACTED], Maggie Moran [REDACTED], +Rich Azzopardi, Maggie Moran [REDACTED]@kivvit.com]; +Judy Mogul, Beth Garvey [REDACTED], Dani [REDACTED]; Jeff Pollock [REDACTED]
Subject: 3/1/2021 6:32:08 PM -05:00 : Lis Smith [REDACTED] [13 parties]

I'm trying to get them to biden in the story

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:36:54 PM
To: Josh Vlasto [REDACTED]; Steve Cohen; Judy Mogu; Linda Lacewell; Melissa DeRosa [REDACTED];
Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED];
Rich Azzopardi; Peter Ajemian; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey
[REDACTED]
Subject: 3/3/2021 1:36:54 PM -05:00 : Lis Smith [REDACTED] [13 parties]

what is he doing

MORAN00000809

EXHIBIT

31

Message

From: Jeff Pollock [REDACTED]
Sent: 3/3/2021 6:37:24 PM
To: Judy Mogul [REDACTED]; Linda Lacewell [REDACTED]; Steve Cohen [REDACTED]; Beth Garvey [REDACTED]; Peter Ajemian [REDACTED]; Stephanie Benton
Cell [REDACTED]; Maggie Moran [REDACTED]; Rich Azzopardi [REDACTED]; Lis Smith [REDACTED]; Maggie
Moran [REDACTED]@kivvit.com]; Melissa DeRosa [REDACTED]; Dani [REDACTED]; Josh Vlasto [REDACTED]
[REDACTED]
Subject: 3/3/2021 1:37:24 PM -05:00 : Jeff Pollock [REDACTED] [13 parties]

And now he is not sounding contrite so let's get back to that

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:37:24 PM
To: Judy Mogul [REDACTED] Rich Azzopardi [REDACTED] Linda Lacewell [REDACTED] Dani [REDACTED] Stephanie Benton Cell [REDACTED]
Melissa DeRosa [REDACTED]; Steve Cohen [REDACTED] Jeff Pollock [REDACTED] Maggie Moran
[REDACTED]@kivvit.com]; Maggie Moran [REDACTED] Josh Vlasto [REDACTED] Peter Ajemian Beth
Garvey [REDACTED]
Subject: 3/3/2021 1:37:24 PM -05:00 : Lis Smith [REDACTED] [13 parties]

Stop

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:37:28 PM
To: Beth Garvey [REDACTED]; Peter Ajemian [REDACTED] Steve Cohen [REDACTED]; Maggie Moran [REDACTED]; Linda Lacewell [REDACTED]
Josh Vlasto [REDACTED]; Judy Mogul [REDACTED] Rich Azzopardi [REDACTED] Stephanie Benton Cell [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Dani [REDACTED] Jeff Pollock [REDACTED] Melissa DeRosa [REDACTED]
Subject: 3/3/2021 1:37:28 PM -05:00 : Lis Smith [REDACTED] [13 parties]

Stop

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:37:41 PM
To: Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED]; Dani [REDACTED]; Jeff Pollock [REDACTED]; Peter Ajemian [REDACTED]; Steve Cohen [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]; +Linda Lacewell [REDACTED]; Beth Garvey [REDACTED]; [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Melissa DeRosa [REDACTED]
Subject: 3/3/2021 1:37:41 PM -05:00 : Lis Smith [REDACTED] [13 parties]

Tone is not contrite

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:37:58 PM
To: Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]; Linda Lacewell; Dani [REDACTED]; Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Rich Azzopardi; Judy Mogul; Jeff Pollock [REDACTED]; Steve Cohen; Peter Ajemian; Melissa DeRosa [REDACTED]
Subject: 3/3/2021 1:37:58 PM -05:00 : Lis Smith [REDACTED] [13 parties]

He needs to soften u

Message

From: Jeff Pollock [REDACTED]
Sent: 3/3/2021 6:38:03 PM
To: Melissa DeRosa [REDACTED]; Steve Cohen [REDACTED]; Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED];
[REDACTED] Maggie Moran [REDACTED]; Beth Garvey [REDACTED]; Linda Lacewell [REDACTED]; Peter Ajemian [REDACTED];
Rich Azzopardi [REDACTED]; Lis Smith [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Judy Mogul [REDACTED]; Dani [REDACTED]
[REDACTED]
Subject: 3/3/2021 1:38:03 PM -05:00 : Jeff Pollock [REDACTED] [13 parties]

Remind him to soften

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:38:07 PM
To: Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; Rich Azzopardi [REDACTED] Steve Cohen [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; +Peter Ajemian [REDACTED] Maggie Moran [REDACTED] Josh Vlasto [+ [REDACTED] Beth Garvey [REDACTED] Melissa DeRosa [REDACTED] Judy Mogul [REDACTED] Jeff Pollock [REDACTED] Linda Lacewell [REDACTED]
Subject: 3/3/2021 1:38:07 PM -05:00 : Lis Smith [REDACTED] [13 parties]

soften

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:38:09 PM
To: Rich Azzopardi; Stephanie Benton Cell [REDACTED]; Linda Lacewell; Maggie Moran [REDACTED]@kiwvit.com];
Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]; Peter Ajemian; Jeff Pollock [REDACTED]
Beth Garvey [REDACTED]; Steve Cohen; Dani [REDACTED]; Melissa DeRosa [REDACTED]
Judy Mogul [REDACTED]
Subject: 3/3/2021 1:38:09 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

Melissa

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:38:12 PM
To: Josh Vlasto [REDACTED]; Judy Mogul [REDACTED]; Dani [REDACTED]; MelissaDeRosa [REDACTED];
Linda Lacewell; Steve Cohen; Rich Azzopardi; Jeff Pollock [REDACTED]; Peter Ajemian; Maggie Moran [REDACTED];
[REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Beth Garvey [REDACTED]
Subject: 3/3/2021 1:38:12 PM -05:00 : Lis Smith [REDACTED] [13 parties]

soften

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:38:52 PM
To: Stephanie Benton Cell [REDACTED]; Rich Azzopardi; Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey [REDACTED];
[REDACTED]; Judy Mogul; Steve Cohen; Melissa DeRosa [REDACTED]; Linda Lacewell; Peter Ajemian
Josh Vlasto [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]; Dani [REDACTED]
[REDACTED]
Subject: 3/3/2021 1:38:52 PM -05:00 : Lis Smith <[REDACTED]> [13 parties]

soften

Message

From: Peter Ajemian [redacted]
Sent: 3/3/2021 6:38:55 PM
To: Rich Azzopardi; Stephanie Benton Cell [redacted]; Maggie Moran [redacted]; Josh Vlasto [redacted];
[redacted]; Linda Lacewell; Beth Garvey [redacted]; Steve Cohen; Judy Mogul; Jeff Pollock [redacted];
[redacted]; Lis Smith [redacted]; Maggie Moran [redacted]@kivvit.com]; Dan [redacted]; Melissa DeRosa
[redacted]
Subject: 3/3/2021 1:38:55 PM -05:00 : Peter Ajemian [redacted] [13 parties]

I actually think it was ok... too long but this was powerful: "My intent doesn't matter" followed by another apology

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:38:55 PM
To: Rich Azzopardi [REDACTED]; Steve Cohen [REDACTED]; Maggie Moran [REDACTED]; Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; Stephanie Benton Cell [REDACTED]; Peter Ajemian [REDACTED]; Jeff Pollock [REDACTED]; Judy Mogul [REDACTED]; Linda Lacewell [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED] [REDACTED]@kivvit.com]
Subject: 3/3/2021 1:38:55 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Shorter

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:39:03 PM
To: Judy Mogul [REDACTED]; Steve Cohen [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Peter Ajemian [REDACTED]; MelissaDeRosa [REDACTED]; Rich Azzopardi [REDACTED]; Linda Lacewell [REDACTED]; Dani [REDACTED]; Stephanie Benton Cell [REDACTED]; Beth Garvey [REDACTED]; Josh Vlasto [REDACTED]
Subject: 3/3/2021 1:39:03 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Melissa

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:39:04 PM
To: Judy Mogul [REDACTED]; Maggie Moran [REDACTED]; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED];
[REDACTED] Dani [REDACTED]; Jeff Pollock [REDACTED]; Linda Lacewell [REDACTED]; Steve Cohen [REDACTED]; Peter Ajemian [REDACTED]; Beth
Garvey [REDACTED]; Rich Azzopardi [REDACTED]; Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED]
[REDACTED]
Subject: 3/3/2021 1:39:04 PM -05:00 : Lis Smith [REDACTED] [13 parties]

Shorter

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 6:42:09 PM
To: Linda Lacewell; Steve Cohen; Jeff Pollock [REDACTED]; Stephanie BentonCell [REDACTED];
Peter Ajemian; Maggie Moran [REDACTED]@kivvit.com]; Dani [REDACTED]; Melissa DeRosa [REDACTED];
Beth Garvey [REDACTED]; Maggie Moran [REDACTED]; Josh Vlasto [REDACTED]; Judy Mogul [REDACTED];
Rich Azzopardi [REDACTED]
Subject: 3/3/2021 1:42:09 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

Shorter

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 7:49:25 PM
To: Melissa DeRosa [REDACTED]; Dani [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Peter Ajemian
Maggie Moran [REDACTED]; Steve Cohen [REDACTED] Jeff Pollock [REDACTED] Josh Vlasto [REDACTED]
Beth Garvey [REDACTED]; Rich Azzopardi [REDACTED] Judy Mogul [REDACTED] Linda Lacewell [REDACTED] Stephanie Benton Cell [REDACTED]
[REDACTED]
Subject: 3/3/2021 2:49:25 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Can we get allies complimenting him

MORAN00000918

EXHIBIT

32

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 7:49:27 PM
To: Maggie Moran [REDACTED]; Steve Cohen [REDACTED]; Rich Azzopardi [REDACTED]; Melissa DeRosa [REDACTED]; Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; Peter Ajemian; Maggie Moran [REDACTED]@kivvit.com; Linda Lacewell; Judy Mogul [REDACTED]; Stephanie Benton Cell [REDACTED]
Subject: 3/3/2021 2:49:27 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Quinn

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 7:49:33 PM
To: Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; +Linda Lacewell [REDACTED]; Steve Cohen [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]; Judy Mogul [REDACTED]; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com]; Rich Azzopardi [REDACTED]; Peter Ajemian [REDACTED]; Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED]
Subject: 3/3/2021 2:49:33 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

Kaplan

Message

From: Lis Smith [REDACTED]
Sent: 3/3/2021 7:49:36 PM
To: Judy Mogul [REDACTED]; Maggie Moran [REDACTED] Steve Cohen [REDACTED] Linda Lacewell Maggie Moran [REDACTED] [REDACTED]@kivvit.com]; Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED] Dani [REDACTED] [REDACTED] Rich Azzopardi Beth Garvey [REDACTED]; Jeff Pollock [REDACTED] Peter Ajemian Melissa DeRosa [REDACTED]
Subject: 3/3/2021 2:49:36 PM -05:00 : Lis Smith <[REDACTED]> [13 parties]

On twitter

Dani Lever Texts 3318-3400

3318	<p>██████████ Peter Ajemien</p>	<p>██████████ Lis Smith Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul ██████████@gmail.com Dani Lever (owner)</p>	<p>Dani Lever (owner) Lis Smith Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul ██████████@gmail.com Dani Lever (owner)</p>	<p>I actually think it was ok... too long but this was powerful: "My intent doesn't matter" followed by another apology</p>	3/3/2021
3319	<p>██████████ Lis Smith</p>	<p>██████████ Lis Smith Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul ██████████@gmail.com Dani Lever (owner)</p>	<p>Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul ██████████@gmail.com Dani Lever (owner)</p>	<p>Shorter</p>	3/3/2021

3320	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED] gmail.com Dani Lever (owner)</p>	Melissa	3/3/2021
3321	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED] @gmail.com Dani Lever (owner)</p>	Shorter	3/3/2021

3322	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Shorter	3/3/2021
3323	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Josh? Spin?	3/3/2021

3324	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>What is chuck Todd saying</p>	<p>3/3/2021</p>
3325	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>Isn't done yet but I think I would say this was clear and contrite and a strong base to pivot back to work until the ag comes back.</p>	<p>3/3/2021</p>

3326	<div data-bbox="131 191 354 233" style="background-color: black; width: 100%; height: 20px;"></div> <p data-bbox="131 233 354 264">Lis Smith</p>	<div data-bbox="358 191 570 905" style="background-color: black; width: 100%; height: 340px;"></div> <p data-bbox="570 191 927 226">Dani Lever (owner)</p> <p data-bbox="570 264 927 300">Peter Ajemien</p> <p data-bbox="570 338 927 373">Rich Azzopardi</p> <p data-bbox="570 411 927 447">Jefrey Pollock</p> <p data-bbox="570 485 927 520">Melissa Derosa</p> <p data-bbox="570 558 927 594">Linda Lacewell</p> <p data-bbox="570 632 927 667">Steve Cohen</p> <p data-bbox="570 705 927 741">Steph Benton</p> <p data-bbox="570 779 927 814">Beth Garvey</p> <p data-bbox="570 852 927 888">Judy Mogul</p> <p data-bbox="358 926 927 961"> <div data-bbox="358 926 448 968" style="background-color: black; width: 55px; height: 20px;"></div> @gmail.com Dani Lever (owner) </p>	Nothing since pain	3/3/2021
3327	<div data-bbox="131 995 354 1037" style="background-color: black; width: 100%; height: 20px;"></div> <p data-bbox="131 1037 354 1068">Lis Smith</p>	<div data-bbox="358 995 570 1709" style="background-color: black; width: 100%; height: 340px;"></div> <p data-bbox="570 995 927 1031">Dani Lever (owner)</p> <p data-bbox="570 1068 927 1104">Peter Ajemien</p> <p data-bbox="570 1142 927 1178">Rich Azzopardi</p> <p data-bbox="570 1215 927 1251">Jefrey Pollock</p> <p data-bbox="570 1289 927 1325">Melissa Derosa</p> <p data-bbox="570 1362 927 1398">Linda Lacewell</p> <p data-bbox="570 1436 927 1472">Steve Cohen</p> <p data-bbox="570 1509 927 1545">Steph Benton</p> <p data-bbox="570 1583 927 1619">Beth Garvey</p> <p data-bbox="570 1656 927 1692">Judy Mogul</p> <p data-bbox="358 1730 927 1766"> <div data-bbox="358 1730 448 1772" style="background-color: black; width: 55px; height: 20px;"></div> @gmail.com Dani Lever (owner) </p>	Isaac said he nailed it	3/3/2021

3328	<p>[REDACTED] Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Right	3/3/2021
3329	<p>[REDACTED] Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	But don't overhype	3/3/2021

3330	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>[REDACTED]</p> <p>Lis Smith</p> <p>[REDACTED]</p> <p>Peter Ajemien</p> <p>[REDACTED]</p> <p>Rich Azzopardi</p> <p>[REDACTED]</p> <p>Jefrey Pollock</p> <p>[REDACTED]</p> <p>Melissa Derosa</p> <p>[REDACTED]</p> <p>Linda Lacewell</p> <p>[REDACTED]</p> <p>Steve Cohen</p> <p>[REDACTED]</p> <p>Steph Benton</p> <p>[REDACTED]</p> <p>Beth Garvey</p> <p>[REDACTED]</p> <p>Judy Mogul</p> <p>[REDACTED]</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	None of this is good	3/3/2021
3331	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>[REDACTED]</p> <p>Lis Smith</p> <p>[REDACTED]</p> <p>Peter Ajemien</p> <p>[REDACTED]</p> <p>Rich Azzopardi</p> <p>[REDACTED]</p> <p>Jefrey Pollock</p> <p>[REDACTED]</p> <p>Melissa Derosa</p> <p>[REDACTED]</p> <p>Linda Lacewell</p> <p>[REDACTED]</p> <p>Steve Cohen</p> <p>[REDACTED]</p> <p>Steph Benton</p> <p>[REDACTED]</p> <p>Beth Garvey</p> <p>[REDACTED]</p> <p>Judy Mogul</p>	It's all hard	3/3/2021

		<p>[REDACTED]@gmail.com Dani Lever (owner)</p>		
3332	<p>[REDACTED] Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED] [REDACTED]@gmail.com Dani Lever (owner)</p>	And it's not over	3/3/2021

3333	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Absolutely	3/3/2021
3334	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Not sure what he's doing here	3/3/2021

3335	<p>[REDACTED] Dani Lever</p>	<p>[REDACTED] Lis Smith Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Who are these reporters	3/3/2021
3336	<p>[REDACTED] Lis Smith</p>	<p>[REDACTED] Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	What's going on here	3/3/2021

3337	<p>[REDACTED] Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	He is apologizing to New York	3/3/2021
3338	<p>[REDACTED] Lis Smith</p>	<p>[REDACTED] Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Stop this	3/3/2021

3339	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	What's he doing	3/3/2021
3340	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	I'm fine with that	3/3/2021

3341	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	K	3/3/2021
3342	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	These reporters are cracking me up	3/3/2021

3343	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Melissa don't take the bait	3/3/2021
3344	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	What do I say	3/3/2021

3345	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Echo him	3/3/2021
3346	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p>	Same thing	3/3/2021

		██████████@gmail.com Dani Lever (owner)		
3347	██████████ Jefrey Pollock	██████████ Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul ██████████@gmail.com Dani Lever (owner)	I would echo	3/3/2021
3348	██████████ Jefrey Pollock	██████████ Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul ██████████@gmail.com Dani Lever (owner)	Excellent. Way to go MDR	3/3/2021

3349	<p>[REDACTED]</p> <p>Josh Vlasto</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Smooth	3/3/2021
3350	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED] gmail.com Dani Lever (owner)</p>	Getting blowback on him saying he wasn't ashamed	3/3/2021

3351	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Who is monitoring local tv	3/3/2021
3352	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	I don't think there is anything to clean up	3/3/2021

3353	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Other than that	3/3/2021
3354	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jefrey Pollock</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Should we all jump on phone fast?	3/3/2021

3355	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	I think spin is getting back to work	3/3/2021
3356	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Sure	3/3/2021

3357	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jefrey Pollock</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Ok	3/3/2021
3358	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Spin is getting back to work	3/3/2021

3359	<p>[REDACTED] Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Jefrey Pollock Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Spin is full throated emotional apology	3/3/2021
3360	<p>[REDACTED] Lis Smith</p>	<p>[REDACTED] Dani Lever (owner) Peter Ajemien Rich Azzopardi Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Is sloughs	3/3/2021

3361	<p>[REDACTED] Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Jefrey Pollock Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Now time to get back to work	3/3/2021
3362	<p>[REDACTED] Lis Smith</p>	<p>[REDACTED] Dani Lever (owner) eter Ajemien ich Azzopardi efrey Pollock Melissa Derosa Linda Lacewell teve Cohen teph Benton eth Garvey udy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Skoufis	3/3/2021

3363	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Biased	3/3/2021
3364	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Let process play out	3/3/2021

3365	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Anti cuomo	3/3/2021
3366	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Yes shougfid has hated us for years	3/3/2021

3367	<p>[REDACTED]</p> <p>Rich Azzopardi</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://www.politico.com/states/new-york/city-hall/story/2021/03/03/some-key-aides-jump-ship-as-cuomo-scandals-spiral-1366493</p>	3/3/2021
3368	<p>[REDACTED]</p> <p>Rich Azzopardi</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://twitter.com/patkiernan/status/1367187005348708356?s=21</p>	3/3/2021

3369	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>Ok cleanup would be on</p> <p>1) intended (it's not about intent)</p> <p>2) he wasn't ashamed though I don't really remember how that went</p>	3/3/2021
3370	<p>[REDACTED]</p> <p>Rich Azzopardi</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://www.newsday.com/amp/news/region-state/cuomo-sexual-harassment-1.50171748?utm_source=appshare&_twitter_impression=true</p>	3/3/2021

3371	<p>[REDACTED]</p> <p>Rich Azzopardi</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>[REDACTED]</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://amp.democratandchronicle.com/amp/6905740002?__twitter_impression=true</p>	3/3/2021
3372	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>[REDACTED]</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Some send me the spin in email	3/3/2021

3373	<p>[REDACTED]</p> <p>Peter Ajemien</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	I will. One sec	3/3/2021
3374	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Peter had it	3/3/2021

3375	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Down pat	3/3/2021
3376	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Peter send here fast	3/3/2021

3377	<p>[REDACTED] Lis Smith</p>	<p>[REDACTED] Dani Lever (owner) [REDACTED] Peter Ajemien [REDACTED] Rich Azzopardi [REDACTED] Jeffrey Pollock [REDACTED] Melissa Derosa [REDACTED] Linda Lacewell [REDACTED] Steve Cohen [REDACTED] Steph Benton [REDACTED] Beth Garvey [REDACTED] Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Does anyone know Anne Thompson	3/3/2021
3378	<p>[REDACTED] Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner) [REDACTED] Lis Smith [REDACTED] Peter Ajemien [REDACTED] Rich Azzopardi [REDACTED] Jeffrey Pollock [REDACTED] Linda Lacewell [REDACTED] Steve Cohen [REDACTED] Steph Benton [REDACTED] Beth Garvey [REDACTED] Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	Who is that	3/3/2021

3379	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>She's on msnbc and they keep coming to her for her advice on what this all means and I don't know her</p>	3/3/2021
3380	<p>[REDACTED]</p> <p>Rich Azzopardi</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Jefrey Pollock</p> <p>Melissa Derosa</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://www.timesunion.com/news/article/Cuomo-holds-first-briefing-since-allegations-of-15997224.php?utm_campaign=socialflow&utm_medium=referral&cmpid=twittersocialflow&utm_source=t.co</p>	3/3/2021

3381	<div data-bbox="131 191 347 233" style="background-color: black; width: 133px; height: 20px;"></div> <p data-bbox="131 233 347 264">Lis Smith</p>	<div data-bbox="363 191 570 894" style="background-color: black; width: 127px; height: 335px;"></div> <p data-bbox="570 191 927 233">Dani Lever (owner)</p> <p data-bbox="570 264 927 306">Peter Ajemien</p> <p data-bbox="570 338 927 380">Rich Azzopardi</p> <p data-bbox="570 411 927 453">Jefrey Pollock</p> <p data-bbox="570 485 927 527">Melissa Derosa</p> <p data-bbox="570 548 927 590">Linda Lacewell</p> <p data-bbox="570 632 927 674">Steve Cohen</p> <p data-bbox="570 705 927 747">Steph Benton</p> <p data-bbox="570 779 927 821">Beth Garvey</p> <p data-bbox="570 852 927 894">Judy Mogul</p> <p data-bbox="363 915 927 957"><div data-bbox="363 915 456 957" style="background-color: black; width: 57px; height: 20px;"></div>@gmail.com Dani Lever (owner)</p>	<p data-bbox="937 191 1414 233">I'm texting w Katy tur</p>	<p data-bbox="1424 191 1580 233">3/3/2021</p>
3382	<div data-bbox="131 989 347 1031" style="background-color: black; width: 133px; height: 20px;"></div> <p data-bbox="131 1031 347 1062">Lis Smith</p>	<div data-bbox="363 989 570 1703" style="background-color: black; width: 127px; height: 340px;"></div> <p data-bbox="570 989 927 1031">Dani Lever (owner)</p> <p data-bbox="570 1062 927 1104">Peter Ajemien</p> <p data-bbox="570 1136 927 1178">Rich Azzopardi</p> <p data-bbox="570 1209 927 1251">Jefrey Pollock</p> <p data-bbox="570 1283 927 1325">Melissa Derosa</p> <p data-bbox="570 1346 927 1388">Linda Lacewell</p> <p data-bbox="570 1430 927 1472">Steve Cohen</p> <p data-bbox="570 1503 927 1545">Steph Benton</p> <p data-bbox="570 1577 927 1619">Beth Garvey</p> <p data-bbox="570 1650 927 1692">Judy Mogul</p> <p data-bbox="363 1713 927 1755"><div data-bbox="363 1713 456 1755" style="background-color: black; width: 57px; height: 20px;"></div>@gmail.com Dani Lever (owner)</p>	<p data-bbox="937 989 1414 1031">Katy is saying my spin live</p>	<p data-bbox="1424 989 1580 1031">3/3/2021</p>

3383	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Like verbatim on cnn	3/3/2021
3384	<p>[REDACTED]</p> <p>Peter Ajemien</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	♥	3/3/2021

3385	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	She means MSNBC	3/3/2021
3386	<p>[REDACTED]</p> <p>Peter Ajemien</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jefrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Spin is in emails	3/3/2021

3387	<p>[REDACTED] Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Rich Azzopardi Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	<p>And so far I'm just seeing mentions by people of the "not ashamed" piece</p>	3/3/2021
3388	<p>[REDACTED] Rich Azzopardi</p>	<p>[REDACTED] Dani Lever (owner) Lis Smith Peter Ajemien Jefrey Pollock Melissa Derosa Linda Lacewell Steve Cohen Steph Benton Beth Garvey Judy Mogul [REDACTED]@gmail.com Dani Lever (owner)</p>	<p>This is good</p>	3/3/2021

3389	<p>[REDACTED]</p> <p>Rich Azzopardi</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://www.nytimes.com/2021/03/03/nyregion/cuomo-sexual-harassment-scandal-apology-non-resignation.html?referringSource=articleShare</p>	3/3/2021
3390	<p>[REDACTED]</p> <p>Jeffrey Pollock</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	In terms of clean up	3/3/2021

3391	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>Yes and I spoke to Jesse about adding wedding context</p>	<p>3/3/2021</p>
3392	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>To unwanted kiss and he will</p>	<p>3/3/2021</p>

3393	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	Times is solid	3/3/2021
3394	<p>[REDACTED]</p> <p>Jefrey Pollock</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Lis Smith</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	And they just blasted it out on email	3/3/2021

3395	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>Ben smith: "Yes. If there's no more, it feels like the turning point"</p>	<p>3/3/2021</p>
3396	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>https://twitter.com/jessemckinley/status/1367195667601494016?s=21</p>	<p>3/3/2021</p>

3397	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>		3/3/2021
3398	<p>[REDACTED]</p> <p>Melissa Derosa</p>	<p>[REDACTED]</p> <p>Dani Lever (owner)</p> <p>Lis Smith</p> <p>Peter Ajemien</p> <p>Rich Azzopardi</p> <p>Jefrey Pollock</p> <p>Linda Lacewell</p> <p>Steve Cohen</p> <p>Steph Benton</p> <p>Beth Garvey</p> <p>Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	What's everyone hearing?	3/3/2021

3399	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>from wapo</p>	<p>3/3/2021</p>
3400	<p>[REDACTED]</p> <p>Lis Smith</p>	<p>[REDACTED] Dani Lever (owner)</p> <p>[REDACTED] Peter Ajemien</p> <p>[REDACTED] Rich Azzopardi</p> <p>[REDACTED] Jeffrey Pollock</p> <p>[REDACTED] Melissa Derosa</p> <p>[REDACTED] Linda Lacewell</p> <p>[REDACTED] Steve Cohen</p> <p>[REDACTED] Steph Benton</p> <p>[REDACTED] Beth Garvey</p> <p>[REDACTED] Judy Mogul</p> <p>[REDACTED]@gmail.com Dani Lever (owner)</p>	<p>Yeah it's good. But all depends on who else comes out. He has been sleeping with people he works with for decades I have been told. Consent when power is involved is complicated. As is flirtation.</p>	<p>3/3/2021</p>

From: Lis Smith [REDACTED]@gmail.com> on behalf of Lis Smith [REDACTED]@gmail.com>
To: Rich Azzopardi
CC: Dani Lever; Melissa DeRosa; Peter Ajemian
Sent: 3/3/2021 4:54:20 PM
Subject: Re: Inquiry re: Cuomo

This would be bad for my credibility and yours
On Wed, Mar 3, 2021 at 12:40 PM Rich Azzopardi [REDACTED]@gmail.com> wrote:
Yeah don't.

On Wed, Mar 3, 2021 at 12:40 PM Lis Smith [REDACTED]@gmail.com> wrote:
I do t know this guy and do not want to be a part of story and will ignore completely unless told otherwise

----- Forwarded message -----

From: Campbell, Jon [REDACTED]@gannett.com>
Date: Wed, Mar 3, 2021 at 12:38 PM
Subject: Inquiry re: Cuomo
To: [REDACTED]@gmail.com [REDACTED]@gmail.com>

Hi Lis,

I'm working on a story on Cuomo and who is advising him amid the sexual harassment tumult.

Are you part of the team advising Cuomo? Would you be interested in talking about it?

Thanks,

Jon Campbell
New York State Team editor



Mobile: [REDACTED]
Office: [REDACTED]
[REDACTED]@gannett.com

--
Rich Azzopardi
(c) [REDACTED]

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 8:57:42 PM
To: Rich Azzopardi; Peter Ajemian; Steve Cohen; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED];
Linda Lacewell; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]; Beth Garvey [REDACTED];
[REDACTED]; Judy Mogul; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Dani [REDACTED]
Subject: 3/1/2021 3:57:42 PM -05:00 : Lis Smith <[REDACTED]> [13 parties]

Ok I have incoming from Dawsey, Scherer, Charlotte alter, Dan Merica at cnn

MORAN00000681

EXHIBIT

35

Message

From: Lis Smith [REDACTED]
Sent: 3/1/2021 8:58:05 PM
To: Josh Vlasto [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com];
Linda Lacewell; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]; Beth Garvey [REDACTED]-
[REDACTED]; MelissaDeRosa [REDACTED]; Steve Cohen [REDACTED]; Peter Ajemian [REDACTED]; Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED]; Dani
[REDACTED]
Subject: 3/1/2021 3:58:05 PM -05:00 : Lis Smith [REDACTED] > [13 parties]

I do not have bandwidth to handle these- who has talked w people

From: Lis Smith [REDACTED]@gmail.com>
Sent: Thursday, March 04, 2021 5:02 AM
To: Melissa DeRosa
Cc: Beth Garvey ; Jef Pollock ;
Judy Moqul ; Linda Lacewell ; Peter Ajemian ;
Rich Azzopardi ; Steve Cohen ; Dani Lever ;
Josh Vlasto
Subject: clips?

why am i not getting media reports? and why are we not even trying to work anyone when they have the worst political actors on their shows attacking the governor?

his reflexive critics are on tv with zero pushback or context.

On Mon, Mar 1, 2021 at 5:04 PM Melissa DeRosa [REDACTED]@exec.ny.gov> wrote:

From: Lis Smith [REDACTED]@gmail.com>
Sent: Monday, March 01, 2021 4:40 PM
To: Melissa DeRosa
Cc: Beth Garvey; Jeffrey Pollock; Judith Mogul; Linda A Lacewell (dfs.ny.gov); Peter Ajemian; Richard Azzopardi; Steven Cohen (esd.ny.gov); Dani Lever [REDACTED]; Josh Vlasto [REDACTED]
Subject: Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

I would also push back hard on the times here/ this is absurd. In front of dozens of people and with cameras around? At a wedding? This doesn't pass the smell test.

This is not harassment-

On Mon, Mar 1, 2021 at 4:37 PM Melissa DeRosa [REDACTED]@exec.ny.gov> wrote:

OK then let's just leave it alone

not reference review - this wont be reviewed - its not workplace sexual harassment

From: Lis Smith [REDACTED]@gmail.com>
Sent: Monday, March 01, 2021 4:33 PM
To: Judith Mogul
Cc: Beth Garvey; Jeffrey Pollock; Linda A Lacewell (dfs.ny.gov); Melissa DeRosa; Peter Ajemian; Richard Azzopardi; Steven Cohen (esd.ny.gov); Dani Lever [REDACTED]; Josh Vlasto [REDACTED]

Subject: Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

This also isn't even a thing- sounds like every Italian grand dad at a wedding

Do not do statement Melissa- just refer to comments yesterday

On Mon, Mar 1, 2021 at 4:29 PM Lis Smith <[REDACTED]@gmail.com> wrote:
Yes I agree- no further comment

On Mon, Mar 1, 2021 at 4:28 PM Judith Mogul <[REDACTED]@exec.ny.gov> wrote:

And when he wants to revert to no comment this comment will be thrown back at him. No further comment should mean no further comment

From: Lacewell, Linda A (DFS) <[REDACTED]@dfs.ny.gov>

Sent: Monday, March 1, 2021 4:27 PM

To: Steven Cohen <[REDACTED]@esd.ny.gov>; Melissa DeRosa <[REDACTED]@exec.ny.gov>

Cc: Jeffrey Pollock <[REDACTED]@globalstrategygroup.com>; Beth Garvey <[REDACTED]@exec.ny.gov>; Peter Ajemian

<[REDACTED]@exec.ny.gov>; Judith Mogul <[REDACTED]@exec.ny.gov>; Josh Vlasto <[REDACTED]>;

Dani Lever <[REDACTED]>; Richard Azzopardi <[REDACTED]@exec.ny.gov>; **Lis Smith** <[REDACTED]>

Subject: Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

You're going to comment on each and every allegation now

Get [Outlook for iOS](#)

From: Melissa DeRosa [REDACTED] <[REDACTED]@exec.ny.gov>
Sent: Monday, March 1, 2021 4:25:49 PM
To: Cohen, Steven (ESD) [REDACTED] <[REDACTED]@esd.ny.gov>; Lacewell, Linda A (DFS) [REDACTED] <[REDACTED]@dfs.ny.gov>
Cc: Jeffrey Pollock [REDACTED] <[REDACTED]@globalstrategygroup.com>; Garvey, Beth (CHAMBER) [REDACTED] <[REDACTED]@exec.ny.gov>; Ajemian, Peter (CHAMBER) [REDACTED] <[REDACTED]@exec.ny.gov>; Mogul, Judith (CHAMBER) [REDACTED] <[REDACTED]@exec.ny.gov>; **Josh Vlasto** [REDACTED] <[REDACTED]@gmail.com>; **Dani Lever** [REDACTED] <[REDACTED]@gmail.com>; Azzopardi, Richard (CHAMBER) [REDACTED] <[REDACTED]@exec.ny.gov>; **Lis Smith** [REDACTED] <[REDACTED]@gmail.com>
Subject: Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

I just spoke w lis and she agrees w me

what is the issue?

The Governor has kissed and hugged and posed for photos with men and women alike at thousands of public events for the last 40 years. If that has offended anyone in anyway, it was not his intention. In this instance, there was a photographer less than 5 feet away in a room filled with hundreds of people where he was performing a wedding ceremony.

From: Cohen, Steven (ESD) [REDACTED] <[REDACTED]@esd.ny.gov>
Sent: Monday, March 01, 2021 4:25 PM
To: Linda A Lacewell (dfs.ny.gov)
Cc: Melissa DeRosa; Jeffrey Pollock; Beth Garvey; Peter Ajemian; Judith Mogul; **Josh Vlasto** [REDACTED]; **Dani Lever** [REDACTED]; Richard Azzopardi; **Lis Smith** [REDACTED]
Subject: Re: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

Agree with No.

On Mar 1, 2021, at 4:23 PM, Lacewell, Linda A (DFS) [REDACTED]@dfs.ny.gov> wrote:

No

Sent from my iPhone

On Mar 1, 2021, at 4:21 PM, Melissa DeRosa [REDACTED]@exec.ny.gov> wrote:

Can we give this?

The Governor has kissed and hugged and posed for photos with men and women alike at thousands of public events for the last 40 years. If that has offended anyone in anyway, it was not his intention. In this instance, there was a photographer less than 5 feet away in a room filled with hundreds of people where he was performing a wedding ceremony.

From: Jeffrey Pollock [REDACTED]@globalstrategygroup.com>

Sent: Monday, March 01, 2021 4:03 PM

To: Beth Garvey; Peter Ajemian; Melissa DeRosa; Linda A Lacewell (dfs.ny.gov);
Judith Mogul; Steven Cohen (esd.ny.gov)

cc: Josh Vlasto [REDACTED]; Dani Lever [REDACTED]; Richard Azzopardi;
Lis Smith [REDACTED]

Subject: RE: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

agreed

From: Beth Garvey [REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>

Sent: Monday, March 1, 2021 4:03 PM

To: Peter Ajemian [REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>; Melissa DeRosa

[REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>; Linda A Lacewell (dfs.ny.gov)

[REDACTED] <[\[REDACTED\]@dfs.ny.gov](mailto:[REDACTED]@dfs.ny.gov)>; Judith Mogul [REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>; Steven

Cohen (esd.ny.gov) [REDACTED] <[\[REDACTED\]@esd.ny.gov](mailto:[REDACTED]@esd.ny.gov)>

cc: Josh Vlasto [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>; Dani Lever [REDACTED]

[REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>; Richard Azzopardi [REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>;

Lis Smith [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>; Jeffrey Pollock

[REDACTED] <[\[REDACTED\]@globalstrategygroup.com](mailto:[REDACTED]@globalstrategygroup.com)>

Subject: RE: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

[EXT EMAIL]

I think we need to lean in to – we have an ongoing review now, a referral has been made, no further comment on this or related matters.

From: Peter Ajemian [REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>

Sent: Monday, March 1, 2021 4:00 PM

To: Melissa DeRosa [REDACTED] <[\[REDACTED\]@exec.ny.gov](mailto:[REDACTED]@exec.ny.gov)>; Linda A Lacewell (dfs.ny.gov)

[REDACTED]@dfs.ny.gov>; Judith Mogul [REDACTED]@exec.ny.gov>; Beth Garvey [REDACTED]@exec.ny.gov>; Steven Cohen (esd.ny.gov) [REDACTED]@esd.ny.gov>
cc: Josh Vlasto [REDACTED]@gmail.com>; Dani Lever [REDACTED]@gmail.com>; Richard Azzopardi [REDACTED]@exec.ny.gov>; Lis Smith [REDACTED]@gmail.com>; 'Jefrey Pollock' [REDACTED]@globalstrategygroup.com>
Subject: privileged & confidential - please see. FW: Comment on 2019 wedding interaction

I think we have to refer to yesterday's statement.

From: Jesse McKinley [REDACTED]@nytimes.com>
Sent: Monday, March 1, 2021 3:53 PM
To: Richard Azzopardi [REDACTED]@exec.ny.gov>; Peter Ajemian [REDACTED]@exec.ny.gov>
Subject: Comment on 2019 wedding interaction

Rich, Peter,

Working on an article with Matt Flegenheimer, who interviewed the main subject, that involves an accusation by a 33-year-old woman, who says that the governor touched her inappropriately at a 2019 wedding (Gareth's, though he is not mentioned), and tried to kiss her even after she had conveyed her discomfort.

The woman, Anna Ruch, is on the record. She said in an interview that the governor put his hand on her bare lower back and after she removed it, the

governor asked if he could kiss her, placing his palms on her face against her wishes and drawing closer as she pulled her head away. He then kissed her on the cheek.

There are photos of this moment, some of which are bouncing around Instagram.

I'll reflect the governor's previous comments on the Bennett/Boylan accusations, but can, of course, include any additional comment.

Jesse

--

Jesse McKinley

New York Times

Bureau Chief

Albany

[REDACTED]

c [REDACTED]

Twitter: @jessemckinley

Skype: [REDACTED]

Instagram: jessemckinley70

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Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:34:54 AM
To: Beth Garvey [REDACTED]; Steve Cohen; Rich Azzopardi; Jeff Pollock [REDACTED]; Linda Lacewell
Judy Mogul; Dani [REDACTED]; Maggie Moran [REDACTED]; Peter Ajemian; Stephanie Benton Cell
[REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Melissa DeRosa [REDACTED]
[REDACTED]
Subject: 3/4/2021 9:34:54 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

ok I texted Bill mahers producer

MORAN00001091



Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:35:20 AM
To: Dani [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Stephanie BentonCell [REDACTED] Maggie Moran [REDACTED]; Jeff Pollock [REDACTED]; Rich Azzopardi; Judy Mogul; Peter Ajemian; Linda Lacewell; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; +Steve Cohen
Subject: 3/4/2021 9:35:20 PM -05:00 : Lis Smith [REDACTED] [13 parties]

To see if I could connect w him before show- want him to tee off on this

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:41:54 AM
To: Judy Mogul [REDACTED], Steve Cohen [REDACTED], Peter Ajemian [REDACTED], Melissa DeRosa [REDACTED], Rich Azzopardi [REDACTED], Josh Vlasto [REDACTED], Beth Garvey [REDACTED], Stephanie Benton Cell [REDACTED], Maggie Moran [REDACTED], [REDACTED]@kivvit.com]; Jeff Pollock [REDACTED], Linda Lacewell [REDACTED], Dani [REDACTED], Maggie Moran [REDACTED]
Subject: 3/4/2021 9:41:54 PM -05:00 : Lis Smith [REDACTED] [13 parties]

Do we have everything on this in one place- his statement, apology important facts etc?

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:45:17 AM
To: Jeff Pollock [REDACTED]; Peter Ajemian [REDACTED]; Rich Azzopardi [REDACTED]; Steve Cohen [REDACTED]; Melissa DeRosa [REDACTED];
Beth Garvey [REDACTED]; Linda Lacewell [REDACTED]; Judy Mogul [REDACTED]; Maggie Moran [REDACTED]; Dani [REDACTED];
[REDACTED] Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]
[REDACTED]@kivvit.com]
Subject: 3/4/2021 9:45:17 PM -05:00 : Lis Smith [REDACTED] [13 parties]

He wants everything we have

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:45:24 AM
To: Josh Vlasto [REDACTED]; Judy Mogul; Steve Cohen; Melissa DeRosa [REDACTED]; Peter Ajemian
Beth Garvey [REDACTED]; Linda Lacewell; Maggie Moran [REDACTED]; Maggie Moran
[REDACTED]@kivvit.com]; StephanieBenton Cell [REDACTED]; Dani [REDACTED]; Rich Azzopardi; Jeff
Pollock [REDACTED]
Subject: 3/4/2021 9:45:24 PM -05:00 : Lis Smith <[REDACTED]> [13 parties]

Can someone get it together?

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:45:36 AM
To: Dani [REDACTED]; Peter Ajemian; Maggie Moran [REDACTED]; Linda Lacewell; Beth Garvey [REDACTED];
[REDACTED]; Judy Mogul; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com]; Steve Cohen;
StephanieBenton Cell [REDACTED]; Rich Azzopardi; Jeff Pollock [REDACTED]; Melissa DeRosa [REDACTED]
[REDACTED]
Subject: 3/4/2021 9:45:36 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

He's only main voice that will do this- 4m viewers

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:46:02 AM
To: +Steve Cohen [REDACTED], Melissa DeRosa [REDACTED], Maggie Moran [REDACTED], Josh Vlasto [REDACTED],
[REDACTED] Rich Azzopardi [REDACTED], Maggie Moran [REDACTED@kivvit.com], Peter Ajemian [REDACTED], Beth Garvey [REDACTED],
Judy Mogul [REDACTED], Stephanie Benton Cell [REDACTED], Linda Lacewell [REDACTED], Dani [REDACTED]; Jeff Pollock [REDACTED].
[REDACTED]
Subject: 3/4/2021 9:46:02 PM -05:00 : Lis Smith [REDACTED] [13 parties]

so please please please help me help you

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 2:46:09 AM
To: +Steve Cohen [REDACTED]; Rich Azzopardi [REDACTED]; Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED];
Linda Lacewell [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; Melissa DeRosa [REDACTED];
Judy Mogul [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED] [kivvit.com]; Maggie Moran [REDACTED];
[REDACTED] Peter Ajemian [REDACTED]
Subject: 3/4/2021 9:46:09 PM -05:00 : Lis Smith [REDACTED] [13 parties]

We need some big names weighing in on our side

Message

From: Lis Smith [REDACTED]
Sent: 3/5/2021 3:02:40 AM
To: Josh Vlasto [REDACTED]; Maggie Moran [REDACTED@kivvit.com]; StephanieBenton Cell [REDACTED];
Maggie Moran [REDACTED]; Dani [REDACTED]; Melissa DeRosa [REDACTED] Peter Ajemian
Judy Mogul +Steve Cohen Jeff Pollock [REDACTED] Beth Garvey [REDACTED] Rich Azzopardi
Linda Lacewell
Subject: 3/4/2021 10:02:40 PM -05:00 : Lis Smith [REDACTED] 13 parties]

I need the packet by noon to make this work-

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/5/2021 3:03:59 AM
To: Jeff Pollock [REDACTED]; Linda Lacewell [REDACTED]; Dani [REDACTED]; Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED]; Maggie Moran [REDACTED]; Lis Smith [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; +Steve Cohen [REDACTED]; Peter Ajemian [REDACTED]; Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED]; Beth Garvey [REDACTED]
Subject: 3/4/2021 10:03:59 PM -05:00 : Melissa DeRosa [REDACTED] [13 parties]

calling u

Chat #	From	To	Body	Timestamp: Time
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Also would like to help w the sec harassment stuff- the maher people offered to do a call w me today but I need something from your team,	3/5/2021 7:13:45 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	At some point you guys need to give people a reason to help you and some ammo	3/5/2021 7:14:02 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Tell me wgat u need and I'll put together this am	3/5/2021 7:16:18 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	I texted last night	3/5/2021 7:17:41 AM(UTC-5)

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/6/2021 2:52:38 AM
To: Josh Vlasto [REDACTED]; Linda Laceywell [REDACTED]; Beth Garvey [REDACTED]; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com; Rich Azzopardi [REDACTED]; Lis Smith [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]; [REDACTED]; Peter Ajemian [REDACTED]; Steve Cohen [REDACTED]; Dani [REDACTED]; Judy Mogul [REDACTED]; Stephanie Benton Cell [REDACTED]
Subject: 3/5/2021 9:52:38 PM -05:00 : Melissa DeRosa [REDACTED] [13 parties]
Attachments: Screenshot 2021-03-05 at 9.52.22 PM.jpeg [REDACTED]

MORAN00001159

EXHIBIT

39

From: Melissa DeRosa [REDACTED]@exec.ny.gov>
To: Charlotte Bennett
[REDACTED]@exec.ny.gov>
Subject: =?Windows-1252?Q?
Re: What_I_didn=92t_get_to_say_to_you_before_you_le
ft?=
Thread-Topic: =?Windows-1252?Q?
What_I_didn=92t_get_to_say_to_you_before_you_left?=
Thread-Index: AQHWRnJ7tpH3yIwS+Emn84zJ6lICfqjhdjM/
Date: Sat, 20 Jun 2020 12:52:13 +0000
Message-ID: <1592657534199.61976@exec.ny.gov>
References: <0C743813-FB48-4A7A-8BA8-
5EA6486903F6@exec.ny.gov>
In-Reply-To: <0C743813-FB48-4A7A-8BA8-
5EA6486903F6@exec.ny.gov>
Content-Language: en-US
X-MS-Has-Attach:
X-MS-TNEF-Correlator:
x-ms-exchange-organization-originalclientipaddress:
67.248.41.100
x-ms-exchange-organization-originalserveripaddress:
10.74.46.234
Content-Type: text/plain; charset="Windows-1252"
Content-Transfer-Encoding: quoted-printable
MIME-Version: 1.0

Thanks for this incredible message -- it takes a
team to accomplish somethi=
ng like this, and you were very much a part of it
:) Hope you enjoy the we=
ekend, M

From: Charlotte Bennett
Sent: Friday, June 19, 2020 3:47 PM
To: Stephanie Benton; Melissa DeRosa
Subject: What I didn=92t get to say to you before
you left

Steph and Melissa -

Thank you for demonstrating to me (and the world)
what it means to be a wom=
an in New York. Thank you for your hard work and
your leadership. Thank you=
for saving lives. Thank you for leading by
example. You are the foundation=
of this state and this country. You will forever
be my role models. I am i=
n awe. I am proud. I am thankful.

Sent from my iPhone

MORAN00001160

Message

From: Rich Azzopardi
Sent: 3/6/2021 2:53:49 AM
To: Josh Vlasto; Lis Smith; Judy Mogul; Linda Lacewell; Melissa DeRosa; Stephanie Benton Cell; Maggie Moran [mailto:]; Maggie Moran; Beth Garvey; Dani; Jeff Pollock; +Steve Cohen; +Peter Ajemian
Subject: 3/5/2021 9:53:49 PM -05:00 : Rich Azzopardi [13 parties]

Yup

Message

From: Dani [REDACTED]
Sent: 3/6/2021 3:00:26 AM
To: Maggie Moran [REDACTED]@kivvit.com]; Maggie Moran [REDACTED]]; Josh Vlasto [REDACTED]; Beth Garvey [REDACTED] Lis Smith [REDACTED] Peter Ajemian [REDACTED] Jeff Pollock [REDACTED] +Judy Mogul [REDACTED] +Rich Azzopardi [REDACTED] Stephanie Benton Cell [REDACTED] +Linda Lacewell [REDACTED] Melissa DeRosa [REDACTED] 715-7794]; +Steve Cohen [REDACTED]
Subject: 3/5/2021 10:00:26 PM -05:00 : Dani [REDACTED] [13 parties]

Wow

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/6/2021 3:00:44 AM
To: Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey [REDACTED]; Linda Lacewell [REDACTED]; Peter Ajemian [REDACTED];
Judy Mogul [REDACTED]; Stephanie Benton Cell [REDACTED]; Jeff Pollock [REDACTED]; Dani [REDACTED];
Rich Azzopardi [REDACTED]; Steve Cohen [REDACTED]; Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]
[REDACTED]
Subject: 3/5/2021 10:00:44 PM -05:00 : Melissa DeRosa [REDACTED] [13 parties]

Yeah

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/6/2021 3:01:06 AM
To: Rich Azzopardi Linda Lacewell Stephanie Benton Cell [REDACTED] Maggie Moran [REDACTED]@kivvit.com];
Maggie Moran [REDACTED] Steve Cohen Beth Garvey [REDACTED] Josh Vlasto [REDACTED]
Lis Smith [REDACTED] Jeff Pollock [REDACTED] Judy Mogul Peter Ajemian Dani [REDACTED]
Subject: 3/5/2021 10:01:06 PM -05:00 : Melissa DeRosa <[REDACTED]> [13 parties]

Should I get this out there

Message

From: Jeff Pollock [REDACTED]
Sent: 3/6/2021 3:01:18 AM
To: Maggie Moran [REDACTED]@kivvit.com]; Judy Mogul; Maggie Moran [REDACTED]; Lis Smith [REDACTED];
[REDACTED]; Linda Lacewell; Beth Garvey [REDACTED]; Melissa DeRosa [REDACTED]; Peter Ajemian
StephanieBenton Cell [REDACTED]; Josh Vlasto [REDACTED]; +Steve Cohen; Rich Azzopardi; Dani [REDACTED]
[REDACTED]
Subject: 3/5/2021 10:01:18 PM -05:00 : Jeff Pollock <[REDACTED]> -> [13 parties]

Nooooo

Message

From: Linda Lacewell [REDACTED]
Sent: 3/6/2021 3:01:28 AM
To: Melissa DeRosa [REDACTED]; Maggie Moran [REDACTED]; Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Beth Garvey [REDACTED]; Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Peter Ajemian [REDACTED]; Jeff Pollock [REDACTED]; Dani [REDACTED]; Stephanie Benton Cell [REDACTED]; [REDACTED] +Steve Cohen [REDACTED]
Subject: 3/5/2021 10:01:28 PM -05:00 : Linda Lacewell [13 parties]

Hold for AG

Message

From: Jeff Pollock [REDACTED]
Sent: 3/6/2021 3:01:30 AM
To: Linda Lacewell Peter Ajemian Beth Garvey [REDACTED] Lis Smith [REDACTED] Dani [REDACTED]
[REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED]
StephanieBenton Cell [REDACTED]; Judy Mogul Rich Azzopardi Maggie Moran [REDACTED]
+Steve Cohen
Subject: 3/5/2021 10:01:30 PM -05:00 : Jeff Pollock [REDACTED] -> [13 parties]

For the AG

Date: Sunday, March 14 2021 09:43 AM
Subject: [Chat #1445]
From: Chris Cuomo [REDACTED]
To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Melissa DeRosa]; + [REDACTED] [Steven M. Cohen]; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];"
Attachments: IMG_9859.jpeg

Have you seen this? Is it fake?

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

All

Mentions

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



Date: Friday, March 5 2021 08:10 PM

Subject: [Chat #2349]

From: Liz Smith <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Dani Lever]; +[REDACTED] [Jefrey Pollock];

I have a bad feeling about this one

-----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:13 PM

Subject: [Chat #2350]

From: Dani Lever <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];

Also we think she's not credible but reporters love her

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:13 PM

Subject: [Chat #2351]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

They'll believe her

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:14 PM

Subject: [Chat #2352]

From: Liz Smith <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock];

We need to see statement before they give it a

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:16 PM

Subject: [Chat #2353]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

Ping mdr on that

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:16 PM

Subject: [Chat #2354]

From: Dani Lever <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];

Also the rest of that email isn't good either

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:16 PM

Subject: [Chat #2355]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

Calling men pussies

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:19 PM

Subject: [Chat #2356]

From: Liz Smith <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock];

That's survivable

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Friday, March 5 2021 08:19 PM

Subject: [Chat #2357]

From: Liz Smith <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Dani Lever]; +[REDACTED] [Jefrey Pollock];

This isn't

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 07:09 AM

Subject: [Chat #2358]

From: Dani Lever <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];

I did wake up thinking that the claim seems pretty ridiculous and convenient to come out now

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 07:10 AM

Subject: [Chat #2359]

From: Joshua Vlasto <+ [REDACTED]>

To: + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];

Agreed. It's in the bucket of the old stuff not new stuff

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 07:10 AM

Subject: [Chat #2360]

From: Liz Smith <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock];

When's it coming out

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 07:11 AM

Subject: [Chat #2361]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

Deadline is 1pm per the email

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 07:11 AM

Subject: [Chat #2362]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

So tonight

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 02:55 PM

Subject: [Chat #2365]

From: Dani Lever <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];

Getting this put on a t shirt: "what, when she WAS a HUD employee, he hugged the shit out of her?!"

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 02:55 PM

Subject: [Chat #2366]

From: Jeffrey Pollock <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Dani Lever]; + [REDACTED] [Liz Smith];

Sorry. I'm bad. I know.

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 03:03 PM

Subject: [Chat #2367]

From: Liz Smith <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Dani Lever]; + [REDACTED] [Jefrey Pollock];

What did [REDACTED] say to the post

----METADATA INFORMATION-----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 03:09 PM

Subject: [Chat #2368]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

Never happened

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 03:10 PM

Subject: [Chat #2369]

From: Liz Smith <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Dani Lever]; +[REDACTED] [Jefrey Pollock];

Was he under the govs bed?

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 03:10 PM

Subject: [Chat #2370]

From: Dani Lever <+ [REDACTED]>

To: "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Jefrey Pollock]; + [REDACTED] [Liz Smith];

It was that he's been friends with her for years and she never said anything about it

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Date: Saturday, March 6 2021 03:10 PM

Subject: [Chat #2371]

From: Dani Lever <[REDACTED]>

To: "+[REDACTED] [Joshua Vlasto (owner)]"; +[REDACTED] [Jefrey Pollock]; +[REDACTED] [Liz Smith];

Laughed at "Was he under the govs bed?"

----METADATA INFORMATION----

Device Owner:

[REDACTED] Josh Vlasto

ICCID:

[REDACTED]

Message

From: Rich Azzopardi
Sent: 3/6/2021 5:07:41 PM
To: Stephanie Benton Cell [REDACTED]; Peter Ajemian; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED];
[REDACTED]@kiwit.com; Steve Cohen; Maggie Moran [REDACTED]; Judy Mogul; Dan [REDACTED];
Linda Lacewell; LisSmith [REDACTED]; Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; Jeff
Pollock [REDACTED]
Subject: 3/6/2021 12:07:41 PM -05:00: Rich Azzopardi > [13 parties]

Don't love the gov calling dudes pussies. I certainly never heard him call someone that. Should i deny and say as someone who's been here 8 years I've never heard him use coarse language like that (no mention of other course language?)

MORAN00001179

EXHIBIT

42

Message

From: Lis Smith [REDACTED]
Sent: 3/6/2021 5:28:41 PM
To: Linda Lacewell; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]; Rich Azzopardi; Peter Ajemian; Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; Beth Garvey [REDACTED]; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED]; Steve Cohen; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com];
Judy Mogul
Subject: 3/6/2021 12:28:41 PM -05:00 : Lis Smith [REDACTED] [13 parties]

jumping in quick- i wouldn't push back too hard on pussies=

Message

From: Rich Azzopardi
Sent: 3/6/2021 5:29:29 PM
To: Steve Cohen; Stephanie Benton Cell [redacted]; Linda Lacewell; Peter Ajemian; Judy Mogul; Lis Smith
[redacted]; Maggie Moran [+redacted]; Melissa DeRosa [redacted]; Jeff Pollock [redacted]
[redacted]; Josh Vlasto [redacted]; Maggie Moran [redacted]@kivvit.com]; Dan [redacted]; Beth Garvey
[redacted]
Subject: 3/6/2021 12:29:29 PM -05:00 : Rich Azzopardi [13 parties]

Again I can speak to my experience and couch it that way.

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/9/2021 4:14:58 PM
To: Maggie Moran [REDACTED]; Dani [REDACTED]; Beth Garvey [REDACTED]; Josh Vlasto [REDACTED];
[REDACTED]; Judy Mogul [REDACTED]; Lis Smith [REDACTED]; Linda Lacewell [REDACTED]; Peter Ajemian; Maggie Moran [REDACTED];
[REDACTED]; Jeff Pollock [REDACTED]; Stephanie Benton Cell [REDACTED]; Steve Cohen; Rich Azzopardi [REDACTED]
Subject: 3/9/2021 11:14:58 AM -05:00 : Melissa DeRosa [REDACTED] [13 parties]

Important call need u guys on

MORAN00001452

EXHIBIT

43

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 4:16:51 PM
To: Maggie Moran [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Judy Mogul [REDACTED] Linda Lacewell [REDACTED] Beth Garvey [REDACTED] Rich Azzopardi [REDACTED] Peter Ajemian [REDACTED] Steve Cohen [REDACTED] Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; Melissa DeRosa [REDACTED]
Subject: 3/9/2021 11:16:51 AM -05:00 : Lis Smith [REDACTED] [13 parties]

Can you guys text the call in

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 4:16:57 PM
To: Maggie Moran [REDACTED]@kivvit.com; Steve Cohen [REDACTED]; Rich Azzopardi [REDACTED]; Judy Mogul [REDACTED]; Linda Lacewell [REDACTED]; Dani [REDACTED]; Stephanie Benton Cell [REDACTED]; Peter Ajemian [REDACTED]; Maggie Moran [REDACTED]; Josh Vlasto [REDACTED]; Melissa DeRosa [REDACTED]; Jeff Pollock [REDACTED]; Beth Garvey [REDACTED]
Subject: 3/9/2021 11:16:57 AM -05:00 : Lis Smith [REDACTED] -> [13 parties]

stephanie emailed like 20 numbers

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 4:17:09 PM
To: Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED] Maggie Moran [REDACTED]@kivvit.com];
Peter Ajemian; Linda Laceywell; Melissa DeRosa [REDACTED]; Dani [REDACTED]; Jeff Pollock [REDACTED]
[REDACTED] Steve Cohen Josh Vlasto [REDACTED] Rich Azzopardi Judy Mogul Maggie Moran [REDACTED]
[REDACTED]
Subject: 3/9/2021 11:17:09 AM -05:00 : Lis Smith [REDACTED] [13 parties]

Nobody has time to enter that into the phone

Message

From: Lis Smith [REDACTED]
Sent: 3/9/2021 4:17:18 PM
To: Melissa DeRosa [REDACTED]; Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED];
Maggie Moran [REDACTED]; Jeff Pollock [REDACTED]; Beth Garvey [REDACTED]; Linda Lacewell [REDACTED];
Steve Cohen [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Peter Ajemian [REDACTED]; Rich Azzopardi [REDACTED];
Judy Mogul [REDACTED]
Subject: 3/9/2021 11:17:18 AM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

I was in the phone w Chris he and asked to be included

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/9/2021 4:17:29 PM
To: Maggie Moran [REDACTED]@kivvit.com]; Linda Lacewell Judy Mogul [REDACTED]; Josh Vlasto [REDACTED] Maggie Moran [REDACTED]; Rich Azzopardi Lis Smith [REDACTED]; Steve Cohen Jeff Pollock [REDACTED]; Beth Garvey [REDACTED]; Peter Ajemian Dani [REDACTED]; Stephanie Benton Cell [REDACTED]
Subject: 3/9/2021 11:17:29 AM -05:00 : Melissa DeRosa [REDACTED] [13 parties]

ok

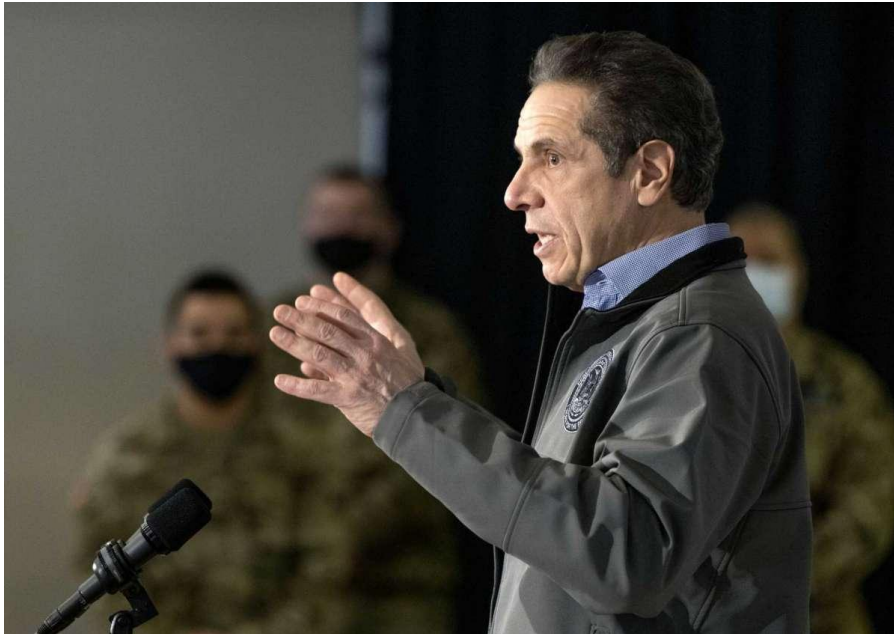
Chat #	From	To	Body	Timestamp: Time
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Lemme know how call goes	3/9/2021 11:21:22 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	U can't be on?	3/9/2021 11:21:36 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	No one is sending the number	3/9/2021 11:21:44 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	I texted and emailed	3/9/2021 11:21:49 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Just sent	3/9/2021 11:22:03 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Your assistant needs to text	3/9/2021 11:22:09 AM(UTC-5)

9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	That doesn't work for me	3/9/2021 11:22:21 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	If your assistant texts I'll get on	3/9/2021 11:22:28 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Did you assistant get me too'd	3/9/2021 11:24:48 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	That's gross	3/9/2021 11:36:21 AM(UTC-5)
9	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith + [REDACTED] Melissa DeRosa (owner)	Which part	3/9/2021 11:36:44 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	All of this!	3/9/2021 11:36:50 AM(UTC-5)

Chat #	From	To	Body	Timestamp: Time
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	What's with all these women going to the mansion	3/9/2021 11:37:15 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	Can you just fire every woman	3/9/2021 11:42:20 AM(UTC-5)
9	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) + [REDACTED] Melissa DeRosa (owner)	In the office	3/9/2021 11:42:25 AM(UTC-5)

Female aide said Cuomo aggressively groped her at Executive Mansion

Governor issues denial, but describes details of woman's account as "gut-wrenching"



ALBANY — A female aide to [Gov. Andrew M. Cuomo](#) alleges he aggressively groped her in a sexually charged manner after she had been summoned to the Executive Mansion late last year, according to a person with direct knowledge of the woman's claims.

The staff member, whose identity is being withheld by the Times Union, had been called to the mansion under the apparent pretext of having her assist the governor with a minor technical issue involving his mobile phone. They were [alone in Cuomo's private residence](#) on the second floor when he closed the door and allegedly reached under her blouse and began to fondle her, according to the source.

The allegations by the female aide, who is the sixth woman to accuse Cuomo of inappropriate behavior, were first reported Tuesday by the Times Union. The additional details describe the most egregious behavior attributed to the governor to date — conduct that could potentially be pursued as a misdemeanor sexual assault charge.

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The person briefed on the case, who is not authorized to comment publicly, said the woman — who is much younger than Cuomo — told the governor to stop. Her broader allegations include that he frequently engaged in flirtatious behavior with her, and that it was not the only time that he had touched her.

The woman's story was revealed within the governor's Executive Chamber on March 3, as staff members watched his first news conference in the week since Lindsey Boylan published [an online essay](#) detailing her own allegations against Cuomo. In the news conference, the governor denied ever touching any women "inappropriately."

Hearing those remarks, the female aide became emotional. At least one female supervisor came to her assistance and asked why she was upset. The female aide subsequently told the supervisor about what she said had been inappropriate encounters with Cuomo, the source said.

In response to the Times Union's questions about the allegations, Cuomo on Wednesday evening issued a statement to the newspaper: "As I said yesterday, I have never done anything like this. The details of this report are gut-wrenching. I am not going to speak to the specifics of this or any other allegation given the ongoing review, but I am confident in the result of the attorney general's report."

State Attorney General Letitia James' office is overseeing [an investigation](#) of multiple harassment allegations against Cuomo.

In the most recent case, at least one of the woman's supervisors reported the allegations to an attorney in the governor's office on Monday.

On Tuesday afternoon, several hours after Cuomo's office had been asked about the matter by the Times Union, the governor said in a news conference, "I'm not aware of any other claim," when he was asked by a reporter about the new story, which by then had been published online. That story included a statement from his acting counsel, Beth Garvey, who said that "all allegations" of sexual

harassment made against the governor were being referred to the attorney general's office.

"As I said last week, this is very simple: I never touched anyone inappropriately," Cuomo said Tuesday. "I never made any inappropriate advances ... (and) no one ever told me at the time that I made them feel uncomfortable. Obviously, there are people who said after the fact they felt uncomfortable."

The woman has not filed a formal complaint with the governor's office.

Aides to the governor on Tuesday said the governor stands by his statements that he never touched anyone inappropriately. They would not explain the governor's statement that he was unaware of the latest allegation against him.

This week, the attorney general's office announced its investigation will be handled by two private attorneys: Joon H. Kim, a former acting U.S. attorney for New York's Southern District in Manhattan, and Anne L. Clark, who specializes in labor law and sexual harassment cases.

On Wednesday morning, the attorney general's office declined to comment in response to detailed questions about how that office, which does not have statutory jurisdiction on any criminal component of the case, would be handled. The March 1 referral letter from Garvey to James authorizing the probe invoked a section of Executive Law that empowers the attorney general's office to conduct a civil investigation with the aid of office subpoenas, but not to pursue a criminal case or to bring the allegations before a grand jury.

If a criminal complaint is made, by Boylan or the female aide who alleges Cuomo groped her at the mansion, those cases could potentially be handled by the offices of Albany County District Attorney David Soares or Manhattan District Attorney Cy Vance.



The new allegations that came to light Tuesday immediately intensified the pressure from many lawmakers — including Cuomo's fellow Democrats — for the governor to resign. He had already faced calls to step down from [state Senate Majority Leader Andrea Stewart-Cousins](#), and Assembly Speaker Carl E. Heastie had issued a statement Sunday questioning Cuomo's ability to remain an effective leader.

Republicans in the Legislature have [been more forceful in their remarks](#). Senate Minority Leader Robert Ort on Tuesday characterized the latest allegation as "a disturbing pattern of predatory pattern behavior by Gov. Cuomo, not to mention a pattern of lies and broken public trust."

The initial allegations were made by three women — Boylan as well as Charlotte Bennett and Anna Ruch, who did not work for Cuomo but told the New York Times last week that the governor grabbed her and attempted to kiss her at the 2019 wedding of one of his senior aides, Gareth Rhodes.

Bennett told the New York Times that Cuomo, during an encounter in his Capitol office last June, talked about being lonely during the pandemic and that he had missed being able to hug someone. She said that the governor never tried to touch her. Bennett, in another interview with CBS News, also recounted being alone with Cuomo at the mansion and said that he had asked her probing questions about her personal life but did not touch her.

Debra Katz, Bennett's attorney, issued a statement in response to this story late Wednesday saying the allegations by the female aide are "eerily similar" to Bennett's experience.

"Charlotte was summoned to the Capitol on a Saturday, left isolated with the governor and asked to help him with minor technical issues with his phone. Charlotte reported this behavior and the governor's sexual proposition to his most senior aides, including his Special Counsel, Judith Mogul. In response, those aides failed to report Charlotte's claims to the Governor's Office of Employee Relations, as they were legally required," Katz said.

"Had the governor's staff taken Charlotte Bennett's allegations and their legal obligations seriously, perhaps this woman would have been spared of this sexual assault," she added. "That the governor does not deny touching people, but insists he never did it inappropriately, shows he is committed to gaslighting victims and perpetuating these lies. This is exactly how abusers operate."

Over the weekend, in stories published by the Washington Post and Wall Street Journal, two more women came forward and described what they characterized as inappropriate behavior by Cuomo, including Karen Hinton, who worked with the governor more than two decades ago at the U.S. Housing and Urban Development agency.

blyons@timesunion.com

Name	Msg #	From	To	Body	Timestamp: Date	Timestamp: Time
[REDACTED]	1435	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) @gmail.com Dani Lever (owner)	Did you hear what it is	3/9/2021	3/9/2021 11:40:57 AM(UTC-5)
[REDACTED]	1436	[REDACTED] Dani Lever	[REDACTED] Lis Smith @gmail.com Dani Lever (owner)	No what is it	3/9/2021	3/9/2021 11:43:54 AM(UTC-5)
[REDACTED]	1437	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) @gmail.com Dani Lever (owner)	pushed this chick up against the wall, kissed her, put hand up her shirt	3/9/2021	3/9/2021 11:45:00 AM(UTC-5)

[NEWS](#)

Cuomo faces new sexual harassment allegation, this time at Executive Mansion

Female aide claims governor touched her inappropriately; complaint reported to AG

[Brendan J. Lyons](#)

March 9, 2021 Updated: March 11, 2021 3:10 p.m.



Gov. Andrew M. Cuomo has been accused of sexual harassment by a sixth woman who has alleged he touched her inappropriately last year at the Executive Mansion in Albany. (Photo by Lev Radin/Pacific Press/LightRocket via Getty Images)

Pacific Press/Pacific Press/LightRocket via Ge

ALBANY — A sixth woman has leveled allegations of sexually inappropriate conduct against Gov. Andrew M. Cuomo, accusing him of

EXHIBIT

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touching her without consent late last year during an encounter at the governor's mansion, the Times Union has confirmed.

The alleged incident took place after the woman, a member of the governor's Executive Chamber staff, had been summoned to the mansion to assist the governor with a work-related matter. The woman's supervisors recently became aware of the allegation and alerted the governor's counsel of it on Monday.

An official close to the matter on Tuesday confirmed to the Times Union that the new allegation had been made, although Cuomo, during a news conference hours later, denied knowledge of it.

In response to detailed questions about the handling of the woman's allegations by the governor's office, Beth Garvey, acting counsel to the governor, said: "All allegations that we learn of directly or indirectly are going promptly to the investigators appointed by the attorney general."

Cuomo, in a conference call with reporters on Tuesday afternoon, did not deny touching women, but repeated his statement from last week that if he did, it was not "inappropriate."

"First, I'm not aware of any other claim," he said. "As I said last week, this is very simple: I never touched anyone inappropriately. ... I never made any inappropriate advances ... (and) no one ever told me at the time that I made them feel uncomfortable. Obviously, there are people who said after the fact they felt uncomfortable."

The woman has not filed a formal complaint with the governor's office.

Her allegations were reported to the governor's counsel by other employees in the Executive Chamber. The information also was relayed by the governor's office to the attorney general's office, which is coordinating an investigation into multiple allegations of sexual harassment that have been made against the governor.

The sixth woman could not be reached for comment.

The investigation being coordinated by the attorney general's office is being handled by two private attorneys: Joon H. Kim, a former acting U.S. attorney for New York's Southern District in Manhattan, and Anne L. Clark, who specializes in labor law and sexual harassment cases.

Last week, Cuomo said he "now understand(s) that I acted in a way that made people feel uncomfortable. It was unintentional and I truly and deeply apologize for it. I feel awful about it and, frankly, I am embarrassed by it."

The governor, apparently in response to earlier accusations made by another aide, Lindsey Boylan, that he had kissed her in his Manhattan office, also said: "I want you to know this from me directly, I never touched anyone inappropriately."

Aides to the governor on Tuesday said the governor stands by his statement that he never touched anyone inappropriately.

The new allegations by the sixth woman potentially undermine that statement by Cuomo, and are certain to intensify the pressure that many lawmakers — including fellow Democrats — are putting on him to resign. They include state Senate Majority Leader Andrea Stewart-Cousins, who on Sunday said Cuomo should step down due to a series of scandals, and Assembly Speaker Carl E. Heastie, who stopped short of telling Cuomo to resign but questioned whether he can remain an effective leader.

Lt. Gov. Kathy Hochul, who would take over the position if Cuomo is impeached, on Tuesday issued a statement regarding the appointment of the

independent investigators, saying, "I am confident everyone's voice will be heard and taken seriously. I trust the inquiry to be completed as thoroughly and expeditiously as possible. New Yorkers should be confident that through this process they will soon learn the facts."

"The latest allegation by a current employee of the Executive Chamber highlights a disturbing pattern of predatory pattern behavior by Gov. Cuomo, not to mention a pattern of lies and broken public trust," state Senate Minority Leader Robert Ort, a Republican, said in a statement after the new allegations were published online by the Times Union. "Just last week, the governor claimed he had never inappropriately touched anyone — but yet the brave and courageous account of the sixth accuser says he did just that, only months ago."

Assemblyman Richard N. Gottfried, a Manhattan Democrat who has been a member of the Assembly for more than 50 years, issued a statement on Twitter Tuesday — just hours after the new allegation was reported — in which he joined the multitude of lawmakers calling for Cuomo to step down.

"Multiple and growing credible allegations of sexual harassment and recent reports detailing the cover-up of the true COVID-19 death toll in nursing homes are extremely disturbing and make it clear that Gov. Cuomo is no longer the right governor for New York," Gottfried said. "It is clear that it is best for New York for Gov. Cuomo to resign."

The intensifying calls for his resignation followed the initial allegations made by three women — Boylan as well as Charlotte Bennett and Anna Ruch, who did not work for Cuomo but told the New York Times that the governor grabbed her and attempted to kiss her at a 2019 wedding of one of his senior aides.

Bennett told the New York Times that Cuomo, during an encounter in his Capitol office last June, talked about being lonely during the pandemic and that he had missed being able to hug someone. She said that Cuomo never tried to touch her.

Over the weekend, in stories published by the Washington Post and Wall Street Journal, two more women came forward and described what they characterized as inappropriate behavior by Cuomo, including one who worked with the governor more than two decades ago at the U.S. Housing and Urban Development agency.

Jessica Westerman, an attorney for the law firm representing Bennett — along with her associate Debra Katz — on Monday told the Times Union that the Executive Chamber's decision last year to handle Bennett's complaint "in-house" and not refer the matter to the Governor's Office of Employee Relations (GOER) needs to be a focus of the ongoing probe.

In that case, Jill DeRosiers, fielded the complaint from 25-year-old Bennett, and Garvey, a top member of the governor's legal team, assigned the matter to Judith Mogul, a special counsel for the governor. There was apparently no formal investigation, and it was resolved when Bennett "received the transfer she requested to a position in which she had expressed a long-standing interest, and was thoroughly debriefed on the facts which did not include a claim of physical contact or inappropriate sexual conduct."

"She was consulted regarding the resolution, and expressed satisfaction and appreciation for the way in which it was handled," Garvey added in a statement last week.

The handling of the investigation by a legal team that provides advice to the governor also raises questions about the potential inherent conflict of interest in their decision to not notify GOER and instead resolve the case by transferring Bennett to a new job.

Westerman said there were multiple problems with that process, which she said did not follow state law or the rules spelled out in the employee handbook covering the Executive Chamber.

"It's clear that they were legally obligated to refer the complaint to GOER, and so by failing to do so — regardless of whether they otherwise advised

Charlotte of the options available to her — they violated their legal obligation to report the governor's conduct to GOER," Westerman said.

In December 2018, under an executive order signed by Cuomo, GOER became the office responsible for handling sexual harassment investigations, and is required to be notified of all complaints. That order, which followed expanded rules for sexual harassment allegations and responses, "transferred the responsibility for conducting investigations of all employment-related discrimination complaints to the Governor's Office of Employee Relations ... (and) all such complaints of protected class employment-related discrimination will be investigated by GOER."

The governor, when asked last week whether he had taken legally mandated, annual sexual harassment training, said "the short answer is yes." But his office has declined to provide details on when the governor took the training.

Bennett, in an interview with CBS News last week, said she witnessed an assistant to Cuomo taking the harassment training for him, although the governor certified he had completed the online course. The assistant has denied Bennett's allegation.

Written By

[Brendan J. Lyons](#)

Reach Brendan J. on

Brendan J. Lyons is a managing editor for the Times Union overseeing the Capitol Bureau and Investigations. Lyons joined the Times Union in 1998 as a crime reporter before being assigned to the investigations team. He became editor of the investigations team in 2013 and began overseeing the Capitol Bureau in 2017. You can reach him at blyons@timesunion.com or [518-454-5547](tel:518-454-5547).

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/10/2021 5:27:39 PM
To: Lis Smith [REDACTED]; Maggie Moran [REDACTED@kivvit.com]; Rich Azzopardi; Beth Garvey [REDACTED]
+Steve Cohen; Jeff Pollock [REDACTED]; Judy Mogul; Maggie Moran [REDACTED]; Dani [REDACTED]
[REDACTED]; Josh Vlasto [REDACTED]; Linda Lacewell; Stephanie Benton Cell [REDACTED]; Peter Ajemian
Subject: 3/10/2021 12:27:39 PM -05:00 : Melissa DeRosa [REDACTED] 13 parties]

Steph can u send a dial in

MORAN00001565



Message

From: Jeff Pollock [REDACTED]
Sent: 3/10/2021 5:27:56 PM
To: +Steve Cohen [Linda Lacewell Maggie Moran [REDACTED]@kivvit.com]; Josh Vlasto [REDACTED] Melissa DeRosa [REDACTED] Dani [REDACTED] Maggie Moran [REDACTED] Rich Azzopardi [REDACTED] Peter Ajemian Judy Mogul Stephanie Benton Cell [REDACTED]; Lis Smith [REDACTED] Beth Garvey [REDACTED]
Subject: 3/10/2021 12:27:56 PM -05:00 : Jeff Pollock [REDACTED] [13 parties]

I'm presenting and can't join anything

Message

From: Lis Smith [REDACTED]
Sent: 3/10/2021 5:28:30 PM
To: Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED]; Dani [REDACTED]; Linda Lacewell [REDACTED]; Peter Ajemian [REDACTED]; Judy Mogul [REDACTED]; Stephanie BentonCell [REDACTED]; Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; +Steve Cohen [REDACTED]; Maggie Moran [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Rich Azzopardi [REDACTED]
Subject: 3/10/2021 12:28:30 PM -05:00 : Lis Smith [REDACTED] > [13 parties]

Wow, Jef, didnt know you were such a quitter

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/10/2021 5:28:32 PM
To: Linda Lacewell [REDACTED] Rich Azzopardi [REDACTED] Maggie Moran [REDACTED] Steve Cohen [REDACTED] Jeff Pollock [REDACTED]
Lis Smith [REDACTED] Peter Ajemian [REDACTED] Dani [REDACTED] Stephanie Benton Cell [REDACTED]
JoshVlasto [REDACTED] Beth Garvey [REDACTED] Judy Mogul [REDACTED] Maggie Moran [REDACTED]
[REDACTED]@kivvit.com]
Subject: 3/10/2021 12:28:32 PM -05:00 : Melissa DeRosa [REDACTED] [13 parties]

K

Message

From: Stephanie Benton Cell [REDACTED]
Sent: 3/10/2021 5:28:36 PM
To: +Steve Cohen, Beth Garvey [REDACTED], Peter Ajemian, Rich Azzopardi, Jeff Pollock [REDACTED],
Judy Mogul, Dani [REDACTED], Josh Vlasto [REDACTED]; Lis Smith [REDACTED]; Maggie Moran
[REDACTED]; Linda Lacewell, Melissa DeRosa [REDACTED], Maggie Moran [REDACTED]@kivvit.com]
Subject: 3/10/2021 12:28:36 PM -05:00 : Stephanie Benton Cell [REDACTED] [13 parties]

Yes, give me 2 mins to open line.

Message

From: Lis Smith [REDACTED]
Sent: 3/10/2021 5:28:47 PM
To: Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; Peter Ajemian [REDACTED];
Judy Mogul [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Stephanie Benton Cell [REDACTED];
Josh Vlasto [REDACTED]; Rich Azzopardi [REDACTED]; Steve Cohen [REDACTED]; Maggie Moran [REDACTED];
Linda Lacewell [REDACTED]
Subject: 3/10/2021 12:28:47 PM -05:00 : Lis Smith [REDACTED] [13 parties]

Make sure Chris is included

Message

From: Stephanie Benton Cell [REDACTED]
Sent: 3/10/2021 5:29:05 PM
To: Maggie Moran [REDACTED]; Beth Garvey [REDACTED]; +Steve Cohen [REDACTED] Dani [REDACTED]
Judy Mogul [REDACTED] Josh Vlasto [REDACTED]; Rich Azzopardi [REDACTED] Linda Lacewell [REDACTED] Jeff Pollock [REDACTED]
Melissa DeRosa [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Peter Ajemian [REDACTED] Lis Smith [REDACTED]
Subject: 3/10/2021 12:29:05 PM -05:00 : Stephanie Benton Cell <[REDACTED]> [13 parties]

[REDACTED]

Message

From: Dani [REDACTED]
Sent: 3/10/2021 5:31:22 PM
To: Rich Azzopardi [REDACTED]; Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED]; Jeff Pollock [REDACTED];
[REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Melissa DeRosa [REDACTED]; +Steve Cohen [REDACTED]; LisSmith [REDACTED];
[REDACTED]; Maggie Moran [REDACTED]; Judy Mogul [REDACTED]; Linda Lacewell [REDACTED]; Beth Garvey [REDACTED];
Peter Ajemian
Subject: 3/10/2021 12:31:22 PM -05:00 : Dani [REDACTED] [13 parties]

I'm in a meeting

Message

From: Dani [REDACTED]
Sent: 3/10/2021 5:31:28 PM
To: Josh Vlasto [REDACTED] Stephanie Benton Cell [REDACTED] LisSmith [REDACTED]
+Steve Cohen Beth Garvey [REDACTED] Maggie Moran [REDACTED]; Peter Ajemian Melissa DeRosa
[REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Judy Mogul [REDACTED] Rich Azzopardi Linda Lacewell Jeff
Pollock [REDACTED]
Subject: 3/10/2021 12:31:28 PM -05:00 : Dani [REDACTED] > [13 parties]

Can do in 20

Message

From: Lis Smith [REDACTED]
Sent: 3/10/2021 5:31:35 PM
To: Peter Ajemian; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Judy Mogul; Josh Vlasto
[REDACTED]; Maggie Moran [REDACTED]; Rich Azzopardi; Dani [REDACTED]; Steve Cohen; Beth
Garvey [REDACTED]; Linda Lacewell; Melissa DeRosa [REDACTED]; Stephanie Benton Cell [REDACTED]
[REDACTED]
Subject: 3/10/2021 12:31:35 PM -05:00 : Lis Smith <[REDACTED]> [13 parties]

I'm on the line

Message

From: Lis Smith [REDACTED]
Sent: 3/10/2021 5:31:38 PM
To: Maggie Moran [REDACTED]@kivvit.com]; Dani [REDACTED] Melissa DeRosa [REDACTED] +Judy Mogul [REDACTED]
Jeff Pollock [REDACTED] Maggie Moran [REDACTED]; Rich Azzopardi [REDACTED] Beth Garvey [REDACTED]
Linda Lacewell [REDACTED] +Steve Cohen [REDACTED] Josh Vlasto [REDACTED] Stephanie Benton Cell [REDACTED];
Peter Ajemian [REDACTED]
Subject: 3/10/2021 12:31:38 PM -05:00 : Lis Smith [REDACTED] [3 parties]

Is this happening

Message

From: Stephanie Benton Cell [REDACTED]
Sent: 3/10/2021 5:31:46 PM
To: Beth Garvey [REDACTED]; Lis Smith [REDACTED]; Dani [REDACTED]; Melissa DeRosa [REDACTED];
[REDACTED]; Steve Cohen; Rich Azzopardi; Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED];
Judy Mogul [REDACTED]; Linda Lacewell; Maggie Moran [REDACTED]; [REDACTED]@kivvit.com; Peter Ajemian; Maggie Moran [REDACTED];
[REDACTED]
Subject: 3/10/2021 12:31:46 PM -05:00 : Stephanie Benton Cell [REDACTED] [13 parties]

Y

Message

From: Lis Smith [+ [REDACTED]]
Sent: 3/10/2021 5:31:46 PM
To: Jeff Pollock [REDACTED]; Dani [REDACTED]; Josh Vlasto [REDACTED]; Beth Garvey [REDACTED];
[REDACTED] Melissa DeRosa [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Peter Ajemian [REDACTED] Maggie Moran [REDACTED];
[REDACTED] Rich Azzopardi [REDACTED] Stephanie Benton Cell [REDACTED]; Judy Mogul [REDACTED]; Linda Lacewell [REDACTED];
+Steve Cohen [REDACTED]
Subject: 3/10/2021 12:31:46 PM -05:00 : Lis Smith [REDACTED] [13 parties]

I'll speak for pollock on this one

Message

From: +Rich Azzopardi [+ [REDACTED]]
Sent: 3/10/2021 5:31:48 PM
To: Josh Vlasto [[REDACTED]]; Linda Lacewell; Melissa DeRosa [[REDACTED]]; Maggie Moran [[REDACTED]]
[[REDACTED]]@kivvit.com; Steve Cohen; Lis Smith [[REDACTED]]; Maggie Moran [[REDACTED]]; Dani [[REDACTED]]
[[REDACTED]]; Jeff Pollock [[REDACTED]]; Beth Garvey [[REDACTED]]; Judy Mogul; Stephanie Benton Cell
[[REDACTED]]; Peter Ajemian [[REDACTED]]
Subject: 3/10/2021 12:31:48 PM -05:00 : Rich Azzopardi [[REDACTED]] 13 parties]

I'm on too

Message

From: Jeff Pollock [+ [REDACTED]]
Sent: 3/10/2021 5:31:54 PM
To: Linda Lacewell; Lis Smith [REDACTED]; Beth Garvey [+ [REDACTED]]; Maggie Moran [REDACTED];
Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; Peter Ajemian; Josh Vlasto [REDACTED];
MelissaDeRosa [REDACTED]; Rich Azzopardi; Judy Mogul; Maggie Moran [REDACTED]@kivvit.com];
+Steve Cohen
Subject: 3/10/2021 12:31:54 PM -05:00 : Jeff Pollock [REDACTED] [13 parties]

Proxy given

From: Cohen, Steven (ESD) [REDACTED]@esd.ny.gov
Subject: Re: priv and confidential - pls review asap
Date: March 12, 2021 at 11:37 AM
To: DeRosa, Melissa (CHAMBER) [REDACTED]@exec.ny.gov
Cc: Jeffrey Pollock [REDACTED]@globalstrategygroup.com, Christopher Cuomo [REDACTED]@gmail.com, [REDACTED]@gmail.com, Dani Lever [REDACTED]@gmail.com, Azzopardi, Richard (CHAMBER) [REDACTED]@exec.ny.gov, Lacewell, Linda A (DFS) [REDACTED]@dfs.ny.gov, Mogul, Judith (CHAMBER) [REDACTED]@exec.ny.gov, Garvey, Beth (CHAMBER) [REDACTED]@exec.ny.gov



Here's the crux after denial --

A rush to judgement is the exact opposite of due process, the exact opposite of our system of government and the exact opposite of what Americans and NYers say they believe in. You either believe in fairness, due process and justice -- or you don't. And none of that undermines a person's right to speak their truth or be heard. If those 2 concepts cannot co-exist than what are left with is mob rule or chaos.

On Mar 12, 2021, at 11:17 AM, Melissa DeRosa [REDACTED]@exec.ny.gov wrote:

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

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

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

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

COHEN000448

EXHIBIT

50

From: Melissa DeRosa [REDACTED]@exec.ny.gov>
Sent: Friday, March 12, 2021 12:54 PM
To: Lis Smith [REDACTED]@gmail.com>; Christopher Cuomo; Jeffrey Pollock; Steven Cohen (esd.ny.gov)
Cc: Beth Garvey [REDACTED]
Subject: Fw: Privileged

From: Stephanie Benton
Sent: Friday, March 12, 2021 12:54 PM
To: Melissa DeRosa
Cc: Judith Mogul
Subject: Privileged

DRAFT GAMC

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

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

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

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

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

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

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

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

Sent: Wednesday, March 10, 2021 8:17 PM
To: Melissa DeRosa <+ [REDACTED]>; Peter Ajemien < [REDACTED]>; Lis Smith <+ [REDACTED]>; Rich Azzopardi < [REDACTED]>
Subject: CHAT - 00784 - 2021/03/10

Lis Smith
3/10/2021 8:17 PM

I can't hear anything

Melissa DeRosa
3/10/2021 8:17 PM

Do t speak

Melissa DeRosa
3/10/2021 8:17 PM

U r on now

Lis Smith
3/10/2021 8:17 PM

I'm muted

Melissa DeRosa
3/10/2021 8:18 PM

Can u hear?

Lis Smith
3/10/2021 8:18 PM

Y

Lis Smith
3/10/2021 8:19 PM

Ong it's kaitlin

Lis Smith
3/10/2021 8:21 PM

I fucking lost it at the lumberjack

Lis Smith
3/10/2021 8:22 PM



Do email and phone

Lis Smith

3/10/2021 8:22 PM

Make it painful for her

Lis Smith

3/10/2021 8:26 PM

Guys

Lis Smith

3/10/2021 8:26 PM

Rich

Lis Smith

3/10/2021 8:26 PM

Stop

Lis Smith

3/10/2021 8:26 PM

You're being absurd

Lis Smith

3/10/2021 8:26 PM

Find a right balance

Lis Smith

3/10/2021 8:27 PM

Have someone else take over e call

Lis Smith

3/10/2021 8:27 PM

Not rich

Lis Smith

3/10/2021 8:27 PM

Oeter or Melissa

Lis Smith

3/10/2021 8:27 PM

Take over

Lis Smith

3/10/2021 8:32 PM

Melissa I can hear you

Lis Smith

3/10/2021 8:33 PM

Guys

Peter Ajemien

3/10/2021 8:33 PM

She's muting Rich's phone when she does that

Lis Smith

3/10/2021 8:33 PM

We know what she's saying

Lis Smith

3/10/2021 8:33 PM

It's gonna be written for our interpretation

Lis Smith

3/10/2021 8:33 PM

That last chick wouldn't have lasted an hour in pete for America comms

Melissa DeRosa

3/10/2021 8:36 PM

This is so stupid

Lis Smith

3/10/2021 8:36 PM

I'm dying

Peter Ajemien

3/10/2021 8:37 PM

How are we supposed to behave in restrooms?

Lis Smith

3/10/2021 8:37 PM

I'm dying

Peter Ajemien
3/10/2021 8:37 PM

I really need to know

Peter Ajemien
3/10/2021 8:37 PM

I don't know the rules

Lis Smith
3/10/2021 8:40 PM

This doesn't sound so bad

Lis Smith
3/10/2021 8:40 PM

Let's do a call on this later w team

Lis Smith
3/10/2021 8:41 PM

We know they are Melissa and Stephanie

Lis Smith
3/10/2021 8:41 PM

Linda Lovelace

Lis Smith
3/10/2021 8:41 PM

Was the porn star

Lis Smith
3/10/2021 8:41 PM

Omg

Lis Smith
3/10/2021 8:41 PM


Don't correct them

Lis Smith
3/10/2021 11:34 PM

I'm having a panic attack

Lis Smith
3/10/2021 11:34 PM

I can't breathe

Chat #	From	To	Body	Timestamp: Time
8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [?] + [REDACTED] Jefrey Pollock [?] + [REDACTED] Melissa DeRosa (owner) [?]	[REDACTED] sent me this as a joke draft tweet	3/13/2021 4:47:36 PM(UTC-5)
8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [?] + [REDACTED] Jefrey Pollock [?] + [REDACTED] Melissa DeRosa (owner) [?]		3/13/2021 4:47:41 PM(UTC-5)
8	+ [REDACTED] Melissa DeRosa	+ [REDACTED] Lis Smith [?] + [REDACTED] Jefrey Pollock [?] + [REDACTED] Melissa DeRosa (owner) [?]	Yessss	3/13/2021 4:48:05 PM(UTC-5)

8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [REDACTED] + [REDACTED] Jefrey Pollock [REDACTED] + [REDACTED] Melissa DeRosa (owner) [REDACTED]	Script for Peter in AM:	3/14/2021 3:17:19 AM(UTC-4)
8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [REDACTED] + [REDACTED] Jefrey Pollock [REDACTED] + [REDACTED] Melissa DeRosa (owner) [REDACTED]	1- Hey melissa let me know you reached about a story, I handle all the press inquiries in the gov office, so wanted to chat/reach out	3/14/2021 3:18:09 AM(UTC-4)
8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [REDACTED] + [REDACTED] Jefrey Pollock [REDACTED] + [REDACTED] Melissa DeRosa (owner) [REDACTED]	2- What does the story like? What's it about? Can you share any details of it? B/c I'd be happy to help	3/14/2021 3:19:20 AM(UTC-4)

8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [REDACTED] + [REDACTED] Jefrey Pollock [REDACTED] + [REDACTED] Melissa DeRosa (owner) [REDACTED]	3- (ronan gives details)- Okay, there's a lot I'd have to run up the chain here. Thank you so much for reaching out. What's your deadline?	3/14/2021 3:20:21 AM(UTC-4)
8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [REDACTED] + [REDACTED] Jefrey Pollock [REDACTED] + [REDACTED] Melissa DeRosa (owner) [REDACTED]	4- (ronan doesn't give details). I'm just calling to see what you're reporting on and how our press office can help. Melissa doesn't handle press requests and any of the press requests that come in re: her or other key state employees go through the press office. So, I would just like to find the best way to work with you guys on that.	3/14/2021 3:21:52 AM(UTC-4)
8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [REDACTED] + [REDACTED] Jefrey Pollock [REDACTED] + [REDACTED] Melissa DeRosa (owner) [REDACTED]	AND 4+- can you let me know your deadline?	3/14/2021 3:23:20 AM(UTC-4)

8	+ [REDACTED] Lis Smith	+ [REDACTED] Melissa DeRosa (owner) [?] + [REDACTED] Jefrey Pollock [?] + [REDACTED] Melissa DeRosa (owner) [?]	Zero antagonism with him. Zero.	3/14/2021 3:23:41 AM(UTC-4)
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4 People >

iMessage

Sun, Mar 14, 2:33 PM

Melissa DeRosa

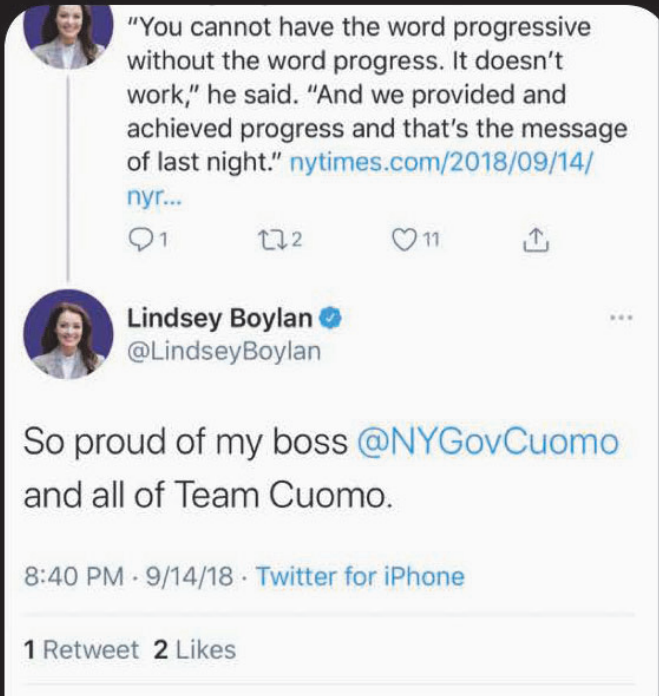


EXHIBIT
54



iMessage








 4 People >



Lindsey Boylan ✓
@LindseyBoylan

This. Way to go [@LtGovHochulNY](#)
[@NYGovCuomo](#). Exactly the
pragmatic things we need to change
outcomes and help families succeed.

Kathy Hochul ✓ @LtGovHochulNY · 2/21/19
As part of the #2019WomensAgenda, we want
to provide single parents with the services they
need – including child care and career
counseling – to succeed in college and the
workplace.

9:30 AM · 2/22/19 · [Twitter for iPhone](#)

3 Likes






Lindsey Boylan ✓
@LindseyBoylan


Proud to work for a governor who
takes women seriously
[@NYGovCuomo](#) [@NOW_NYC](#)


NOW-NYC ✓ @NOW_NYC · 8/15/18
"Governor, you have delivered for the women
and girls in New York year in and year out."
#StopChildTrafficking @NYGovCuomo



 iMessage



LS PA MD
4 People >



Lindsey Boylan
@LindseyBoylan

Proud to work for a governor who takes women seriously

@NYGovCuomo @NOW_NYC

NOW-NYC @NOW_NYC · 8/15/18
 "Governor, you have delivered for the women and girls in New York year in and year out."
 #StopChildTrafficking @NYGovCuomo

3:05 PM · 8/15/18 · Twitter for iPhone

2 Retweets 1 Like



MD

Priv - should we give these to RF?

Jef Pollock

Not the hochul one but why not?



They are in the public

Lis Smith

Yes I agree

LS

Why not

Camera App Store iMessage Voice Recorder

App Store App Store Apple Pay Face ID Search Music



NOT:

They are in the public

Lis Smith

Yes I agree

LS Why not

Melissa DeRosa

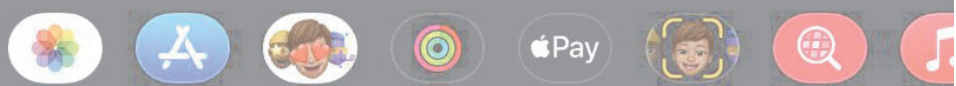
MD Beth any problem?

i don't have a problem but i'm not sure how many of these are "false" that we had to respond to

Lis Smith

LS We're t there some other things- like she was represented by Tara reade lawyer, sent threatening messages

peter i need to get you and [redacted] on phone together



Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:23:35 PM
To: Peter Ajemian, Linda Lacewell, Judy Mogul, Dani [REDACTED], Maggie Moran [REDACTED],
Rich Azzopardo, +Steve Cohen, Beth Garvey [REDACTED], Melissa DeRosa [REDACTED], Stephanie
Benton Cell [REDACTED], Josh Vlasto [REDACTED], Maggie Moran [REDACTED] [mailto:[REDACTED]@kivvit.com]; Jeff Pollock [REDACTED]
Subject: 3/14/2021 7:23:35 PM -04:00 : Lis Smith [REDACTED] [13 parties]

- 1- get as much as possible in writing
- 2- end goal is making sure that all evidence proving the accounts are challenged/inaccurate and that the proof is included in the story to provide readers w objective facts to consider on evaluating credibility
- 3 - ask him to describe process of him reporting vs new Yorker fact checker on back end



Message

From: +Peter Ajemian [+ [REDACTED]]
Sent: 3/14/2021 11:25:03 PM
To: Judy Mogul, Maggie Moran [REDACTED], Maggie Moran [REDACTED]@kivvit.com; Dani [REDACTED];
Josh Vlasto [REDACTED], Stephanie Benton Cell [REDACTED]; Rich Azzopardi, Melissa DeRosa [REDACTED];
[REDACTED] Lis Smith [REDACTED], Linda Lacewell, Beth Garvey [REDACTED]; +Steve Cohen, Jeff Pollock
[REDACTED]
Subject: 3/14/2021 7:25:03 PM -04:00 : Peter Ajemian -> [13 parties]

2- she didn't say they were on the plane together

Message

From: +Peter Ajemian [+ [REDACTED]]
Sent: 3/14/2021 11:25:11 PM
To: +Steve Cohen Beth Garvey [REDACTED] Melissa DeRosa [REDACTED] Lis Smith [REDACTED]
Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]@kivvit.com; Judy Mogul [REDACTED] Maggie Moran [REDACTED]
[REDACTED]; Jeff Pollock [+ [REDACTED]]; Rich Azzopardi Dani [REDACTED]; Linda Lacewell Stephanie Benton
Cell [REDACTED]
Subject: 3/14/2021 7:25:11 PM -04:00 : Peter Ajemian [13 parties]

He just clarified that

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/14/2021 11:25:27 PM
To: Judy Mogul [REDACTED] +Steve Cohen [REDACTED] Beth Garvey [REDACTED]; Stephanie BentonCell [REDACTED]; Dani [REDACTED]
[REDACTED] Lis Smith [REDACTED]; Jeff Pollock [REDACTED] Rich Azzopardi [REDACTED] Josh Vlasto [REDACTED]-
[REDACTED] Linda Lacewell [REDACTED] +Peter Ajemian [REDACTED] Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com]
Subject: 3/14/2021 7:25:27 PM -04:00 : Melissa DeRosa [REDACTED] [13 parties]

Puh Teeze

Message

From: Peter Ajemian [redacted]
Sent: 3/14/2021 11:25:36 PM
To: +Steve Cohen [redacted]; Melissa DeRosa [redacted]; Rich Azzopardi [redacted]; Josh Vlasto [redacted]; Dani [redacted];
[redacted]; Maggie Moran [redacted]; Jeff Pollock [redacted]; Judy Mogul [redacted]; Maggie Moran
[redacted]@kivvit.com]; Beth Garvey [redacted]; Linda Lacewell [redacted]; Lis Smith [redacted]; Stephanie
Benton Cell [redacted]
Subject: 3/14/2021 7:25:36 PM -04:00 : Peter Ajemian [redacted] [13 parties]

I know

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/14/2021 11:25:41 PM
To: Beth Garvey [REDACTED]; Dani [REDACTED]; Rich Azzopardi [REDACTED]; Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED]; Peter Ajemian [REDACTED]; Linda Lacewell [REDACTED]; Jeff Pollock [REDACTED]; +Steve Cohen [REDACTED]; Maggie Moran [REDACTED]; Judy Mogul [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Lis Smith [REDACTED]
Subject: 3/14/2021 7:25:41 PM -04:00 : Melissa DeRosa [REDACTED] > -> [13 parties]

Annabel pushes for her to do that

Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:25:42 PM
To: Melissa DeRosa [REDACTED]; **Judy Mogul** Maggie Moran [REDACTED] Stephanie Benton Cell [REDACTED]
[REDACTED]; Jeff Pollock [REDACTED]; Rich Azzopardi +Steve Cohen Linda Lacewell Peter Ajemian Dani
[REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Josh Vlasto [REDACTED] Beth Garvey [REDACTED]
Subject: 3/14/2021 7:25:42 PM -04:00 : Lis Smith <[REDACTED]> -> [13 parties]

so what's the story then?

Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:25:53 PM
To: Jeff Pollock [REDACTED]; Judy Mogul [REDACTED]; Peter Ajemian [REDACTED]; Melissa DeRosa [REDACTED]; Dani [REDACTED]; Linda Laceywell [REDACTED]; Steve Cohen [REDACTED]; Beth Garvey [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]; Rich Azzopardi [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]
Subject: 3/14/2021 7:25:53 PM -04:00 : Lis Smith [REDACTED] [13 parties]

why's he including it and Annabel?

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/14/2021 11:25:55 PM
To: Rich Azzopardi + Steve Cohen, Jeff Pollock [REDACTED], Lis Smith [REDACTED]; Dani [REDACTED]
Maggie Moran [REDACTED]; Josh Vlasto [REDACTED]; Peter Ajemian, Maggie Moran
[REDACTED]@kivvit.com]; Linda Lacewell + Judy Mogul, Beth Garvey [REDACTED], Stephanie Benton Cell [REDACTED]
Subject: 3/14/2021 7:25:55 PM -04:00 : Melissa DeRosa <[REDACTED]> -> [13 parties]

And she was supposed to stay behind

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/14/2021 11:26:07 PM
To: +Linda Lacewell [REDACTED]; Rich Azzopardi [REDACTED]; Stephanie Benton Cell [REDACTED]; Judy Mogul [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; LisSmith [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Maggie Moran [REDACTED]; Jeff Pollock [REDACTED]; +Peter Ajemian [REDACTED]; +Steve Cohen [REDACTED]; Josh Vlasto [REDACTED]
Subject: 3/14/2021 7:26:07 PM -04:00 : Melissa DeRosa [REDACTED] -> [13 parties]

We need to speak w his editor

Message

From: Melissa DeRosa [REDACTED]
Sent: 3/14/2021 11:26:32 PM
To: Peter Ajemian [REDACTED]; Judy Mogul [REDACTED]; Rich Azzopardi [REDACTED]; Lis Smith [REDACTED]; Stephanie Benton Cell [REDACTED];
[REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Jeff Pollock [REDACTED]; +Steve Cohen [REDACTED]; Linda Lacewell [REDACTED]; Josh
Vlasto [REDACTED]; Maggie Moran [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]
[REDACTED]
Subject: 3/14/2021 7:26:32 PM -04:00 : Melissa DeRosa <[REDACTED]> -> [13 parties]

see Lis's point in fact checker

Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:26:48 PM
To: Rich Azzopardi; +Linda Lacewell; Josh Vlasto [REDACTED]; Dani [REDACTED]; +Steve Cohen; Beth Garvey
[REDACTED]; Melissa DeRosa [REDACTED]; Stephanie Benton Cell [REDACTED]; Jeff Pollock [REDACTED]
[REDACTED]; +Peter Ajemian; Maggie Moran [REDACTED]; Judy Mogul [REDACTED]; Maggie Moran
[REDACTED]@kivvit.com]
Subject: 3/14/2021 7:26:48 PM -04:00 : Lis Smith [REDACTED] [13 parties]

Just bring up fact checker now

Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:26:50 PM
To: Jeff Pollock [REDACTED]; Melissa DeRosa [REDACTED] Maggie Moran [REDACTED] Stephanie Benton Cell [REDACTED]; Linda Lacewell Beth Garvey [REDACTED] Peter Ajemian +Steve Cohen Dani [REDACTED]; Rich Azzopardi Judy Mogul Maggie Moran [REDACTED]@kivvit.com]; Josh Vlasto [REDACTED]
Subject: 3/14/2021 7:26:50 PM -04:00 : Lis Smith [REDACTED] [13 parties]

Not editor

Message

From: Peter Ajemian
Sent: 3/14/2021 11:26:54 PM
To: Beth Garvey [REDACTED]; Rich Azzopardi; Melissa DeRosa [REDACTED]; +Steve Cohen; Linda Lacewell
Lis Smith [REDACTED]; Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]; Maggie Moran
[REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED]; Dani [REDACTED]; Judy Mogul; Josh
Vlasto [REDACTED]
Subject: 3/14/2021 7:26:54 PM -04:00 : Peter Ajemian > [13 parties]

Liked "Just bring up fact checker now"

Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:28:04 PM
To: +Steve Cohen Dani [REDACTED]; Beth Garvey [REDACTED]; Linda Lacewell Rich Azzopardi Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED@kivvit.com]; Josh Vlasto [REDACTED]; Peter Ajemian **Judy Mogul** Melissa DeRosa [REDACTED] Jeff Pollock [REDACTED] Maggie Moran [REDACTED]
Subject: 3/14/2021 7:28:04 PM -04:00 : Lis Smith [REDACTED] [13 parties]

(Meaning - understand who is going to fact check him... and be prepared to utilize that person to bring things to higher ups...)

4- be focused not just on making sure lies and other nonsense are NOT in the story but also in making sure that string evidence IS in the story

Message

From: Peter Ajemian [redacted]
Sent: 3/14/2021 11:28:11 PM
To: Stephanie Benton Cell [redacted]; Rich Azzopardi; Jeff Pollock [redacted]; Maggie Moran [redacted]@kivvit.com]; Lis Smith [redacted]; Maggie Moran [redacted]; Linda Lacewell [redacted]; +Steve Cohen; Melissa DeRosa [redacted]; Josh Vlasto [redacted]; Dani [redacted]; Beth Garvey [redacted]; Judy Mogul [redacted]
Subject: 3/14/2021 7:28:11 PM -04:00 : Peter Ajemian [13 parties]

We get a fact checker

Message

From: Lis Smith [REDACTED]
Sent: 3/14/2021 11:28:15 PM
To: Josh Vlasto [REDACTED]; Jeff Pollock [REDACTED]; Melissa DeRosa [REDACTED]; Linda Lacewell [REDACTED]; Beth Garvey [+ [REDACTED]; **Judy Mogul** [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED] @kivvit.com]; Peter Ajemian [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]; +Steve Cohen [REDACTED]; Rich Azzopardi [REDACTED]
Subject: 3/14/2021 7:28:15 PM -04:00 : Lis Smith [REDACTED] > [13 parties]

5 - trust nothing he tells you

From: Peter Ajemian [REDACTED]
Sent: 3/18/2021 8:59:19 PM
To: Garvey, Beth (CHAMBER) [REDACTED]@exec.ny.gov]; Jeffrey Pollock [REDACTED]@globalstrategygroup.com]; Lacewell, Linda A (DFS) [REDACTED]@dfs.ny.gov]
CC: Lis Smith [REDACTED]@gmail.com]; Mitra Hormozi [REDACTED]@wmhlaw.com]
Subject: Re: Privileged

Thank you

From: Beth Garvey
Sent: Thursday, March 18, 2021 8:58 PM
To: Jeffrey Pollock; Peter Ajemian; Linda A Lacewell (dfs.ny.gov)
Cc: Lis Smith; Mitra Hormozi
Subject: Re: Privileged

Yes

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

From: Jeffrey Pollock
Sent: Thursday, March 18, 2021 8:57 PM
To: Peter Ajemian; Linda A Lacewell (dfs.ny.gov)
Cc: Lis Smith; Beth Garvey; Mitra Hormozi
Subject: Re: Privileged

Yep

Jeffrey Pollock
President
D [REDACTED]
M [REDACTED]
My pronouns: he, him, his

From: Peter Ajemian [REDACTED]@exec.ny.gov>
Sent: Thursday, March 18, 2021 8:52:03 PM
To: Linda A Lacewell (dfs.ny.gov) [REDACTED]@dfs.ny.gov>
Cc: Jeffrey Pollock [REDACTED]@globalstrategygroup.com>; Lis Smith [REDACTED]@gmail.com>; Beth Garvey [REDACTED]@exec.ny.gov>; Mitra Hormozi [REDACTED]@wmhlaw.com>
Subject: Re: Privileged

[EXT EMAIL]

Tweaked. Sending the below

From: Lacewell, Linda A (DFS)
Sent: Thursday, March 18, 2021 8:41 PM
To: Peter Ajemian
Cc: Jeffrey Pollock; Lis Smith; Beth Garvey; Mitra Hormozi
Subject: Re: Privileged

EXHIBIT
56

No issue

Sent from my iPhone

On Mar 18, 2021, at 8:41 PM, Peter Ajemian <[REDACTED]@exec.ny.gov> wrote:

Minus Melissa. Mitra/Linda is this ok? Edits?

From: Peter Ajemian
Sent: Thursday, March 18, 2021 8:22 PM
To: Jeffrey Pollock; Lis Smith
Cc: Beth Garvey; Linda A Lacewell (dfs.ny.gov); Melissa DeRosa; Mitra Hormozi
Subject: Re: Privileged

Ok?

"Melissa is one of the smartest, most accomplished and hardest working public servants in government. Enough with the sexist tropes."

From: Jeffrey Pollock
Sent: Thursday, March 18, 2021 8:04 PM
To: Lis Smith; Peter Ajemian
Cc: Beth Garvey; Linda A Lacewell (dfs.ny.gov); Melissa DeRosa; Mitra Hormozi
Subject: Re: Privileged

Agreed

Jeffrey Pollock
President
D [REDACTED]
M [REDACTED]
My pronouns: he, him, his

From: Lis Smith [REDACTED]@gmail.com>
Sent: Thursday, March 18, 2021 8:03:14 PM
To: Peter Ajemian [REDACTED]@exec.ny.gov>
Cc: Beth Garvey [REDACTED]@exec.ny.gov>; Jeffrey Pollock [REDACTED]@globalstrategygroup.com>; Linda A Lacewell (dfs.ny.gov) <[REDACTED]@dfs.ny.gov>; Melissa DeRosa <[REDACTED]@exec.ny.gov>; Mitra Hormozi [REDACTED]wmhlaw.com>
Subject: Re: Privileged

[EXT EMAIL]

I'm not sure "name calling" coming from you guys is super credible

Maybe- enough of the sexist name calling

On Thu, Mar 18, 2021 at 7:47 PM Peter Ajemian [REDACTED]@exec.ny.gov> wrote:

Draft

For the Ronan Farrow piece, how about this in response to Lindsey saying Melissa is a “mean girl”:

“Melissa is one of the smartest, most accomplished and hardest working public servants in government. Enough with the sexist characterizations and name calling.”

- (Private)

If you know off one that's not
like specific that's
use remove 3. That's all

↳ these are from security

ADmission of CV today press do that
Chair Informative they do that
from his press
span can

Cuomo Faces New Claims of Sexual Harassment From Current Aide

The aide, Alyssa McGrath, accused Gov. Andrew Cuomo of ogling her body, remarking on her looks, and making suggestive comments to her and another woman in his office.



By Jesse McKinley

Published March 19, 2021 Updated April 7, 2021

ALBANY, N.Y. — He called her and her co-worker “mingle mamas.” He inquired about her lack of a wedding ring, she said, and the status of her divorce. She recalled him telling her she was beautiful — in Italian — and, as she sat alone with him in his office awaiting dictation, he gazed down her shirt and commented on a necklace hanging there.

In the latest allegation against Gov. Andrew M. Cuomo, Alyssa McGrath, an employee of the governor’s office, described a series of unsettling interactions with the governor, telling The New York Times that Mr. Cuomo would ogle her body, remark on her looks, and make suggestive comments to her and another executive aide.

Ms. McGrath, 33, is the first current aide in Mr. Cuomo’s office to speak publicly about allegations of harassment inside the Capitol. Her account of casual sexual innuendo echoes other stories that have emerged in recent weeks about a demeaning office culture, particularly for young women who worked closely with the governor.

The most serious accusation against the governor was made by another current aide who has accused Mr. Cuomo of groping her breast in the Executive Mansion. Ms. McGrath said that the aide described the encounter in detail to her after it was made public in a report in The Times Union of Albany last week.

“She froze when he started doing that stuff to her,” Ms. McGrath said, adding, “But who are you going to tell?”

She added that the co-worker, who has not been publicly identified, told her that the governor had asked her not to talk about the alleged incident, knowing that the two women regularly spoke and texted about their interactions with Mr. Cuomo.

“He told her specifically not to tell me,” Ms. McGrath said.

In several interviews conducted over the past week, Ms. McGrath described a pattern of the governor mixing flirtatious banter with more personal comments, as well as a subtle and persistent cultivation of competitive relationships between female co-workers in his office. It was something she said was compounded and protected by a demand for secrecy, and normalized inside the governor’s inner circle.

Ms. McGrath did not accuse the governor of making sexual contact, though she said that she believed that his actions amounted to sexual harassment.

Over the last three years, Ms. McGrath said, the governor had seemingly fostered an unusual work triangle with her and her friend, the co-worker he allegedly groped, blending a professional relationship with unwanted attention. There was paternalistic patter, but also a commandeering, sometimes invasive physicality.

“He has a way of making you feel very comfortable around him, almost like you’re his friend,” Ms. McGrath said. “But then you walk away from the encounter or conversation, in your head going, ‘I can’t believe I just had that interaction with the governor of New York.’”

Ms. McGrath said that it was only after the fact that she found these interactions to be troubling — a sense that grew with each new sexual harassment accusation lodged against the governor, and his blanket denials.

Mariann Wang, a lawyer for Ms. McGrath, said that “this would be unacceptable behavior from any boss, much less the governor,” and that Ms. McGrath’s experience reflected larger issues for women in the workplace in Albany’s corridors of power.

“The women in the executive chamber are there to work for the State of New York,” Ms. Wang said, “not serve as his eye candy or prospective girlfriend.”

Multiple women, including former and current aides, have accused the governor of inappropriate remarks and behavior, including unwanted touching and unwelcome sexual advances.

Mr. Cuomo, 63, has denied any wrongdoing, and has suggested that his relationships with employees he viewed as friends may have been misinterpreted.

On Friday, Rita Glavin, a lawyer for Mr. Cuomo, responded to Ms. McGrath’s allegations by saying that “the governor has greeted men and women with hugs and a kiss on the cheek, forehead, or hand. Yes, he has posed for photographs with his arm around them. Yes, he uses Italian phrases like ‘ciao bella.’”

Ms. Glavin added: “None of this is remarkable, although it may be old-fashioned. He has made clear that he has never made inappropriate advances or inappropriately touched anyone.”

The scandal that has engulfed the governor, leading most of the state’s Democratic leaders to call for his resignation, began with the accounts of two former employees, Lindsey Boylan, a former economic development official, and Charlotte Bennett, an executive assistant and senior briefer.



Charlotte Bennett, who came forward last month, accused the governor of asking her questions that she believed were testing whether she would have sex with him. Elizabeth Frantz for The New York Times

Although Ms. McGrath does not work directly for Mr. Cuomo, she said that she and her co-worker were commonly pulled from the pool of executive chamber assistants to work weekends and at the mansion. Many assistants in the chamber are women, often decades younger than Mr. Cuomo.

Emails reviewed by The Times showed that Mr. Cuomo’s surrogates would often ask Ms. McGrath — who has a young child — and her co-worker to work on weekends at the Capitol building and at the mansion, where the governor lives.

The calls for assistance came from a top scheduling official in the governor's office, home to a large staff of administrative assistants, many of whom are women who earn a base salary between \$40,000 and \$60,000 a year, according to state payroll records.

"Hi gals," read one email sent to the two women on Feb. 29, 2020. "Who can spend a little while with him when he gets back on the book signing project?"

That day — the Saturday before the state's first confirmed case of coronavirus — Ms. McGrath and her co-worker answered that request. They were working alone with Mr. Cuomo in the Capitol when the topic of a planned trip to Florida by the two women arose.

Ms. McGrath was separated from her husband at the time. While chatting with the two women, the governor asked the co-worker — who was married — if she was going to try to meet men and "mingle" while they were in Florida.

The women laughed off the question, as did the governor, but not before giving them a nickname.

"He called us 'mingle mamas' for the rest of the day," Ms. McGrath said.

Two months earlier, on New Year's Eve, Mr. Cuomo asked the co-worker to pose for a photograph with him and send it to Ms. McGrath, she said. The photo, which was reviewed by The Times, shows the governor sitting in a chair at the Executive Mansion with the aide, her face next to his, nearly touching.

The aide's wedding ring is visible on her hand, her arm draped over the governor's shoulder. Mr. Cuomo, beaming, is sitting in a gray sweater and a T-shirt.

Ms. McGrath, whose accounts were supported by contemporaneous texts, emails, social media posts, said she did not understand why the governor had wanted her to see the photo, but she believed it may have been "to make me jealous."

She said that it was common knowledge around the office that Mr. Cuomo would play favorites among female staffers.

"We were told from the beginning that was a typical move of his," she said. "Who was the girl of the week? Who was the girl of the month?"

Ms. McGrath said that her uncomfortable interactions with the governor began not long after she was hired in the middle of 2018. Early the following year, she was called to the governor's second-floor office in the mansion.

While she prepared to start working, Mr. Cuomo asked Ms. McGrath if she spoke Italian — she does not, though she is of Italian heritage — and then made a comment in that language. She later asked her parents what the phrase meant.

"It was commenting on how beautiful I was," she recalled being told. (Ms. McGrath's lawyer said that the governor did not use the term "ciao bella.")

Soon after that experience, Ms. McGrath was called into Mr. Cuomo's office in the Capitol for a dictation session. She was alone and nervous and wanted to do a good job, she said. She sat across from the governor, pen and paper at the ready.

"I put my head down waiting for him to start speaking, and he didn't start speaking," she said. "So I looked up to see what was going on. And he was blatantly looking down my shirt."

The governor noticed her gaze, she said, and then "made a reference, a subtle reference, saying, 'What's on your necklace?' Which was in my shirt."

Ms. McGrath said she felt flushed and embarrassed — "My face turned really hot," she said — but she continued to work. She shared this experience at the time with her co-worker.

Ms. McGrath and her co-worker regularly texted and spoke about the governor. They confided in each other in part because an informal policy prohibited them from speaking to anyone outside the executive chamber about Mr. Cuomo.

“We were told right off the bat, as soon as we walk out of the office or as soon as we walk away from the governor, we were not to say a word about anything to anyone,” she recalled.

At an office Christmas party in 2019, the governor’s attention to her and her co-worker continued.

“He kissed me on the forehead,” Ms. McGrath said. “And in the picture we posed with him that year, he is gripping our sides very tightly.” The Times reviewed a photo of the two women and the governor, with the governor grinning, his hands wrapped firmly around their waists.



Lindsey Boylan has accused Mr. Cuomo of inappropriate behavior, and said last month that he had kissed her on the lips without her permission in 2018. Rob Latour/Shutterstock

Other women, including Ms. Boylan, have accused the governor of giving them unsolicited kisses, something the governor has stridently denied.

Ms. Bennett, 25, told The Times in late February that the governor had asked her questions about her sex life, and concluded that “the governor wanted to sleep with me.” Other current and former aides have spoken about seemingly retrograde requirements such as pressure to wear makeup, dresses and heels. The governor’s office has said there was no dress requirement at work.

The governor has asked New Yorkers to await the outcome of two separate investigations into the harassment allegations, one overseen by the state attorney general, Letitia James, and another by the State Assembly, before making any decisions about his behavior.

On Monday, Debra Katz, Ms. Bennett’s lawyer, said her client had provided more than 100 documents and four hours of testimony to investigators backing up her claims about the governor, including that he created a “sexually hostile work environment” as part of “his deliberate effort to create rivalries and tension among female staffers on whom he bestowed attention.”

Ms. McGrath believes that her proximity to the governor may have stymied other opportunities. When she sought another job in state government in 2019, she was told that the governor's fondness for working with her would interfere with her taking the new position.

She was told, she recalled, that "because I 'help out up front,' I couldn't leave."

Since other allegations against Mr. Cuomo have arisen, Ms. McGrath has continued to go to work. She says that the executive offices are largely quiet, a far cry from the heady days of Mr. Cuomo's pandemic-related popularity, when the halls of the Capitol buzzed with excitement and purpose.

Ms. McGrath said that she watched the governor's first news conference after Ms. Bennett went public in The Times, on March 3, and that she was angry at his insistence that he never "touched anyone inappropriately."

"It makes me really upset to hear him speak about this and completely deny all allegations," she said, saying it left her in disbelief. "And I have no doubt in my mind that all of these accusers are telling the truth."

One of those accusers is her co-worker. Ms. McGrath said she feared retaliation for speaking out, but she and her co-worker had grown upset with themselves for putting up with Mr. Cuomo's behavior for so long.

"Her and I discussed this after the fact and now we're like, 'How did we not see this?'" Ms. McGrath said, still bewildered by her interactions with Mr. Cuomo. "Because it's so blatant and obvious."

Jesse McKinley is the Albany bureau chief. He was previously the San Francisco bureau chief, and a theater columnist and Broadway reporter for the Culture desk. @jessemckinley

A version of this article appears in print on , Section A, Page 1 of the New York edition with the headline: Cuomo Facing Another Claim Of Harassment

Name	Msg #	From	To	Body	Timestamp: Date	Timestamp: Time
+ [REDACTED]	1485	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) [REDACTED]@gmail.com Dani Lever (owner)	I just reread the times story	3/19/2021	3/19/2021 7:13:32 PM(UTC-4)
+ [REDACTED]	1486	[REDACTED] Lis Smith	[REDACTED] Dani Lever (owner) [REDACTED]@gmail.com Dani Lever (owner)	He's so fucked	3/19/2021	3/19/2021 7:13:59 PM(UTC-4)
+ [REDACTED]	1487	[REDACTED] Dani Lever	[REDACTED] Lis Smith [REDACTED]@gmail.com Dani Lever (owner)	It's bad	3/19/2021	3/19/2021 7:21:13 PM(UTC-4)

From: Peter Ajemian \$!<Other>!\$_ (owner)
Timestamp: 2/12/2021 6:40:54 PM(UTC-5)
Source App: Native Messages
Attachments:
#1: chats\Native
Messages [REDACTED]@yahoo.com\attachments2900_Library_SMS_Attach_1_23_03_C65132_1_E6D
C9E_1
#2: chats\Native
Messages [REDACTED]@yahoo.com\attachments2900_Library_SMS_Attach_1_e8_08_84C9C3_1_E497
B9_1
Body:
https://nypost.com/2021/02/12/who-is-melissa-derosa-top-aide-to-gov-andrew-cuomo/?utm_campaign=ip_hone_nyp&utm_source=message_app

From: Peter Ajemian \$!<Other>!\$_ (owner)
Timestamp: 2/12/2021 6:41:07 PM(UTC-5)
Source App: Native Messages
Body:
Can u read and call me pls?

From: [REDACTED] Lis Smith
Timestamp: 2/22/2021 10:22:07 PM(UTC-5)
Source App: Native Messages
Body:
this is not a criticism of you

From: [REDACTED] Lis Smith
Timestamp: 2/22/2021 10:22:10 PM(UTC-5)
Source App: Native Messages
Body:
to be clear

From: [REDACTED] Lis Smith
Timestamp: 2/22/2021 10:22:11 PM(UTC-5)
Source App: Native Messages
Body:
or rich

From: [REDACTED] Lis Smith
Timestamp: 2/22/2021 10:22:26 PM(UTC-5)
Source App: Native Messages
Body:
i'm trying to get on melissa's ass about this

From: Peter Ajemian \$!<Other>!\$_ (owner)
Timestamp: 2/23/2021 6:38:23 AM(UTC-5)
Source App: Native Messages
Body:
No you are right. Will work something up today

From: [REDACTED] Lis Smith
Timestamp: 3/15/2021 3:45:09 PM(UTC-4)
Source App: Native Messages
Body:
i was gonna make a joke about andrew ball

From: Peter Ajemian \$!<Other>!\$_ (owner)
Timestamp: 3/15/2021 3:47:05 PM(UTC-4)
Source App: Native Messages
Body:
Ahh

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 8:46:37 PM(UTC-4)
Source App: Native Messages
Body:
Just confirming- you think "enough with the sexist name calling" is ok?

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 8:51:07 PM(UTC-4)
Source App: Native Messages
Body:
That's fine

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 8:52:33 PM(UTC-4)
Source App: Native Messages
Body:
Or "sexist tropes"

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 8:52:41 PM(UTC-4)
Source App: Native Messages
Body:
Jef thought tropes

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 8:55:12 PM(UTC-4)
Source App: Native Messages
Body:
Tropes fine

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 9:12:00 PM(UTC-4)
Source App: Native Messages
Body:
Thank you

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 10:16:21 PM(UTC-4)
Source App: Native Messages
Body:
Dude

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 10:16:22 PM(UTC-4)
Source App: Native Messages
Body:
Honestly

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 10:16:28 PM(UTC-4)
Source App: Native Messages
Body:
You handled the shit out of this story

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 10:17:33 PM(UTC-4)
Source App: Native Messages
Body:
Thank you. Only because of support from you and the team. Thank you.

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 10:17:46 PM(UTC-4)
Source App: Native Messages
Body:
Texted Chris Cuomo that too

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 10:18:01 PM(UTC-4)

Source App: Native Messages
Body:
You deserve a lot of credit here

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 10:19:30 PM(UTC-4)
Source App: Native Messages
Body:
Thank you Lis. Means a lot coming from you.

From: [REDACTED] Lis Smith
Timestamp: 3/18/2021 10:29:28 PM(UTC-4)
Source App: Native Messages
Body:
Dude, i got your back

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 10:29:55 PM(UTC-4)
Source App: Native Messages
Body:
Loved "Dude, i got your back"

From: Peter Ajemian <[REDACTED]> (owner)
Timestamp: 3/18/2021 10:32:28 PM(UTC-4)
Source App: Native Messages
Attachments:
#1: files\image\Farrow-LindseyBoylan.jpg.webp
Body:

Cuomo's First Accuser Raises New Claims of Harassment and Retaliation
In her first extensive interview, Lindsey Boylan sheds new light on a toxic workplace, as insiders detail the campaign to discredit her.

By Ronan Farrow March 18, 2021

Lindsey Boylan's tweets accusing Andrew Cuomo of harassment helped spark an uproar that has since engulfed her life. Photograph by Widline Cadet for The New Yorker

On the morning of December 13, 2020, Lindsey Boylan sat in the passenger seat of her family's car, with her husband at the wheel and her six-year-old daughter in the back. She began typing a series of tweets on her phone. Boylan, a former special adviser to New York Governor Andrew Cuomo, had felt increasingly troubled as press reports mentioned Cuomo as a potential Attorney General in the Biden Administration. For more than a year, she had been raising allegations on Twitter that Cuomo presided over a hostile and toxic workplace, initially drawing little attention. A week before, Boylan had tweeted again, and another former Cuomo employee had reached out to her privately, to share a story of being sexually harassed by the Governor. "I felt really responsible for what happened to this woman, because I didn't do something about it," Boylan told me, in her first detailed interview about her allegations. She saw the stories about Cuomo's political prospects as a cause for urgency.

In the car, she began tweeting allegations that Cuomo had sexually harassed her, too. "@NYGovCuomo sexually harassed me for years. Many saw it, and watched," she wrote. She referenced harassment about her looks and described an unpredictable and intimidating workplace experience. Her husband became aware of the tweets only as the reaction began to build online. "I felt like I was just exploded," Boylan recalled. "And he felt like he was having a heart attack."

As Boylan's disclosures began to draw notice on social media, a group of current and former Cuomo staffers who served as his informal crisis-communications brain trust moved to squash them "in real time," according to one person with direct knowledge of the effort. Members of that group included Melissa DeRosa, a senior aide; Rich Azzopardi, Cuomo's spokesperson; and Steven M. Cohen, a former secretary to the Governor. They circulated Boylan's tweets and held a series of urgent calls. The group had just emerged from a frantic effort to respond to allegations that Cuomo's office had deliberately undercounted COVID-related deaths in New York nursing homes. They were "putting that to bed, and then she pipes up. And then it's sort of a big scramble," the person with direct knowledge of the effort told me. "It was, like, what the hell do we do about this?" Cuomo's advisers arrived at a plan to leak Boylan's personnel records, which included allegations that Boylan had bullied colleagues, some of them women of color.

"The decision was made collectively," the person with direct knowledge of the effort said. "That these are facts, the reporters should see them."

An intermediary who says that he was not on the calls, Rich Bamberger, a former communications director for Cuomo who now works for the public-relations firm Kivvit, called several reporters and advised them to contact the Governor's office. According to the person with knowledge of the conversations, Azzopardi then sent Boylan's personnel files to reporters. By day's end, several of the complaints about Boylan had appeared in stories, by the Associated Press, the New York Post, and the Albany-based Times Union. Boylan recalled being stunned by the articles. "I couldn't move. I couldn't breathe," she said. In the ensuing days, Cuomo aides began contacting people who had worked under Boylan—which some

of the recipients found intimidating, the Wall Street Journal reported last week. Cuomo advisers also considered releasing a letter attacking Boylan's credibility and reputation, drafts of which were first reported by the Times this week. They ultimately decided against releasing the letter. "My life was, you know,

for a period, destroyed," Boylan told me. In a statement, Beth Garvey, Cuomo's acting counsel, said, "With certain limited exceptions, as a general matter, it is within a government entity's discretion to share redacted employment records, including in instances when members of the media ask for such public information and when it is for the purpose of correcting inaccurate or misleading statements."

Boylan's allegations largely faded from public view, until last month, when she posted a detailed account of her experience on Medium. Boylan told me, during a series of lengthy interviews, that she decided to disclose her allegations via online posts and initially declined interview requests from journalists because "having someone dissect my trauma is not something I wanted." She said that the essay took her more than a month to write. "I realized I had to own this experience," she told me. "It was something I was going to have to talk about eventually." A series of disclosures about Cuomo from other women, including multiple allegations of harassment and one of groping, quickly followed Boylan's. "Seeing Lindsey's story was a huge factor in my decision to come forward," Charlotte Bennett, a former Cuomo staffer who began publicly discussing her account of sexual harassment by the Governor after Boylan's Medium post, told me. "Coming forward didn't feel like a choice—it felt like my responsibility to validate Lindsey's story and signal to others that it was O.K. to come forward."

The revelations have left Cuomo's political future in New York, which he has governed since 2011, in a free fall. He now faces probes by both the New York attorney general, Letitia James, and the state assembly, which this week retained a law firm for that purpose. Senate Majority Leader Chuck Schumer, Senator Kirsten Gillibrand, Representative Alexandria Ocasio-Cortez, and other prominent Democrats in the state congressional delegation have called for the Governor to resign. This week, President Biden, a longtime ally of Cuomo's, said that the Governor should step down if the allegations are confirmed by investigators. Cuomo acknowledged some of the harassment allegations, saying, "I now understand that I acted in a way that made people feel uncomfortable," but he maintained that his behavior was unintentional and denied all allegations that he "touched anyone inappropriately." A spokesperson added, "As we said before, Ms. Boylan's claims of inappropriate behavior are quite simply false."

Until December 13th, Cuomo's grip on power in New York had been near-absolute, a dominance secured at times through his willingness to discredit and intimidate his adversaries. Then Boylan posted her tweets. At first, it seemed as if she would meet the same fate as so many others who had challenged the Governor. Now, the Cuomo team's response may turn out to be one of its final efforts to frighten an opponent into submission.

Between 2015 and 2018, Boylan served in several government roles, including deputy secretary for economic development. In 2016, she began interacting with Cuomo directly and had her first encounters with a workplace culture under him that she said was rife with bullying and retribution. "It was toxic, and particularly for women," she said. Her description matched those of multiple current and former Cuomo staffers I spoke with, though others told me that the office culture was intense but not inappropriate. Boylan's leaked personnel files reportedly contain allegations that she bullied women who worked with her, including Black women. Several former colleagues of Boylan's, none of whom are Black, told me that they found the claims plausible and said that they had also found Boylan herself to be a hostile presence in the workplace. "I've seen Lindsey do her job well, but I've also had experiences where I felt belittled or bullied by her," a former colleague, who spoke on condition of anonymity, told me. Others disputed that account or said that Boylan's conduct was consistent with a culture where volatility was the norm. "It was a hard place to be," Joel Wertheimer, an attorney who served as Cuomo's staff secretary, told me. "They were nasty and awful." Wertheimer quit after just seven months, dispirited by the environment. He is now a campaign consultant to Boylan, who is running for Manhattan borough president. He added, "I also was not the best version of myself when I was working there."

Boylan said that Cuomo set the tone, ridiculing several of his closest staffers, including Stephanie Benton, the director of the Governor's offices. "I remember, Stephanie had a haircut that he kept making fun of her for all day in front of other people. And she was crying," Boylan said. (Benton, who is still employed in state government, said that Boylan's account was untrue and that the Governor had always treated her well, adding, "If I felt otherwise, I would speak for myself.") Boylan also said that Cuomo repeatedly ranted about another staffer, a young male aide, being "fat." The young male aide, who no longer works for Cuomo, declined to comment on his experience and asked not to be named. Boylan described the workplace culture under the Governor as aggressive and combative. At a party in the pool house at the Governor's mansion, in Albany, Boylan recalled seeing a dartboard bearing a photo of Bill de Blasio, Cuomo's antagonist since he was elected Mayor of New York City, in 2014. "I couldn't believe how brazen that was," she said. (A spokesperson for the Governor declined to comment on the dartboard.) Boylan had her first interaction with Cuomo after a speech he gave at Madison Square Garden on January 6, 2016, when she was working as the chief of staff at Empire State Development, a state entity that promotes economic growth. She said that he seemed to pay an unusual amount of attention to her. Soon afterward, she said, her boss, Howard Zensky, told her that Cuomo had a "crush" on her. (Zensky did not respond to a request for comment.) During the next two years, Boylan said, the Governor repeatedly commented on her appearance and touched her more than she felt was necessary or professional. "He would put his hand on my lower back," Boylan said, adding that her experiences mirrored those of another woman, Anna Ruch, who told the Times that the Governor touched her lower back and asked to kiss her at a wedding reception. "He would find a way to, like, touch me in

passing—getting on the plane, getting off the plane,” Boylan said. “He frequently stared at my legs.” Kelsey DePalo, who met Boylan when both attended Wellesley College, told me that Boylan was initially excited to work with Cuomo, but her attitude soon changed. “She would talk about how he was creepy,” DePalo recalled. “We would talk about, you know, how when, if someone opens a door for you, they can open a door, or they can open a door and put their hand on the small of your back. They can lean over to tell you something, or lean over to tell you something and also put their hand on your knee.” She added, “You can sometimes catch someone, like, looking at your outfit in a way that makes you feel uncomfortable. Or commenting on your appearance. And so she would describe how he gave her the creeps, and was very touchy-feely in ways that made her feel highly uncomfortable.”

Another friend, as well as Boylan’s mother and husband, told me that Boylan had discussed similar concerns with them in 2016 and 2017. Boylan’s mother, Karen Boylan, saw the behavior as a pattern. “I hoped she would stay away from him,” she told me. Karen told me that, years earlier, she had quit a job as an accountant at a law firm after her boss sexually harassed her. Boylan was in high school at the time, and told me that her mother’s experience, which she referred to in her first tweets about her harassment allegations, deeply affected her. Boylan’s mother said that she had described the harassment to her daughter to prepare her for what she might face in the workplace. “It was something that we talked about a lot while she was growing up,” Karen told me. “You know, you hope your children learn from this.” In an e-mail sent on August 4, 2016, Karen wrote, to her daughter, “I was thinking after our conversation last night about Governor Cuomo... I would hate (couldn’t tolerate) living with a partner or husband who behaved like that with women. It sounds very inappropriate what he says to you too.” Three months later, Boylan forwarded her mother an e-mail in which a Cuomo staffer asked Boylan’s supervisor whether she would be at an event the Governor was attending. “It’s gross,” Boylan told her mother, in a text that day. “I just wish I could be told how great I am based on my intelligence and abilities rather than some dumb thing.” (A spokesperson for Cuomo said that the staffer who sent the e-mail “oversaw events and scheduling, so it was her job to understand what relevant senior members of the team—male and female—would be attending Governor events.”)

Boylan said that the Governor frequently sought her out, sometimes taking her away from substantive responsibilities to fulfill a role she felt was ornamental. The Regional Economic Development Council awards, in Albany, in December, 2016, were the culmination of a year’s work for Boylan. The monetary awards to local businesses and organizations are a part of Cuomo’s economic strategy and were a centerpiece of Boylan’s portfolio. After the awards, a Cuomo aide aggressively pressed Boylan to return to New York City on a helicopter with Cuomo and Maria Bartiromo, a television host, who had spoken at the event. Boylan refused. “He likes to put women next to each other,” Boylan said. “Like we’re part of his tools, or his little, you know, dolls.” (A spokesperson for Cuomo said that the flight arrangements were “not a point of contention.”) A few days later, Benton, the Cuomo aide, e-mailed Boylan, telling her that the Governor had suggested Boylan look up a woman that colleagues had told her was romantically linked to the Governor. “You could be sisters,” Benton wrote. “Except you’re the better looking sister.” (Benton told me, “That was my attempt at banter, not his.”)

At a holiday party held at an Albany convention center later that month, Boylan said, when the Governor approached her, she left the room. That night, she said, the young male aide, whom Boylan said had been bullied, called and told her that the Governor wanted her to come to the Capitol. (The aide declined to comment on the call.) As Boylan walked to Cuomo’s office in the Capitol, she called her husband and told him that she was afraid. In a statement, her husband said that he could “sense absolute terror in her voice.” Cuomo showed her his office, and called attention to a cigar box that he told her was a gift from President Bill Clinton. Since childhood, Boylan had idolized Hillary Clinton. She once waited in line for hours to have a photo taken with her, an experience that she said “changed my life.” Boylan said that the obvious reference to Clinton’s sexual behavior disturbed her, because the Governor knew that she considered Hillary Clinton a role model. “It was deeply distressing,” Boylan told me.

Boylan says that the pattern of inquiries about her and comments about her looks continued through the rest of her time in the administration. E-mails from Cuomo aides reviewed by The New Yorker were consistent with that account. Boylan said that the harassment grew more brazen over time. She said that, in October, 2017, as she sat with the Governor on a private plane, he told her, “Let’s play strip poker.” (In a statement released by the Governor’s office, four former staffers listed as being on such flights that month said that they had not witnessed the exchange.) In 2018, in an incident she has not previously disclosed, Boylan attended a meeting on the ground floor of the Governor’s mansion. At a press conference that February, Cuomo had proudly showed off his new puppy, a Siberian-Shepherd-Malamute mix named Captain. After the meeting, Boylan said that she made her way toward the entrance with the Governor, and Captain approached her. When the dog jumped up and down near her, Boylan said, she reached out

to calm him, and then backed away. Cuomo, she said, joked that if he were a dog, he would try to “mount” her as well. Boylan said that she did not reply. “I remember being grossed out but also, like, what a dumb third-grade thing to say.” She added, “I just shrugged it off.” A spokesperson for Cuomo declined to comment specifically on the claim, but reiterated Cuomo’s denial that he behaved inappropriately with Boylan.

Boylan told me that over time she had become accustomed to such remarks, but she felt that her physical boundaries were crumbling. In an incident in the summer of 2018, which she described in her Medium post, she met with Cuomo one-on-one in his Manhattan office. As she got up to leave, Cuomo moved in front of her. “He blocked me getting out,” she told me. Then, as she attempted to move forward, she said, he kissed her on the lips. “It was in no way platonic,” she told me. “I was mortified.” Her mother, Karen,

says Boylan told her about the incident at the time. "Lindsey's way is to either call or text me immediately when things like this have happened, because she's horrified," she said. "She was, like, 'Oh, my God, did anybody see that happen? You know, I'm so embarrassed.'" Cuomo said of the kiss, "This did not happen."

By now, Boylan said, her mental health had deteriorated and she had become more adversarial at the office, responding vocally to harsh comments from a circle of aides loyal to Cuomo, whom she said were known in the office as "the mean girls." She said that group included Melissa DeRosa, the senior aide. (A spokesperson praised DeRosa, calling the label an example of "sexist tropes.") On one occasion, Boylan said, during a call about a work matter, DeRosa screamed at her, "What the fuck did you do?" Boylan said that she told DeRosa, "I'm not speaking to you," and hung up the phone. (DeRosa and a spokesperson for the Governor both declined to comment on the interaction.) "I was lighting all these fires," Boylan told me. "And I think it was the culmination of a very long, destructive period of this dynamic."

Boylan said that she had not seen her leaked personnel files and was unaware of any specific allegations they might contain. "I don't want to take anything away from a woman that may have had a negative interaction with me," she said. But she viewed the release of the files as a calculated effort to discredit her accusations of sexual harassment. "In more than three years that I worked for the administration, I never once had a performance review," she said. "I've never seen an H.R. or personnel file, not just for myself but for any other employee, especially in the executive chamber. There's no real H.R. function that would be independent of the Governor and his closest aides." She called the introduction of the alleged workplace complaints into the initial coverage of her harassment claims "victim-blaming bullshit."

Boylan told me that, beginning that summer, she tried to quit several times. A text from July, 2018, shows that, after one such attempt, DeRosa tried to persuade Boylan to return, writing, "I know it was a tough day today but we hope to see you back here tomorrow with the team helping to get things done." Boylan resigned that September. "Lindsey's such a tough person, usually positive and upbeat, but when she left the Governor's office I saw a change in her," Kelsey DePalo, her friend from college, said. "You could tell it was upsetting to her, the experience."

In public, Boylan remained supportive of the Cuomo administration. That November, she retweeted an Op-Ed in the Times endorsing Cuomo's reelection, with applause and thumbs-up emojis. She said that her hesitation to condemn Cuomo publicly reflected the difficulty of working in New York politics without the Governor's support. "There's no other place to go," she said. "When I was a teen-ager, I knew that I wanted to go into government and that this was what mattered to me," she said. "You can't leave. If you leave, you are destroyed."

The uproar that Boylan's December tweets helped to start has now engulfed her life. She runs her campaign for Manhattan borough president from her West Chelsea apartment while embracing her new role as one of Cuomo's most public and persistent critics. In addition to her tweets excoriating the Governor and his supporters, she has traded insults with Internet trolls who have targeted her with sexist broadsides. Last Saturday, Boylan and her attorney met for two and a half hours, via Zoom, with the investigators leading the New York attorney general's probe of the allegations against Cuomo. The investigators, Joon Kim and Anne Clark, sought records, witnesses, and additional details. Boylan said that she will continue to cooperate with the investigation.

She expressed frustration with what she perceives to be a reluctance among some Democrats to demand Cuomo's resignation. She was especially dismayed by Hillary Clinton's response. After Boylan's and other allegations were made public, Clinton issued a statement saying that the allegations against Cuomo are "difficult to read" and "raise serious questions." She emphasized the attorney general's investigation, stopping short of calling for the Governor's resignation. Clinton, Boylan told me, "was the great hero of my life." She said that this was no longer the case. "There's no way you don't know who this man is if you've worked with, or around, him for decades," she added.

Last week, Boylan broke down during a conversation on the telephone with her mother. "She was sobbing uncontrollably. She was in a bad place," Karen told me. "She just didn't feel like she was being supported." Boylan said that she continues to feel that way: "I believe that anyone who is in politics and senior and has been around has heard all of these stories, at the very least, and has seen his lack of control, his lack of concern, his lack of integrity, at a very high level, and they said nothing."

Another factor informed Boylan's decision to first disclose her allegations online, on her own terms. She had been fearful about reporters' willingness to stand up to Cuomo's tactics. Cuomo and his aides were legendary for their bullying of the press. According to a source familiar with the episode, in a February, 2014, off-the-record dinner with the Times, Cuomo, after several drinks, began shouting at Susanne Craig, the newspaper's Albany bureau chief, finally telling her, "I'm going to ruin you. As long as I live, I will never speak to you again." Cuomo then stormed out of the restaurant. (A Cuomo spokesperson acknowledged a "tense disagreement" with Craig over an article. He added, "It's no secret that the office has had a number of difficult conversations with reporters over the years—we respect tough reporters and hope they respect us.")

Boylan had personally witnessed Cuomo's belligerence with the press, and it had left a searing impression on her. "I remember being in the car after one of our trips with the Governor and Melissa. And he is obliterating someone on the phone. He's obliterating him," she said. "I'm just assuming it's one of our staffers. And it was this famous reporter." She went on, "His main source of power is destroying you in the press." She paused. "Look what he did to me."

From: [REDACTED] Lis Smith
Timestamp: 3/24/2021 5:50:47 PM(UTC-4)

Source App: Native Messages

Body:

I am getting the sense that they have sicced a whole bunch of pro-Melissa partisans on me, including you, which is fine. We are not doing a hit piece, it's not our usual style. But Cuomo is not a particularly nice man a lot of the time and I haven't a sense of how she deals with that when she sees it. Or if she doesn't see that aspect of him, why?

From: [REDACTED] Lis Smith

Timestamp: 3/24/2021 7:15:56 PM(UTC-4)

Source App: Native Messages

Body:

Isn't it inappropriate for Katz to be sharing details of ag investigaiton w the press

From: [REDACTED] Lis Smith

Timestamp: 3/24/2021 7:16:01 PM(UTC-4)

Source App: Native Messages

Body:

Seems really sus

From: Peter Ajemian [REDACTED] \$!<Other>!\$ (owner)

Timestamp: 3/24/2021 7:29:11 PM(UTC-4)

Source App: Native Messages

Body:

I would think so...but she's been doing that

From: [REDACTED] Lis Smith

Timestamp: 3/25/2021 12:37:19 PM(UTC-4)

Source App: Native Messages

Body:

On the phone

From: Peter Ajemian [REDACTED] \$!<Other>!\$ (owner)

Timestamp: 3/25/2021 12:37:37 PM(UTC-4)

Source App: Native Messages

Body:

K. What do u think of those Melissa quotes?

From: [REDACTED] Lis Smith

Timestamp: 3/25/2021 12:37:45 PM(UTC-4)

Source App: Native Messages

Body:

Didn't see

From: Peter Ajemian [REDACTED] \$!<Other>!\$ (owner)

Timestamp: 3/25/2021 12:43:46 PM(UTC-4)

Source App: Native Messages

Body:

Just emailed latest

Nonresponsive

Redacted in original production