

**Albany County Sheriff's Office**  
**Misdemeanor Complaint**



Local Criminal Court City of Albany  
County of Albany, State of New York

The People of The State of New York

Vs.

Andrew M. Cuomo      DOB: 12/06/1957

I, Amy Kowalski, the complainant herein, am a police officer of The State of New York, to wit an Investigator of The Albany County Sheriff's Office, assigned to the Criminal Investigations Unit located in the Town of New Scotland, New York.

I, accuse Andrew M. Cuomo, the defendant in this action and charge that on December 7, 2020 between the hours of 3:51 o'clock in the afternoon and 4:07 o'clock in the afternoon while at 138 Eagle Street (The Governor's Executive Mansion) on the second floor, located in the City of Albany, County of Albany, State of New York, the defendant Andrew M. Cuomo did knowingly, and intentionally commit the class A misdemeanor of Forcible Touching in violation of section 130.52 subdivision 1- of the Penal Law of the State of New York.

A person is guilty of Forcible Touching when such person intentionally, and for no legitimate purpose forcibly touches the sexual or other intimate parts of another person for the purpose of degrading or abusing such person, or for the purpose of gratifying the actor's sexual desire.

To Wit: At the aforesaid date, time, and location the defendant Andrew M. Cuomo did intentionally, and for no legitimate purpose, forcibly place his hand under the blouse shirt of the victim and onto her intimate body part. Specifically, the victims left breast for the purposes of degrading and gratifying his sexual desires, all contrary to the provisions of the statute in such case made and provided.

**RECEIVED**

The above allegations of fact are made by the complainant herein:

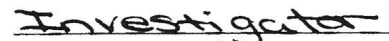
- Of my own knowledge gained through the course of the investigation.
- The attached New York State Police Blackberry PIN messages.
- The attached Verizon Wireless cell phone records of
- The attached New York State Capitol Swipes belonging to
- The attached New York State Police Aviation records for December 7, 2020.
- The attached Text message from Andrew M. Cuomo's cell phone.
- The attached Media coverage documentation of a press conference dated December 7, 2020
- The attached Testimony of \_\_\_\_\_ taken by the First Deputy Attorney General of the AG's Office, pages 139-146.

OCT 28 2021  
LOCAL CRIMINAL COURT  
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\*False statements made herein are punishable as a Class A Misdemeanor pursuant to section 210.40 of The New York State Penal Law.

Sworn before me this 25<sup>th</sup> day of October 2021.

  
Complainant/Signature

  
Investigator  
Title