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IN THE MATTER OF INDEPENDENT INVESTIGATION

UNDER EXECUTIVE LAW 63(8)

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May 19, 2021

9:00 a.m.

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

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

CLEARY GOTTLIEB STEEN & HAMILTON LLP  
One Battery Plaza  
New York, New York 10006

BY: HYATT MUSTEFA, ESQ.

-and-

JENNIFER KENNEDY PARK, ESQ.

EMERY CELLI BRINCKERHOFF ABADY WARD &  
MAAZEL LLP  
Attorneys for Witness  
600 Fifth Avenue, 10th floor  
New York, New York 10020

BY: ZOE SALZMAN, ESQ.

ALSO PRESENT:

MARCO SOZIO, Videographer

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Witness 5/19/21

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

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

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

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

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

My name is Marco Sozio from the firm

1                   Witness 5/19/21

2           Veritext New York and I'm the  
3           videographer. The court reporter is  
4           Brittany Saline, from the firm Veritext  
5           New York. The notary is Maria Kozan, who  
6           is located in Missouri.

7                   Both parties have agreed to one New  
8           York reporter and one notary in Missouri  
9           to swear in the witness.

10                   I am not authorized to administer an  
11           oath, so will the court reporter -- well,  
12           will the notary please swear in the  
13           witness.

14                   MS. KOZAN: **Kaitlin**, will you  
15           raise your right hand, please, and I will  
16           swear you in?

17                   Do you solemnly swear that the  
18           testimony you are about to give in this  
19           case will be the truth, the whole truth  
20           and nothing but the truth so help you God?

21                   THE WITNESS: Yes.

22                   MS. KOZAN: Okay. Thank you. I  
23           will be departing.

24                   THE VIDEOGRAPHER: Thank you. You  
25           may proceed.

Witness 5/19/21

EXAMINATION BY MS. PARK:

Q Good morning, **Kaitlin**. My name is Jennifer Kennedy Park. I am one of the special deputies to the First Deputy Attorney General that has been appointed by the New York Attorney General to conduct the Independent Investigation under New York Executive Law Section 63(8) into the allegations of sexual harassment brought against Governor Andrew Cuomo as well as the surrounding circumstances.

Thank you for being here today. May I call you Kaitlin today?

A Yes, please.

Q You understand that you're here today pursuant to a subpoena that we issued in connection with the investigation?

A Yes.

Q And as you just heard, we are -- we are video recording and I want to make sure that you are not video recording yourself nor are you -- your counsel video recording this in any way.

A I am not.

MS. SALZMAN: Nope. I am not

1                                 Witness 5/19/21

2             either.

3             Q           Kaitlin, as you just heard, you are  
4             under oath. That means that you have to  
5             testify fully and truthfully just as if you  
6             were in a court of law sitting before a judge  
7             and a jury. Your testimony today is subject to  
8             penalty of perjury. Do you understand that?

9             A           Yes.

10            Q           If you would like to make any brief  
11            sworn statement on your behalf, we ask that you  
12            do so at the conclusion of my examination and I  
13            will remind you and your counsel of that at the  
14            conclusion.

15            A           Okay.

16            Q           Although -- although this is a civil  
17            investigation, the New York Attorney General's  
18            Office also has criminal enforcement powers.  
19            You have the right to refuse to answer any of  
20            my questions on the grounds that doing so would  
21            incriminate you. However, any failure to  
22            answer my question could be used against you in  
23            a court of law in a civil proceeding. Do you  
24            understand?

25            A           Yes.

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Witness 5/19/21

Q You are appearing today with your attorney, but this is not a deposition and so you may consult with your attorney about privileged matters, but otherwise we would not expect your counsel to participate in today's testimony. Do you understand?

A Yes.

Q As you can see, we've got a court reporter here with us in what is our virtual room and she needs to take down my questions and she needs to take down your answers. To have a clean record, we need to make sure you give verbal responses to my questions, so don't shake your head or nod or anything like that. Do you understand?

A Yes.

Q If you don't know an answer to my question, just tell me you don't know. Okay?

A Okay.

Q All right. And I'm sure the court reporter will tell us if we're talking over each other, but you and I will do our best not to do that.

A Okay.





1                   Witness 5/19/21

2                   MS. SALZMAN: I am also alone, yes.

3            Q       Okay. And can you confirm, Kaitlin,  
4   that there's no device you're using to allow  
5   anyone to listen in to this testimony?

6            A       There is no device that's set up for  
7   anyone to listen in to this testimony.

8                   MS. PARK: And, Zoe, same question  
9            for you?

10           MS. SALZMAN: I can also confirm no  
11   one is listening in.

12   BY MS. PARK:

13           Q       I spoke to your counsel before  
14   today's testimony and advised her of the  
15   provision of Executive Law 63(8) that makes it  
16   a misdemeanor to share any information you  
17   obtain over the course of today's testimony  
18   with anyone.

19                   Do you understand that obligation to  
20   keep this confidential?

21           A       I do understand, yes.

22           Q       If anyone asks you to disclose the  
23   contents of your testimony today, we would ask  
24   you or your counsel to let us know. Do you  
25   understand?

Witness 5/19/21

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A Yes.

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

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

Q Okay. Have you had any alcohol today?

A No.

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

A No.

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

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

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

Witness 5/19/21

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A [REDACTED].

Q Have you ever given testimony before?

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

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

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

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

A Yes, sorry, yep.

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

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

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

1                                    Witness 5/19/21

2        we sent you.

3                            (Whereupon document was marked  
4        Exhibit 1 for identification as of this  
5        date.)

6        A        Mm-hm.    Okay.

7        Q        Take a minute to review that and  
8        then when you're ready, just let me know.

9        A        Okay.

10        Q        Do you recognize this as a document  
11        subpoena from the New York Attorney General's  
12        Office that you received?

13        A        Yes, I do.

14        Q        Did you read the subpoena before  
15        today?

16        A        Yes.

17        Q        What did you do to provide documents  
18        responsive to that subpoena?

19        A        I spoke with Zoe about the subpoena  
20        and then I reviewed my files on my personal  
21        iPhone and my personal computer to respond. I  
22        also went through files that I had at my mom's  
23        house, personal files that have like my Social  
24        Security card, things like that in it and found  
25        my hiring paperwork from -- from the Executive

1                                   Witness 5/19/21

2   Chamber in [REDACTED].   What else?   I -- I looked  
3   at the -- the files that I had sent previously  
4   too.   I think we submitted prior to the  
5   subpoena and I think that's -- I think that's  
6   all I did.

7           Q           Did your review include looking at  
8   your social media accounts for potentially  
9   responsive information to the subpoena?

10          A           Yes, I reviewed my LinkedIn, my  
11   Twitter and my Facebook and Instagram accounts.

12          Q           Great.   We are in receipt of the  
13   productions that you provided through your  
14   counsel and we are also in receipt of your  
15   responses and objections to the document  
16   subpoena.

17                        Why don't you go ahead and open what  
18   is marked in the electronic file as Exhibit 3.

19                        (Whereupon document was marked  
20   Exhibit 3 for identification as of this  
21   date.)

22          A           Okay.

23          Q           Just let me know when you have had a  
24   chance to look at it.

25          A           Yes, I looked at it.

Witness 5/19/21

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

5 A Yes.

6 Q Did you read the subpoena before  
7 today?

8 A Yes.

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

12 A Yes.

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

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

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

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

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

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

Witness 5/19/21

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

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

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

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

1 Witness 5/19/21

2 transitioned to --

3 Q When did -- that's right. When did  
4 you -- when did you stop working there and  
5 start working at [REDACTED] ?

6 A When I stopped working for -- when I  
7 finished my Master's Degree, I wasn't an  
8 intern. I was a full time employee with [REDACTED]  
9 with the Congressman. I started working for  
10 [REDACTED] in November of 2016,  
11 November 1st, maybe or October 31st, 2016. I  
12 don't know the exact date. I have it -- I  
13 don't have it. It was right at the beginning  
14 of November, the end of October.

15 Q Do you have any documents in front  
16 of you?

17 A I have my notebook, the notes and  
18 then I have a folder of the hiring paperwork  
19 from the chamber in [REDACTED] that I submit --  
20 that I sent to Zoe, but that's -- that's all  
21 and my work stuff.

22 MS. PARK: Can we go off the record  
23 for just a minute?

24 THE VIDEOGRAPHER: Standby. We are  
25 now off the record at 9:15 a.m.



1 Witness 5/19/21

2 (Discussion held off the record.)

3 THE VIDEOGRAPHER: We are now on the  
4 record. The time is 9:17 a.m.

5 BY MS. PARK:

6 Q So you started at [REDACTED]  
7 [REDACTED] sometime in October or November of 2016.  
8 What was your role there?

9 A I was a junior lobbyist. I think my  
10 title was policies -- I don't remember what my  
11 title was exactly. Maybe policy associate.

12 Q And what were your responsibilities  
13 in your role as policy associate?

14 A I was to support the state and local  
15 lobbying team, government team. I was -- I was  
16 only there for eight weeks. We really didn't  
17 get into a lot of specifics about my role and  
18 assignments. It was on-boarding mostly and  
19 then some events and just kind of getting to  
20 know what they do and the team and the state,  
21 clients, yeah.

22 Q How did you come to be employed at  
23 [REDACTED] ?

24 A Congressman -- former Congressman  
25 [REDACTED] 's [REDACTED] works there.

Witness 5/19/21

1  
2 I think he's still there. But he -- the  
3 Congressman and I -- the Chief of Staff  
4 ██████████, they both knew that I was  
5 working two full time jobs and they had  
6 suggested that I should go work at ██████████  
7 ██████████ because they could pay me more  
8 and they needed to fill that role and they  
9 thought it would help me cut my hours back from  
10 the restaurant and they approached me over the  
11 summer of 2016 first, but didn't offer me  
12 enough money where I could cut back my hours  
13 from the restaurant and so I couldn't take  
14 the -- their first offer and then they came  
15 back in the fall with more money and then I  
16 accepted that job.

17 Q And what was your salary at

18 ██████████?

19 A I don't remember. I think I started  
20 at -- in the ██████████, I think.

21 Q While you were employed at ██████████,  
22 did you continue to work at ██████████?

23 A Yes, on the weekends.

24 Q You said you only worked at ██████████  
25 for eight weeks. How did it happen that you

Witness 5/19/21

1 only worked at [REDACTED] for eight weeks?  
2

3 A About six weeks into the job, the  
4 state -- government, I don't know what it's  
5 called, the state lobbying team was holding a  
6 fundraiser for the Governor and we had to staff  
7 the event and so we were at the fund raising  
8 evening and I met the Governor and he said that  
9 I was going to come work at the state level and  
10 by the end of the week, I had interviewed and  
11 was hired to go to the Governor's office.

12 Q Do you remember the date of these  
13 lobbying events that you just referred to?

14 A I don't remember the dates, I'm  
15 sorry. I think it was Monday, December 14th.

16 Q You -- you said you -- you met the  
17 Governor at that event; is that correct?

18 A Yes.

19 Q Why don't we -- you open what is in  
20 the electronic exhibit folder as Exhibit 4.

21 (Whereupon document was marked  
22 Exhibit 4 for identification as of this  
23 date.)

24 A Mm-hm. Okay.

25 Q You have that open?

Witness 5/19/21

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A Mm-hm.

Q Do you see there are -- there are five photographs in that folder?

A Yep.

Q Tell us about these photographs.

A Wait. There are five. So this is the night I got to meet the Governor at the Friars Club. It was December 12th, not 14th, 2016. This was the fundraiser. He did a speech in the main room and then as he was walking out, if you look at photo number two or three, behind his left shoulder is the door to exit.

He had stopped to take -- to say thank you, to say bye, work the room, and he saw me and I introduced myself. I said I worked for [REDACTED]. At the time, he's still a Congressman and he -- I don't know, he took this -- he -- he grabbed me -- held onto my hand and then said that he was going to have me work at -- at the state level and then we took these photos and then he took the photo number six or photo five, page six, with the team.

Witness 5/19/21

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

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

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

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

Q And what did he say when he approached you?

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

Q How long did --

A Sorry. It's just something that

1  Witness 5/19/21

2      stands out to me and something I remember just  
3      because it was unique to any situation I ever  
4      had before.  I mean he was the Governor.

5              Q          How long did your conversation with  
6      Governor Cuomo on that occasion last?

7              A          Not long.  I said two minutes, but  
8      I -- I don't know how long it was.

9              Q          On that occasion, did you have your  
10     resume with you?

11            A          No, no, I didn't have my resume.

12            Q          On December 12th, on that night, did  
13     you give your resume or something equivalent to  
14     your resume to any member of Governor Cuomo's  
15     senior staff?

16            A          No.

17            Q          Did you have a business card with  
18     you on December 12th, 2016?

19            A          Well, I say -- I shook my head, but  
20     if I had it on, it wasn't on my person.  It  
21     would have been in my purse, probably, in like  
22     a cardholder probably, but I didn't give a card  
23     to anybody.  I didn't give my information to  
24     anybody.

25            Q          When you say to anybody, you did not

1                                 Witness 5/19/21

2       give your business card to Governor Cuomo or  
3       any members of his staff?

4             A           That's correct. To my recollection,  
5       I did not give my business card or any -- to  
6       anyone on his staff or the Governor.

7             Q           If you look at the first, second and  
8       third pictures that are in that exhibit, please  
9       describe how Governor Cuomo touched you in  
10      these photos?

11            A           So he first went in to shake my hand  
12      and then he pulled me towards him and then he  
13      grabbed -- like shifted my body so we were in a  
14      dance pose and then he took the photo with me  
15      and his right arm is on my lower back.

16            Q           How did you feel about the way the  
17      Governor touched you in these photographs and  
18      while these photographs were being taken?

19            A           I was uncomfortable. I recognize  
20      that I'm smiling in these photos, but I -- it  
21      was uncomfortable.

22            Q           Why did you feel uncomfortable when  
23      you were taking these photos with Governor  
24      Cuomo?

25            A           Several reasons. One, I was in

Witness 5/19/21

1 front of my team that I had just met. There  
2 was a photographer with flashes right next to  
3 us taking these photos and it was a lot of  
4 attention. I just don't get -- I just am not  
5 comfortable in those situations.  
6

7 Q Was there anything about the way  
8 Governor Cuomo -- sorry, I didn't mean to  
9 interrupt you, Kaitlin.

10 A No, I'm sorry. Just he's the  
11 Governor and it's just a weird situation.

12 Q Did the Governor on this occasion  
13 ask if he could touch you?

14 A No.

15 Q Did he ask if he could hold you in a  
16 dance position?

17 A No.

18 Q Did you say anything to the Governor  
19 on this occasion about the way he touched you?

20 A No.

21 Q You can put aside the photographs.  
22 What happened after these photographs? Did you  
23 talk to anyone about your interaction with  
24 Governor Cuomo on December 12th, 2016?

25 A Yes, I left -- excuse me. There was



Witness 5/19/21

1  
2 banter within -- amongst the [REDACTED] staff before I  
3 left the event, just about how uncomfortable it  
4 was and how the Governor liked me and then I  
5 walked home from the Friars Club to my  
6 apartment and I had called friends and family  
7 and text them, talking about how weird that  
8 interaction was and no -- I don't know if  
9 people believed me or not, but there is --  
10 yeah, that's odd.

11 Q Let's start with the banter with  
12 your colleagues. Which colleagues did you  
13 speak to after the photograph of the Governor?

14 A At the event or --

15 Q Well, let's start with at the event.

16 A Okay. So at the event, can I pull  
17 up that photo again? I can tell you.

18 Q Sure. Yes. And are you pulling up  
19 what is the last photo in -- in that exhibit,  
20 which is a group photo?

21 A Yes. After the event, I likely  
22 told -- beginning from left to right, [REDACTED]  
23 [REDACTED], who is in the front with the orange tie.  
24 He was on my team and somebody I would  
25 report -- he wasn't my direct boss, but I would

1 Witness 5/19/21

2 work with [REDACTED] and report to him.

3 [REDACTED], who is over my  
4 right shoulder. [REDACTED] and [REDACTED]  
5 who are next to him. I would have told

6 [REDACTED]. I would have told [REDACTED]

7 [REDACTED] She just got married.

8 That's not her last name now. [REDACTED] who  
9 was next to [REDACTED] and maybe [REDACTED], but  
10 probably not, directly after the event, that  
11 is, before I had left.

12 Q Directly after the event, these  
13 colleagues that you were speaking to, I think  
14 you said you discussed that it was  
15 uncomfortable and someone said the Governor  
16 liked you.

17 What do you remember about your  
18 colleagues saying that the Governor liked you?

19 A It was -- it was like -- like a ooh,  
20 the Governor likes, like yeah, that kind of  
21 like joking around because he had singled me  
22 out and paid attention to me. I don't know  
23 what their intentions were when they made those  
24 comments. I just know that they said those  
25 things.

1 Witness 5/19/21

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

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

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

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

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

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

19 Q How did you come to have these  
20 photographs?

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

1 Witness 5/19/21

2 and family that this actually happened, so they  
3 believe me.

4 Q That was when you were working in  
5 the executive chamber?

6 A That's correct, yep.

7 Q And you said that after the  
8 December 12th event, you also spoke to some  
9 friends and family on your walk home about what  
10 had occurred with the Governor. Which family  
11 and friends did you speak to?

12 A I know it was my -- my mom, my older  
13 sister and my middle sister. Friends, I don't  
14 remember every friend I spoke to on my walk  
15 home. I would guess it was my roommate, my old  
16 roommate and I would guess it was some of my  
17 closest friends.

18 Q And in summary, what did you tell  
19 your friends and family about what had occurred  
20 with the Governor?

21 A What happened at the event that he  
22 gave a speech, he was leaving and then he  
23 grabbed me and we took those weird photos and  
24 that he said I was going to work at -- in  
25 government again, at the state level.

Witness 5/19/21

1  
2 Q What's the -- after December 12th,  
3 what is your next interaction related to Andrew  
4 Cuomo?

5 A I was in a meeting downtown with the  
6 city council member, I don't remember which  
7 one, and I received a voicemail from the  
8 executive chamber asking me to come in for an  
9 interview and so when I had got back to the  
10 office, I told [REDACTED] and [REDACTED] and  
11 they told me I had to go and we need to tell  
12 [REDACTED] and they all said, you know, unfortunately,  
13 he's going to poach you and we -- you -- you  
14 have to take the job.

15 Q The voicemail that you received from  
16 the Governor's office, who particularly was  
17 that voicemail from?

18 A It was either Stephanie Benton or  
19 Jill DeSrosiers. I don't remember. I don't  
20 have that voicemail anymore.

21 Q Do you remember anything else about  
22 the voicemail, other than they told you they  
23 wanted -- whoever it was said that they wanted  
24 you to interview for a position in the  
25 Governor's office?

Witness 5/19/21

1  
2 A No, that's all I remember. Come --  
3 to come to their office to -- to meet -- I  
4 don't think they said it was for an interview.  
5 I think that was implied.

6 Q Anything else you remember about the  
7 voicemail saying they -- they wanted to come  
8 meet or have you come and meet, any description  
9 of a position that was open or they were trying  
10 to have you interview for?

11 A No.

12 Q After you -- you said you received  
13 the voicemail. You spoke to three individuals,  
14 ■■■, ■■■ and ■■■. What did you discuss with  
15 ■■■?

16 A If I said ■■■, I misspoke. ■■■.

17 Q Oh, ■■■. I apologize. I might  
18 have misheard.

19 A That's okay. ■■■, ■■■  
20 ■■■ and ■■■. They would have been  
21 my management team and then the managing  
22 partner. I told them -- I asked if they  
23 remembered what happened at the Friars Club and  
24 they did and I said I told you it was weird and  
25 they had called and wanted me to go to the

1                                  Witness 5/19/21

2        Governor's office and they said [REDACTED] had  
3        worked -- I think at the [REDACTED] so he  
4        had known how that -- that the inner circle  
5        worked and he had said that -- they -- they all  
6        said that I had to go and they advised me  
7        that -- they all knew of my financial situation  
8        as well with my other job and they said that  
9        the state has a multi billion dollar budget and  
10      that I should ask for 125,000 for them to match  
11      both of my salaries.

12                Q        What did you say to [REDACTED], [REDACTED] and  
13      [REDACTED] ?

14                A        About going over there or the advice  
15      on the salaries?

16                Q        Any -- anything that you said to  
17      them in response to them -- them telling you  
18      you had to go and then the salaries?

19                A        That I didn't want to go. I didn't  
20      want to go back to state government because I  
21      needed to make money and that I was not going  
22      to make money in government and I -- I had  
23      liked my job, kind of liked my job and they --  
24      I didn't have a choice.

25                              I was -- they lobbied the state

1 Witness 5/19/21

2 government and the Governor had wanted me to go  
3 over there, so I had to go and then when they  
4 told me about the salary, I was like I can't  
5 ask for that. I didn't -- it was not something  
6 I had been paid before and I didn't think it  
7 would ever happen and they insisted that I do  
8 it and so when I went over there, I just said  
9 120, for -- I don't know why. It just came  
10 out.

11 Q Before we talk about when you -- you  
12 went over there, you said that [REDACTED] had -- had  
13 worked at the [REDACTED] and he knew how  
14 the inner circle worked. When you say inner  
15 circle, what do you mean?

16 A The executive chamber, the -- at the  
17 time it was [REDACTED], Alphonso David, Rob  
18 Mujica, I can't think of his name, [REDACTED],  
19 Jill DeSrosiers, Melissa DeRosa, Stephanie  
20 Benton, Andrew Ball and Annabel Walsh. It was  
21 that inner circle. Dani Lover.

22 Q For the court reporter's sanity, if  
23 you could just, when you're giving lists of  
24 names, slow down a little bit.

25 MS. PARK: Brittany, we will help



1    Witness 5/19/21

2    you get the names at a break.

3    Q           But, Kaitlin, if you just could slow  
4    down a little bit when you're giving names, so  
5    she -- she can make sure she gets them, I  
6    appreciate it.

7    A           Yes, of course, sorry.

8    THE VIDEOGRAPHER: I'm sorry --

9    MS. PARK: Our videographer --

10   THE VIDEOGRAPHER: Yeah. I just  
11   need to tell you something. Your video is  
12   lagging for the witness. It -- it seems  
13   like it's starting to lag. Is anyone else  
14   noticing that or is it just me? Time to  
15   time it's just -- are you on a wireless  
16   right now or are you hard wired into the  
17   computer?

18   THE WITNESS: It's Wi-Fi.

19   THE VIDEOGRAPHER: It's Wi-Fi, okay.

20   We will keep an eye on that. Yeah, so,  
21   okay, we can continue. Just keep an eye  
22   on it. As long as it's not affecting the  
23   audio. Thank you.

24   BY MS. PARK:

25   Q           It's causing us to talk over each

1                   Witness 5/19/21

2     other a little bit, but I'm going to do my best  
3     to pause and deal with the lag so we can keep  
4     going.

5                   Other than ██████, ██████ and ██████, did  
6     you talk to anybody else about the voicemail  
7     before you -- you returned the executive  
8     chamber phone call?

9           A        Before I returned the phone call?

10          Q        Mm-hm?

11          A        It's possible I told my officemate  
12     ████████ and ██████████. It's possible I told my  
13     closest friends and my family. I told the -- I  
14     don't know if it was before or after, but they  
15     all knew about it.

16          Q        And when you say ██████████, what was  
17     ████████ last name?

18          A        ██████████. She's married, so  
19     it -- I don't -- I think she changed her last  
20     name.

21          Q        And what was ██████████ last name?

22          A        ██████████.

23          Q        Did -- did you call the executive  
24     chamber back after the voicemail?

25          A        I called the number that I was told

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Witness 5/19/21

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

Q Who did you speak to?

A I believe it was Stephanie Benton.

Q Tell us about that conversation with Ms. Benton.

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

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

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

1 Witness 5/19/21

2 Q Tell us about the conversation with

3 [REDACTED].

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

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

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

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

25 A Because of the interaction that I

1 Witness 5/19/21

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

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

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

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

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

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

Witness 5/19/21

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

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

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

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

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

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

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

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

Witness 5/19/21

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

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

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

15 A Yes.

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

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

1   Witness 5/19/21

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

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

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

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

16          A           I did, yep.

17          Q           When was the interview?

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

20          Q           And with whom did you interview?

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



1    Witness 5/19/21

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

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

5                        A            Yes.

6                        Q            Tell us about what happened in the  
7        interview.

8                        A            They -- I don't remember everything  
9        that happened. They asked questions. I --  
10       they described a role that I didn't understand.  
11       I remember leaving and people asking me what I  
12       was -- what my job was and I was like, I don't  
13       know. I don't know what I'm going to be doing.  
14       I was -- I had -- they had asked about  
15       salary -- I think maybe I had asked about  
16       salary and I believe asked what my number was  
17       and I said 120 and they laughed and they said  
18       that's probably not going to happen and then  
19       they had a -- when they called to tell me that  
20       I was hired, they agreed to that salary. They  
21       told me that they had agreed to that salary. I  
22       think that the Governor actually agreed to that  
23       salary.

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

Witness 5/19/21

1  
2 and out, did they ask you about your experience  
3 working for Congressman [REDACTED]

4           A           I honestly don't remember everything  
5 that happened in that conversation. The things  
6 that stand out, it was not really knowing the  
7 position and the salary because I was happy to  
8 not have two jobs. I'm sure I talked about my  
9 job with [REDACTED] and maybe the lobbying firm. I  
10 don't know. I can't say with 100 percent  
11 certainty that I did.

12           Q           Do you remember if you felt like it  
13 was a real interview? Was there substance to  
14 the interview?

15           A           I don't think I've ever had a real  
16 interview to be honest with you. Maybe at [REDACTED]  
17 but I mean I met [REDACTED] and [REDACTED] prior to the  
18 real interview. Real, I don't know, the one in  
19 their office for lunch and we talked about it.  
20 I -- I don't -- I don't think it was a real  
21 interview with Stephanie and Annabel and Jill.

22           Q           Did you bring your resume to the  
23 interview with Stephanie, Annabel and Jill?

24           A           I did. I did.

25           Q           And is that the first time you had

Witness 5/19/21

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

4 A Yeah, to my knowledge, yes.

5 Q So what happens after the interview?

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

10 Q And --

11 A Yeah.

12 Q And what did you tell the team?

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

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

24 A What time?

25 Q When, what day? So you interviewed

1    Witness 5/19/21

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

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

7                    Q            Okay. So about 48 hours later?

8                    A            Yeah, it was that same week.

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

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

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

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

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

22                   A            That's correct.

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

1                                   Witness 5/19/21

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

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

9           A           Yep.

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

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

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

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

1                                    Witness 5/19/21

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

4            Q            Yes.

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

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

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

15          Q            What --

16          A            -- specific advice like who gave it  
17 to me, but I talked to [REDACTED]. I talked to  
18 [REDACTED] I talked to the restaurant. I  
19 talked to friends, family. One of the  
20 questions I asked is what do I call the  
21 Governor? I didn't know do I call him Andrew?  
22 It was so informal with [REDACTED] I keep saying  
23 [REDACTED], with the Congressman. I was told to call  
24 him Governor, to be professional, dress  
25 professional.

1                                  Witness 5/19/21

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

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

9                                  A           Governor, Governor Cuomo, Governor.

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

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

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

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

25                                  Q           And when -- after you started





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Witness 5/19/21

offices and then director of the New York office.

Q What was your background check process?

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

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

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

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

A I don't know my last official date and when I went over to [REDACTED]. I don't know. It's in the paperworks. I'm sorry.

Q Okay. Was it sometime around January 2018?

A Yes, it was in January 2018.

Q During that time period, when you

1 Witness 5/19/21

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

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

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

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

1                                 Witness 5/19/21

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

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



Witness 5/19/21

1 executive chamber?

2  
3 A That -- that's what I'm told. I --  
4 I don't remember. I thought she had turned  
5 down the position, but I was told that she  
6 accepted the position and that she was doing  
7 like [REDACTED] maybe, but it wasn't something  
8 that she had done and then she left shortly  
9 thereafter and took a job, I think, in  
10 [REDACTED]. That's what I'm told. I don't  
11 know how accurate that is.

12 Q Who told you that?

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

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

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

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

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

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Witness 5/19/21

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

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

A I thought it was on her hand and then I was told it was on her forearm. [REDACTED], [REDACTED] told me that.

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

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

1 Witness 5/19/21

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

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

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

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

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

1    Witness 5/19/21

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

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

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

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

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



1 Witness 5/19/21

2 I'm sorry. I don't -- I don't recall.

3 Q And what did you come to understand  
4 about the -- the speechwriter with the short  
5 blonde hair and how she came to be at the  
6 executive chamber?

7 A Just that he had met her at an event  
8 and liked her and that she came on staff.

9 Q If you -- if you remember her name  
10 over the course of your testimony today, just  
11 let us know. Okay?

12 A Mm-hm.

13 Q So you -- you join the executive  
14 chamber on December 30th as the Deputy Director  
15 of The Governor's Office and the Director of  
16 the New York Governor's Office. What is your  
17 job? What's your role?

18 A I don't know. It was to be a  
19 gatekeeper to the Governor. It was -- if  
20 people wanted to see the Governor, they  
21 couldn't just walk into his office. They had  
22 to go through me and Stephanie if she was  
23 there. I sat in meetings with the Governor. I  
24 attended events with the Governor. I did  
25 dictation with the Governor. I set up

1                                 Witness 5/19/21

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

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

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

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

Witness 5/19/21

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

10 Q Were you in a cubicle?

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

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

15 A Yes.

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

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

Witness 5/19/21

1  
2 Q Putting aside the training for how  
3 to do your role, did you get training about  
4 policies and procedures of the Governor's  
5 office?

6 A See, I don't remember. I -- I  
7 believe I received a hand -- maybe a handbook  
8 or a link to handbook. I don't remember. I  
9 remember going to [REDACTED] and my on-boarding  
10 process there was much more detailed and it was  
11 very different and I remember making the  
12 comment about how easy it was to come on board  
13 at [REDACTED] compared to the Governor's office,  
14 but I don't remember exactly what I did in the  
15 chamber for trainings or procedures.

16 Q If you open up the electronic  
17 exhibit binder that we gave you?

18 A Mm-hm.

19 Q Can you open Exhibit 6.

20 (Whereupon document was marked  
21 Exhibit 6 for identification as of this  
22 date.)

23 A Okay.

24 Q Take a look at it. The question is  
25 whether the handbook you just referenced is

1                               Witness 5/19/21

2       what is labeled as Exhibit 6?

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

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

12          A           The prior arrest records.

13          Q           Sorry, say that again, Kaitlin?

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

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

18          A           Oh, that's 25.

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

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

23          Q           Thank you.

24          A           Okay.

25          Q           Do you remember ever reading during

1                                 Witness 5/19/21

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

4             A           No.

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

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

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

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

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

20            A           Yep.

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

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

1                                   Witness 5/19/21

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

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

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

15          Q           ██████████?

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

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

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

1   Witness 5/19/21

2           Q           Camille Varlack?

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

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

11          A           No, no.

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

14          A           Yes.

15          Q           Which devices did you get?

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

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

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

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

25                       (Whereupon document was marked



1   Witness 5/19/21

2           Exhibit 8 for identification as of this  
3           date.)

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

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

10                          MS. SALZMAN:   Perfect, yeah, thanks.

11   BY MS. PARK:

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

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

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

24                   Q        And you referred to someone named  
25   ██████████ earlier.  Who is ██████████?

1                                   Witness 5/19/21

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

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

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

21                                   (Brief recess taken.)

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

Witness 5/19/21

BY MS. PARK:

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

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

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

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

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

Witness 5/19/21

recollection. I don't know.

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

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

Q What did you actually do at the event?

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

1 Witness 5/19/21

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

5 Q Was that [REDACTED]  
6 (spelling)?

7 A Yes, it was [REDACTED].  
8 Thank you.

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

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

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

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

25 Q In the beginning, what were your

1                                   Witness 5/19/21

2       interactions with the Governor like?

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

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

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

1 Witness 5/19/21

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

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

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

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

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

Witness 5/19/21

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

A       Yes, sorry, yes.

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

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

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

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

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



1                                   Witness 5/19/21

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

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

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

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

Witness 5/19/21

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touching?

A Not to my recollection, no.

Q Who decided when you would travel with the Governor?

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

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

A No, well --

Q Did the Governor ever --

A He never grabbed me like that.

Q Kaitlin, can you start your answer over again?

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



Witness 5/19/21

1  
2 A He said -- he's said like a word or  
3 two. I wouldn't call that speaking Italian.

4 Q Did you understand what the words  
5 meant?

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

8 Q That does bella mean?

9 A Beautiful, I think.

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

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

18 Q The Governor called you sponge?

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

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

23 A Yes.

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

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Witness 5/19/21

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

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

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

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

A No.

Q And why not?

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

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

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

Q And what do you base that on?

A My experience in his office.

Q Can you tell me anything more specifically?

1 Witness 5/19/21

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

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

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

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

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Witness 5/19/21

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

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

A Not that I remember.

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

A Not that I remember.

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

A I do, yes.

Q Can you tell us what happened?

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

1 Witness 5/19/21

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

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

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

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



Witness 5/19/21

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

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

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

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

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

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Witness 5/19/21

A Immediately after or recently?

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

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

Q Do you remember --

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

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

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

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

A Yes.

Q And what did he say about your  
clothing?

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

There were times when I would have

1                                 Witness 5/19/21

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

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

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

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

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

Witness 5/19/21

1  
2 I know that a trooper -- I thought a trooper  
3 had overheard what he said and I had asked him  
4 about it later and they -- they sat across from  
5 my desk behind glass and basically said just  
6 don't worry about him.

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

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

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

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

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

21 A Recently?

22 Q Yes.

23 A No.

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



Witness 5/19/21

1  
2 Q Any other occasion, and I know  
3 you're saying it happened -- it sounds like  
4 more than a handful of times. Are there any  
5 other specific memories you have of the  
6 Governor commenting on your appearance?

7 A It -- it was the same situation. It  
8 would be early in the morning when he left,  
9 that happened multiple times and then it was  
10 the outfit I put together where he called me a  
11 lumberjack, just after the first time and the  
12 lumberjack, you just kind of get used to his  
13 commentary.

14 Q Did the Governor ever give you any  
15 gifts?

16 A The Governor gave out the rose to  
17 everyone on Valentine's Day. He -- I think it  
18 was Christmas, he gave out a quarter zip to --  
19 to staff, but that was -- that was it.

20 They're -- the other women received  
21 perfume. I didn't. That's when he didn't like  
22 me anymore, so I wasn't on his gift list.

23 Q Let's start with the roses. Were  
24 the roses on Valentine's Day?

25 A If not Valentine's Day, the day

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Witness 5/19/21

before, whatever the working day was, yes.

Q And what year was that?

A That would have been 2017.

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

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

Q The women in his inner circle?

A Yeah.

Q Who gave you the roses?

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

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

1    Witness 5/19/21

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

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

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

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

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

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

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

25                   Q            And why do you believe that to be



Witness 5/19/21

1  
2 true?

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

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

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

1 Witness 5/19/21

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

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

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

12

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

15 A I don't know.

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

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

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Witness 5/19/21

uncomfortable when he asked me.

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

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

[REDACTED]

Witness 5/19/21

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[REDACTED]

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

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

A He asked about my relationship  
status [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q Was anything else said in that  
conversation?

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

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

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

1                   Witness 5/19/21

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

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

13                  Q       Do you remember how you answered?

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

Witness 5/19/21

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

[REDACTED]

[REDACTED]

Q When he asked you if you have been with an older man, did you understand him to be asking you whether you had dated an older man, slept with an older man or both?

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

Q You told him [REDACTED]

[REDACTED]

[REDACTED] ?

A Yes.

Q Was that true?

A Yeah, yep.

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

A No.

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

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

Witness 5/19/21

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

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

21 Q Intently kind of starring at you?

22 A Yes.

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

1  Witness 5/19/21

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

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

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

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



Witness 5/19/21

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

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

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

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

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

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

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

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



Witness 5/19/21

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wall?

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

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

A Yes. My backside was to the Governor.

Q And your -- was he directly behind you?

A Yes.

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

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

Q Was he --

A Sorry.

Q Nope, go ahead?

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

Witness 5/19/21

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

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

A Not that I recall.

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

A No.

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

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

Q Less than a foot?

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

1   Witness 5/19/21

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

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

7           A           Yes, that's it.

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

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

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

19          A           Yes.

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

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

Witness 5/19/21

1 that situation.

2 Q Did you print out anything for him  
3 or order any car parts?  
4

5 A No.

6 Q Kaitlin, did you hear the question?

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

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

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

14 Q So how does this interaction end?

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

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

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

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

Witness 5/19/21

1  
2 uncomfortable when you said he got you alone in  
3 the room adjacent to his office. Tell us about  
4 that incident.

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

1                                  Witness 5/19/21

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

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

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

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

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

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



1                                      Witness 5/19/21

2     Does the room that you were in, that you  
3     described as dimly lit, have a name?

4             A           The -- we didn't go through the --  
5     we walked by the bathroom.   The bathroom was  
6     just over there before you left.   I believe the  
7     room was the war room, but I don't know.   It --  
8     it was -- it's whatever room that connects from  
9     his office, whatever room is right over there  
10    in that corner.

11            Q           Let's just call it the war room for  
12    now.   When you were in the war room, you said  
13    you were shaking.   Why were you shaking?

14            A           I was uncomfortable.   I didn't --  
15    there was no reason for me to be given this  
16    tour, for me to be in that room.   Like I had  
17    been in the office before.   It was an odd  
18    situation and then that room was very cold and  
19    he was close to me, standing next to me and  
20    it's a big space.   I don't -- there was not a  
21    reason why he needed to be that close or why we  
22    needed to be in there.   It was weird.

23            Q           How close was he to you?

24            A           I don't remember him touching me,  
25    not that close, but he was very close, like --

1    Witness 5/19/21

2        and I would say in my personal space.

3                    Q            Were you afraid?

4                    A            I wouldn't say I was afraid that he  
5        was going to do something to me. Did I think  
6        that something could happen? Yes. I wasn't  
7        afraid. Nervous, maybe. Uncomfortable, but I  
8        wouldn't say I was afraid.

9                    Q            How did it end?

10                  A            I don't -- he just left. I don't --  
11        I don't know -- I don't know why -- I don't  
12        remember the details of why we walked out of  
13        the room.

14                  Q            Anything else you remember about  
15        that occasion? Do you remember what -- what  
16        month that was?

17                  A            No, I'm sorry.

18                  Q            What year?

19                  A            I would have to -- it had to have  
20        been 2017.

21                  Q            Why do you say it had to have been  
22        2017?

23                  A            Because I mean when I started was  
24        the end of 2016 and then at the end of my time  
25        in the Governor's office, he probably knew I

1                                   Witness 5/19/21

2       didn't like him at the time. I was not shy to  
3       be -- at that time, I just was kind of over it.  
4       I didn't -- I didn't care anymore. I just  
5       wanted to be out of there and I think I had had  
6       the conversation with Jill that I was  
7       eventually going to be gone, so I -- that would  
8       have been 2018. So it had to have been that  
9       year.

10                   Q       We'll come back to your leaving and  
11       how your experience in the chamber changed.  
12       But you said there were occasions in which you  
13       were in the executive mansion with the Governor  
14       and you were uncomfortable. Can you tell us  
15       about those?

16                   A       We were -- we would be at the  
17       mansion for any number of reasons, but then  
18       there were evenings and afternoons that we  
19       would go to the pool house for dinner or  
20       something or drinks or gathering. I don't know  
21       what you would call it. And I always just felt  
22       uncomfortable over there. It was more of a  
23       relaxed environment, with just that inner  
24       circle. Sometimes some other folks from  
25       Albany, yeah, I guess you can say were in the

Witness 5/19/21

1  
2 inner circle. But it just -- it -- I didn't --  
3 it was uncomfortable to be over there. I don't  
4 know.

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

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

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

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

Witness 5/19/21

1  
2 were the expectations for people in that group  
3 and I didn't -- I didn't want to be there.

4 Q Which women did you see sitting  
5 close to the Governor or with their arms around  
6 the Governor?

7 A It -- I would say not just at the  
8 mansion, but throughout my time it would have  
9 been Senior Staffer #3 , Senior Staffer #2 , Senior Staffer #1

10 Senior Staffer #1 , something or other, I  
11 don't know how to say her last name and then --  
12 I can't think of other names right now, but I  
13 can always let Zoe know who else -- who else I  
14 think of.

15 Q Did you ever see the Governor kiss  
16 any of those women?

17 A I have never seen the Governor kiss  
18 anybody on the lips. If he would have been  
19 like the -- the side, Italian greeting. I  
20 don't know what you call that.

21 Q Did you ever see -- yeah. The  
22 double kiss. Did you ever see the Governor  
23 touch any of those women in a way that you felt  
24 was not appropriate for the work environment?

25 A They were -- they were just close.

1                           Witness 5/19/21

2       It -- he had -- like -- would he put his arm  
3       around any one of those women, probably, yeah.  
4       I don't recall a specific instance right now  
5       where I saw him. I have seen **Senior Staffer #3** hang on  
6       him at a bar, at Dorrian's, at Super Bowl.

7                           There was one evening there was a  
8       storm, him and **Senior Staffer #1** went out for drinks, I  
9       think downstairs at Dock's or a place on 42nd,  
10      I don't remember which one, but they had dinner  
11      and drinks and they came back late and they  
12      were walking around barefoot in his office and  
13      I had to sit there until they got back, until  
14      he told me I could leave and it was just the  
15      two of them barefoot in his office. I think  
16      that was inappropriate. If I think of other  
17      instances, then I will let Zoe know, but I'm  
18      sorry.

19                    Q           It's okay. You said you saw **Senior Staffer #3**  
20      **Senior Staffer #3** hanging on the Governor at Dorrian's at  
21      the Super Bowl party. What specifically did  
22      you see?

23                    A           She had been drinking and she had  
24      her arms around him, was kind of hanging on  
25      him.

1                                      Witness 5/19/21

2                   Q        So both of her arms around him?

3                   A        Yeah, like around two (indicating),  
4 like grabbed him like how you would grab your  
5 partner or your spouse or, very casually, not a  
6 way I would ever grab the Governor. I thought  
7 that was inappropriate.

8                   Q        Did -- on that occasion, did you see  
9 **Senior Staffer #3** sit on the Governor's lap?

10                  A        I don't know. I think I heard that,  
11 but I don't -- I don't recall seeing it. I --  
12 if it happened -- if that was said that it  
13 happened I believe that it could be true. I  
14 would believe that.

15                  Q        Who did you hear that from?

16                  A        Maybe **[REDACTED]**. I mean there were  
17 several phone conversations between the old  
18 staff just reminiscing on some of these -- like  
19 do you remember -- can you -- do you -- are you  
20 in contact with this person, but I don't -- I  
21 don't know. It could have been **[REDACTED]**. It could  
22 have been **[REDACTED]**, but I -- I believe that if  
23 it -- if they said that it happened, I believe  
24 that it could be true.

25                  Q        And when you say there were several





Witness 5/19/21

1  
2 car, what he commented on me -- on my attire,  
3 what I look like. He wanted me to email  
4 commissioners one time asking if they -- more  
5 than once, asking if they liked their job and  
6 wanted to keep their job because they did  
7 something that he didn't like or didn't follow  
8 his directions and that made me uncomfortable.  
9 The way I had to communicate some of his  
10 messages made me uncomfortable to others.

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

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

18 Q Did the Governor ever yell at you?

19 A Yes.

20 Q Tell us about that.

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

Witness 5/19/21

1  
2 drop or -- and he would -- he had said that if  
3 I couldn't figure out the fucking phones, he  
4 would end my career. If photos got into the  
5 thank you note process or pile that he didn't  
6 look good in or you could see his bald spot or  
7 something was wrong, I would get yelled at.

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

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

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

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

1                                  Witness 5/19/21

2       doubt in my mind that I was hired based on what  
3       I look like. I think that was belittling.  
4       I -- I don't -- I don't -- I don't know. Can  
5       we take a break?

6                   Q       Yes. We can. Why don't we go off  
7       the record, please.

8                   THE VIDEOGRAPHER: Standby. We are  
9       now off the record. The time is 11:41  
10      a.m.

11                               (Brief recess taken.)

12                   THE VIDEOGRAPHER: We are now on the  
13      record. The time is 11:55 a.m. back from  
14      break.

15   BY MS. PARK:

16                   Q       A while ago, Kaitlin, you told us  
17      that at some point the mean girls were treating  
18      you meanly and you told the Governor that. How  
19      were the mean girls treating you?

20                   A       They were dismissive, short. They  
21      weren't helpful. They would -- they -- there  
22      was no like office comradery to help each other  
23      or to do your job. They didn't call me names.  
24      They just -- dismissed me, like I didn't exist.

25                   Q       Was it all of the mean girls or did

1                                Witness 5/19/21

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

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

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

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

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

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

1   Witness 5/19/21

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

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

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

Witness 5/19/21

1  
2 Q Did your role in the executive  
3 chamber change at any point?

4 A It did.

5 Q When and how did it change?

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

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

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

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

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

Witness 5/19/21

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

11 Q This is when you were reporting to  
12 [REDACTED] ?

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

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

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

Witness 5/19/21

1  
2 or the other. I think she just did what she  
3 was told. And I came to the understanding  
4 because of what I had experienced in how he  
5 treats other people and how he pushes them  
6 aside when he's done, how they do that, how  
7 they talk about people behind their backs and  
8 then I went to **Staffer #5** a lot to ask  
9 questions about his past experience in and  
10 workplace knowledge and history about how  
11 people operated and would -- based on his  
12 feedback or response came to that conclusion as  
13 well.

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

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

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

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



Witness 5/19/21

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

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

4 [REDACTED] --

5 [REDACTED] --

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

9  
10 Q But you did go?

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

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

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

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

25 A Yes. I went around the corner and I

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Witness 5/19/21

sat in the same perimeter office with Staffer #6  
Staffer #6 and .

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

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

Q Okay. When you were reporting to  
what work were you doing?

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

I don't recall a task that  
gave me. I don't think she was being unkind or  
demeaning or anything in that. I just don't



1                                 Witness 5/19/21

2     came to you already prepared?

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

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

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

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

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

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Witness 5/19/21

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

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

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

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

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

1    Witness 5/19/21

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

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

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

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

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

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

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

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

1                                   Witness 5/19/21

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

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

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

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

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

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

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

Witness 5/19/21

1  
2           A           She may have asked about the type of  
3 work, yeah, because my [REDACTED]  
4 [REDACTED], so I think we had the conversation  
5 about where I could use my degree. But I -- I  
6 can't say for certain if that happened. I -- I  
7 think it did.

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

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

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

16          A           Mm-hm.

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

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

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

24          A           Mm-hm.

25          Q           And Hyatt might be able to help us,



Witness 5/19/21

1    Witness 5/19/21  
2        but I want you to look at what, at least in my  
3        binder is labeled page 186.  It's an email from  
4        Jill to you on December 27th, 2017.

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

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

9    MS. PARK:  Thank you.

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

12  BY MS. PARK:

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

15                        A            Okay.

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

18                        A            When I found it I recalled, yes.

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

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

Witness 5/19/21

1  
2 Q And she proposes -- she says because  
3 you referenced [REDACTED] being an area of  
4 interest, we did some looking into [REDACTED]  
5 positions. Do you remember referencing [REDACTED]  
6 [REDACTED] as an area of interest in your  
7 conversation with Jill?

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

25 Q Okay. So at some point you think

Witness 5/19/21

1  
2 you remember -- thinking about or conveying to  
3 Jill that you would be interested in the  
4 [REDACTED] or [REDACTED]  
5 [REDACTED]; is that right?

6 A In [REDACTED], where I am, yes.

7 Q In [REDACTED], okay. And so this email  
8 she says they did some looking into [REDACTED]  
9 positions. And they have a great new president  
10 and CEO. They would like to discuss it more.  
11 What happens after this email?

12 A I -- I just waited to hear back from  
13 Jill. I wasn't in the conversations between  
14 the chamber and [REDACTED] and when they were --  
15 when they're finding a position for me, I had  
16 only spoken with Jill and then when Jill, I  
17 guess, narrowed in on [REDACTED], she had  
18 additional conversations with [REDACTED] and then  
19 eventually I went up to Albany and interviewed  
20 at [REDACTED].

21 Q Do you remember when you interviewed  
22 at [REDACTED]?

23 A No. I could probably find that date  
24 somewhere.

25 Q Why don't you turn to the next page

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Witness 5/19/21

in that electronic exhibit binder and we will mark the email that's on the next page as Exhibit 9.

(Whereupon document was marked Exhibit 9 for identification as of this date.)

Q It's an email from Jill, two e-mails from Jill to you on January 24th.

A Yep.

Q Do you think you interviewed before this email was sent?

A I probably did because her email said that they're expecting me to start tomorrow.

Q And tell us about who you interviewed with?

A I went up to Albany. I took the train up and interviewed with [REDACTED], [REDACTED] [REDACTED], [REDACTED] and I believe [REDACTED] was in that interview, but maybe not.

Q And what was the role that you were interviewing for?

A I was going to be on the government

Witness 5/19/21

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affairs team, reporting to [REDACTED].

Q And is that the role you eventually accepted?

A Yes.

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

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

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

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

1                                 Witness 5/19/21

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

8                 Q       Do you feel --

9                 A       Sorry.

10                Q       ██████████. That's okay. Did  
11       you deal where anyone else in the executive  
12       chamber as part of your transfer or transition  
13       to ██████?

14                A       If I did, it would have been ██████  
15       ██████████ or -- I forgot the woman's name. I think  
16       ██████████ maybe.

17                Q       ██████████

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

20                       THE VIDEOGRAPHER: Excuse me.

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

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

1                                 Witness 5/19/21

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

4                                 (Brief recess taken.)

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

9   BY MS. PARK:

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

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

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

17          A       Yes. That was --

18          Q       Why did you send?

19          A       Sorry?

20          Q       Sorry.

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

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

Witness 5/19/21

1  
2           A           The -- their office was across from  
3 where I sat and so I had been -- I mean they  
4 looked at me all day, so I had become friendly  
5 with them and whenever I was with the Governor,  
6 they were always there and they were just kind  
7 people as well, so they were at times the only  
8 people who I could speak to or felt like I was  
9 a person, I could be, I existed to somebody.  
10 We -- we just -- they knew how tough that role  
11 was and we became friendly.

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

15           A           Yes.

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

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

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



Witness 5/19/21

1  
2 I -- I didn't. It was basically -- don't say  
3 you don't know something, always make sure you  
4 will find out the answer and don't take things  
5 personally was one of them, it's not me and  
6 then some other advice, I just -- I don't  
7 recall, but it was the gesture and the kindness  
8 was meaningful.

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

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

Witness 5/19/21

1  
2 Governor.

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

5 A Sorry. It's just eventually, when I  
6 was -- so I was on the government affairs team  
7 and then eventually [REDACTED], who was  
8 the [REDACTED], I  
9 think he's now just the chair of the [REDACTED]  
10 board, but he -- his team needed support, so  
11 they had asked me to split my time between his  
12 team and the [REDACTED] government affairs team,  
13 so I had assumed that role and -- but before I  
14 accepted, I said that like I didn't want to  
15 have any sort of communication with the  
16 Governor's team.

17 If the Governor were to call, I  
18 wasn't going to answer the phone, like I  
19 just -- there needed to be a separation. And  
20 they didn't really understand why because I  
21 didn't disclose everything at that time at  
22 first, but they were fine with it and they were  
23 helpful and -- and understanding and then there  
24 were a couple of occasions where we needed to  
25 have a meeting at 633 Third Avenue, the

1                                   Witness 5/19/21

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

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

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

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

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

1   Witness 5/19/21

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

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

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

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

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

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

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

18           A         No, I don't.

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

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

Witness 5/19/21

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

8 Q Who is your current boss?

9 A [REDACTED].

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

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

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

Witness 5/19/21

1  
2 working on this road map project, the [REDACTED]  
3 [REDACTED] team. They needed help and  
4 then the [REDACTED] because I had that same  
5 thought about finance and make some money one  
6 day and I interviewed with each of the teams  
7 and I just -- I picked [REDACTED] team because [REDACTED]  
8 is a very relaxed -- he's not like a micro  
9 manager. He's pretty easy going and so I -- I  
10 kind of thought that that would best suit my  
11 needs in a boss, management.

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

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

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

Witness 5/19/21

1  
2           A           Yes.   The Governor was interested  
3 in -- so the -- it wasn't common for the  
4 Governor to interact closely with other  
5 agencies' staff at Lindsey's role, in her  
6 position.

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

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

Witness 5/19/21

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him.

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

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

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



Witness 5/19/21

1  
2 to day. That never really came -- turned into  
3 anything. We didn't sit on the same floor and  
4 I couldn't really leave my desk, so it was just  
5 whenever she was there waiting to go into his  
6 office when we connected, but it just wasn't  
7 the norm.

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

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

25 Q Lindsey tweets, your boyfriend

1                                   Witness 5/19/21

2           pointed it out to you and then what happens?

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

8           Q           And then what happened?

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

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

23          A           (Indicating).

24          Q           Right. Did you leave that tweet up?

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

Witness 5/19/21

1  
2 it maybe when I saw Linda and Annabel looking  
3 at my LinkedIn or after Staffer #6 and I spoke. I  
4 deleted it in that timeframe because I was  
5 worried about getting fired. I deleted it. I  
6 told my boss what happened. I told [REDACTED]  
7 [REDACTED] what happened. The conversation  
8 was this is what I did. I would do it again.  
9 I don't regret it, but I -- the tweet has been  
10 deleted and I accept whatever happens because  
11 of this.

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

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

Witness 5/19/21

1  
2 started tweeting at him and I think I've tagged  
3 Cuomo in some of those, but that was not  
4 related to anything to do with this. It was --  
5 it was dangerous where I was living in midtown.

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

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

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

25 Q So between the time Lindsey Boylan

Witness 5/19/21

1  
2 tweets in December 2020 and the time you see --  
3 you speak to someone at [REDACTED] about the  
4 tweets, had you been in contact with any  
5 lawyers? I don't know what you talked about.  
6 I just want to know if you were in contact with  
7 any lawyers.

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

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

1   Witness 5/19/21

2       name out there and I needed to do it  
3       anonymously because I still work for the state.

4               Q           Do you remember the name of that  
5       lawyer?

6               A           It was Jean.   If you want, I can  
7       Google it real quick and try to pull her last  
8       name, but it was Jean something.

9               Q           Nope, that's okay.   Did that lawyer  
10       tell you how many other individuals that lawyer  
11       was aware of who had similar experiences to  
12       Lindsey?

13              A           At that time, no, I don't think so.  
14       She -- she was kind of being a shark.   She was  
15       trying to get -- have me use her as my  
16       representation and it just wasn't -- I wasn't  
17       doing that.   I wasn't interested in that.   I  
18       didn't see a need for me to have representation  
19       at that time.

20              Q           Did she convey to you in substance  
21       at all that there was a group of people who had  
22       similar experiences to Lindsey?

23              A           I don't -- I don't think so.   I  
24       think if she said anything and this is what  
25       several people had said, they said they

1                                  Witness 5/19/21

2          wouldn't be surprised if more people started  
3          speaking up.  I don't recall if she said  
4          specifically that she knew of other  
5          individuals.

6          Q          And then you said you saw Linda  
7          Lacewell and Annabel Walsh looking at your  
8          LinkedIn and there was, after that, or sometime  
9          near that time a phone call made to you from  
10          Staffer #6 .  Tell us about the phone call  
11          from Staffer #6 .

12          A          Yes.  She called.  I didn't have the  
13          number saved in my phone.  I didn't answer it,  
14          but I had known that they were looking at my  
15          LinkedIn and it was an Albany number and so I  
16          was a little anxious and then Staffer #6 -- there's  
17          a text exchange, saying that she wanted to talk  
18          on the phone because of the tweet that I had  
19          sent out about Lindsey and then we got on the  
20          phone and she -- I played dumb.  I said I  
21          don't -- she said that the press corps in  
22          Albany had seen the tweet and I had -- I was  
23          like I don't know how that would have happened.  
24          Nobody follows me.  Nobody pays attention to  
25          what I do on Twitter.





Witness 5/19/21

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**Staffer #6** had recorded that phone call?

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

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

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

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

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

Witness 5/19/21

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Q Okay. So let's start with your boss [REDACTED]. What did you tell him?

A I told him about the tweet. I told him what I had done, what was happening with Linda and Annabel. And then the conversation with Staffer #6. And I have tried to explain to people how manipulative these individuals can be, like since I've left and I -- I don't think anybody ever believed me until -- and I don't think [REDACTED] believed me until he saw it finally happening, unravel with the situation because I had said no, this -- like they're -- they're working -- they're doing something in the back. I know they are. This is how they operate. This is what they do and he tried to just assure me that they weren't, like they don't -- they're not paying attention to me that closely and I don't have anything to worry about.

I think he was being naive. He probably thought I was being irrational and paranoid, which I probably was a bit, being paranoid.

Q And then you said you -- you spoke to [REDACTED]. Was [REDACTED] on that call as

Witness 5/19/21

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well?

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

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

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

Witness 5/19/21

1  
2           A           It is possible I told her about  
3 something. I don't -- I did not -- I don't  
4 believe that I went into -- into details like I  
5 did with [REDACTED] in that moment. She had  
6 called me late and I was trying to get off the  
7 phone because I had a tee time. I was at the  
8 golf course trying to go play golf and we were  
9 late, so I was -- I was trying to be quick with  
10 it and tell her what was happening and get off  
11 the phone.

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

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

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

24           A           [REDACTED]

25 [REDACTED]

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Witness 5/19/21

and --

Q Kaitlin, can we -- can we stop? I just want to go off the record for a second.

THE VIDEOGRAPHER: Standby. We are now off the record at 1 p.m.

(Discussion held off the record.)

THE VIDEOGRAPHER: We are now on the record. The time is 1:02 p.m.

BY MS. PARK:

Q Kaitlin, I will ask again. Why did you not consider your experience with the Governor to be sexual harassment?

A I don't consider any of my experiences to be sexual harassment or anything else because I don't like that victim mentality.

Q Do -- do you know what the legal definition is of sexual harassment?

A I have been told what it is. I could not recite to you what the legal definition is of sexual harassment.

Q So in this conversation with [REDACTED], did you say anything to her about having or getting a lawyer?

Witness 5/19/21

1  
2 A No because I could -- I didn't think  
3 I needed one and I couldn't afford one. It was  
4 never something I had entertained because I --  
5 I knew right away that I couldn't afford it.

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

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

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

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

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

Witness 5/19/21

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retaliation?

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

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

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

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

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

1                                    Witness 5/19/21

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

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

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

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

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





Witness 5/19/21

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

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

Witness 5/19/21

1  
2 could speak to Judith and sort this out because  
3 I didn't say that and that could have ruined my  
4 life, my career if it went around that I said  
5 that the Governor sexually harassed me when I  
6 never said that and we hung up.

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

1                   Witness 5/19/21

2                   I never told anybody -- she said  
3                   that I told somebody in chamber that and I  
4                   never told anybody in chamber that. I never  
5                   told anybody that, so I don't know. She said  
6                   okay, if you want to drop this, we can do that.  
7                   This will all go away right now and I said I  
8                   want to drop this. I didn't say those things.  
9                   I don't have a lawyer. And yes, I said I asked  
10                  that if something were to come up again, if she  
11                  would reach out to me directly because I  
12                  honestly had no intention at that time of  
13                  retaining counsel. I couldn't afford it and  
14                  she said yes.

15                 Q           And this conversation with -- well,  
16                 had Judith Mogul tried to reach out to you  
17                 prior to that conversation in January?

18                 A           No and -- well, if she did, it was  
19                 on a number that I didn't recognize and didn't  
20                 answer, but no. But she had told [REDACTED] that she  
21                 couldn't reach out to me because she heard that  
22                 I retained counsel and it would be an ethical  
23                 issue.

24                 Q           But you wouldn't recognize her --  
25                 her phone number?

1                                      Witness 5/19/21

2                      A              No.

3                      Q              In the conversation you -- when you  
4 spoke to Ms. Mogul, did she tell you that it --  
5 it didn't matter whether you wanted something  
6 to be done, that there were requirements in the  
7 state regarding reports of workplace  
8 misconduct?

9                      A              No, she said that if I wanted it to  
10 go away, it would go away.

11                     Q              Did she tell you anything about you  
12 being protected from retaliation?

13                     A              I -- I -- I don't even think that  
14 was a topic of that conversation. I think it  
15 was a -- I didn't say these things, I'm sorry  
16 for wasting everybody's time. These are not  
17 true and I'm -- clear the air and I want to be  
18 done with this.

19                     Q              Did she ask you for any information  
20 regarding your actual experience in the  
21 executive chamber, regardless of how you  
22 characterized it?

23                     A              No. She didn't want any information  
24 from me.

25                     Q              And what makes you say she didn't

Witness 5/19/21

1 want any information from you?

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

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

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

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

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

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

23 A Yes, yes.

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

Witness 5/19/21

1  
2 A Yeah, Lindsey had asked if I would  
3 speak to -- no, the -- the first -- I don't  
4 know what happened first. Lindsey asked me to  
5 speak to, I believe, Rebecca Traister first and  
6 then Ronan Farrow or vice versa and then at  
7 some time -- maybe at the same time the New  
8 York Times reporter Louis -- I don't  
9 remember --

10 Q Luis Ferre-Sadurni?

11 A Yes. He had wanted to have a  
12 conversation with me as well and I spoke with  
13 him off the record on the phone. I -- and then  
14 I went forward and had -- and had a  
15 conversation with Rebecca Traister.

16 Q And did that -- sorry, go ahead.

17 A Sorry. It was -- I agreed to let  
18 Rebecca tell the story because of her story  
19 with -- when she approached me with the story,  
20 told me about her storyline. It was more about  
21 the power dynamic and it wasn't so heavily  
22 focused on sexual harassment and I -- that is  
23 why I -- I decided that it would be okay for  
24 her to do this because that is what I believed  
25 what was wrong and I didn't want it to happen

Witness 5/19/21

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to anybody else.

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

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

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

A Yes.

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

A Yes.

Q When you -- can you open Exhibit 7



1                                 Witness 5/19/21

2       again and Hyatt perhaps can help me.   I'm  
3       looking at what I think is page 7 of a text  
4       message chain between you and someone named  
5       Rebecca from February 26th, beginning at 10:59  
6       a.m.

7                A           That's Rebecca Traister.

8                Q           Can you see that page?

9                A           Yes.

10             Q           And for the record, I'm going to  
11       mark this -- these text messages with Rebecca  
12       Traister as the next exhibit.

13                         (Whereupon document was marked

14           Exhibit 10 for identification as of this  
15           date.)

16             A           Sorry, the -- the time stamp you  
17       have on this text is 3:32.

18             Q           Mine is 10:59 -- oh, at the very top  
19       it says 3:32, on the left-hand corner.   Is that  
20       what you're looking at?

21             A           Yes, yep.

22             Q           Okay.   If you turn to the second  
23       page of that, at the top, underneath the R  
24       Rebecca, it says Friday, February 26th 10:59  
25       a.m.?

1 Witness 5/19/21

2 A Yep.

3 Q Okay. So this is a text message  
4 between you and Rebecca Traister from New York  
5 Magazine and you sent her a list of 15 names.

6 A Yep.

7 Q Who are the people on this list?

8 A These are the people that I  
9 identified that might have a story, that might  
10 speak to her, that would be able to speak to  
11 that dynamic or that -- speak to the story that  
12 she wanted to write, but I didn't think that a  
13 lot of these people would ever talk to her. It  
14 was just a list of people that I thought would  
15 maybe or could.

16 Q Can you go through the list and tell  
17 us what you know about the individuals on this  
18 list personal experience in the executive  
19 chamber, meaning what did you observe or what  
20 did they tell you or what did you hear about?  
21 Start with [REDACTED].

22 A Yeah, [REDACTED] was the -- her role --  
23 her title might have changed once while she was  
24 there, but she was [REDACTED]. She came  
25 from [REDACTED]. She had a good

Witness 5/19/21

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

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

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

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

1    Witness 5/19/21

2                  Cuomo in his office.

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

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

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

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

23                 A             Mm-hm.

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

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Witness 5/19/21

the executive mansion?

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

Q Who did you hear that from?

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

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

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

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

Witness 5/19/21

1  
2 Staffer #5 would know that, should know that. I  
3 think they were talking. But [REDACTED] father,  
4 I believe, was a trooper and so that was like  
5 the other reason why people were kind of  
6 annoyed that she didn't -- because of the role  
7 her father had.

8 [REDACTED], he was a -- I think  
9 he ran Bernie Sanders campaign. He -- I don't  
10 know who found him or how he came on board, but  
11 he eventually started working in the chamber  
12 and was one of the people who came on board who  
13 just couldn't believe like how operate -- the  
14 day-to-day of the chamber and how anything got  
15 done. [REDACTED] and [REDACTED] were close and then so I  
16 had asked [REDACTED] if I could help with anything  
17 because I had no work to do.

18 [REDACTED] was an Obama staffer. Same  
19 situation. Came in, couldn't believe what was  
20 happening and we kind of commiserated at the  
21 time and he -- he helped with -- or he did the  
22 briefing books and so he would have to hand off  
23 the briefing -- he was supposed to be managing  
24 the process, I believe and then he -- the  
25 briefing books were supposed to come to me or

1                   Witness 5/19/21

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

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

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

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

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

Witness 5/19/21

1  
2 genuinely didn't understand her role and what  
3 she contributed. I don't know. I just knew --  
4 I could tell that he liked her.

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

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

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

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



1                   Witness 5/19/21

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

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

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

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

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

Witness 5/19/21

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

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

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

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

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

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

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

25 A They were just very close in a way

1                                      Witness 5/19/21

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

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

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

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

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

1 Witness 5/19/21

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

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

13 Q Who the Governor just hired?

14 A Yeah, yeah.

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

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

20 Q And was this the same general topic?

21 A Yes.

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

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

Witness 5/19/21

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week recently, but upstate, [REDACTED]  
[REDACTED].

Q Do you know Charlotte Bennett?

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

Q How did you connect with her?

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

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

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

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

1 Witness 5/19/21

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

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

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

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

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

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

1                                 Witness 5/19/21

2     with her allegations?

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

5                 Q         Have you been in touch with her  
6     since then?

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

12                Q         Do you know Alessandra Biaggi?

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

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

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

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

Witness 5/19/21

1  
2 bad the retaliation was from his office because  
3 I wanted to learn about that before I did  
4 anything publicly.

5 Q Was this before the New York  
6 Magazine article?

7 A Yeah. It was right after the tweet  
8 in December. Scheduling calendars, holiday, we  
9 never connected to talk about that, but that  
10 was my intent when I reached out to her.

11 Q Do you know any of the other women  
12 who have come forward publicly to make  
13 allegations against the Governor?

14 A I -- so the -- I know -- no.

15 Q Have you been told anything about  
16 who the woman is who has alleged that the  
17 Governor groped her breasts in the executive  
18 mansion?

19 A Have I been told anything about her,  
20 like who -- what her name was prior? No, I  
21 asked --

22 Q Anything about her?

23 A No, I asked people because Ronan had  
24 asked me and I wasn't going to give Ronan a  
25 story and so I was trying to be helpful and



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Witness 5/19/21

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

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

A Yes.

Q But you never found out who it was?

A I think it is in the subpoena.

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

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

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

A Do you want me to pull it up?

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

A [REDACTED] and I discussed who it might

1                                      Witness 5/19/21

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

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

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

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

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

20                                      (Brief recess taken.)

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

24       BY MS. PARK:

25                 Q            Kaitlin, I asked you a number of

1    Witness 5/19/21

2        questions about inappropriate conduct --  
3        conduct by the Governor. You have given us  
4        lots of details about that.

5    Do you ever recall the Governor  
6        making comments about the size of his hands and  
7        implying what that might mean about the size of  
8        his genitals?

9            A            No, no.

10           Q            Do you recall observing the Governor  
11        ever ask someone to memorize song lyrics or  
12        sing for him?

13           A            No. When I started, we went to get  
14        drinks at a bar on Second Avenue and I had to  
15        do a toast to everybody, but I didn't have to  
16        memorize a song or do that.

17           Q            Who -- who was there for that?

18           A            Oh, it was the Governor. It was  
19        Melissa, Stephanie. I believe Jill DeSrosiers  
20        was there. [REDACTED] and [REDACTED] may  
21        have been there. Alphonso David, maybe Rob  
22        Mujica. It was just that close -- that close  
23        circle, Andrew Ball -- and Andrew Ball.

24           Q            How did you come to understand that  
25        you had to make a toast?

1    Witness 5/19/21

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

4            Q            And so what did you say?

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

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

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

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

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

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

Witness 5/19/21

1 I also knew that from when I worked for [REDACTED]  
2 [REDACTED], anything campaign related had to be  
3 separate.  
4

5 Q Did you volunteer to work on the  
6 Cuomo campaign?

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

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

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

18 A Yeah, yes.

19 Q Who knows you're meeting with us  
20 today?

21 A [REDACTED], [REDACTED] [REDACTED]  
22 [REDACTED].

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

Witness 5/19/21

1  
2 to do this. And my -- my New York -- I call  
3 him [REDACTED]. He's the manager at  
4 [REDACTED]. I have become very close with his --  
5 him and his wife. He knows that I'm doing this  
6 today.

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

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

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

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

21 Q Can you hear me?

22 A Yes.

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

25 A The question was is there anything

Witness 5/19/21

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additional?

Q Yes.

A That we did not talk about today?

Q Yes.

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

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

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

A No, thank you.

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

A I understand.

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

A Thank you very much.

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Witness 5/19/21

Q We can go off the record.

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

MS. PARK: You can conclude.

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

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

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

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



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Witness 5/19/21

C E R T I F I C A T E

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

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

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



BRITTANY SALINE