

POSITION STATEMENT OF GOVERNOR ANDREW M. CUOMO
CONCERNING THE SEXUAL HARASSMENT ALLEGATIONS MADE AGAINST HIM

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TABLE OF CONTENTS

	Page
PRELIMINARY STATEMENT	1
FACTS	2
A. The Executive Chamber’s Working Environment and the Governor’s Efforts To Connect with Employees and Constituents.	2
B. Allegations Raised Concerning the Governor.	3
1. Lindsey Boylan	3
2. The Governor’s Interactions with Charlotte Bennett, a Survivor of Sexual Assault, Reflect His Family’s Experiences.....	11
3. The Governor Never Groped Ms. X	14
4. The Governor’s Interactions with Alyssa McGrath, Ana Liss and Kaitlin Were Unremarkable.....	21
5. Karen Hinton’s Twenty-Year-Old Allegation	23
6. Jessica Bakeman, Valerie Bauman, Anna Ruch and Sherry Vill	24
CONCLUSION.....	26

PRELIMINARY STATEMENT

I make this statement on behalf of my client Governor Andrew M. Cuomo to begin to set the record straight about the unfair and inaccurate findings of the Attorney General's Report. Regrettably, as the findings in the Report show, the investigators have directed an utterly biased investigation and willfully ignored evidence inconsistent with the narrative they have sought to weave from the outset. In coming to their conclusion, they ignored the Governor's testimony and substantial corroborating evidence, and were not candid about that fact at a press conference during which they announced their findings. We have just received and are viewing the Report and will supplement this statement. But even on a quick first review, it is clear that the Report purposefully omits key evidence.

The Governor has fully cooperated with an investigative process that he initiated and referred to the Attorney General with the specific directive to appoint independent investigators with no predisposition or bias. It had been his hope that the process would be fair and probe all aspects of these allegations.¹ Unfortunately, the release of the Report and today's press conference confirm that this has not been the case.

Until the series of tweets by Lindsey Boylan in December 2020 shortly after she announced her campaign for Manhattan Borough President, no one has ever advanced a charge of sexual harassment against the Governor—despite his having been in the public eye for decades, two FBI background checks, two Senate confirmations, and bruising political campaigns for state-wide elected office.

¹ Counsel for the Executive Chamber will address the fairness of the investigation.

The Governor has repeatedly made clear—including in his sworn testimony—that he never made any inappropriate sexual advances to anyone nor inappropriately touched anyone in a sexual manner. Today’s Report ignores facts and other key evidence.

FACTS

A. The Executive Chamber’s Working Environment and the Governor’s Efforts To Connect with Employees and Constituents.

The Governor made a commitment to deliver for the people of New York. He holds himself and his employees accountable. His leadership style is results-oriented. The Governor’s high expectations for his staff are the same irrespective of gender (or race, ethnicity, sexual identity or age, for that matter). And while the pressure and demands of that environment are not for everyone, it is telling that the Governor has built a first-rate, large team of trusted advisors who have remained by his side for decades. Indeed, women occupy the most senior posts in his administration, and he has more senior women in his administration than any previous governor of this state.

Given the stress that inherently comes with the job’s demands, the Governor strives to foster a strong sense of collegiality within his team. He is informal with his staff and banters with all employees, again, regardless of gender, in an effort to bring collegiality and levity to their high-pressure and demanding positions. He is interested in their lives. His close staff members have become his family, which is not uncommon when working in politics. President Barack Obama’s White House staffers went “everywhere in cliques” and lived together in Washington, D.C.: they believed that having close relationships with their colleagues “helped them to do their jobs” because they were “all part of a team.”¹ U.S. Senate Majority Leader Chuck Schumer similarly describes his staff as a “family,” enjoys teasing staffers about their relationship status and

encourages them to get married and have kids, and at least 22 former staff members have gotten married after working for the Senator.ⁱⁱ

The way he interacts with others is not gender-based: he has hugged or kissed male and female members of his staff, Al Gore, Bill Clinton and Hillary Clinton, Andrea Stewart Cousins and Carl Heastie, as well as constituents he meets on the street, and family and friends, as has been well documented. The Governor's interaction has been on public display virtually on a daily basis for nearly 20 years. (Ex. 1.) The Governor's conduct in this regard is unremarkable: Democratic and Republican politicians, male and female alike, use handshakes, hugs, and kisses to connect with others. (Ex. 2.)

B. Allegations Raised Concerning the Governor.

Certain individuals have come forward publicly with complaints about their interactions with the Governor. Those complaints are addressed below.

1. Lindsey Boylan

Lindsey Boylan worked in the Governor's administration from March 2015 through September 2018, serving as Chief of Staff and Executive Vice President at Empire State Development (ESD), and then as Deputy Secretary for Economic Development and Special Advisor to the Governor beginning in April 2018. Through a series of public statements that began with tweets in December 2020 and culminated in a February 24, 2021 *Medium* essay, Boylan has essentially claimed that she resigned from her state post due to a hostile work environment. This is inaccurate.

In her *Medium* essay detailing her sexual harassment allegations, Ms. Boylan asserted that she resigned in September 2018 after she "started speaking up for" herself and the environment around her "grew hostile."ⁱⁱⁱ She made similar claims about her departure in a series of tweets she made on December 5, 2020, less than two weeks after she announced her political campaign to run

for Manhattan Borough President. In those tweets she stated, among other things: “I had to quit three times before it stuck. . . .”; “And I’m a privileged person. I could opt out and eventually did.”; and “Yes I did not sign whatever they told me to sign when I left. Nope!”^{iv} Ms. Boylan has misrepresented the circumstances of her departure from the Executive Chamber.

On September 20, 2018, as memorialized in an internal memo, senior management at the ESD requested to terminate Ms. Boylan because of complaints received from numerous employees that Ms. Boylan was a “bully,” “yells,” “treats them like children,” and displays a lack of professionalism. The memo noted: “On an agency-wide basis, L. Boylan is reported to be hostile and a bully.” The memo reflected that an employee took time off to deal with health effects related to her interactions with Ms. Boylan, and an employee reported feeling like a “punching bag.” The memo also noted complaints that Ms. Boylan failed to follow office policies and procedures.

As a result of ESD’s request to terminate Ms. Boylan, on September 26, 2018, Ms. Boylan met with Alphonso David, Counsel to the Governor, where he counseled her about those complaints. While Mr. David did not request Ms. Boylan’s resignation or indicate that she was being fired or pushed out (and he told her as much), Ms. Boylan resigned and left the meeting. Several hours later, Ms. Boylan sent an email to Executive Chamber staff announcing her resignation effective immediately. Four days later, on September 30, 2018, Ms. Boylan reached out to Mr. David and asked for her job back. Mr. David did not agree to her request. Ms. Boylan subsequently attempted to directly contact the Governor by emailing his senior aide, Stephanie Benton, in what the Governor understood was an effort to get her job back. After consulting with Mr. David and others, the Governor never responded Ms. Boylan’s outreach. She did not get her job back. The Governor has not spoken to Ms. Boylan since she worked for him.

Ms. Boylan's allegation that the Governor and his staff tracked her whereabouts, forced her to attend events, and pressured her to ride on a state helicopter because of her gender, appearance, or some perceived romantic interest in her by the Governor is not true.^v

Ms. Boylan also claims that the Governor showed her a cigar box in the Governor's office gifted to him by President Clinton, asserting her belief that the Governor was subtly referring to the Monica Lewinsky affair by doing so.^{vi} In fact, the Governor has shown countless visitors over the years the same cigar box and many other significant gifts, all of which are displayed prominently in a conference room adjoining his personal office with other memorabilia.² The Governor enjoys showing guests the cigar box given to him by President Clinton because, as he tells guests, it contains the last "legal" cigars imported from Cuba before they were embargoed. Indeed, there is a handwritten note in the cigar box signed by Bill Clinton. The Governor does not doubt that he gave Ms. Boylan a tour of his conference room because he routinely gives visitors the same tour. He certainly did not intend to make Ms. Boylan uncomfortable or give Ms. Boylan any impression that he was romantically interested in her by showing that cigar box.

Ms. Boylan also complains that the Governor's gesture of sending roses and signed photographs to female staffers on Valentine's Day in 2017 was a "not-so-subtle reminder[] of the Governor exploiting the power dynamic with the women around him."^{vii} Nothing could be further from the truth. The Governor's office sent flowers as a good-faith gesture to dozens of dedicated

² The "Governor's office" that Ms. Boylan refers to is, in fact, a conference room *outside* the Governor's personal office at the Capitol. That conference room contains memorabilia that includes: the framed Senate roll call for his confirmation as Secretary of HUD; a framed American flag that flew over the U.S. Capitol on the outside day of his confirmation as Secretary, gifted to the Governor by Senator Ted Kennedy; a bust of Attorney General and Senator Robert F. Kennedy; a bust of President Franklin D. Roosevelt; at least five other cigar boxes gifted to him; a piece of terra-cotta from the New York State Capitol roof signed by a workman in 1867; an original poster from Franklin D. Roosevelt's reelection campaign in 1930; and the conference table used by his father, Mario Cuomo.

female employees in his office on Valentine’s Day, many of whom would not see their families or children that day, to thank them for their dedication.^{viii} His intention was to be thoughtful—and most certainly not, as Ms. Boylan contends, to “exploit[] the power dynamic with the women around him.”^{ix} Each year the Governor’s assistant assembled the list of senior staffers to receive the roses; the Governor did not review those lists. To the extent Ms. Boylan believes that the Governor somehow specifically singled her out for a rose, she is wrong.³

The Governor also flatly denies Ms. Boylan’s unfortunate claims that he once suggested that he wanted to “mount” her like a dog⁴ and that following a work meeting at his New York City office, he blocked her from leaving and kissed on the lips in a manner that was in “no way platonic” as she exited toward his open office door. The Governor’s assistant was sitting right outside the open door. This did not happen.

Ms. Boylan repeatedly posted on social media during and after her employment praising the Governor and his administration. (Ex. 4.) As just one of several examples, on August 15, 2018—just *one month* after she claims the Governor inappropriately kissed her on the lips in a non-platonic way in his New York City office with the door open and his assistant sitting right

³ Ms. Boylan also insinuates that she was somehow singled out for attention because she was given a signed photo of the Governor. To the contrary, it is a common practice within the Chamber to send signed pictures to staffers, male and female, after events at which pictures of them are taken. Staffers appreciate receiving these kinds of photos: as discussed below, one of the individuals who has raised concerns about the Governor, Ana Liss, displayed one such picture on her desk.

⁴ In an interview with the *The New Yorker* published on March 18, 2021, Ms. Boylan claims the Governor made this comment to her in February 2018, at a reception at the Mansion with many dozens in attendance in which he introduced his 14-week old puppy Captain to the public. This was a crowded evening event that took place on February 12, 2018, where the Governor hosted a conference of New York State mayors at the Mansion. Reporters were present, and there are many photographs and videos from this event. (See Ex. 3 (photo from event with Ms. Boylan in the crowd).) He made no such comment to Ms. Boylan. After he introduced his dog to the guests from a podium, the dog was taken out of the reception area and away from the guests.

outside the open door—Ms. Boylan tweeted, “Proud to work for a governor who takes women seriously.”^x Ms. Boylan’s praise of the Governor continued after her departure from the administration: as recently as March 2, 2020, she tweeted: “This is what we need in leadership. Thankfully we have it. #coronavirus #Covid_19,” and “Leadership is not perfect. But it takes responsibility and accountability and forthright communication. All of the above are on short supply in our federal leadership. But I am seeing it with our Governor.”^{xi}

Ms. Boylan’s tone towards the Governor changed in mid-March 2020, when she sent several texts to senior Executive Chamber personnel in late March 2020 threatening retribution against the Governor while she was in the midst of a primary campaign against Congressman Jerry Nadler. Those texts appeared to be prompted by Ms. Boylan’s belief that the Governor issued an Executive Order directly aimed at hurting her campaign. Specifically, on March 14, 2020, just one week after the Governor declared a state of emergency due to the COVID-19 pandemic, the Governor issued an Executive Order shortening the petition period for all primary election candidates in an effort to reduce the spread of the virus.^{xii} Although the Executive Order applied to *all* primary candidates statewide and was aimed at reducing transmission of a deadly virus in the earliest days of a global pandemic, Ms. Boylan appeared to take this order as a personal slight, sending text messages to senior aides to the Governor that stated, among other things:

- “Absolutely not helpful please relay that while we are ok, I see what the point is here and I will find a way to respond. Life is long. And so is my memory. And so are my resources” (*see* Ex. 5); and
- “Absolutely not helpful specific response to a tragedy but please relay that while we are ok, I see what the point is here and I will find ways to respond to the message. The future is coming after assholes” (*see* Ex. 6).

Following her unsuccessful bid to unseat Representative Nadler, on November 23, 2020, Ms. Boylan announced her candidacy for Manhattan Borough President. Less than two weeks later, beginning on December 5, 2020 and continuing on December 13, 2020, Ms. Boylan made claims of harassment against the Governor in the form of a series of tweets. These tweets followed other tweets, as noted above, in which Ms. Boylan had praised both the Governor and his leadership.

Soon after Ms. Boylan's tweets, the chief-of-staff to the Attorney General had conversations with Tripp Yang, a campaign consultant to Ms. Boylan's campaign who had also served as campaign consultant to the Attorney General's 2018 campaign. During those conversations, Mr. Yang discussed Ms. Boylan's allegations with the Attorney General's chief of staff, including purportedly discussing what he thought about them and what Ms. Boylan was doing within her campaign with respect to them. These communications between the Attorney General's chief-of-staff and the Boylan campaign about her harassment claims certainly raise questions as to whether the investigators—who work for the Attorney General—could ever credibly investigate what Tripp Yang was told by Ms. Boylan, and what the Attorney General's chief-of-staff learned from Tripp Yang about Ms. Boylan's allegations in December 2020 and the timing of those allegations in connection with her campaign. The Report makes no reference to this.

Moreover, in December 2020, several days after Ms. Boylan first accused the Governor of sexual harassment, Ms. Boylan's communications consultant quit the campaign because it was "not a good fit."^{xiii} A source was quoted in the news as saying "it was the last straw" for that communications consultant with respect to Ms. Boylan. The Report does not reference having interviewed anyone in Ms. Boylan's campaign.

On February 24, 2021, Ms. Boylan published her *Medium* essay making allegations against the Governor.^{xiv} It is noteworthy that Ms. Boylan’s campaign finance records reflect that Cade Leebron—a writer who has written about rape, rape culture, assault, and trauma, and whose pieces have also been posted on *Medium*—was paid \$10,500 by Ms. Boylan’s political campaign in the weeks just prior to the publication of Ms. Boylan’s *Medium* essay, and nearly \$32,000 by the campaign in total.⁵ This timing raises questions about who was the author of this essay and its purpose. The Report makes no reference to having subpoenaed any documents from the Boylan campaign relating to her claims of sexual harassment.

As her political campaign progressed, Ms. Boylan’s rhetoric grew more severe towards the Governor, and she employed her allegations against the Governor as a campaign theme and to attract voter support. For example:

- March 6, 2021 tweet: “Resign you disgusting monster, @NYGovCuomo”;⁶
- March 18, 2021 published interview with Ronan Farrow for *The New Yorker* where Ms. Boylan discussed her claims of sexual harassment, “embracing her new role as one of Cuomo’s most public and persistent critics,” and her political campaign;⁷

⁵ Specifically, Ms. Leebron was paid \$10,500 between January 25, 2021 and February 23, 2021, and an additional \$21,466.67 between March 5, 2021 and June 2, 2021. *See Search Candidate: Expenditures*, N.Y.C. Campaign Fin. Bd., <https://www.nyccfb.info/FTMSearch/Candidates/Expenditures?ec=2021&cand=2465&ir=Leebron%2C%20Cade&trans=F> (last accessed August 3, 2021).

⁶ Lindsey Boylan (@lindseyboylan), Twitter (Mar. 6, 2021, 9:34 p.m.), <https://twitter.com/LindseyBoylan/status/1368389610276028421>.

⁷ Ronan Farrow, *Cuomo’s First Accuser Raises New Claims of Harassment and Retaliation*, *The New Yorker* (March 18, 2021), <https://www.newyorker.com/news/news-desk/cuomos-first-accuser-raises-new-claims-of-harassment-and-retaliation>.

- March 24, 2021 tweet: “Abuser of power. Rape culture king. @NYGovCuomo”;⁸
- March 26, 2021 speech posted to campaign Facebook page: “I’m Lindsey Boylan. I’m a candidate for Manhattan Borough President, but you likely know my name from the headlines. Please know, like all survivors, I am so much lower than the person that you read about in the news. It was an incredibly difficult decision to tell my story of harassment that I experienced while working for the governor of New York”;⁹
- May 10, 2021 speech: “I’m Lindsey Boylan. I’m running for Manhattan Borough President. . . [Y]ou may have heard of me recently. I’m fighting my own battle against abuse of the system, abuse of power. The Governor of New York is an abuser. . . .”¹⁰

Ms. Boylan’s credibility should be weighed also against her recent tweets during this investigation. For example, during the Governor’s testimony on Saturday July 17, 2021 at his New York City office, Ms. Boylan tweeted at 4:12p.m.: “Riddle me this, why was Judge Janet DeFiore meeting with @NYGovCuomo today, of all days, for 6 hours in NYC.”¹¹ This tweet is demonstrably false: the Governor did not meet with Chief Judge DiFiore at all that day. Indeed, the Governor was giving testimony that day to the Attorney General’s investigators.

Ms. Boylan’s hyperbolic tweets have also bordered on the absurd and flatly contradict the praise she continued to heap on the Governor, even after she stopped working for him, right up

⁸ Lindsey Boylan (@lindseyboylan), Twitter (Mar. 24, 2021, 12:32 p.m.), <https://twitter.com/LindseyBoylan/status/1374761026596569088>.

⁹ Lindsey Boylan for Manhattan, Facebook (Mar. 26, 2021), <https://www.facebook.com/347949635853274/videos/469259011162904>.

¹⁰ Ernest Chirico, Facebook (May 10, 2021), <https://www.facebook.com/1326935285/videos/10220051921631466>.

¹¹ Lindsey Boylan (@lindseyboylan), Twitter (July 17, 2021, 4:12 p.m.), <https://twitter.com/LindseyBoylan/status/1416490902764277768>.

until her perceived slight during her unsuccessful primary campaign against Rep. Nadler. For example: “Honestly, I don’t care who stands next to the governor if they are about ending gun violence while not further criminalizing young black and brown men and disinvesting in their communities. Just don’t stand too close to him for too long if you’re a younger woman.”¹² And: “I just can’t sleep. I keep thinking about the ongoing, pervasive abuse of power that @NYGovCuomo exhibits daily. Forget how it has affected me. I can’t stop thinking how it affects all New Yorkers, particularly our most vulnerable, on a daily basis. It’s rotten to the core.”¹³ And: “When a monster tries to grab every branch on his way back down to earth. So embarrassing. <https://nypost.com/2021/07/26/cuomo-claims-victory-amid-nursing-home-sex-harassment-probes>.”¹⁴

Ms. Boylan’s agenda and motivations are obvious.

2. The Governor’s Interactions with Charlotte Bennett, a Survivor of Sexual Assault, Reflect His Family’s Experiences

Charlotte Bennett worked in the Executive Chamber as an administrative/briefing assistant. Ms. Bennett has claimed that the Governor was “grooming” her for a relationship in his interactions with her and he sexually harassed her. Although the Governor very much regrets that she feels that way, nothing could be further from the truth.

As she has disclosed publicly, Ms. Bennett told the Governor that she was a survivor of sexual assault and that one of the reasons she joined the administration was due to his work

¹² Lindsey Boylan (@lindseyboylan), Twitter (July 14, 2021, 6:49 p.m.), <https://twitter.com/LindseyBoylan/status/1415443253453901837>.

¹³ Lindsey Boylan (@lindseyboylan), Twitter (July 17, 2021, 10:56 p.m.), <https://twitter.com/LindseyBoylan/status/1416592755963404292>.

¹⁴ Lindsey Boylan (@lindseyboylan), Twitter (July 27, 2021, 4:26 p.m.), <https://twitter.com/LindseyBoylan/status/1420118397912768516>.

protecting victims of sexual assault.^{xv} The Governor has seen up close the devastating consequences of sexual assault: a close family member was the victim of a sexual assault similar to Ms. Bennett's experience, and the Governor has since spent years learning from therapists and experts about this issue because of that traumatic event. The Governor shared this with Ms. Bennett. Given that experience and perspective, the Governor tried to support and mentor Ms. Bennett. He is saddened that anything he said to her, which came entirely from a place of empathy and compassion, made her uncomfortable.

Ms. Bennett asked for the Governor's input for a speech she was giving at her college about her sexual assault at that school. The Governor was willing to help Ms. Bennett because of his prior discussion with her about her experience and his close family member's experience. He discussed with her how he would deliver the speech, including delivering it in a forceful manner by pointedly emphasizing to her audience the powerful words that she was raped and then violated second time by her school in how they handled her assault. He remembers that Ms. Bennett expressed discomfort with the manner in which he delivered the speech he thought she should give. She told him that he was overpowering her voice. The Governor heard her and stopped making suggestions because of her unease.

Ms. Bennett claims that the Governor asked her about her dating habits and she understood his inquiries to be motivated by a romantic interest in her.^{xvi} To the contrary, the Governor asked some questions about her personal relationships entirely out of concern for Ms. Bennett's well-being at a particular point in time after the Governor received information that concerned him. While the Governor provided the investigators with more detail on this specific topic during his testimony, the Governor does not intend publicly explain those details out of respect for Ms. Bennett and her privacy. Nevertheless, Ms. Bennett's contemporaneous interpretation of her

interactions with the Governor as him acting “as a father figure” and not “anything sexual” are entirely consisting with his intentions.^{xvii}

Ms. Bennett referenced a conversation with the Governor in which she told him that she was thinking about getting a tattoo.^{xviii} The Governor remembers this conversation and suggested to her that it was a decision she may regret later in life and that if she was going to get a tattoo, she should consider getting it someplace on her body where no one could see it in case she did come to regret it. He did not tell her to put the tattoo on her “butt” or chest area. He told her that the New York State Police has a tattoo policy that a tattoo may not be visible while the member is in uniform.

The Governor recalls Ms. Bennett discussing with him early in the pandemic that she was isolated working in Albany and did not feel welcome in the group of junior staffers in the Executive Chamber who socialized together outside of work hours. The Governor made a point to suggest to her ways to invite herself into the group, including mentioning two junior staffers the Governor thought would be welcoming and inclusive of her if she asked to join the post-work gatherings. The Governor thought it would be good for Ms. Bennett to assimilate into the larger group to avoid her feeling of isolation, and actively encouraged her to take the initiative and do so.

The Governor also spoke with Ms. Bennett about the effects of the COVID-19 pandemic on mental health. He discussed with her, as he had with many others, the physical loneliness and isolation caused by the pandemic.^{xix} His comments had nothing to do with a desire to be physical with Ms. Bennett. He remembers speaking with her about her own living situation during the pandemic and the isolation, and simply wanted to share what he believed was a feeling felt by many others during this difficult time.

On one occasion during the COVID-19 crisis, Ms. Bennett told the Governor that she had reviewed his social media accounts and that “all these women want to date you.” The Governor, who was used to staff members and his family regularly joking with him about this same topic at that time, remembers jokingly asking Ms. Bennett to find him a good candidate. The Governor was bantering with her—in a humorous way—when she raised the topic of his personal life, just as he had done with others who made similar comments to him. He denies making any statement to Ms. Bennett that implied he wanted to date her.

The Governor understands that Ms. Bennett took his comments and conversations with her to mean something else. He never intended to make Ms. Bennett feel uncomfortable or suggest anything untoward in what he thought was a paternalistic and mentoring relationship. Far from it. He is deeply saddened that his efforts to help her have now appeared to hurt her. The Governor did relate to Ms. Bennett through his experience with his family member who was also a victim of sexual assault, which is why he engaged with her in the ways that he did. In retrospect, he understands that he should not have engaged in such personal discussions with her even if his intent was to be helpful and came from a place of compassion and concern.

3. The Governor Never Groped Ms. X

Ms. X is one of several administrative assistants to the Governor, who had only begun to work more directly with him during the COVID pandemic. Although the two did not work together extensively, their interactions were pleasant, familiar, and the two engaged in friendly banter.

The Governor was stunned by her claim made for the first time in early March 2021 (after Lindsay Boylan and Charlotte Bennett’s claims were made public) that he groped her breast under her shirt and over her bra in his Mansion office during a workday in November 2020. This claim is false, as the Governor has stated repeatedly and unequivocally. Ms. X retained a personal injury

lawyer who contacted the Executive Chamber on March 8, 2021, claimed that the Governor had groped her breast in his office during the workday and indicated he planned to file an administrative complaint on her behalf—a common precursor to filing a civil lawsuit for damages.¹⁵

Although Ms. X’s attorney had indicated that she wanted to maintain her privacy, approximately one month later Ms. X chose to give an “anonymous” interview to the Albany *Times Union* about what she claimed was her experience working with the Governor. On April 7, 2021, the *Times Union* published an article about the interview.

In her *Times Union* interview, Ms. X said that on a weekday in November 2020, she was summoned by one of the Governor’s top assistants, Stephanie Benton, to the Mansion from the Capitol to assist the Governor with a “technical issue with his mobile phone.”^{xx} Ms. X states that she drove the “short distance” to the Mansion and, when she reached the Governor’s office on the second floor, he “came out from behind his desk, and began groping her in a sexually aggressive manner.”^{xxi} When she purportedly told him, “You’re going to get us in trouble,” she claims he responded by slamming the door and saying “I don’t care.”^{xxii} According to Ms. X, the Governor then groped her breast under her shirt and over her bra. She alleges that she left his office, walked downstairs, went to her car and headed back to the Capitol.^{xxiii}

¹⁵ “Title VII’s administrative exhaustion provision requires that any complaint be filed with the EEOC. . . .” *McGullam v. Cedar Graphics, Inc.*, 609 F.3d 70, 75 (2d Cir. 2010). A prevailing plaintiff under Title VII may obtain back pay, *see* 42 U.S.C. § 2000e-5(g)(1), front pay, *see Thomas v. iStar Fin., Inc.*, 508 F. Supp. 2d 252, 258 (S.D.N.Y. 2007), compensatory and punitive damages, *see Lewis v. Am. Sugar Refining, Inc.*, 2018 WL 4179053, at *2 (S.D.N.Y. Aug. 15, 2018) (citing 42 U.S.C. § 1981a(b)(3)), and attorneys’ fees, *see Gilbert v. Indeed, Inc.*, 2021 WL 169111, at *20 (S.D.N.Y. Jan. 19, 2021). Under the New York State Human Rights Law, “Any person claiming to be aggrieved by an unlawful discriminatory practice shall have a cause of action in any court of appropriate jurisdiction for damages,” or may file a complaint with the New York State Division of Human Rights. N.Y. Exec. Law §§ 297(1), (9).

As the Governor has stated, Ms. X's claims are false. He has never behaved in this manner and never would. It would be a pure act of insanity for the Governor—who is 63 years old and lives his life under a microscope—to grab an employee's breast in the middle of the workday at his Mansion Office. This simply did not happen.

Notably, the only day in November in which state records reveal that Ms. X was at the Executive Mansion was November 16, 2020—and the date the Attorney General's investigators claim the Governor groped her. The contemporaneous documentary evidence—which the Attorney General's investigators apparently did not bother to review or consider—does not support this allegation.

Contrary to Ms. X's interview with the *Times Union* that she was only at the Mansion a short time when she was groped and then left the Mansion, Ms. X was at the Mansion *for almost three hours that day*. Records show that Ms. X arrived at 11:59 a.m. and left at 2:47 p.m. At 12:05 p.m.—six minutes after Ms. X arrived at the Mansion—Ms. Benton forwarded Ms. X a draft of a 17-page speech. Records demonstrate that numerous staffers were also at the Mansion, including: Ms. Benton, Ms. DeRosa, and Peter Ajemian.¹⁶ At 2 p.m., the Governor had a governors-only conference call with Vice-President Mike Pence. Sixteen minutes later, at 2:16 p.m., Farrah Kennedy checked in with Ms. X to see how it was going at the Mansion. Ms. X replied two minutes later, saying, “pretty good right now actually... carol just came through with some cheese and crackers. so im happy now[.]” Ms. Kennedy replied six minutes later to Ms. X: “Gotta love

¹⁶ Ms. Benton was at the Mansion all day (having spent the prior night at the Mansion), leaving at 4:09 p.m. and then returning to the Mansion at 4:34 p.m. Ms. DeRosa (who had also spent the prior night at the Mansion), was at the Mansion from 12:20p.m. through 7:56 p.m. Mr. Ajemian was at the Mansion from early morning (having also spent the prior night at the Mansion) until 1:47 p.m. He returned to the Mansion at 6:47 p.m. and then left at 7:56 p.m.

the cheese!” Such correspondence is inconsistent with any notion that the Governor had acted inappropriately while Ms. X was at the Mansion with other staffers that day.

Indeed, thirteen minutes later, Ms. X emailed Ms. Benton: “Hey gov just came in and said he was good. Do you need me to do anything else for you before I head back to cap?” This demonstrates a brief conversation between the Governor and Ms. X, but rather than suggesting anything untoward, it indicates the opposite. This email reflects that the two had a professional conversation and—critically—Ms. X offered to stay at the Mansion in case her assistance was needed. This offer is inconsistent with Ms. X’s allegations. Two minutes later, Ms. Benton replied to Ms. X: “Sounds good. TY!” and two minutes after that, Ms. X left the Mansion to return to the Capitol.

Contemporaneous emails, schedules, and logs reflect the following from that day:

- 6:43 a.m.: Tracy Goodman calls out sick.
- 7:20 a.m.: Governor is interviewed from the Mansion on MSNBC’s *Morning Joe*;¹⁷
- 8:07 a.m.: Governor participates in a phone call;
- 9:30 a.m.: Governor conducts pre-recorded interview for the Steve Harvey Morning Show;¹⁸
- 10:00 a.m.: Governor records radio interview with WBLB;¹⁹
- 10:45 a.m.: Governor attends staff meeting;

¹⁷ New York State, Audio & Rush Transcript: Governor Cuomo is a Guest on MSNBC’s Morning Joe (Nov. 16, 2020), <https://www.governor.ny.gov/news/audio-rush-transcript-governor-cuomo-guest-msnbcs-morning-joe-1>; MSNBC, *Gov. Cuomo: Trump Doesn’t Like That I Stand Up To Him*, YouTube (Nov. 16, 2020), <https://www.youtube.com/watch?v=mnllpCpoqjs>.

¹⁸ The pre-taped interview aired on November 17, 2020. New York State, Governor Cuomo is in Albany (Nov. 17, 2020), <https://www.governor.ny.gov/schedule/governor-cuomo-albany-1052>.

¹⁹ The pre-taped interview also aired on November 17, 2020. *Id.*

- 11:00-11:30 a.m. Governor has a staff call;
- 11:30 a.m.: Governor has a call with NGA ED Bill McBride;
- 11:59 a.m.: Ms. X arrives at the Mansion;
- 12:05 p.m.: Ms. Benton forwards to Ms. X a draft of a speech;
- 12:33 p.m.: Ms. Benton confirmed that the Governor was on a call with Gretchen Whitmer, Governor of Michigan;
- 12:45 p.m.: Lauren Goldfarb indicates she will drop materials for a 2:00 p.m. call with the White House;
- 12:54 p.m.: Steve provides call materials to Governor;
- 1:05 p.m.: Emails between Ms. X and David Yassky indicating they were on a call ending around 1:05 p.m. Ms. X emails Mr. Yassky at 1:07 p.m., thanking him;
- 1:10 p.m.: Scheduled call with Jared Polis, Governor of Colorado;
- 1:15 p.m.: Scheduled call with Gary Herbert, Governor of Utah;
- 1:30 p.m.: Scheduled call with Charlie Baker, Governor of Massachusetts;
- 1:59 p.m.: email from Ms. X to Farrah Kennedy with only a subject line reading: “steph said never mind Harold fixed it”;
- 2:00 p.m.: Governor participates in Governors’ only call with Vice-President Mike Pence on Covid-19 response and recovery;
- 2:09 p.m.: Ms. X emails speech draft to Stephanie Benton;
- 2:14 p.m.: Ms. Benton forwards the draft to senior staff;
- 2:16 p.m.: Farrah Kennedy emails Ms. X asking how it is going at the Mansion;
- 2:18 p.m.: Ms. X replies to Ms. Kennedy, “pretty good right now actually... carol just came through with some cheese and crackers. so im happy now”;

- 2:24 p.m.: Ms. Kennedy replies to Ms. X: “Gotta love the cheese!”;
- 2:37 p.m.: Ms. X emails Ms. Benton: “Hey gov just came in and said he was good. Do you need me to do anything else for you before I head back to cap?”;
- 2:39 p.m.: Ms. Benton replies to Ms. X: “Sounds good. TY!”;
- 2:43 p.m. The Governor has a phone call with Chief of Staff Jill DesRosiers
- 2:47 p.m.: Ms. X leaves the Mansion;
- 2:49 p.m.: Ms. X replies to an email regarding COVID testing;
- 3:00 p.m.: Scheduled call with Lujan Grisham, Governor of New Mexico;
- 4:50 p.m.: Governor’s private zoom with Robert Mujica;
- 5:00 p.m.: Governor attends a fundraiser;
- 5:40 p.m.: Governor participates in a television interview on MSNBC’s *The ReidOut*.

Ms. X’s allegations are inconceivable. They are especially implausible on November 16, 2020.

The only interaction that the Governor recalls having with Ms. X without others present bears no resemblance at all to her allegations. Specifically, Ms. X came to the Governor’s office in the Executive Mansion. Ms. X asked if she could speak with him about an important matter, and then told the Governor that she was divorcing her husband and needed a different work schedule to accommodate her increased childcare responsibilities. Ms. X also told the Governor that the divorce would create additional financial pressure on her. Ms. X was adamant with the Governor that she loved her job and did not want to be transferred to a different position because she could not work the required hours during the work week. The Governor, who experienced a divorce as a parent of young children, asked Ms. X whether she had fully considered the situation, and shared that from his own experience, divorce can be very difficult, particularly when children

are involved. Other staffers have sought the Governor's guidance from time to time on their own potential divorces, and the Governor has set points that he makes in these situations, which he shared with Ms. X. He explained to Ms. X that based on his own experience, when parents divorce, their divorce does not end the relationship because they will need to continue to work together for the good of their children. The Governor asked if she had pursued marital counseling. During this conversation, the Governor remembers Ms. X became visibly emotional, and she told the Governor that she felt that he was suggesting that she was a "bad parent" for wanting a divorce. The Governor told her he supported whatever decision she made regarding the divorce. The Governor never noticed any change in Ms. X's behavior towards him after this conversation.

Subsequent to her conversation with the Governor, in late 2020 and early 2021, Ms. X spoke with her supervisors about her family and work situation. In those conversations, Ms. X told them that she would need to leave work early at times when she had custody of her child, and she also asked for a raise and more overtime hours on weekends when she was available. No promises were made to Ms. X by her supervisors about her work situation, and she was told by a supervisor that a raise was not possible at the time because of budget constraints.

On or about March 8, 2021, as noted above, after the complaints by Ms. Boylan and Ms. Bennett, Ms. X's attorney contacted the Executive Chamber with the complaint that the Governor had groped Ms. X and she planned to file an administrative complaint. Days later, Ms. X's attorney complained that Ms. X was not assigned overtime work the preceding weekend, with the inference being that Ms. X cannot suffer any adverse employment action under the law because of her complaint. Her employment status has remained unchanged.

It is notable that, soon after Lindsay Boylan first made allegations against the Governor in December 2020, Ms. X told the Governor that "no one believes her." It is also notable that, because

Ms. X is requesting anonymity (as is her right), and I understand the Attorney General's investigators are respecting this in terms seeking to avoid revealing her identity in witness interviews, those investigators are necessarily limited in their questioning of people they interview about Ms. X and the credibility of her allegations so as not to reveal her identity. It is also notable that the investigators did little to nothing in terms of the documentary evidence that refutes Ms. X's allegation of being groped on November 16, 2020.

4. The Governor's Interactions with Alyssa McGrath, Ana Liss and Kaitlin Were Unremarkable.

Much of what Ms. McGrath, Ms. Liss or Kaitlin allege are largely consistent with how the Governor has acted with colleagues and constituents, male and female, throughout his forty-year career.

Ms. McGrath is a close, longtime friend of Ms. X, and they work together as Executive Assistants to the Governor. The Governor does not doubt that he kissed Ms. McGrath on the forehead, or that he hugged her at a holiday party, or that he once called her "bella," as he has with many people.^{xxiv} He frequently uses Italian phrases. The Governor does not recall asking Ms. McGrath about a necklace she was wearing, which Ms. McGrath claims occurred during one of the first times that she took dictation from him.^{xxv} Nothing about that "jewelry" allegation strikes the Governor as inconsistent with his mannerisms: it is commonplace for him to make innocuous comments to put people around him at ease, particularly when they, like Ms. McGrath, appear visibly nervous.

The Governor did refer to Ms. McGrath and Ms. X as "mingle mamas," as Ms. McGrath claims,^{xxvi} but he did so only in response to their telling him, before leaving for a vacation together to Florida, that they were "single and ready to mingle" because they would be vacationing without their spouses and children. He made the comment in a friendly banter that was typical in the office,

between men and women alike. Indeed, Ms. McGrath is clear that the Governor never made any sexual advances toward her.^{xxvii}

Ms. Liss was a junior employee in the Executive Chamber from 2013 through 2015.²⁰ On or about March 6, 2021, Ms. Liss gave an interview to the *Wall Street Journal* in which she explained that she perceived her interactions with the Governor around the office to be “harmless flirtations” at the time,^{xxviii} and claimed that, during an event in 2014, the Governor greeted her by calling her “sweetheart,” kissing her on the cheek and touching her back while taking a picture.^{xxix} On numerous occasions thereafter, Ms. Liss posted on social media messages praising the Governor, including a tweet wishing him a happy birthday in December 2020. (Ex. 7.) Until at least March 6, 2021, when her interview with the *Wall Street Journal* was published, she continued to display on her desk the picture in which she claims the Governor was touching her back.²¹

Kaitlin was a Deputy Director in the Governor’s office in 2016 and 2017. Kaitlin came to work for the Governor after he met her at an event which she helped organize. At the event, the Governor was told that Kaitlin was a “young star” and also that she had previously worked for then-Congressman Joe Crowley. The next day, the Governor relayed to the Executive Chamber’s Personnel Office that they should see if Kaitlin was interested in joining the Chamber in an administrative assistant role, which she was and, after interviewing, she was hired.

Kaitlin alleges that after she began working for him, the Governor commented on her appearance, asked questions about her personal life, stood closely to her while she assisted his on

²⁰ Liss worked for a former aide to the Governor, Howard Glaser. Mr. Glaser is the husband of Karen Hinton. Ms. Liss and Ms. Hinton’s made their complaints public on the same day.

²¹ Jimmy Vielkind et al., *Cuomo Faces New Accusations of Inappropriate Behavior From Third Former Aide*, *Wall St. Journal* (Mar. 6, 2021), https://www.wsj.com/articles/third-former-andrew-cuomo-aide-describes-inappropriate-workplace-treatment-11615081956?mod=hp_lead_pos2 (“Ana Liss keeps in her office a framed picture of her and Gov. Andrew Cuomo, taken at a 2014 reception, showing his arm around her waist.”).

the computer and looked at her in a way she felt was inappropriate.^{xxx} The Governor does not recall any remarks about Kaitlin’s appearance but does not dispute that he occasionally makes comments about employees’ appearance—usually in a complimentary way and sometimes as a light-hearted joke—to Executive Chamber employees. Kaitlin also claims that the Governor occasionally became impatient and frustrated with her work.^{xxxii} The Governor does recall being frustrated with Kaitlin on an occasion because of issues with her disconnecting callers for the Governor as she was transferring the calls. The Governor says that he had asked Kaitlin to receive training on how to transfer calls. The Governor also does not doubt that he asked her questions about her personal life, as he done so with many staffers with the intent of getting to know them and establishing a friendly relationship with them.

5. Karen Hinton’s Twenty-Year-Old Allegation

On or about March 6, 2021, Karen Hinton claimed that, over twenty years ago, in 2000, while working as a consultant for HUD, the Governor made a sexual advance toward her when he “embraced her” in a hotel room—“too tightly, too long and was aroused”—and then pulled her back again into an embrace when she pulled away from him.^{xxxii} The Governor strongly denies this. Over the course of 20 years, Ms. Hinton and the Governor have been colleagues, friends, and political opponents. But through it all, the Governor had no inkling that Ms. Hinton thought he ever acted inappropriately with her in that way. Indeed, Ms. Hinton’s husband Howard Glaser was a 20-year friend of the Governor and worked for the Governor and never mentioned the alleged episode.

It is notable that Ms. Hinton also said the exact opposite about the Governor. On May 13, 2018, the *New York Daily News* published an op-ed by Ms. Hinton entitled “In Power, Out of Control: Manipulative Men in Politics like Eric Schneiderman Force Women into Survival

Strategies.”²² In her piece, Ms. Hinton discussed her experiences with men in politics and the mistreatment that women face: “Every woman knows this experience: hoping to be valued for your knowledge and skills, and then feeling crushed when you realize it is something else altogether.” She alleged that in 1984, then-Governor Bill Clinton paid close attention to her for 30 minutes discussion policy during a political hangout—and he then handed her a note with the name of his hotel and room number. With respect to Governor Cuomo, however, Ms. Hinton had this to say: “I’ve been fortunate to have male bosses, like Andrew Cuomo . . . who know how to be respectful of women even while being no-nonsense managers. But the institutions of government and politics remain saturated with the poisonous odor of men who don’t know where to draw the line.”

Ms. Hinton made her recent allegation about a twenty-year old interaction with Mr. Cuomo approximately one week after she published a February 24, 2021 op-ed *New York Daily News* announcing that she was writing a book on “penis politics” and made numerous complaints about the working environments under Governor Cuomo.^{xxxiii} Her op-ed, however, made no reference to the alleged interaction from 2000.

6. Jessica Bakeman, Valerie Bauman, Anna Ruch and Sherry Vill

Jessica Bakeman, a journalist, alleges that the Governor teased her in a non-sexual manner among a group of reporters, and made a joke after taking a picture with her at a holiday party.^{xxxiv} Valerie Bauman, also a reporter, has raised concerns about the Governor’s communications with her while she was covering him, but she herself has said that the Governor never said anything to her that she “could report to [her] boss,” and that he never touched her inappropriately.^{xxxv} The

²² Karen Hinton, *In Power, Out of Control: Manipulative Men in Politics like Eric Schneiderman Force Women into Survival Strategies*, N.Y. Daily News (May 13, 2018) <https://www.nydailynews.com/opinion/power-control-article-1.3985202>.

Governor takes thousands of pictures a year with employees, constituents and reporters, has never made any inappropriate advances on any reporters and, like many other politicians, has always intended his customary embraces to show respect or warmth.

Anna Ruch claims that, at a wedding, the Governor greeted her by kissing her cheeks and touching her face, which was captured in a photograph.^{xxxvi} The Governor does not remember this interaction, but it is consistent with his practice of embracing males and females alike when taking pictures. He had no intention to make her feel uncomfortable, particularly at a wedding he officiated for a staff member where many other staffers were in attendance.^{xxxvii}

Sherry Vill, a constituent, claims that she felt uncomfortable during a 2017 that the Governor made to her home after it sustained significant flood damage, when the Governor kissed her on the cheek and hugged her, as is reflected in a photograph.^{xxxviii} The Governor subsequently sent Ms. Vill a letter and copies of a photograph of them, which Ms. Vill posted on Facebook under the caption, “Look what the Governor sent me in the mail...” She also posted, “Thank you, Governor,” with a picture of relief workers supplying pumps for the flooding in her home. (Ex. 8.) The Governor’s embrace of Ms. Vill occurred during an attempt to comfort her during a difficult time, while the two of them were surrounded by her family and the press. The Governor’s interactions with Ms. Vill are not different than thousands of similar interactions that he and other politicians have had with numerous victims of natural disasters and other tragedies.

CONCLUSION

The Governor has spent almost all of his adult life in the public eye. The sudden allegations of sexual harassment over the last number of months—allegations never made before about him-- have been stunning to him because he has never conducted himself in that way. The Report ignored key facts and pieces of evidence that undermine many of those allegations, and the press conference confirmed that this “investigation” had a predetermined outcome regardless of all the evidence.

Dated: August 3, 2021
New York, New York

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ⁱ Ashley Parker, *All the Obama 20-somethings*, N.Y. Times (Apr. 29, 2010), <https://www.nytimes.com/2010/05/02/magazine/02obamastaff-t.html>.

ⁱⁱ *Chuck Schumer: Senator: Matchmaker*, CBS News (June 28, 2015), <https://www.cbsnews.com/news/chuck-schumer-senator-matchmaker/>; Michael M. Grynbaum, *Senator, Senator, Make Me a Match: For Staff, Schumer is Cupid*, N.Y. Times (Aug. 17, 2012), <https://www.nytimes.com/2012/08/18/nyregion/senator-senator-make-me-a-match-for-staff-schumer-is-cupid.html?referringSource=articleShare>.

ⁱⁱⁱ Lindsey Boylan, *My Story of Working with Governor Cuomo*, Medium (Feb. 24, 2021), <https://lindseyboylan4ny.medium.com/my-story-of-working-with-governor-cuomo-e664d4814b4e>.

^{iv} Lindsey Boylan (@lindseyboylan), Twitter (Dec. 5, 2020, 2:08 p.m.), <https://twitter.com/LindseyBoylan/status/1335300029041553410>; Lindsey Boylan (@lindseyboylan), Twitter (Dec. 5, 2020, 2:09 p.m.), <https://twitter.com/LindseyBoylan/status/1335300208830402561>; Lindsey Boylan (@lindseyboylan), Twitter (Dec. 5, 2020, 6:13 p.m.), <https://twitter.com/LindseyBoylan/status/1335361707565314049>

^v Lindsey Boylan, *My Story of Working with Governor Cuomo*, Medium (Feb. 24, 2021), <https://lindseyboylan4ny.medium.com/my-story-of-working-with-governor-cuomo-e664d4814b4e>; Ronan Farrow, *Cuomo's First Accuser Raises New Claims of Harassment and Retaliation*, The New Yorker (Mar. 18, 2021), <https://www.newyorker.com/news/news-desk/cuomos-first-accuser-raises-new-claims-of-harassment-and-retaliation>.

^{vi} *Id.*

^{vii} *Id.*

^{viii} Jimmy Vielkind et al., *Cuomo Faces New Accusations of Inappropriate Behavior From Third Former Aide*, Wall St. Journal (Mar. 6, 2021), https://www.wsj.com/articles/third-former-andrew-cuomo-aide-describes-inappropriate-workplace-treatment-11615081956?mod=hp_lead_pos2.

^{ix} Lindsey Boylan, *My Story of Working with Governor Cuomo*, Medium (Feb. 24, 2021), <https://lindseyboylan4ny.medium.com/my-story-of-working-with-governor-cuomo-e664d4814b4e>.

^x Lindsey Boylan (@lindseyboylan), Twitter (Aug. 15, 2018, 3:05 p.m.), <https://twitter.com/LindseyBoylan/status/1029806281752801280>.

^{xi} Lindsey Boylan (@lindseyboylan), Twitter (Mar. 20, 2020, 11:34 a.m.), <https://twitter.com/LindseyBoylan/status/1241025305826992129>; Lindsey Boylan (@lindseyboylan), Twitter (Mar. 20, 2020, 11:56 a.m.), <https://twitter.com/LindseyBoylan/status/1241030982582575106>.

^{xii} *Amid COVID-19 Pandemic, Governor Cuomo Signs Executive Order Temporarily Modifying Election Procedures to Reduce Spread of Coronavirus*, New York Governor (March 14, 2020), <https://www.governor.ny.gov/news/amid-covid-19-pandemic-governor-cuomo-signs-executive-order-temporarily-modifying-election>.

^{xiii} Michael Gartland, *Ex-gov aide Lindsey Boylan loses press staffer over Cuomo sex harass allegations: source*, N.Y. Daily News (Dec. 19, 2020), <https://www.nydailynews.com/news/politics/new-york-elections-government/ny-nyc-boylan-cuomo-20201219-jpxunggpvbe75anuq22utzb5am-story.html>.

^{xiv} Lindsey Boylan, *My Story of Working with Governor Cuomo*, Medium (Feb. 24, 2021), <https://lindseyboylan4ny.medium.com/my-story-of-working-with-governor-cuomo-e664d4814b4e>.

^{xv} See, e.g., Jesse McKinley, *Cuomo Is Accused of Sexual Harassment by a 2nd Former Aide*, N.Y. Times (Feb. 27, 2021), <https://www.nytimes.com/2021/02/27/nyregion/cuomo-charlotte-bennett-sexual-harassment.html>.

^{xvi} *Id.*

^{xvii} *Id.*

^{xviii} *Id.*

^{xix} *Id.*

^{xx} Brendan J. Lyons, *In Her Own Words: Woman Describes Cuomo's Alleged Groping at Mansion*, Albany Times Union (Apr. 7, 2021), <https://www.timesunion.com/news/article/cuomo-alleged-groping-victim-mansion-incident-16078748.php?IPID=Times-Union-HP-CP-Spotlight>.

^{xxi} *Id.*

^{xxii} *Id.*

^{xxiii} *Id.*

^{xxiv} Jesse McKinley, *Cuomo Faces New Claims of Sexual Harassment from Current Aide*, N.Y. Times (Mar. 19, 2021), <https://www.nytimes.com/2021/03/19/nyregion/alyssa-mcgrath-cuomo-harassment.html?action=click&module=Alert&pgtype=Homepage>.

^{xxv} *Id.*

^{xxvi} *Id.*

^{xxvii} *Id.* (“Ms. McGrath did not accuse the governor of making sexual contact. . .”).

^{xxviii} Jimmy Vielkind et al., *Cuomo Faces New Accusations of Inappropriate Behavior From Third Former Aide*, Wall St. Journal (Mar. 6, 2021), https://www.wsj.com/articles/third-former-andrew-cuomo-aide-describes-inappropriate-workplace-treatment-11615081956?mod=hp_lead_pos2.

^{xxix} *Id.*

^{xxx} Rebecca Traister, *Abuse and Power Andrew Cuomo's governorship has been defined by cruelty that disguised chronic mismanagement. Why was that celebrated for so long?*, N.Y. Mag. (Mar. 12, 2021), <https://nymag.com/intelligencer/article/andrew-cuomo-misconduct-allegations.html>.

^{xxxi} *Id.*

^{xxxii} Carl Campanile & Bruce Golding, *Cuomo accuser Karen Hinton says he was 'aroused' when he hugged her*, N.Y. Post (Mar. 15, 2021), <https://nypost.com/2021/03/15/karen-hinton-says-cuomo-was-aroused-when-he-hugged-her/>; Amy Brittain, et. al, *Cuomo's behavior created 'hostile, toxic' workplace culture for decades, former aides say*, Wash. Post (Mar. 6, 2021), https://www.washingtonpost.com/politics/cuomo-toxic-workplace/2021/03/06/7f7c5b9c-7dd3-11eb-b3d1-9e5aa3d5220c_story.html.

^{xxxiii} Karen Hinton (@KarenHinton), Twitter (Feb. 24, 2021 9:30AM), <https://twitter.com/KarenHinton/status/1364583474498166784>.

^{xxxiv} Jessica Bakeman, *Cuomo Never Let Me Forget I was a Woman*, N.Y. Mag. (Mar. 12, 2021), <https://nymag.com/intelligencer/article/andrew-cuomo-sexual-harassment-albany-reporter.html>.

^{xxxv} Valerie Bauman, Twitter (Mar. 18, 2021, 7:11AM), <https://twitter.com/valeriereports/status/1372506038679781381>.

^{xxxvi} Matt Flegenheimer and Jesse McKinley, *Cuomo Accused of Unwanted Advance at a Wedding: 'Can I Kiss You'*, N.Y. Times (Mar. 1, 2020), <https://www.nytimes.com/2021/03/01/nyregion/cuomo-harassment-anna-ruch.html>.

^{xxxvii} Matt Flegenheimer & Jesse McKinley, *Cuomo Accused of Unwanted Advance at a Wedding: 'Can I Kiss You'*, N.Y. Times (Mar. 1, 2020), <https://www.nytimes.com/2021/03/01/nyregion/cuomo-harassment-anna-ruch.html>.

^{xxxviii} *Gloria Allred Press Conference with Andrew Cuomo Accuser Transcript March 29*, Rev (Mar. 29, 2021), <https://www.rev.com/blog/transcripts/gloria-allred-press-conference-with-andrew-cuomo-accuser-transcript-march-29>.

EXHIBIT 1



Figure 1: with President Joe Bidenⁱ



Figure 2: with Secretary Hillary Clintonⁱⁱ



Figure 3: with Governor Chris Christieⁱⁱⁱ



Figure 4: with Rochester Mayor Lovely Warren^{iv}



Figure 5: with Vice President Al Gore^v



Figure 6: with Speaker Nancy Pelosi^{vi}



Figure 7: with President Obama^{vii}



Figure 8: with Governor David Paterson^{viii}



Figure 9: with Assemblyman Heastie^{ix}



Figures 10–13: with Governor Mario Cuomo^x



Figure 10^{vi}



Figure 11^{xii}



Figure 12^{xiii}



Figure 13: with daughter Michaela Kennedy-Cuomo^{xiv}



Figure 14: with mother Matilda Cuomo^{xv}

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- ⁱ Newsday, Photograph of Joe Biden and Andrew Cuomo, *See photos of Andrew Cuomo through the years*, Newsday (Mar. 3, 2021).
- ⁱⁱ Darren McGee, Photograph of Hillary Clinton and Andrew Cuomo, *What to watch for at the state Democratic Convention*, City and State N.Y. (May 22, 2018), <https://www.cityandstateny.com/articles/politics/new-york-state/cuomo-nixon-clinton-new-york-state-democratic-convention.html>.
- ⁱⁱⁱ Aristide Economopoulos, Photograph of Chris Christie and Andrew Cuomo, *Christie and Cuomo (2 really calm pals) talk up civility in politics*, NJ.com (Sept. 27, 2019), <https://www.nj.com/politics/2019/09/christie-and-cuomo-2-really-calm-pals-talk-up-civility-in-politics.html>.
- ^{iv} Max Schulte, Photograph of Lovely Warren and Andrew Cuomo, *Warren: \$15 minimum wage for Rochester city workers*, Democrat & Chronicle (Nov. 18, 2015), <https://www.democratandchronicle.com/story/news/2015/11/18/rochester-minimum-wage-lovely-warren-andrew-cuomo/75988428/>.
- ^v Governor Andrew Cuomo, Facebook (July 19, 2019), <https://www.facebook.com/login/?next=https%3A%2F%2Fwww.facebook.com%2FGovernorAndrewCuomo%2Fposts%2Ftoday-i-executed-the-nations-largest-offshore-wind-agreement-and-signed-the-clim%2F2592534974111033%2F>.
- ^{vi} Photograph of Nancy Pelosi and Andrew Cuomo, Feb. 25, 2019, *Cuomo Kissed Pelosi and...*, CNSNews (Mar. 8, 2021), <https://www.cnsnews.com/blog/cnsnewscom-staff/cuomo-kissed-pelosi-and>.
- ^{vii} Photograph of Barack Obama and Andrew Cuomo, *Cuomo cautiously criticizes Giuliani*, Democrat & Chronicle (Feb. 20, 2015), <https://www.democratandchronicle.com/story/vote-up/2015/02/20/cuomo-cautiously-criticizes-giuliani/23747211/>.
- ^{viii} Mike Groll, Photograph of David Paterson and Andrew Cuomo, *Andrew Cuomo begins the job he's always wanted*, The Record (Jan. 1, 2011), https://www.troyrecord.com/news/andrew-cuomo-begins-the-job-hes-always-wanted/article_5f910b45-c038-50af-97c7-c7057d0a9e43.html.
- ^{ix} Governor Andrew Cuomo (@governorandrewcuomo), Flickr (Mar. 17, 2015), <https://www.flickr.com/photos/governorandrewcuomo/16849192615/>.
- ^x John Angelillo, Photograph Andrew Cuomo and Mario Cuomo, *Andrew Cuomo hugs kisses dad, Mario Cuomo, after being elected the next Governor of New York State during a Democratic Election Night Party at the Sheraton Hotel and Towers in New York City*, Alamy Stock Photo (Nov. 2, 2010), <https://www.alamy.com/andrew-cuomo-hugs-kisses-dad-mario-cuomo-after-being-elected-the-next-governor-of-new-york-state-during-a-democratic-election-night-party-at-the-sheraton-hotel-and-towers-in-new-york-city-on-november-2-2010-upijohn-angelillo-image257982734.html>.
- ^{xi} Mike Groll, Photograph of Andrew Cuomo and Mario Cuomo, *Ex-NY Gov. Mario Cuomo dead at 82*, Assoc. Press (Jan. 1, 2015), https://www.niagara-gazette.com/news/ex-ny-gov-mario-cuomo-dead-at-82/article_c8281d8e-9231-11e4-9eea-4329705e05ac.html.
- ^{xii} Reuters, Photograph of Andrew Cuomo and Mario Cuomo, *Former New York Governor Mario Cuomo dead at 82*, The Jerusalem Post (Jan. 2, 2015), <https://www.jpost.com/international/former-new-york-governor-mario-cuomo-dead-at-82-386475>.
- ^{xiii} Newsday, Photograph of Mario Cuomo and Andrew Cuomo, *See photos of Andrew Cuomo through the years*, Newsday (Mar. 3, 2021).
- ^{xiv} Nathaniel Brooks, Photograph of Andrew Cuomo and Michaela Kennedy-Cuomo, *Cuomo Promises Emergency Plan on Finance Woes*, N.Y. Times (Jan. 1, 2011), <https://www.nytimes.com/2011/01/02/nyregion/02inaugural.html>.
- ^{xv} Photograph of Andrew Cuomo and Matilda Cuomo, *Andrew Cuomo Says He Hasn't Been Able to See His Mom & Daughter During the Coronavirus Pandemic*, People Mag. (Apr. 13, 2020), <https://people.com/politics/andrew-cuomo-hasnt-been-able-to-see-mom-daughter-during-coronavirus-pandemic/>.

EXHIBIT 2

I. President Joe Biden



Figure 1: with Vice President Kamala Harrisⁱ



Figure 2: with a woman at a rallyⁱⁱ

II. Vice President Kamala Harris



Figure 3: with Senator Cory Bookerⁱⁱⁱ



Figure 4: with a supporter^{iv}

III. President Barack Obama



Figure 5: with Aung San Suu Kyi^v



Figure 6: with Speaker Nancy Pelosi^{vi}



Figure 7: with outgoing Press Secretary Jay Carney^{vii}



Figure 8: with Chancellor Angela Merkel^{viii}



Figure 9: with Governor Cuomo^{ix}

IV. President George W. Bush



Figure 10: with hurricane victim Sandra Patterson^x



Figure 11: with Oprah Winfrey^{xi}

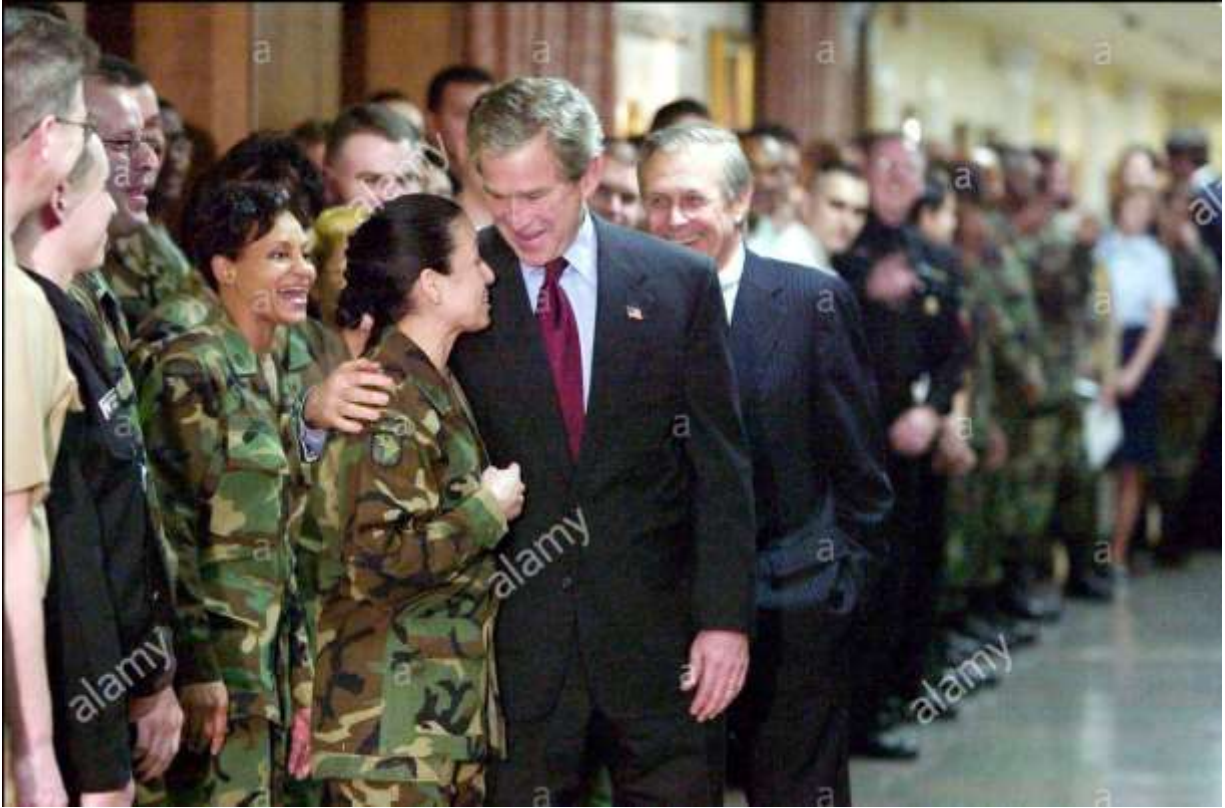


Figure 12: at the Pentagon^{xii}



Figure 13: with Secretary Condoleeza Rice^{xiii}



Figure 14: with Speaker Pelosi^{xiv}



Figure 15: with Chancellor Merkel^{lv}

V. Secretary Hillary Clinton



Figure 16: with President Obama^{vi}



Figure 17: with First Lady Michelle Obama^{vii}



Figure 18: with Speaker Pelosi^{xviii}

VI. Senator Chuck Schumer



Figure 19: with Secretary Clinton^{vi}



Figure 20: with Senator Harry Reid^{ix}

VII. Speaker Nancy Pelosi



Figure 21: with Senator Chuck Schumer^{xvi}



Figure 22: with Representative Alexandria Ocasio-Cortez^{xvii}



Figure 23: with President Obama^{xxiii}



Figure 24: with President Biden^{xxiv}

VIII. Governor Mario Cuomo



Figure 25^{xv}



Figure 26: with Bella Abzug^{xvi}

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EXHIBIT 3



EXHIBIT 4



Lindsey Boylan ✓

@LindseyBoylan



"All tyranny needs to gain a foothold," it has been said, "is for people of good conscience to remain silent." Gov Cuomo - Couldn't be more proud 2 work4 NY's leader.



Andrew Cuomo ✓ @NYGovCuomo · Jun 20, 2018

We cannot wash away this stain on American history. We will not let what has been done go unanswered, and we will do everything we can to ensure that it never happens again.

[nytimes.com/2018/06/20/opi...](https://www.nytimes.com/2018/06/20/opi...)

10:51 AM · Jun 21, 2018 from Manhattan, NY · Twitter for iPhone

Figure 1



Lindsey Boylan ✓
@LindseyBoylan



Spot on [@teenvogue](#) and proud to work for the politician [@andrewcuomo](#) responsible for this.



Teen Vogue ✓ @TeenVogue · 8/3/18



tnvge.co/hfChrAB

2:21 PM · 8/4/18 · [Twitter for iPhone](#)

Figure 2



Lindsey Boylan ✓ @LindseyBoylan · Aug 15, 2018



Proud to work for a governor who takes women seriously
[@NYGovCuomo](#) [@NOW_NYC](#)



NOW-NYC ✓ @NOW_NYC · Aug 15, 2018

"Governor, you have delivered for the women and girls in New York year in and year out." #StopChildTrafficking @NYGovCuomo



1



12



6



Figure 3



Lindsey Boylan ✓
@LindseyBoylan



Proud of my boss [@NYGovCuomo](#)



Andrew Cuomo ✓ @NYGovCuomo · Aug 15, 2018

.@RealDonaldTrump: What you say would be 'great again' would not be great at all...We will not go back to discrimination, segregation, sexism, isolationism, racism or the KKK.

Like NY's motto says: Excelsior -- Ever Upward (not backward)
[twitter.com/realDonaldTrum...](https://twitter.com/realDonaldTrump)

12:47 AM · Aug 16, 2018 · Twitter for iPhone

Figure 4



Lindsey Boylan ✓
@LindseyBoylan



Good news and good leadership from all of you!!!!



Councilman Deutsch ✓ @ChaimDeutsch · Sep 6, 2018

Thanks to @MTA President Andy Byford, our B44 SBS bus stop at Avenue R and Nostrand Avenue is in full operation today! @NYGovCuomo made the right choice for our City by bringing President Byford in. It demonstrates his commitment to improving transit for all New Yorkers.



6:52 AM · Sep 7, 2018 · Twitter for iPhone

Figure 5



Thread



Lindsey Boylan

@LindseyBoylan



Replying to [@LindseyBoylan](#)

So proud of my boss [@NYGovCuomo](#) and all of Team Cuomo.

8:40 PM · Sep 14, 2018 · Twitter for iPhone

6 Retweets **1** Quote Tweet **4** Likes

Figure 6




Councilman Deutsch  @ChaimDeutsch · Sep 14, 2018 

Congratulations @andrewcuomo on a decisive victory! Governor Cuomo has been a friend to Southern Brooklyn communities, and he has delivered for us. I look forward to continuing to work with our Governor for the betterment of our district and beyond!



Andrew Cuomo and 2 others



Lindsey Boylan 

@LindseyBoylan 

Replying to @ChaimDeutsch @andrewcuomo and 3 others



8:00 AM · Sep 14, 2018 · Twitter for iPhone

Figure 7



Tweet



Lindsey Boylan 
@LindseyBoylan



Andrew Cuomo Is New York's Best Choice for Governor



Opinion | Andrew Cuomo Is New York's Best Choice for Governor (Published ...
He hasn't delivered on all his promises, but he has shown he gets big things
done when he's determined.

[nytimes.com](https://www.nytimes.com)

7:08 AM · Nov 4, 2018 · Twitter for iPhone

Figure 8



Lindsey Boylan ✓
@LindseyBoylan



"I accept full responsibility." -@NYGovCuomo. This is what we need in leadership. Thankfully we have it.
[#coronavirus](#) [#Covid_19](#)

11:34 AM · Mar 20, 2020 from Manhattan, NY · Twitter for iPhone

8 Retweets 56 Likes



Lindsey Boylan ✓ @LindseyBoylan · Mar 20, 2020
Replying to @LindseyBoylan



Leadership is not perfect. But it takes responsibility and accountability and forthright communication. All of the above are on short supply in our federal leadership. But I am seeing it with our Governor.

1



14



Figures 9–10

EXHIBIT 5

Absolutely not helpful please relay that while we are ok, I see what the point is here and I will find ways to respond.

Life is long.

And so is my memory.

And so are my resources.



iMessage



Apple Pay



4:02



New iMessage

Cancel

To: Lindsey Boylan

Ulster.

ADSUB000043

EXHIBIT 6

4:02



New iMessage

Cancel

To: [Lindsey Boylan](#)

Absolutely not helpful specific response to a tragedy but please relay that while we are ok, I see what the point is here and I will find ways to respond to the message.



The future is coming after
assholes.

Wed, May 6, 6:15 PM

I hope that journalists will be
looking into NDAs etc as



iMessage



EXHIBIT 7



Figure 1



Figure 2



Figure 3



Figure 4



Ana Liss (not pronounced Annalise. Ah'nah liss)
@analiss



Big TY to @JohnMaggiore6 & friends/colleagues
@NYGovCuomo office for lovely sendoff...working 4
@Cornell as of Mon 🙏❤️



2:34 PM · Jun 18, 2015 · Twitter for iPhone

Figure 5



Ana Liss (not pronounced Annalise. Ah'nah liss)
@analiss



Historic move. We haven't had a new state poet in many years. Kudos [@NYGovCuomo](#)

 **State of New York** 🤗 @NYGov · Jan 26, 2016

Read more about the life and work of the 11th state poet, Yusef Komunyakaa:
nygov.tumblr.com/post/137818561...



12:31 PM · Jan 26, 2016 · Twitter for iPhone

Figure 6



Figure 7



Figure 8



Ana Liss (pronounced AH-nah Liss rhymes with kiss)

@analiss



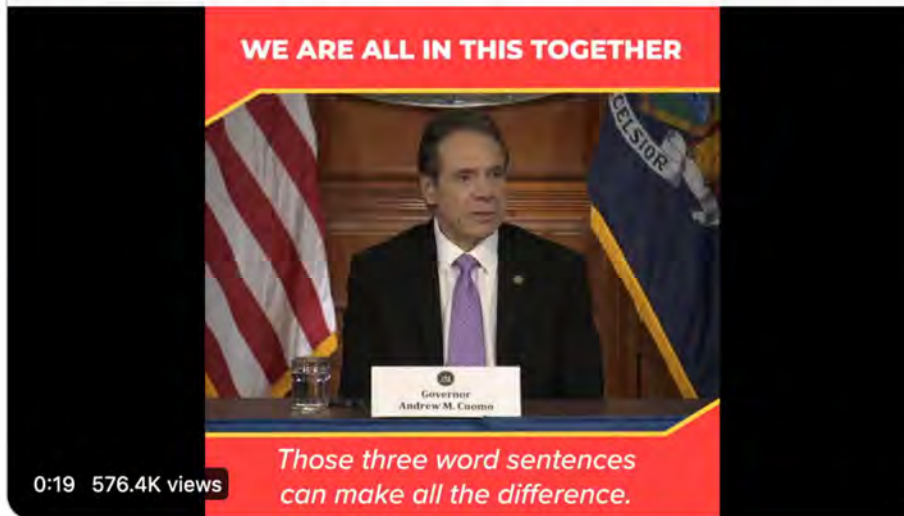
This guy. 😊



Andrew Cuomo @NYGovCuomo · Mar 20, 2020

Three-word sentences can make all the difference: 'I miss you.' 'I love you.'

I know many New Yorkers are anxious and worried. But we're all in this together. Let's support each other.



10:48 AM · Mar 21, 2020 from Chili Center, NY · Twitter for iPhone

Figure 9



Ana Liss (not pronounced Annalise. Ah'nah liss)
@analiss

...

HBD and tanti auguri to the Gov! What a year!



Kathy Hochul @LtGovHochulNY · Dec 6, 2020

Happy Birthday, @NYGovCuomo!

Not only did you write the playbook for managing a once-in-a-century pandemic, you taught the master class in crisis communications in calming an anxious nation when it was needed the most.

Proud to serve with you to move NY Forward. Excelsior!



Figure 10

EXHIBIT 8

Posts

About

Photos



Sherry Vill

Jun 7, 2017 · 🌐



I can't thank these men enough for all the help they gave us during this devastating time. They supplied us with 2 pumps then came with a 3rd in the middle of it all. They are my true hero. We would not have made it without there help. Thank you governor!



👍❤️ 71

15 Comments 3 Shares



Posts

About

Photos



Sherry Vill

Aug 6, 2017 · 🌐



Look what the governor sent me in the mail...

