



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

TO: Annabel Walsh
c/o Aaron Delaney
Paul Weiss
1285 Avenue of the Americas
New York, NY 10019

YOU ARE HEREBY COMMANDED, pursuant to Executive Law § 63(8) and New York Civil Practice Law and Rules § 2302(a), to appear and attend before the Special Deputies to the First Deputy Attorney General, on June 18, 2021 at 8:00 AM, or any agreed upon adjourned date or time, at One Liberty Plaza, 38th Floor, New York, New York 10006 to testify in connection with an investigation into allegations of and circumstances surrounding sexual harassment claims made against Governor Cuomo, or any matter that the Attorney General deems pertinent thereto.

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


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

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

EXHIBIT

1

WITNESS, The Honorable Letitia James, Attorney General of the State of New York,
this 16th day of June, 2021.

By: 

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

By: /s/ Anne L. Clark

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



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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

TO: Annabel Walsh

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


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

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

EXHIBIT

2

WITNESS, The Honorable Letitia James, Attorney General of the State of New York, this 29th day of March, 2021.

By: 

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

By: /s/ Anne L. Clark

Anne L. Clark
Yannick Grant
Special Deputies to the
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[REDACTED]@ag.ny.gov
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[REDACTED]@ag.ny.gov
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SCHEDULE

A. General Definitions and Rules of Construction

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

thereof.

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

B. Particular Definitions

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

2. “Complaint” means any and all complaints, allegations, comments, accusations, or other statements of workplace misconduct, sexual harassment, sex- or gender-based misconduct, or other behavior or comments of a sexual, abusive or otherwise inappropriate or uncomfortable nature, whether made formally or informally.
3. “Executive Chamber” means the Executive Chamber of the State of New York, including but not limited to Governor Andrew M. Cuomo, and all other officers, directors, supervisors, personnel, employees, secretaries, interns, fellows, agents, contractors, consultants, representatives, and attorneys of the Executive Chamber, or any other Persons associated with or acting on behalf of the foregoing, or acting on behalf of any predecessors, successors, or affiliates of the foregoing at any point during the relevant time.
4. “Executive Office” means any office within the New York State government in which employees and officers work directly with, work under the control of, answer to, or maintain direct contact with the Governor. This includes offices in Albany, Manhattan, and anywhere else in New York State.
5. “Governor” means the New York State Governor Andrew M. Cuomo.
6. “New York Attorney General” or “Attorney General” means the New York State Office of the Attorney General, including Letitia James.
7. “Respondent,” “You,” or “Your” means Annabel Walsh, in either an official or individual capacity.
8. “State” or “New York” means the State of New York.

C. Instructions

1. Preservation of Relevant Documents and Information; Spoliation. You are reminded of Your obligations under law to preserve Documents and information relevant or potentially relevant to this Subpoena from destruction or loss, and of the consequences of, and penalties available for, spoliation of evidence. No agreement, written or otherwise, purporting to modify, limit or otherwise vary the terms of this Subpoena, shall be construed in any way to narrow, qualify, eliminate or otherwise diminish Your aforementioned preservation obligations. Nor shall You act, in reliance upon any such agreement or otherwise, in any manner inconsistent with Your preservation obligations under law. No agreement purporting to modify, limit or otherwise vary Your preservation obligations under law shall be construed as in any way narrowing, qualifying, eliminating or otherwise diminishing such aforementioned preservation obligations, nor shall You act in reliance upon any such agreement, unless a Special Deputy to the First Deputy Attorney General confirms or acknowledges such agreement in writing, or makes such agreement a matter of record in open court.

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

maintained before production, including but not limited to production of any Document or other material indicating filing or other organization. Such production shall include without limitation any file folder, file jacket, cover or similar organizational material, as well as any folder bearing any title or legend that contains no Document. Likewise, all Documents that are physically attached to each other in Your files shall remain so attached in any production; or if such production is electronic, shall be accompanied by notation or information sufficient to indicate clearly such physical attachment.

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

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

18. Time Period. Unless otherwise specified, the time period covered by this Subpoena shall be from January 1, 2013 forward.

D. Documents to Be Produced

1. Any and all Documents related to any Complaint concerning the Governor, including any investigation thereof.
2. Any and all Documents concerning Communications with or about a Complainant.
3. Any and all Documents reflecting Communications between the Governor and any Complainant.
4. Any and all Documents concerning a Complainant's attendance at an event, appointment, or meeting at which the Governor was or would be present, including any at the Executive Offices or the Governor's Mansion.
5. Any and all Documents concerning any change in the position, title, employment, or office of any Complainant.
6. Any and all Documents concerning Communications with the media or public and other public statements about the Complainants or Complaints concerning the Governor.
7. Any and all Documents relating to how to respond to Complaints concerning the Governor, including the nature of any investigation to be conducted about such Complaints.
8. Any and all Documents concerning retention or deletion of records within the Executive Chamber, including but not limited to Communications between members or policies regarding the deletion of emails, use of Blackberry instant messaging, and other means of communication.
9. Documents sufficient to identify Your employment history, beginning with Your employment by the Executive Chamber and up to the present day, including but not limited to the time period of Your employment, Your title(s), Your position(s),

Your responsibilities, and Your direct supervisor(s) for each position.

10. A list of all Your electronic devices used for any Communication related to the Executive Chamber or the Governor, whether personally owned or supplied to you by the Executive Chamber, the State, or otherwise.

11. A list of all Your email addresses or phone numbers used for any Communication related to the Executive Chamber or the Governor.

ATTACHMENT 1
Electronic Document Production Specifications

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

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

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

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

A. Relational Databases

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

B. Compression

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

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

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

- hh:mm:ss:mmm

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

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

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

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

D. ***Opticon Load File***

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

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

E. ***Native Files***

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

ATTACHMENT 2
Required Fields for Metadata Load File

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

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

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

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

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

AFFIDAVIT OF COMPLIANCE WITH SUBPOENA

State of _____ }
County of _____ }

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

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

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

Signature of Affiant

Date


Printed Name of Affiant

* * *


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


_____, Notary Public

My commission expires: _____

 0046 17:27:51


Totally not cleaning just going to watch tv or read 19:24:09

Dani Lever  (iMessage)>

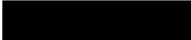
 Yes 19:25:58


Also we didn't throw away the J 19:26:09

(no sender information available)


 When did you smoke a j 19:26:59


Oh oh oh 19:27:02

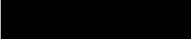
Dani Lever  (iMessage)>


 Juul lol 19:27:09

(no sender information available)


 I feel like I'm going to need patches 19:27:39


I'm so  21:34:20


Dani Lever  (iMessage)>

 why did something happen 21:37:26



(no sender information available)

 No I'm just bummed about life 21:40:49

Dani Lever  (iMessage)>

 Why 21:42:33

(no sender information available)

  and feeling like I'm going to be 21:43:48

AWALSH00000591

EXHIBIT

3

trapped in this shit job forever

But I've been cry drink cleaning so it's great in here but also 21:59:59

[REDACTED]
[REDACTED]

Dani Lever [REDACTED] (iMessage)>



Are you really crying

22:03:48

(no sender information available)



Yeah but I stopped we pulled thru it

22:07:45

I think it's time to [REDACTED] and tmrw I'm going to fully
send everyone who has ever been alive my resume 22:08:14

Is that weird to do before you meet with ppl 22:08:22

Dani Lever <[REDACTED]> (iMessage)



Not weird

22:08:46

(no sender information available)



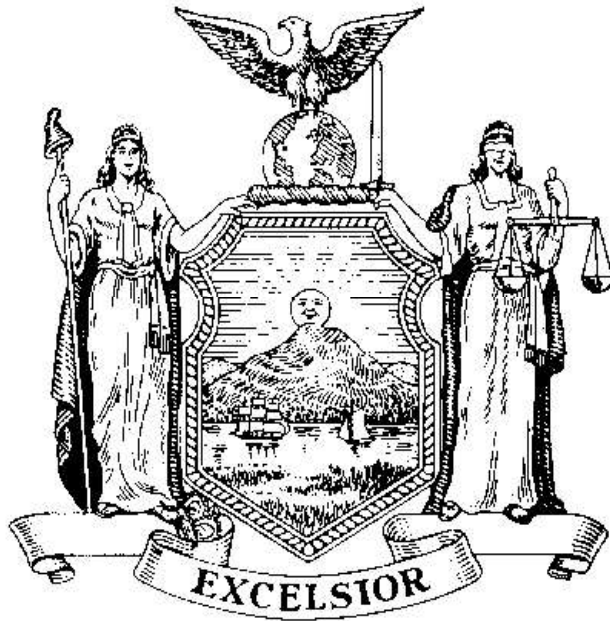
Also may be high on Clorox but that's probably for the best 22:11:56

Also picking the [REDACTED] didn't go well and may
have facilitated this [REDACTED] 22:12:14

Not your fault, mine 22:12:19

But I feel like the [REDACTED] over vacuuming the rug in my
room to still have it shed clouds of white was a real low that
we'll appreciate later 22:13:08

**STATE OF NEW YORK
EXECUTIVE DEPARTMENT**



**EQUAL EMPLOYMENT OPPORTUNITY
In New York State**

RIGHTS AND RESPONSIBILITIES

A Handbook for Employees of New York State Agencies

**Andrew M. Cuomo
Governor**

December 2018

EXHIBIT

4

SEXUAL HARASSMENT

Sexual harassment is a form of sex discrimination and is unlawful. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Statutory protection.

Sexual harassment is prohibited as a form of sex discrimination under the Human Rights Law § 296.1 and § 296-c, and the federal Civil Rights Act of 1964, Title VII.³²

Executive Order concerning State workers.

On January 1, 2011, Governor Andrew M. Cuomo issued Executive Order No. 2 reissuing Executive Order No. 19,³³ which established State policy on sexual harassment in the workplace.

Sexual harassment.

Sexual harassment is both offensive and unlawful. Every State employee and intern is entitled to a working environment free from sexual harassment and its negative economic, psychological and physical effects. Allowing sexual harassment to go unchecked in State workplaces would create significant costs to the State in both human and financial terms, including the replacement of personnel who leave their jobs, increased use of health benefit plans due to emotional and physical stress, absenteeism, and decline in individual and workgroup productivity.

Every employer in New York State must have in place a policy on sexual harassment prevention, which includes a procedure for the receipt and investigation of complaints of sexual harassment. This policy and procedure should be distributed to new employees and made available to all staff as needed. Also, each agency must provide appropriate sexual harassment training to its staff.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or

³² 42 U.S.C. § 2000e et seq.

³³ Issued by Gov. Mario M. Cuomo on May 31, 1983.

EMPLOYEE RIGHTS AND RESPONSIBILITIES

- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

Hostile environment sexual harassment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, or which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment. Only supervisors are deemed to engage in this kind of harassment, because co-workers do not have the authority to grant or withhold benefits.

With respect to inappropriate questions during the hiring process or during employment, see below: [Unlawful Inquiries](#).

Employees should consult their agency's sexual harassment policy for further discussion of what constitutes sexual harassment.

As with all discrimination and harassment, if an employee is a victim of sexual harassment, or observes it in the workplace, the employee should complain promptly to a supervisor, managerial employee, personnel administrator, or equal employment officer. The complaint can be verbal or in writing. If the complaint is verbal, a written complaint may be required in order to assist in the investigation. Any complaint, whether verbal or written, must be investigated by the agency. Furthermore, any supervisory or managerial employee who observes or otherwise becomes aware of conduct of a sexually harassing nature, must report such conduct so that it can be investigated.

If an employee is harassed by a co-worker or a supervisor, it is very important that a complaint be made to a higher authority promptly. An agency cannot stop sexual harassment unless it has knowledge of the harassment. Once informed, the agency is required to initiate an investigation and take prompt and effective remedial action where appropriate.

See below: [Harassment](#).

Harassment by a non-employee.

The employing agency has the duty to prevent harassment in the workplace including harassment by non-employees, such as vendors, consultants, clients, customers, visitors or interns.

EMPLOYEE RIGHTS AND RESPONSIBILITIES

Harassment of non-employees.

Non-employees in the workplace, who are performing work under contract, are explicitly protected from sexual harassment by Human Rights Law § 296-d.

In accord with statewide policy, employees and interns are subject to discipline for harassment of *anyone* in the workplace, including contractors, clients, vendors, or any members of the public.

DISABILITY

No decision affecting hiring, promotion, firing or a term, condition or privilege of employment shall discriminate on the basis of a person's disability, nor shall employees be harassed or otherwise discriminated against on such basis, or perceived basis.

All employees must be able to perform the essential functions of their jobs in a reasonable manner, with or without a reasonable accommodation. Consideration of requests for accommodation of applicants or employees with disabilities is required and should be granted where reasonable.

Statutory protection.

Disability discrimination is unlawful pursuant to Human Rights Law § 296.1 and § 296-c. Reasonable accommodation is required of employers pursuant to Human Rights Law § 296.3(a). New York State law has a very broad definition of disability, and generally protects persons with any disabling condition, including temporary disabilities. Disability discrimination is also unlawful under federal law. However, the scope of disability under the provisions of the Americans with Disability Act (ADA) is not as broad.³⁴ The Federal Rehabilitation Act of 1973 § 503 and § 504³⁵ also apply to many State workers. Federal law also requires reasonable accommodation.

Guide dog, hearing dog, and service dog provisions are found in Human Rights Law § 296.14. An employee who uses a guide, hearing or service dog is also protected by Civil Rights Law § 47-a and § 47-b.

What is a “disability” under the Human Rights Law?

A “disability” is:

- a physical, mental or medical impairment resulting from anatomical, physiological, genetic or neurological conditions which prevents the exercise of a

³⁴ 42 U.S.C. § 12111 et seq.

³⁵ 29 U.S.C. § 793 and § 794.

EMPLOYEE RIGHTS AND RESPONSIBILITIES

this booklet). Information on protected class membership which is collected for statistical purposes should be retained separately from a candidate's other information.

Retaliation

Retaliation by an employer is unlawful pursuant to the Human Rights Law and the Civil Service Law.⁸¹ The federal statutes mentioned in this handbook also prohibit retaliation.

The Human Rights Law protects any individual who has filed a complaint, testified or assisted in any proceeding under the Law, as well as one who has opposed any practices forbidden by the Law. Even if the practices the individual has opposed are not in fact a violation of the Human Rights Law, the individual is protected if he or she had a good faith belief that the practices were unlawful.

Division or court proceedings.

A complainant or witness is absolutely protected against retaliation for any oral or written statements made to the Division or a court in the course of proceedings, regardless of the merits or disposition of the underlying complaint.

Opposing discriminatory practices.

Opposing discriminatory practices includes filing an internal complaint of discrimination with the employing agency or reporting discriminatory actions to a supervisor or other appropriate person, either verbally or in writing. It also includes complaining that another person's rights under the Law were violated or encouraging a fellow employee to report unlawful discriminatory practices.

However, behaving inappropriately towards a person deemed to be engaged in discrimination or harassment does not constitute protected opposition to unlawful practices. Employees should instead complain to a supervisor, manager, human resources officer, or EEO officer.

There is no protection for a person who opposes practices the person finds merely distasteful or wrong, despite having no reasonable basis to believe those practices were in violation of the Law or State policy. Furthermore, the retaliation provision is not intended to protect persons making false charges of discrimination.

Adverse employment action.

Retaliation occurs when an adverse action or actions is taken against the employee by the employer. The action need not be job-related or occur in the workplace. Unlawful retaliation can be any action, more than trivial, that would have the effect of dissuading a reasonable worker from making or supporting a charge of discrimination.

⁸¹ Human Rights Law § 296.7; see also Civil Service Law § 75-B, which gives protection to "whistleblowers."

EMPLOYEE RIGHTS AND RESPONSIBILITIES

Actionable retaliation by an employer can occur after the individual is no longer employed by that employer. This can include giving an unwarranted negative reference for a former employee.

An adverse action is not retaliatory merely because it occurs after the employee engaged in protected activity. Employees continue to be subject to all job requirements and disciplinary rules after having engaged in such activity. In order to make a claim of retaliation, the individual must be able to substantiate the claim that the adverse action was retaliatory.

Interns

Paid interns are employees, and all provisions relating to employees explained in this document apply to paid interns. Unpaid interns are explicitly protected by Human Rights Law § 296-c, and are entitled to the same protections as employees, in most areas, wherever § 296-c is referenced in the sections above.

Unpaid interns are protected from discrimination in hiring, discharge, or the terms, conditions or privileges of employment as an intern because of the intern's age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status, or domestic violence victim status. Unpaid interns are also explicitly protected from harassment.

Political Activities

The Civil Service Law provides that no appointment or selection or removal from employment shall relate to the political opinions or affiliations of any person. No person in the civil service of the State is under any obligation to contribute to any political fund or render any political service and no person shall be removed or otherwise prejudiced for refusing to do so. No person in the civil service shall discharge or promote or reduce or in any manner change the rank or compensation of another for failing to contribute money or any other valuable thing for any political purpose. No person in the civil service shall use his or her official authority or influence to coerce the political action of any person or body or to interfere with any election.⁸² This law is enforced by the New York State Joint Commission on Public Ethics. Complaints regarding this provision should not be filed with the Division of Human Rights.

Diversity

New York State is committed to a nondiscriminatory employment program designed to meet all the legal and ethical obligations of equal opportunity employment. Each department develops affirmative action policies and plans to ensure compliance with equal opportunity laws. To assist in building cooperative work environments, which

⁸² Civil Service Law § 107.

2019 Mandatory Training Attestation Form

I hereby attest that I have completed the following mandatory training courses
(check all that apply):

<input checked="" type="checkbox"/>	Equal Employment Opportunity: Rights and Responsibilities
<input checked="" type="checkbox"/>	Ethics for New York State Employees
<input checked="" type="checkbox"/>	Information and Cyber Security Awareness
<input checked="" type="checkbox"/>	NYS Right to Know Law
<input checked="" type="checkbox"/>	Prevention of Violence in the Workplace
<input checked="" type="checkbox"/>	Sexual Harassment in the Workplace
<input checked="" type="checkbox"/>	Supervisor's Guide to Reasonable Accommodation of Religious Observance or Practices
<input checked="" type="checkbox"/>	Supervisor's Guide to Reasonable Accommodation of Employees with Disabilities and Pregnancy-Related Conditions
<input checked="" type="checkbox"/>	Fire Safety
<input checked="" type="checkbox"/>	Internal Controls

I have read and understand the material and acknowledge that I am responsible
for complying with its contents.

Name (print): F. Annabel Wilson
Signature: F.A. Wilson Date: 10/17/19

Return the completed and signed form to [REDACTED]@exec.ny.gov.

Start Date May 10, 2019 12:12:54 AM UTC

End Date May 10, 2019 1:08:18 AM UTC

Chat Staffer #5 <[REDACTED]> (IMessage)>, Annabel Walsh
Account [REDACTED] (Sms)>, Staffer #5 [REDACTED] (Mms)>, Annabel
Walsh [REDACTED] (Mms)>, Staffer #5 [REDACTED] (Sms)>,
Annabel Walsh [REDACTED] (IMessage)>, Staffer #5 [REDACTED]
[REDACTED] Annabel Walsh [REDACTED]

Staffer #5 <[REDACTED]> (IMessage)>

 He's having [REDACTED] come To 633 00:12:54

He told me to go and keep Charlotte here 00:13:03

I put gift in his car 00:13:08

Charlotte is good. Out of his hands now 00:13:20

My hands now 00:13:24

(no sender information available)

 Oh Jesus 00:28:50

Staffer #5 <[REDACTED]> (IMessage)>

 Lol I know 00:33:05

I tried to get her out. I asked him if I could send her home too. 00:33:23
He said have her stay a while

She says it's quiet there. All good 00:33:31

(no sender information available)

 Okay thank you! 00:36:55

Staffer #5 <[REDACTED]> (IMessage)>

 FYI he's @ docks w. [REDACTED] 01:08:18

AWALSH00000614

EXHIBIT

6

Start Date August 6, 2019 12:13:16 AM UTC

End Date August 6, 2019 11:59:54 PM UTC

Chat Andrew Ball <[REDACTED]> (IMessage)>, Andrew Ball [REDACTED]
Account (Sms)>, Annabel Walsh [REDACTED] (Sms)>, Andrew Ball [REDACTED]
t [REDACTED] (Mms)>, Annabel Walsh [REDACTED] (Mms)>, Annabel
Walsh [REDACTED] (IMessage)>, Andrew Ball [REDACTED], Annabel
Walsh [REDACTED]

Andrew Ball <[REDACTED]> (IMessage)>

 Sick sky right now 00:13:16

(no sender information available)

 BANANAS 00:18:41

I'm not ready for today 12:07:56

Andrew Ball <[REDACTED]> (IMessage)>

 I know 12:08:27

But it's gunna be ok 12:08:33

He leaves at 1 12:08:36

(no sender information available)

 I'm staffing him ... 12:09:46

Andrew Ball <[REDACTED]> (IMessage)>

 Whoops 12:09:47

(no sender information available)

 Yep 12:09:57

Andrew Ball <[REDACTED]> (IMessage)>

 Where's Steph? 12:09:59

AWALSH00000142

EXHIBIT

7

(no sender information available)

 Not coming down w him 12:10:07

Andrew Ball <[REDACTED]> (iMessage)>

 Yeah, why 12:10:15

(no sender information available)

 And sounds like we're off to a bang up start 12:10:19

Andrew Ball <[REDACTED]> (iMessage)>

 I have faith in you 12:10:42

It will be ok 12:10:53

(no sender information available)

 This is tough 12:16:58


This is a nightmare my cab driver just went in a huge circle and now I'm going to have NO TIME FOR COFFEE 13:04:11

Everyone is fired 13:04:18

Andrew Ball <[REDACTED]> (iMessage)>

 I JUST left pret 13:04:49

(no sender information available)

 Oh no I'm getting coffee it's just whether it means I'm fired bc I'm late 13:05:16

Andrew Ball <[REDACTED]> (iMessage)>

 Ha 13:05:35

Noice 13:05:39

~/Library/SMS/Attachments/c1/01/at_0_358F2D4A-4518-4C56-AFC9-428B4D367287/IMG_2394.mov 18:32:05

THAT PIN! 21:35:41

(no sender information available)


 I know right 22:17:57

Andrew Ball  (iMessage)>

 I can't believe I came to this 22:18:28

Snooze fest 22:18:35

(no sender information available)

 Why on earth would you go to that 22:18:47

I mean I get t but no 22:18:52

Andrew Ball  (iMessage)>

 I know 22:18:56

I want to leave 22:18:59

But it's weird because it's so quiet 22:19:11

(no sender information available)

 Yeah 22:19:33

That's not ideal 22:19:35

Andrew Ball  (iMessage)>

 Wow 22:46:56

Over 22:46:59

Longest hour of my life 22:47:20

(no sender information available)

 Omg 22:47:33

Where wa it ? What was it about 22:57:31

Andrew Ball  (iMessage)>

 At some event space at the durst Bldg in Times Square 23:01:23

Was interesting but kind of boring 23:01:32

About John f k jr running for President in 2020 23:01:48

(no sender information available)

 Have you done avengers yet 23:48:32

Andrew Ball  (iMessage)>

 No! 23:48:39

I really want to but haven't yet 23:48:55

(no sender information available)

 I know me too it's too long 23:50:27


I feel like I need a day 23:50:37

Andrew Ball  (iMessage)>


 Yeah, it's a weekend thing 23:50:47

Gotta settle in 23:50:51

(no sender information available)


 I am feeling really strongly about never going to work again 23:52:53


Andrew Ball  (iMessage)>


 Loved "I am feeling really strongly about never going to work again" 23:53:06


Should we start out cross country adventure?! 23:53:17

(no sender information available)

 What do you think would happen if we both just quit a 23:54:49


Andrew Ball  (iMessage)>

 Ouch....so that's a no 23:55:28

 [~/Library/SMS/Attachments/38/08/at_0_34E4DFA7-CEFE-4C7F-846C-1EE5FCBB4261/ms-4nYvpW.gif](#)


Lol 23:55:31


(no sender information available)

 No it's not!!! 23:55:40


It's just a fun dream of imagining 23:55:58

Everyone's rage, immediate disparaging, and finally feelings of good riddance 23:56:40


Andrew Ball  (iMessage)>


 Definitely 23:57:32

(no sender information available)

 Charlotte cried a lot w me today and I think that I shouldn't have told Jill 23:59:04

I blew off my neighbor 23:59:20

Andrew Ball  (iMessage)>

 Why was she crying? 23:59:47


I get that 23:59:54

Start Date August 27, 2019 10:05:40 PM UTC

End Date August 27, 2019 10:10:30 PM UTC

Chat [REDACTED] (iMessage)>, Annabel Walsh [REDACTED]
Account (Sms)> [REDACTED] [REDACTED] (Sms)>,
t Annabel Walsh [REDACTED] (Mms)>, Annabel Walsh [REDACTED]
(iMessage)>, Annabel Walsh [REDACTED]
(Mms)>

(no sender information available)

 Hi there. Charlotte coming, she's going to pin you but you or someone meet her downstairs? I don't want her going up pls 22:05:40

[REDACTED] (iMessage)>

 yes .. out in the front 22:08:29

(no sender information available)

 Thank you. 22:10:30


AWALSH00000596

Start Date October 26, 2019 2:10:22 PM UTC

End Date October 26, 2019 10:45:22 PM UTC

Chat Account Jill DesRosiers [REDACTED] (iMessage)>, Jill DesRosiers [REDACTED] (Sms)>, Annabel Walsh [REDACTED] (Sms)>, Annabel Walsh [REDACTED] (Mms)>, Annabel Walsh [REDACTED] (iMessage)>, Jill DesRosiers [REDACTED] (Mms)>, Annabel Walsh [REDACTED], Jill DesRosiers <[REDACTED]>

Jill DesRosiers [REDACTED] (iMessage)>

 Can you send me the labor and pols list I can't find it 14:10:22

(no sender information available)

 Yep 14:19:09

Jill DesRosiers [REDACTED] (iMessage)>

 What part was too late 15:01:48

(no sender information available)

 Who cares 15:02:47


Getting him the invite ? 15:02:52

Jill DesRosiers [REDACTED] (iMessage)>

 Good pint 15:02:54

Point 15:02:57

(no sender information available)

 God can he ever just do this shit on a work day 15:07:32

Jill DesRosiers [REDACTED] (iMessage)>


 Nope we have to ruin every weekend 15:07:52


(no sender information available)


AWALSH00000602

EXHIBIT


9

 It's so fucking annoying 15:07:58

Jill DesRosiers  (iMessage)>


 He's going to make me retype the fucking labor list right 15:13:35


(no sender information available)

 Yep 15:15:26


They're giggling and flirting and having the time of their lives 19:03:27


I walked in as they were taking about next week 19:03:38


Jill DesRosiers  (iMessage)>

 Who Charlotte 19:03:46


(no sender information available)

 Yup 19:03:50


Jill DesRosiers  (iMessage)>


 I quit 19:03:57

(no sender information available)


 SO GLAD I CAME IN BECAUSE SHES OVER WORKED 19:04:42

When he saw me the fury in his eyes was almost worth it 19:04:59

Jill DesRosiers  (iMessage)>

 I haven't slept in 5 years but she stayed up late 19:05:04

(no sender information available)

 Yep. For nothing having to do with this to be clear 19:05:15

He was like where are the LGA remarks? I was like we have a 19:05:54

draft let me just confirm that [REDACTED] has reviewed them and he was like yeah I don't care give them to me because

No because idk how I typed that 19:06:02

And then I was like I'll get them but I am going to finish the week with you first. 19:06:28


Jill DesRosiers [REDACTED] (iMessage)>

 Did he do the electeds list 19:06:43


(no sender information available)

 Idk I'll ask once they're done 19:07:35


Jill DesRosiers [REDACTED] (iMessage)>

 Is she still in there going through the week 19:07:57


(no sender information available)

 I'm seriously going to murder him he's such an asshole 20:04:12

Jill DesRosiers [REDACTED] (iMessage)>

 God what now 20:09:54

(no sender information available)

 I'm going to lose my mind I hate him so much 21:40:19


Who is the head of mercury 21:40:24

Jill DesRosiers [REDACTED] (iMessage)>

 [REDACTED] he was invited 21:40:57


[REDACTED] is a yes asked about attire! I think he comes in face paint 21:41:19


(no sender information available)

 Yeah that's what I said but of course I can't be right there 21:41:31

FUCK. FUCK I WANTED THAT TO GO TO YOU AND DANI 22:39:15


Whatever I don't care she should know to 22:39:20

Jill DesRosiers  (iMessage)>

 Oh my god! It's ok! 22:40:09

She knows and if she doesn't I don't know what to say 22:40:21

(no sender information available)

 I want her to know. I want to FUCKING scream at all of these people 22:45:22

Start Date October 27, 2019 11:59:28 AM UTC

End Date October 27, 2019 10:09:59 PM UTC

Chat Account t Jill DesRosiers [REDACTED] (IMessage)>, Jill DesRosiers < [REDACTED] (Sms)>, Annabel Walsh [REDACTED] (Sms)>, Annabel Walsh [REDACTED] (Mms)>, Annabel Walsh [REDACTED] (IMessage)>, Jill DesRosiers [REDACTED] (Mms)>, Annabel Walsh < [REDACTED] Jill DesRosiers [REDACTED]

Jill DesRosiers [REDACTED] (IMessage)>

 He needs us to go? 11:59:28

(no sender information available)

 Fuck him 12:00:13

Jill DesRosiers [REDACTED] (IMessage)>

 Such an asshole 12:01:26

Also I'm going to find someone else to hire and move Charlotte downstairs I'm not doing this he probably doesn't like her but doesn't want to say


(no sender information available)

 Of course 12:02:12

She'll fucking be devastated 12:02:29

Which is why I hated her for that job anyways 12:02:36

Jill DesRosiers [REDACTED] (IMessage)>

 Sounds like he's ok with [REDACTED]? He'll hate him too 12:03:59

(no sender information available)

 I can't wait to tell him he has a [REDACTED] 12:04:21


Jill DesRosiers [REDACTED] (IMessage)>

Start Date January 29, 2017 11:13:40 PM UTC


End Date January 29, 2017 11:29:39 PM UTC

Chat Jill DesRosiers [REDACTED] (IMessage)>, Jill DesRosiers [REDACTED]
Account (Sms)>, Annabel Walsh [REDACTED] (Sms)>, Annabel Walsh
t [REDACTED] (Mms)>, Annabel Walsh [REDACTED] (IMessage)>, Jill
DesRosiers [REDACTED] (Mms)>, Annabel Walsh [REDACTED], Jill
DesRosiers <[REDACTED]>


(no sender information available)

 Also did we ever decide what we do with [REDACTED] for the staff meetings or should I ask him 23:13:40

Jill DesRosiers [REDACTED] (IMessage)>

 She's coming up tomorrow for the event so maybe it's ok? Or are we thinking of kicking her out 23:14:17


(no sender information available)

 No I more so meant like if we make her come up - so we'll figure that out for the next time we do one. I'm also going to add Kaitlin to all of the meetings. Even though he told us today she was useless because she still doesn't know anything 23:17:53


Jill DesRosiers [REDACTED] (IMessage)>

 Geez ok 23:28:27

(no sender information available)

 Yeah I think it was a shot that I wasn't there and not really about her which is good 23:29:10

Jill DesRosiers [REDACTED] (IMessage)>

 Yeah it's great... 23:29:39

AWALSH00000599

EXHIBIT


10

Start Date September 13, 2017 12:38:25 AM UTC

End Date September 13, 2017 12:17:24 PM UTC

Chat Dani Lever [REDACTED] (IMessage)>, Stephanie Benton [REDACTED]
Account (IMessage)>, Annabel Walsh [REDACTED] (Sms)>, Dani Lever
t [REDACTED], Annabel Walsh [REDACTED] (Mms)>, Stephanie
Benton [REDACTED] (Sms)>, Dani Lever [REDACTED] (Mms)>,
Annabel Walsh [REDACTED] (IMessage)>, Dani Lever [REDACTED]
(Sms)>, Stephanie Benton [REDACTED] (Mms)>, Annabel Walsh
[REDACTED], Stephanie Benton [REDACTED]

Stephanie Benton [REDACTED] (IMessage)>

 [~/Library/SMS/Attachments/ac/12/at_0_B6B07CFE-9241-4256-AD71-C092B6103D01/output.jpg](#) 00:38:25

(no sender information available)


 Oh my god 01:08:33

ALREADY SMILING !!?? 01:08:39

Wait also let's fuckig fire Kaitlin [REDACTED] 01:08:50

Like 6 months ago 01:08:54

Dani Lever [REDACTED] (IMessage)>

 Do we know if he's def coming into office first 11:16:14

Stephanie Benton [REDACTED] (IMessage)>

 Was here at 645 11:18:45

(no sender information available)

 Ugh I'm coming 11:18:56

Dani Lever [REDACTED] (IMessage)>

 Stop 11:18:59

I'm going to event 11:19:10

AWALSH00000567

EXHIBIT

11

Start Date September 17, 2018 1:00:19 PM UTC

End Date September 17, 2018 11:52:01 PM UTC

Chat Dani Lever [REDACTED] (IMessage)>, Annabel Walsh [REDACTED]
Account (Sms)>, Dani Lever [REDACTED] Annabel Walsh [REDACTED]
t (Mms)>, Dani Lever [REDACTED] (Mms)>, Annabel Walsh
[REDACTED] (IMessage)>, Dani Lever [REDACTED] (Sms)>, Annabel
Walsh [REDACTED]

Dani Lever [REDACTED] (IMessage)>


 Omg are you back 13:00:19

(no sender information available)

 No I'm en route to airport 13:02:35

What's happening there I'm scared I haven't spoken to Jill and she still seems weird 13:02:59

Dani Lever [REDACTED] (IMessage)>

 I barely spoke to her all weekend 13:05:31

I don't want to go 13:05:41

To work 13:05:43

I can wear jeans right 13:05:48

(no sender information available)

 Ugh me either 13:05:52

I get in at 430p I'm not coming in 13:06:30

Do you think it's bad that I'm out today 13:08:28

Dani Lever [REDACTED] (IMessage)>


 Did you like vitners daughter 13:33:39

(no sender information available)

AWALSH00001199


EXHIBIT


12

 I wasn't wild about t 13:45:31

I'm scared 14:28:01

What's happening 14:29:03

Dani Lever  (IMessage)>


 Nothing Melissa having senior staff 14:40:26


I'm hanging at my desk 14:40:30

Obv walked in at same time as the governor 14:40:43

What time do you take off? 14:40:48


(no sender information available)


 She's freaking out on this call about tmrw's private rally 14:43:00

My  is killing me and I'm scared I'm offline for this flight 14:43:13


Melissa is wiggling out and seems really scary today 14:43:44

And I forgot to include a private fundraiser on weds night when I sent her the week bc I didn't have the block in front of me and now I'm panicking 14:44:13


Dani Lever  (IMessage)>


 What is she freaking out about 14:44:30

(no sender information available)

 I dunno about this rally tmrw 14:44:39

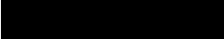
And her office keeps calling me for the block 14:45:00

Dani Lever  (IMessage)>

 What is the rally 14:45:01

(no sender information available)

 Like a dem unity rally 14:55:55

Dani Lever  (iMessage)>

 Do you have internet 18:24:53

(no sender information available)

 Hi is this working 20:03:08

No it stopped working after like 15 minutes 20:03:09

Dani Lever  (iMessage)>

 Yes 20:12:53

Did you land 20:12:57


(no sender information available)

 Yes just crying i. My cab 20:29:57

Dani Lever  (iMessage)>

 Why are you crying 20:30:10


(no sender information available)

 I don't know I just don't want to be here and I know it's 20:31:29
because I'm just tired but I hate this fucking job and I feel so
full of dread being back and I feel like I sucked this weekend
and feel badly about it and I just want to go home but I don't
know where home is anymore

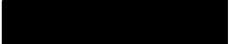
Dani Lever  (iMessage)>


 Ok breathe 20:43:30

(no sender information available)


 I'm not coming into the office do we think that's a mistake because I don't know what's happening 20:50:22

I'm coming I feel like I need to get a handle on everything 21:07:21

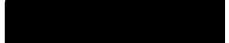
Dani Lever  (IMessage)>


 What's happening there 23:01:19

(no sender information available)

 I don't think we're ever getting past next week 23:26:04

What's happening there 23:26:08


Dani Lever  (IMessage)>


 What Do you mean 23:26:27


I'm having a glass at osteria with stef 23:26:38

But going to leave soon 23:26:43

(no sender information available)


 Did he leave 23:26:47


Dani Lever  (IMessage)>


 Yes 23:27:46

Are you still at campaign 23:27:50


(no sender information available)

 Yes 23:27:53

Dani Lever  (IMessage)>


 Will you be for a while? 23:28:06


(no sender information available)

 I want to leave my 23:29:01


But I don't think I can 23:29:04


I actually fucking hate this place 23:35:46


Dani Lever  (IMessage)>

 What's happening 23:36:09


(no sender information available)

 Nothing I just hate this place I would never agree with Lindsey 23:36:51
on anything but it is ducking toxic


Dani Lever  (IMessage)>


 Did something actually happen 23:38:15

(no sender information available)

 No 23:39:44

Let me know when you leave osteria 23:43:12


Dani Lever  (IMessage)>

 I just got in a cab 23:43:25

Sorry! 23:43:27

You said you weren't leaving 23:43:31

(no sender information available)

 No worries 23:43:31

I want to leave I need to eat dinner and go to bed but I don't 23:52:01
think I can



Explore

Settings

Thread

- Lindsey Boylan** @LindseyBoylan · Dec 8, 2020

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

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

22 174 1.1K
- Lindsey Boylan** @LindseyBoylan · Dec 8, 2020

I have very important work to do getting elected so I can help my city recover and my people be heard.

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

Instead I'm getting back to my work.

4 20 265
- Lindsey Boylan** @LindseyBoylan · Dec 8, 2020

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

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

5 40 335
- Lindsey Boylan** @LindseyBoylan · Dec 8, 2020

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

I will fight.

20 55 442

Replies

- D'Abbey-Bonacci** @lordgrand7 · Dec 8, 2020

Replying to @LindseyBoylan and @NYGovCuomo

I hope things go well for you @LindseyBoylan. There are women across the globe that have suffered trauma from powerful men. Sadly, it's an enduring reality for too many women. I don't know your story, but I'm acutely aware what trauma inflicted by powerful men can do. Stay strong

1 2 27
- Sandra Rios** @sabulosaa · Dec 8, 2020

Replying to @LindseyBoylan and @NYGovCuomo

????? unbelievable #StrongerTogether

3
- Roger** @Roger2dot0 · Dec 8, 2020

Replying to @LindseyBoylan @es_indivisible and @NYGovCuomo

What are you talkin about?

1

View more replies

Search Twitter

New to Twitter?

Sign up now to get your own pers

Sign up

Relevant people

- Lindsey Boylan** @LindseyBoylan

Mom. Progressive M
4 a Livable City. Fm
& Urban Planner. C
Manhattan Boroug
- Andrew Cuomo** @NYGovCuomo

Father, fisherman, n
enthusiast, 56th Go

What's happening

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

Trending in United States
BOYFRIEND REVEAL
4,131 Tweets

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

COVID-19 - LIVE
COVID-19: News and upda
New York

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

Show more

Terms of Service Privacy Policy
Ads info More ... © 2021 Twit

Don't miss what's happening

People on Twitter are the first to know.

Log in S




Start Date December 8, 2020 12:30:10 AM UTC


End Date December 8, 2020 11:29:32 PM UTC

Chat [REDACTED] (IMessage)>, Annabel Walsh [REDACTED]
Account (IMessage)>, Annabel Walsh [REDACTED] (Sms)>, Annabel Walsh
t [REDACTED] (Mms)>, [REDACTED] (Sms)>, [REDACTED]
[REDACTED] (Mms)>, Annabel Walsh [REDACTED]

[REDACTED] (IMessage)>

 Also is Lindsay Boylan going to get murdered now 00:30:10

Annabel Walsh [REDACTED] (IMessage)>


 Omg [REDACTED] was GRILLING me about her earlier today and I was like I don't want to talk about it with you lady 00:42:19

She was crazy and has been saying how toxic that place is forever 00:42:28

[REDACTED] (IMessage)>


 Of course she was!! 00:54:55

Annabel Walsh [REDACTED] (IMessage)>

 First time we had to change conference call lines post departure 01:07:39

Also Jill is [REDACTED] (between us) and now I'm getting the FULLLLL guilt trip must return threatening to call [REDACTED] 01:08:12

[REDACTED] (IMessage)>

 Emphasized "First time we had to change conference call lines post departure " 01:38:44

Oh wow 01:38:49

I mean... 01:39:05


You can't go back!! 01:39:21

Also you never answered this 15:06:58

Which concerns me 15:07:01

And also, how is it we landed a national tv segment that aired 15:07:48
last night and on morning joe this morning [REDACTED] is focused on
this airport contract renewal release in Denver

Annabel Walsh [REDACTED] (iMessage)>


 Obviously I'm not ! But don't give them her number if they ask 15:11:59
you tricky like

I know it's TRULY insane 15:12:32

We're dictating a 30 min description of the EVP of people for 15:12:55
[REDACTED]

30. Full. Minutes. 15:13:00

[REDACTED] [REDACTED] (iMessage)>

 Laughed at "Obviously I'm not ! But don't give them her 15:14:19
number if they ask you tricky like "

You know what it reminds me of? When Cuomo was more 15:15:04
concerned about the state fair talking points than a CBS
morning interview!!!

Redacted in Original Production 15:15:55

Annabel Walsh [REDACTED] (iMessage)>

Redacted in Original Production 15:57:34

[REDACTED] [REDACTED] (iMessage)>

Redacted in Original Production 16:01:52

Annabel Walsh < [REDACTED] (iMessage)>

Redacted in Original Production

16:02:06

17:33:27

[Redacted] <[Redacted] (iMessage)>

Redacted in Original Production

17:37:16

17:37:19

Annabel Walsh <[Redacted] (iMessage)>

Redacted in Original Production

17:37:26

[Redacted] <[Redacted] (iMessage)>

Redacted in Original Production

18:19:33

Annabel Walsh <[Redacted] (iMessage)>

Redacted in Original Production

18:19:43

[Redacted] <[Redacted] (iMessage)>

Redacted in Original Production

18:21:14

18:28:51

22:45:31

Annabel Walsh <[Redacted] (iMessage)>

Redacted in Original Production

22:46:10

[Redacted] <[Redacted] (iMessage)>

Redacted in Original Production

22:46:25

Annabel Walsh <[Redacted] (iMessage)>

Redacted in Original Production

22:46:36

22:46:41

[REDACTED] (iMessage)>

Redacted in Original Production

22:46:54

22:47:03

22:47:06

22:47:15

22:58:11

Annabel Walsh [REDACTED] (iMessage)>

Redacted in Original Production

23:01:04

23:25:40

[REDACTED] (iMessage)>

Redacted in Original Production


23:29:32

Start Date December 16, 2020 10:00:13 PM UTC

End Date December 16, 2020 10:01:03 PM UTC

Chat Account t Melissa DeRosa [REDACTED] (IMessage)>, Annabel Walsh [REDACTED] (Sms)>, Dani Lever [REDACTED] Stephanie Benton [REDACTED] (Sms)>, Melissa DeRosa [REDACTED], Annabel Walsh [REDACTED] (IMessage)>, Dani Lever [REDACTED] (IMessage)>, Stephanie Benton [REDACTED] (IMessage)>, Dani Lever [REDACTED] (Sms)>, Melissa DeRosa [REDACTED] (Sms)>, Annabel Walsh [REDACTED], Stephanie Benton [REDACTED]

 Melissa DeRosa [REDACTED] (IMessage)>

	Just sent u guys current op ed	22:00:13
	[REDACTED] has agreed to do	22:00:23
	Alphonso said if we need him he will do	22:00:31
	[REDACTED] and [REDACTED] lookinh now	22:00:50
	I wouldn't ask you guys if we weren't fighting for our lives	22:01:03

AWALSH00000041



Dani Lever [REDACTED]@gmail.com>

(no subject)

1 message

Melissa DeRosa [REDACTED]@gmail.com>
To: Annabel Walsh [REDACTED]@gmail.com>, Dani Lever [REDACTED]@gmail.com>

Wed, Dec 16, 2020 at 4:59 PM

We are former senior staff members of Governor Andrew Cuomo's Office.

We are writing in response to the claims made on twitter by Lindsay Boylan. We do so reluctantly. Each of us is a longtime and active supporter of civil rights and women's engagement. We believe women must be heard and that allegations of workforce misconduct must be taken seriously. However, when an accusation is unfounded and seemingly launched to gain a political advantage, standing by silently is not an option. To do otherwise, risks delegitimizing the rights of survivors of workplace abuse.

And, while we are fully aware of the all too frequent phenomenon where those who are subject to abuse do not come forward and even deny the abuse they have endured, we think it is significant to note that Ms. Boylan only began raising complaints about her experience last year when she launched a Congressional campaign. And even then, she only complained that the Governor's Office was an abusive environment (an assertion we dispute), the claim of sexual harassment for inappropriate comments was never mentioned. Indeed, the accusation did not occur until two days after she launched a new campaign for Manhattan Borough President. We do not know Ms. Boylan's motivation but the timing is not lost on us.

The political retribution against the Governor by Ms. Boylan comes as no surprise and was directly forecasted by her. In March, during the height of the COVID crisis, the Governor issued an Executive Order truncating the petitioning period and reducing the number of signatures mandated to run for public office. The order effected every political race in the state. However, Ms. Boylan assumed it was a personal attack on her and believed the change was not helpful for her candidacy for Congress. Immediately thereafter, Ms. Boylan texted Robert Mujica, State Budget Director, "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." She texted Dani Lever, Director of Communications, at the same time. "Absolutely not helpful

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DLEVER-0001

EXHIBIT

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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.” Ms. Boylan’s political motivation against the Governor was clearly premediated and purposeful.

Also, her political campaign consultant is also a consultant to a political opponent of the Governor. Ms. Boylan is supported by lawyers and financial backers of Donald Trump: an active opponent of the Governor. We understand from credible sources that female members on Ms. Boylan’s campaign team were offended and actually quit when they heard she and her campaign planned to make such claims for purely political advantage.

We each know Ms. Boylan personally; we served with her when she was an advisor to the Governor both in the Governor’s Office and at Empire State Development Authority. It is likely that almost every interaction between the Governor and Ms. Boylan took place in either our presence or the presence of another Senior Staff member. Indeed, Ms. Boylan says as much herself. What we witnessed was a forceful and demanding Chief Executive requiring his staff do their best at all times. It was challenging work and at times it was hard both for men and women. In other words, it is what you would expect in a high-pressure environment where the accomplishments matter and failures have consequences. It isn’t for everyone. What we did not see was any kind of sexual harassment suggested by Ms. Boylan’s summary and unsubstantiated assertion.

Unfortunately, we are also aware that during Ms. Boylan’s relatively brief tenure, no less than six complaints were raised about her conduct. The complaints came from peers and subordinates, from men and women. We are not here to castigate Ms. Boylan. But it is relevant to assessing Ms. Boylan’s claim, to understand that she left State employment after being formally confronted by repeated official complaints that she “treats [subordinates] like children” and made them feel like a “punching bag”, was “degrading”, “insulting”, and “harassing”. As a consequence of inappropriately firing a subordinate, Ms. Boylan was formally counseled about her conduct by Mr. David. In response, Ms. Boylan resigned. Several days later Ms. Boylan contacted Mr. David and said she changed her mind and wanted to return to her position. Mr. David said that was not possible. Ms. Boylan attempted to contact the Governor, but Mr. David advised the Governor to not discuss the situation with Ms. Boylan as the complaints were outstanding.

Ms. Boylan suggests the Governor made comments about her looks. This is ironic because we know Ms. Boylan referred to the Governor as “handsome” and said she “loved” him to staff; which we do believe were inappropriate comments. As professional women, we also know her behavior to be inappropriately intimate with her coworkers in public, in the presence of other coworkers.

During her tenure, at the time of her departure and after her departure, no complaint – formal or informal – was ever raised about the Governor. In fact, Ms. Boylan praised the Governor and the staff for his work and accomplishments. Ms. Boylan tweeted six weeks before her departure, "I'm proud to work for a Governor who takes women seriously". And another tweet, 12 days before her departure, "So proud of my boss Andrew Cuomo and all of Team Cuomo". She also tweeted, after she left, “Governor Cuomo is the best choice for Governor”.

We are not naive. We understand politics, especially in the current environment, can be a nasty and dirty business. We know the Governor understands that one must endure the slings and arrows to be in the public arena. But it demeans all women when allegations of harassment are made for political or extortive purposes.

We encourage all women to come forward with valid complaints of harassment. But weaponizing a claim of sexual harassment for personal political gain or to achieve notoriety cannot be tolerated. False claims demean the veracity of credible claims.

Message

From: Annabel Walsh [REDACTED]@gmail.com]
on behalf of Annabel Walsh [REDACTED]@gmail.com > [REDACTED]@gmail.com]
Sent: 12/17/2020 4:21:02 PM
To: Melissa DeRosa [REDACTED]@gmail.com]
Subject: Fwd:

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

From: **Annabel Walsh** [REDACTED]@gmail.com >
Date: Wed, Dec 16, 2020 at 8:47 PM
Subject: Re:
To: Melissa DeRosa [REDACTED]@gmail.com >

below is the tom brokaw [letter](#).

I think that there are MANY, MANY people that would sign on to a letter talking about how incredible he is and how empowered they felt by him etc, I really think that is a much more powerful message that people would be (legally and otherwise) okay signing onto - I will gush forever. Attacking her isn't going to be signed onto by anyone and personally feels like the opposite of useful.

and you have all of this in your back pocket if necessary

Subject: Letter on Tom Brokaw

As professional women, we fully endorse the conversation around abuse of power in the workplace. In the context of that conversation, we would like to share our perspectives on working with Tom Brokaw.

We are current and former colleagues of Tom's, who have worked with him over a period spanning four decades. We are producers, correspondents, anchors, directors, executives, researchers, personal assistants, editors and technical staff.

Tom has treated each of us with fairness and respect. He has given each of us opportunities for advancement and championed our successes throughout our careers. As we have advanced across industries — news, publishing, law, business and government — Tom has been a valued source of counsel and support. We know him to be a man of tremendous decency and integrity.

Signed,

Susanna Aaron

Anne Binford Allen

Heather Allan

Marilyn Altman

Liz Bowyer

Mary Casalino

Christine Colvin Casper

Martha Cotton

Karen Curry

Sara Cusimano

Helene Darvick

Linda Ellman

Judy Farinet

Dianne Festa

Tammy Fine

Mary Laurence Flynn

AWALSH00000060

EXHIBIT

17

Message

From: Annabel Walsh [REDACTED]@gmail.com]
on behalf of Annabel Walsh [REDACTED]@gmail.com > [REDACTED]@gmail.com]
Sent: 12/17/2020 1:36:49 AM
To: Melissa DeRosa [REDACTED]@gmail.com]
Subject: Re:

I know you know all of this and i love you and it's going to be okay.

- 1) don't do this (but i get it)
- 2) let this story die
- 3) why give her this insanely amazing platform, if i am running for office this is the best thing that has ever happened to me
- 4) do the tom brokaw letter if you have to do anythign

We are former senior staff members of Governor Andrew Cuomo's Office.

We are writing in response to the claims made on twitter by Lindsay Boylan. We do so reluctantly. Each of us is a longtime and active supporter of civil rights and women's engagement. We believe women must be heard and that allegations of workforce misconduct must be taken seriously. However, when an accusation is unfounded and seemingly launched to gain a political advantage, standing by silently is not an option. To do otherwise, risks delegitimizing the rights of survivors of workplace abuse.

And, while we are fully aware of the all too frequent phenomenon where those who are subject to abuse do not come forward and even deny the abuse they have endured, we think it is significant to note that Ms. Boylan only began raising complaints about her experience last year when she launched a Congressional campaign. And even then, she only complained that the Governor's Office was an abusive environment (there are a lot of people that will combat this, why bring it up – it will ignite a bunch of people on the sidelines we don't need to bring in - an assertion we dispute), the claim of sexual harassment for inappropriate comments was never mentioned. Indeed, the accusation did not occur until two days after she launched a new campaign for Manhattan Borough President.

In March, during the height of the COVID crisis, the Governor issued an Executive Order truncating the petitioning period and reducing the number of signatures mandated to run for public office. The order effected – affected – every political race in the state. However, Ms. Boylan assumed it was a personal attack on her and believed the change was not helpful for her candidacy for Congress. Immediately

AWALSH00000088

EXHIBIT

18

thereafter, Ms. Boylan texted Robert Mujica – let’s be real – is bringing him up in this a good idea?, State Budget Director, “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.” She texted Dani Lever, Director of Communications, at the same time. “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.” Ms. Boylan’s political motivation against the Governor was clearly premediated and purposeful.

Ms. Boylan is supported by lawyers and financial backers of Donald Trump: an active opponent of the Governor. We understand from credible sources that female members on Ms. Boylan’s campaign team were offended and actually quit when they heard she and her campaign planned to make such claims for purely political advantage. – if I was running, I would be PSYCHED TO HAVE THIS and talk about bachelor party and

We each know Ms. Boylan personally; we served with her when she was an advisor to the Governor both in the Governor’s Office and at Empire State Development Authority. It is likely that almost every interaction between the Governor and Ms. Boylan took place in either our presence or the presence of another Senior Staff member. Indeed, Ms. Boylan says as much herself. What we witnessed was a forceful and demanding Chief Executive requiring his staff do their best at all times. It was challenging work and at times it was hard both for men and women. In other words, it is what you would expect in a high-pressure environment where the accomplishments matter and failures THAT HAVE ACTUALLY SERIOUS FUCKING CONSEQUENCES BC THIS IS A REAL JOB - have consequences for 19 million new yorkers. It isn’t for everyone. What we did not see was any kind of sexual harassment suggested by Ms. Boylan’s summary and unsubstantiated assertion.

Unfortunately, we are also aware that during Ms. Boylan’s relatively brief tenure – 2 years is not thaaaat brief, no less than six complaints were raised about her conduct. The complaints came from peers and subordinates, from men and women. We are not here to castigate – this entire thing is castigating her- Ms. Boylan. But it is relevant to assessing Ms. Boylan’s claim, to understand that she left State employment after being formally confronted by repeated official complaints that she “treats [subordinates] like children” and made them feel like a “punching bag”, was “degrading”, “insulting”, and “harassing”. As a consequence

of inappropriately firing a subordinate, Ms. Boylan was formally counseled about her conduct by Mr. David. In response, Ms. Boylan resigned. Several days later Ms. Boylan contacted Mr. David and said she changed her mind and wanted to return to her position. Mr. David said that was not possible. Ms. Boylan attempted to contact the Governor, but Mr. David advised the Governor to not discuss the situation with Ms. Boylan as the complaints were outstanding.

Ms. Boylan suggests the Governor made comments about her looks. This is ironic because we know Ms. Boylan referred to the Governor as “handsome” and said she “loved” him to staff; which we do believe were inappropriate comments. - like why this is just attacking

During her tenure, at the time of her departure and after her departure, no complaint – formal or informal – was ever raised about the Governor. In fact, Ms. Boylan praised the Governor and the staff for his work and accomplishments. Ms. Boylan tweeted six weeks before her departure, "I'm proud to work for a Governor who takes women seriously". And another tweet, 12 days before her departure, "So proud of my boss Andrew Cuomo and all of Team Cuomo". She also tweeted, after she left, “Governor Cuomo is the best choice for Governor”.

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On Wed, Dec 16, 2020 at 6:20 PM Melissa DeRosa [REDACTED]@gmail.com> wrote:

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We are not naive. We understand politics, especially in the current environment, can be a nasty and dirty business. We know the Governor understands that one must endure the slings and arrows to be in the public arena. But it demeans all women when allegations of harassment are made for political or extortive purposes.

We encourage all women to come forward with valid complaints of harassment. But weaponizing a claim of sexual harassment for personal political gain or to achieve notoriety cannot be tolerated. False claims demean the veracity of credible claims.

Start Date December 23, 2020 3:34:12 PM UTC

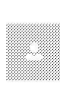
End Date December 23, 2020 5:08:38 PM UTC

Chat Account t Annabel Walsh [REDACTED] (Sms)>, Melissa DeRosa [REDACTED] (iMessage)>, Andrew Ball [REDACTED] (iMessage)>, Andrew Ball [REDACTED] (Sms)>, Stephanie Benton [REDACTED] (Sms)>, Melissa DeRosa [REDACTED], Annabel Walsh [REDACTED] (iMessage)>, Stephanie Benton [REDACTED] (iMessage)>, Andrew Ball [REDACTED], Melissa DeRosa [REDACTED] (Sms)>, Annabel Walsh [REDACTED], Stephanie Benton [REDACTED]

Melissa DeRosa [REDACTED] (iMessage)>

 Hey guys any luck w [REDACTED] and [REDACTED] ? 15:34:12


Andrew Ball [REDACTED] (iMessage)>

 Not yet- she lives out west, and she has two young kids so was hard to connect last night. I was going to call her again today 15:42:23

Spoke to [REDACTED]. All good. Steph, I just tried you. 16:59:53

Love the power red today Melissa 17:00:21

Melissa DeRosa [REDACTED] (iMessage)>

 Loved "Spoke to [REDACTED] All good. Steph, I just tried you. " 17:03:14

Annabel Walsh [REDACTED] (Sms)>


 Still waiting to hear back from [REDACTED] 17:03:41

Steph FYI I just looped [REDACTED] but just got this from [REDACTED]

Hey Annabel! It's [REDACTED] from [REDACTED] office. [REDACTED] [REDACTED] are wondering if they can have a 10-min call with the governor today re the performing arts items he tasked them with. She mentioned Steve Cohen should be as well- but happy to coordinate that from our end or whatever is easiest 17:04:02


Melissa DeRosa [REDACTED] (iMessage)>

AWALSH00000094


 AnnaMay shut down [REDACTED] 17:06:21

Good work ball 17:06:36

Andrew Ball [REDACTED] (iMessage)>

 Liked "Good work ball " 17:06:57


Melissa DeRosa [REDACTED] (iMessage)>

 In case anyone was wondering 17:07:47

[REDACTED] loves the governor by hates [REDACTED] 17:08:01

But* 17:08:08

Andrew Ball [REDACTED] (iMessage)>

 Haha, she hates me too 17:08:12

She's dangerous 17:08:17

Ask [REDACTED] 17:08:23

Dangerous is a bad word choice 17:08:38

Start Date December 23, 2020 6:49:29 PM UTC

End Date December 23, 2020 6:58:13 PM UTC

Chat Account t Annabel Walsh [REDACTED] (Sms)>, Melissa DeRosa [REDACTED] (IMessage)>, Annabel Walsh [REDACTED] (Mms)>, Stephanie Benton [REDACTED] (Sms)>, Melissa DeRosa [REDACTED] Annabel Walsh [REDACTED] (IMessage)>, Stephanie Benton <+[REDACTED] (IMessage)>, Melissa DeRosa [REDACTED] (Mms)>, Stephanie Benton [REDACTED] (Mms)>, Melissa DeRosa [REDACTED] (Sms)>, Annabel Walsh [REDACTED] Stephanie Benton [REDACTED]

Melissa DeRosa [REDACTED] (IMessage)>

 Still nothing AnnaMay? 18:49:29

She's last person on our list 18:49:35


Annabel Walsh [REDACTED] (Sms)>

 No let me call her again like a psycho 18:49:52

Melissa DeRosa <[REDACTED] (IMessage)>

 Loved "No let me call her again like a psycho " 18:50:03

Annabel Walsh <[REDACTED] (Sms)>

 Hasn't been reached out to by a reporter would never talk tot hem anyways 18:56:36


Melissa DeRosa [REDACTED] (IMessage)>

 Anything bad to say? 18:56:59

What did she think of LB thing 18:57:11

Has she heard from lb 18:57:16

Annabel Walsh [REDACTED] (Sms)>

 Hasn't heard from anyone thought it was crazy 18:57:53

Nothing bad to say 18:57:58

Melissa DeRosa [REDACTED] (iMessage)>



Thank u!

18:58:03

Annabel Walsh [REDACTED] (Sms)>



✦✦


18:58:13

Start Date December 8, 2016 12:28:04 AM UTC

End Date December 8, 2016 2:48:45 AM UTC

Chat [REDACTED] (IMessage), Annabel Walsh [REDACTED] (Sms)>
Account [REDACTED], Annabel Walsh [REDACTED] (Mms)>
t [REDACTED] (Mms), [REDACTED] (Sms), Annabel Walsh [REDACTED] (IMessage)>
Annabel Walsh [REDACTED]

(no sender information available)

 How is it going?! Per Dani he told Melissa he was flying down with Maria 00:28:04

Also I can pin him about the other things 00:28:33

But you should leave soon so you can have dinner with us 00:28:42

also Sandra is asking me about the schedule for tomorrow and I'm scared do I put him as flying down with Maria 00:29:23

[REDACTED] (IMessage)

 He thinks he has to fly with her. 00:29:27


(no sender information available)

 Okay. 00:29:34

[REDACTED] (IMessage)

 Does he have to though? 00:30:07

(no sender information available)

 Nope - I had told them it was likely but we have the precedence for her flying alone 00:32:05

Maria's office should be fine with it because Lindsey is flying both ways. they're confirming with her now. In the mean time should we just have him stay here and work out of Capitol 01:42:46

Or plan to have him go down 01:42:51

Maria is good to fly up and down without gov 01:47:48

AWALSH00001056

[Redacted] (Message)



Can u give him A and B and let him pick.

02:40:39

(no sender information available)



Yep


02:48:45

Start Date February 25, 2021 12:12:25 AM UTC

End Date February 25, 2021 10:38:12 PM UTC

Chat Account t Annabel Walsh [REDACTED] (IMessage)>, Dani Lever [REDACTED] (IMessage)>, Annabel Walsh [REDACTED] (Sms)>, Dani Lever [REDACTED] (Mms)>, Dani Lever [REDACTED] (Mms)>, Dani Lever [REDACTED] (Sms)>, Annabel Walsh [REDACTED]

Dani Lever [REDACTED] (IMessage)>

 I spent over 6 years working closely and traveling with Andrew Cuomo -- he is exactly the same person in private as he is in public - he can be playful, he can make bad jokes, he can be direct but nothing that ever crosses the line. 00:12:25

It's not about the statement 00:20:28

They got [REDACTED] to do it 00:20:32

Annabel Walsh [REDACTED] (IMessage)>

 Just to ask if I was hearing anything 00:26:38

I feel badly for her 00:26:44

Like really 00:26:46

S #4 and I fight constantly 00:58:01

Not a today convo 00:58:32

Dani Lever [REDACTED] (IMessage)>

 About what 01:23:03

Annabel Walsh [REDACTED] (IMessage)>

 Me working so much 01:30:13


And other stuff 01:30:18

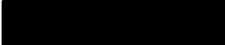
Dani Lever [REDACTED] (IMessage)>


AWALSH00001222

EXHIBIT


21


 Do you want to talk 01:42:32


Annabel Walsh  (iMessage)>


 I can't but thank you. Rest 01:45:22

We just got into a fight bc he said we need to get our stories straight anf was grilling me and told me if I screw it up I'll ruin my career 01:46:22

Dani Lever  (iMessage)>

 Story straight about what 01:54:47

Annabel Walsh  (iMessage)>

 What we say when ppl ask about today's story 01:55:04


I was like WHAT ARE WE TALKING ABOUT 01:55:09


IM AN ADULT FEMALE WITH A VERY GOOD BRAIN
THANKS SO MYCH 01:55:27

I said I'm fine I don't need to get anything straight 01:55:40


But he's like our stories have to align for when we talk to our families and in public to other people 01:55:57


I'm like WHAT SO YOU THINK WERE GOING TO BE ON CHARLIE ROSE TMRW 01:56:13

Dani Lever  (iMessage)>

 Stories about what??? 01:56:17

I'm so confused 01:56:20

Annabel Walsh  (iMessage)>

 SO WAS I 01:56:25

when ppl ask if the governor was abusier 01:56:37

Dani Lever [REDACTED] (iMessage)>

 Yeah the answer is no 01:56:50

Annabel Walsh [REDACTED] (iMessage)>

 Exactly like what the Fuck is the question 01:57:07

He's like jumping ship on him bc he talked to [REDACTED]? I mean 01:57:46
he's not his line is he's a single guy so sometimes he would flirt
bc he's a single guy but nothing bad

I'm going to fix it with him 01:57:54

But I can't right now bc I'm full of rage 01:58:01

It's always that I'm texting or I'm talking on the phone and not 01:58:37
paying him enough attention

And when he's on the phone with [REDACTED] or texting his family 01:58:56

And the reason he can't go away for my birthday is because he 01:59:42
had already planned this ski trip this weekend

And he was like maybe in April 01:59:55

And then he softly and barely was like it's not fair I know but 02:00:19
job blah

Meanwhile I'm like WHAT DONYOU THINKNIM DOING ON 02:00:32
THE PHONE

FUCKIGN WORKING 02:00:37

And the other day he had the audacity to be like you weren't 02:00:50
working you were gossiping

My point was like YAH NO just bc I can laugh and enjoy my 02:01:25
time with colleagues


Doesn't mean that I'm sitting here gossiping. I have ONE friend 02:02:04
at work for me

Sorry word vomit 02:02:15


What did ball say 11:52:14

Wait is your [REDACTED] today?!? I forgot I'm supposed to deaf you out into a van 11:52:45


Dani Lever [REDACTED] (iMessage)>

 Yes! 11:56:17

Annabel Walsh [REDACTED] (iMessage)>

 Omg exciting 11:56:27

Dani Lever [REDACTED] (iMessage)>

 He claimed he did it by accident but I said it for him 11:56:27


Like he was like really 11:56:35

And I said I assumed you did that by accident 11:56:43


And he said yeah! 11:56:46

And I said so unlike it 11:56:50


Annabel Walsh [REDACTED] (iMessage)>

 Oh god 11:56:58


Dani Lever [REDACTED] (iMessage)>

 And he said I don't want to draw more attention 11:57:01

Annabel Walsh [REDACTED] (iMessage)>

 I knew he didn't do it by accident 11:57:10

Dani Lever [REDACTED] (iMessage)>

 And I said you won't this is more attention 11:57:10

But like why? 11:57:18

So melissa would see it 11:57:29

?? 11:57:33

Annabel Walsh [REDACTED] (iMessage)>

 Bc he always talked about that stuff 11:57:33


Also the wood of the post 11:59:32

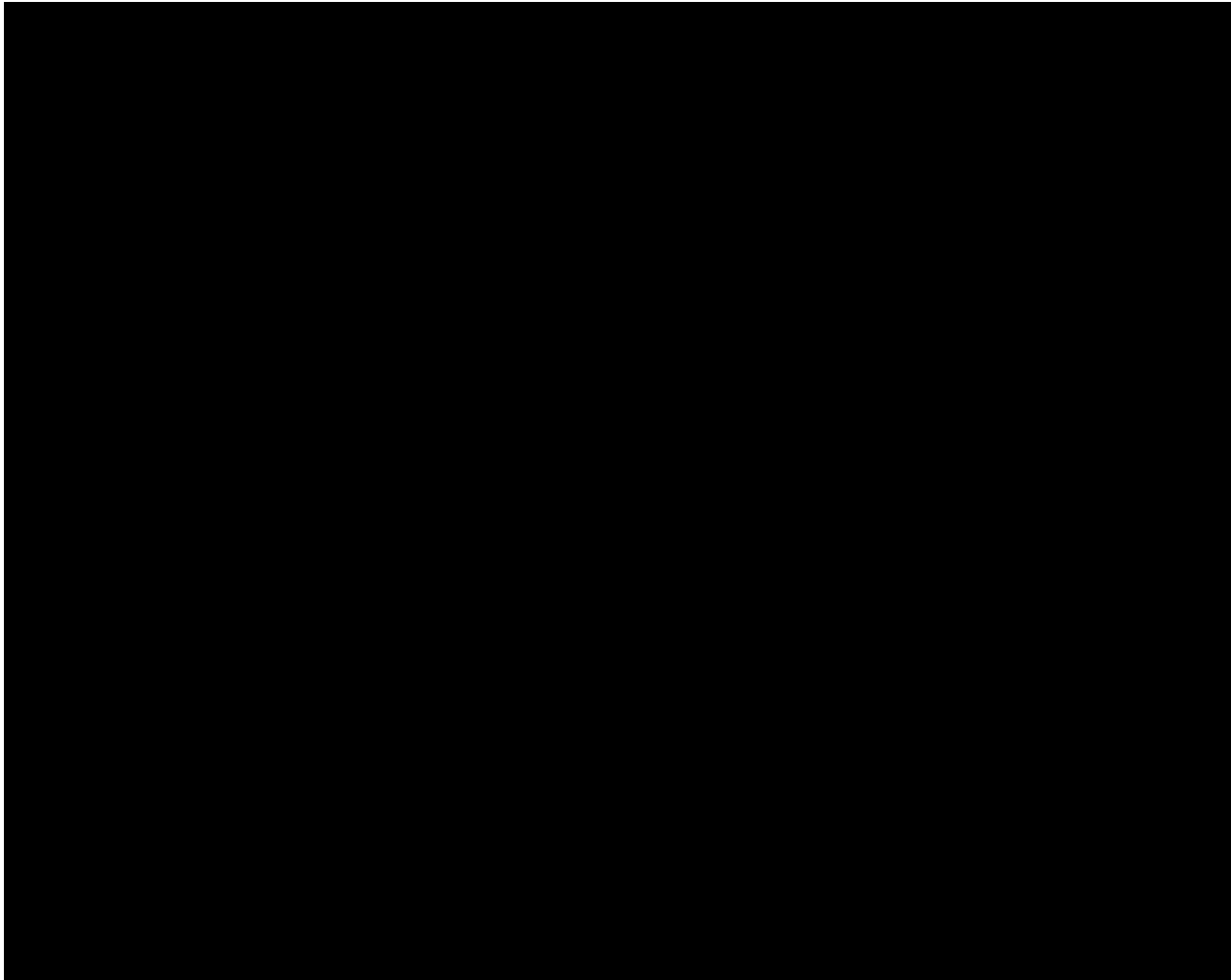
Dani Lever [REDACTED] (iMessage)>

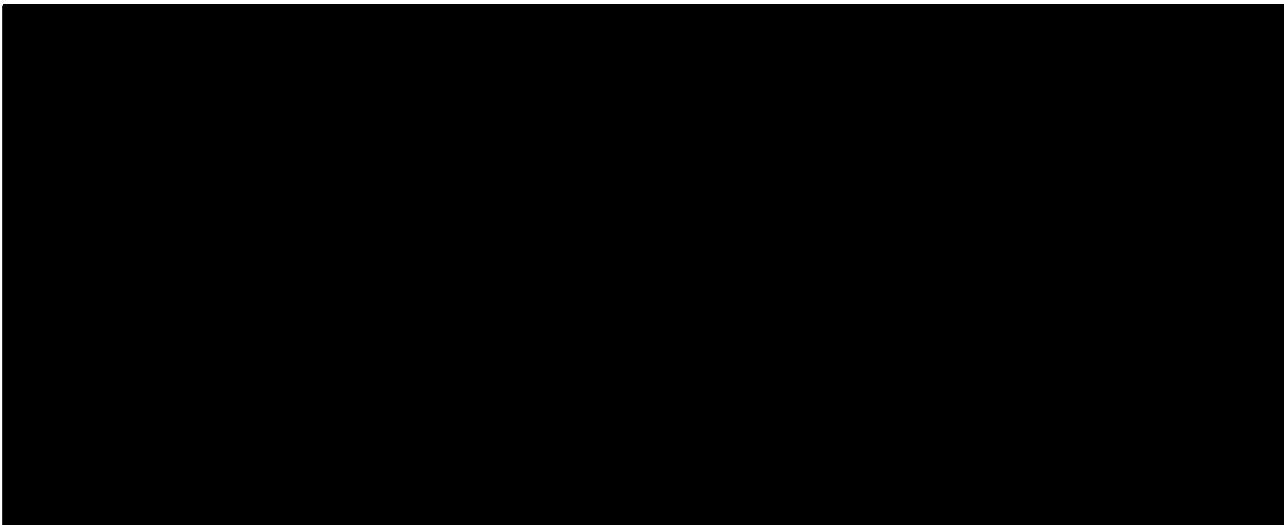
 What is it 11:59:43

I mean we all expected this 11:59:50

Annabel Walsh [REDACTED] (iMessage)>

 [~/Library/SMS/Attachments/c8/08/86A5AB0E-D7BA-467D-974F-6A2CF06BB9A1/Covers New York Post.png](#) 11:59:58





☰ **NEW YORK POST** 🔍

TODAY'S COVER

FEBRUARY 25, 2021



CUOMO'S A PIG!

Gov kissed me, suggested strip poker: former aide

Former aide to Gov. Andrew Cuomo of the Empire State said she kissed with the governor's partner in a strip poker game. The governor's partner is a doctor. Cuomo's attorney says of strip poker and other accusations is 'false as to the content of the COVID-19 and other issues raised.'

PAGES 1-7

BACK COVER

YESTERDAY'S COVER

FEBRUARY 24, 2021

Block Advisors
Your Small Business Partner

Start now


LATE CITY FINAL

Start Date March 2, 2021 12:58:10 AM UTC

End Date March 2, 2021 9:54:27 PM UTC

Chat Annabel Walsh [REDACTED] (iMessage)>, Dani Lever [REDACTED]
Account (iMessage)>, Annabel Walsh [REDACTED] (Sms)>, Dani Lever
t [REDACTED], Annabel Walsh [REDACTED] Dani Lever
[REDACTED] (Mms)>, Dani Lever [REDACTED]>, Annabel Walsh
[REDACTED]

Annabel Walsh [REDACTED] (iMessage)>

 Gwynne hogan just came to my door 00:58:10

Soooo 00:58:13


Dani Lever [REDACTED] (iMessage)>

 I'm on a conf call now 01:01:42

With the office 01:01:44

Should I tell them 01:01:47

Annabel Walsh [REDACTED] (iMessage)>

 I mean sure 01:01:55

She just came and asked for me and S #4 said I wasn't there. 01:02:31
And said you're a reporter right and she said yeah sorry I love
3 blocks away I had to try snd he said okay thanks but please
don't come back have a great night

He was eating chicken in [REDACTED] 01:02:38

for a fun color piece 01:02:49

Hi 20:02:49


When can you chat 20:02:54

Dani Lever [REDACTED] (iMessage)>


 Now 20:03:00

Or 6pm 20:03:13

Annabel Walsh [REDACTED] (IMessage)>


 Okay sorry give me five min 20:03:27

Dani Lever [REDACTED] (IMessage)>

 Don't call Steph back 21:00:31


Trust me 21:00:33

Annabel Walsh [REDACTED] (IMessage)>

 She called me and asked about a statement and said she'd call me back and now I'm ducking 21:04:11


What was it 21:34:38

Dani Lever [REDACTED] (IMessage)>

 That 21:53:09

But I'll call you later to explain 21:53:19

Annabel Walsh [REDACTED] (IMessage)>

 Ok 21:54:27

Start Date March 4, 2021 1:45:10 AM UTC

End Date March 4, 2021 9:52:27 PM UTC


Chat Annabel Walsh [REDACTED] (IMessage)>, Dani Lever [REDACTED]
Account (IMessage)>, Annabel Walsh [REDACTED] (Sms)>, Dani Lever
t [REDACTED], Annabel Walsh [REDACTED] (Mms)>, Dani Lever
[REDACTED] (Mms)>, Dani Lever [REDACTED] (Sms)>, Annabel Walsh

Dani Lever [REDACTED] (IMessage)>


 Were they pretty 01:45:10

Send photos 01:45:14

Annabel Walsh [REDACTED] (IMessage)>

 So pretty thank you 01:55:33
[~/Library/SMS/Attachments/bd/13/1C6E6356-15CF-4872-A2D2-218E9B07472F/IMG_1458.HEIC](#)

Dani Lever [REDACTED] (IMessage)>

 I feel like I didn't pay enough attention to your birthday today or tell you how much you mean to me, but you are truly so important. You are smart, hilarious and make my life so much better that I can't imagine you not it. You are so worldly and sophisticated but also so silly and warm. You've so much to be proud of in your 30 years and I can't wait for this next one for you. You are special and not just like how everyone says it, but truly, truly special. I hope you were surprised by the flowers. Take that green filler shit out of there. Thought I went to the fanciest place in Boston. 02:05:49


Will take you to dinner next week. Name the night. We go ballinnnn 02:06:54

Like something seriously good and fancy 02:07:14

So maybe socks 02:07:21


Docks 02:07:24


Annabel Walsh [REDACTED] (IMessage)>


 [~/Library/SMS/Attachments/56/06/01A777FE-F49D-4A10-924C-B8D529198436/IMG_1467.HEIC](#) 15:21:43


[~/Library/SMS/Attachments/fc/12/9797E1CE-0317-47BD-B099-B9BECA20DA3F/IMG_1466.HEIC](#) 15:23:53

CBS news tonight? 17:33:58


Dani Lever  (iMessage)>


 Yes 17:34:05


Annabel Walsh  (iMessage)>


 What time is that 17:34:13

Like Lester holt? I love him 17:34:22

Dani Lever  (iMessage)>


 Norah I think 17:40:06


Annabel Walsh  (iMessage)>

 I mean 19:58:49

Like is that a threat I didn't even realize the subject line 21:44:51

Also I'm scared to call Steph back in case it's about the letter or something 21:52:11

Dani Lever  (iMessage)>

 I know the subject is nuts 21:52:27

Start Date February 6, 2020 4:01:48 PM UTC

End Date February 6, 2020 4:02:49 PM UTC

Chat Brittany Commisso [REDACTED] (iMessage)>, Annabel Walsh
Account [REDACTED] (Sms)>, Brittany Commisso [REDACTED] (Sms)>, Brittany
t Commisso [REDACTED] Annabel Walsh [REDACTED] (iMessage)>,
Annabel Walsh [REDACTED] >

Brittany Commisso [REDACTED] (iMessage)>

Hey Annabel, sorry to bother. I was wondering if you could give me a little advice. I'm interested down the road in trying a different office here in Chamber. I think I would be an asset to the admin office in particular. Do you think it's a good idea to try and sit down with Jill for 5 minutes to share my thoughts about this? Or not. 16:01:48



I just don't want to waste anyone's time lol and I trust your judgement. 16:02:49

AWALSH00001795

EXHIBIT

23

MEMORANDUM TO FILE

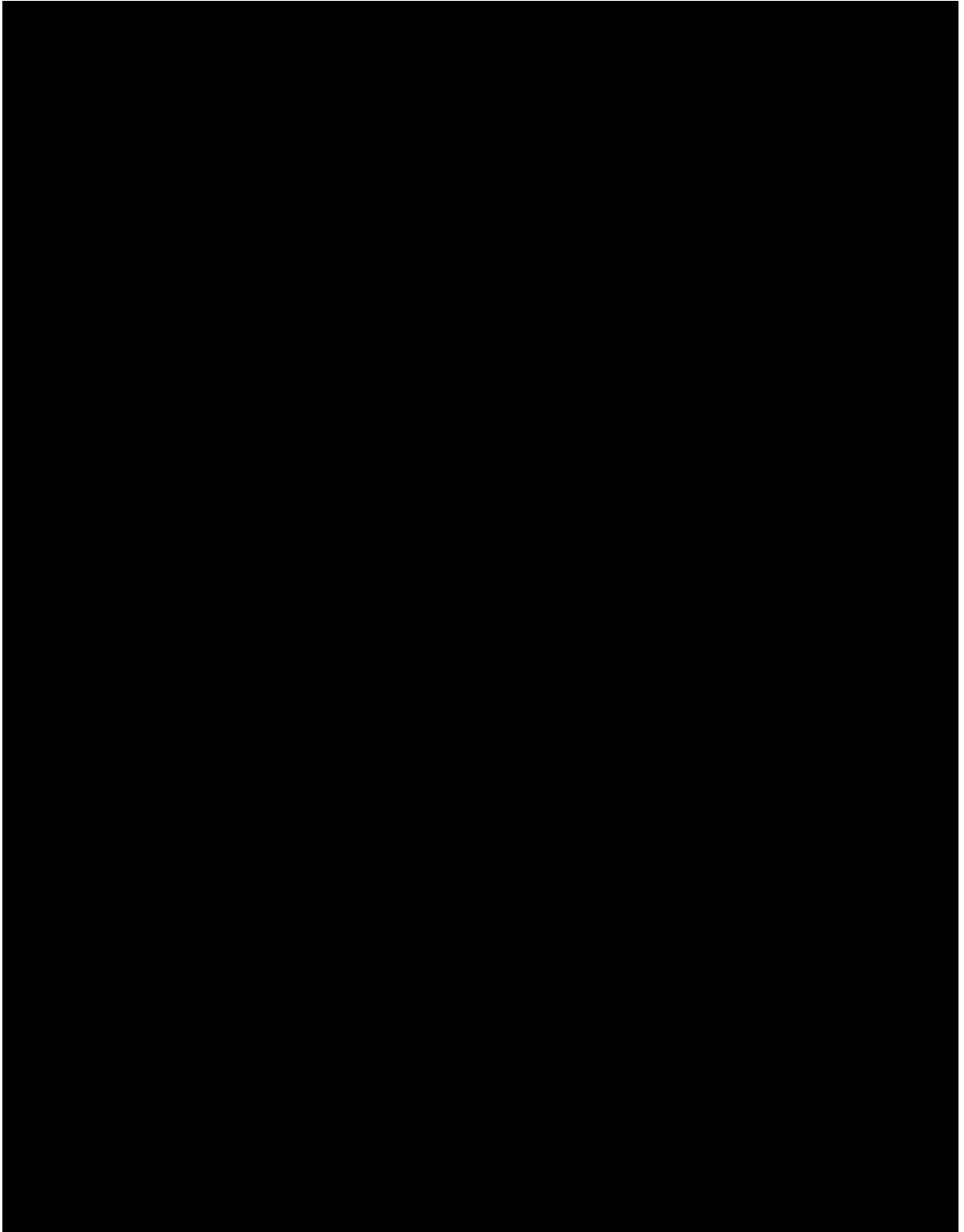
To: Alphonso David, Counsel to the Governor
From: Julia Pinover Kupiec, Assistant Counsel and Chamber Ethics Officer
Date: September 26, 2018
Subject: Employment Counseling for Lindsay Boylan

1. **Purpose**

[REDACTED]
[REDACTED]
[REDACTED] During the course of this counseling session, Ms. Boylan tendered her resignation voluntarily.

[REDACTED]

Draft, privileged and confidential - Attorney Client Privileged Communication
Intra-Agency Communication
Memo to File



3. Ms. Boylan's Resignation

During the meeting Mr. David was clear that she was not being asked to resign, fired, or pushed out in any way. In no uncertain terms he said that she was simply being counseled in response to the complaints that have been made about her from multiple sources.

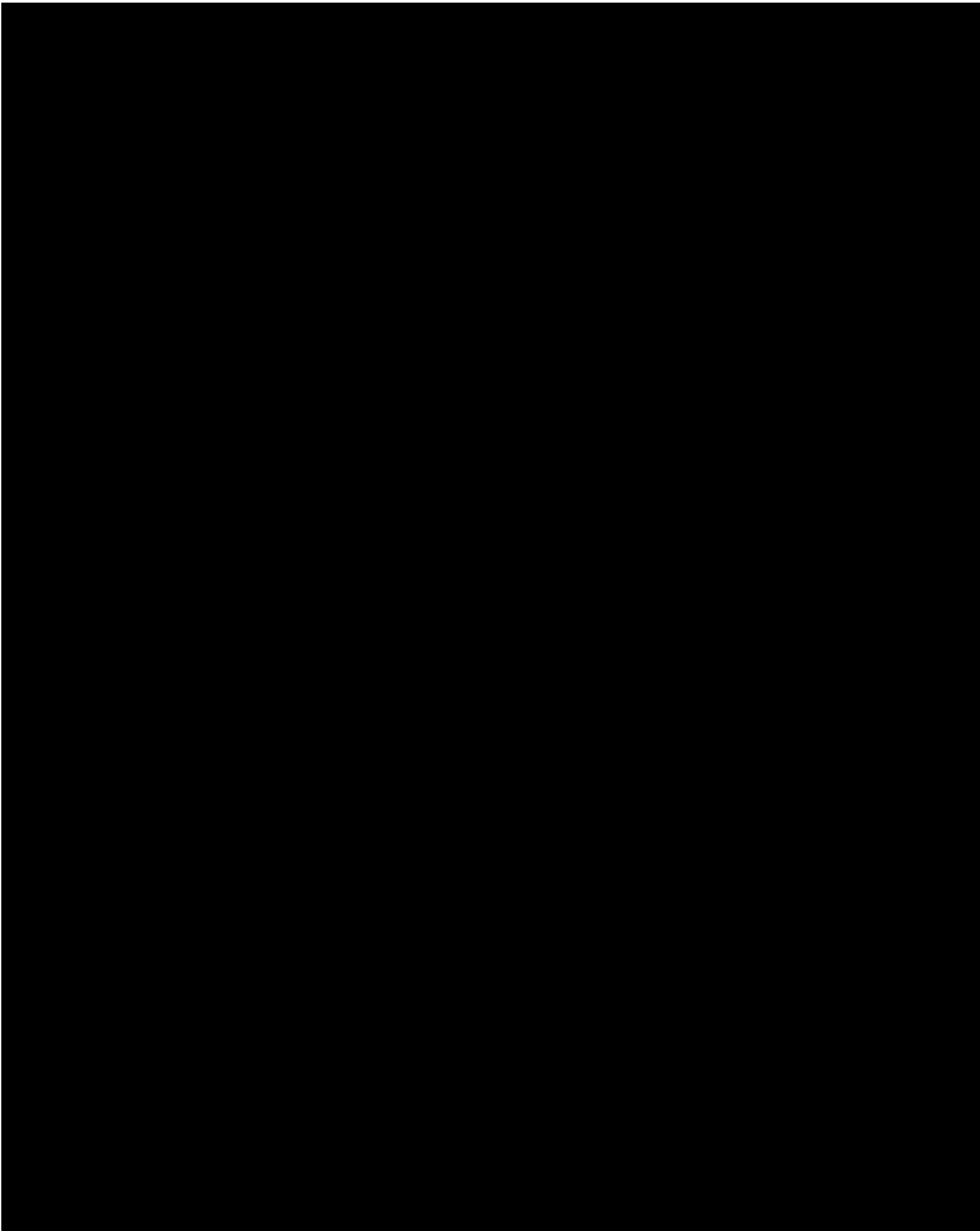
Towards the close of this meeting Ms. Boylan voluntarily tendered her resignation, indicated that she would be leaving the office for the day and consulting with her own counsel regarding her next steps in Executive Chamber. She was clear that she intended to resign but she wished to think through the timing of her departure. Ms. Boylan expressed that she did not feel she could be effective in the Executive Chamber and as a result wished to move on. She expressed that her main priority was to leave her team – consisting of the two deputies she had hired – to be left in good stead in the Executive Chamber and suggested that they be elevated in position and rank here. Mr. David asked that Ms. Boylan advise him when she wished her resignation to be effective and offered the new year as a possibility.

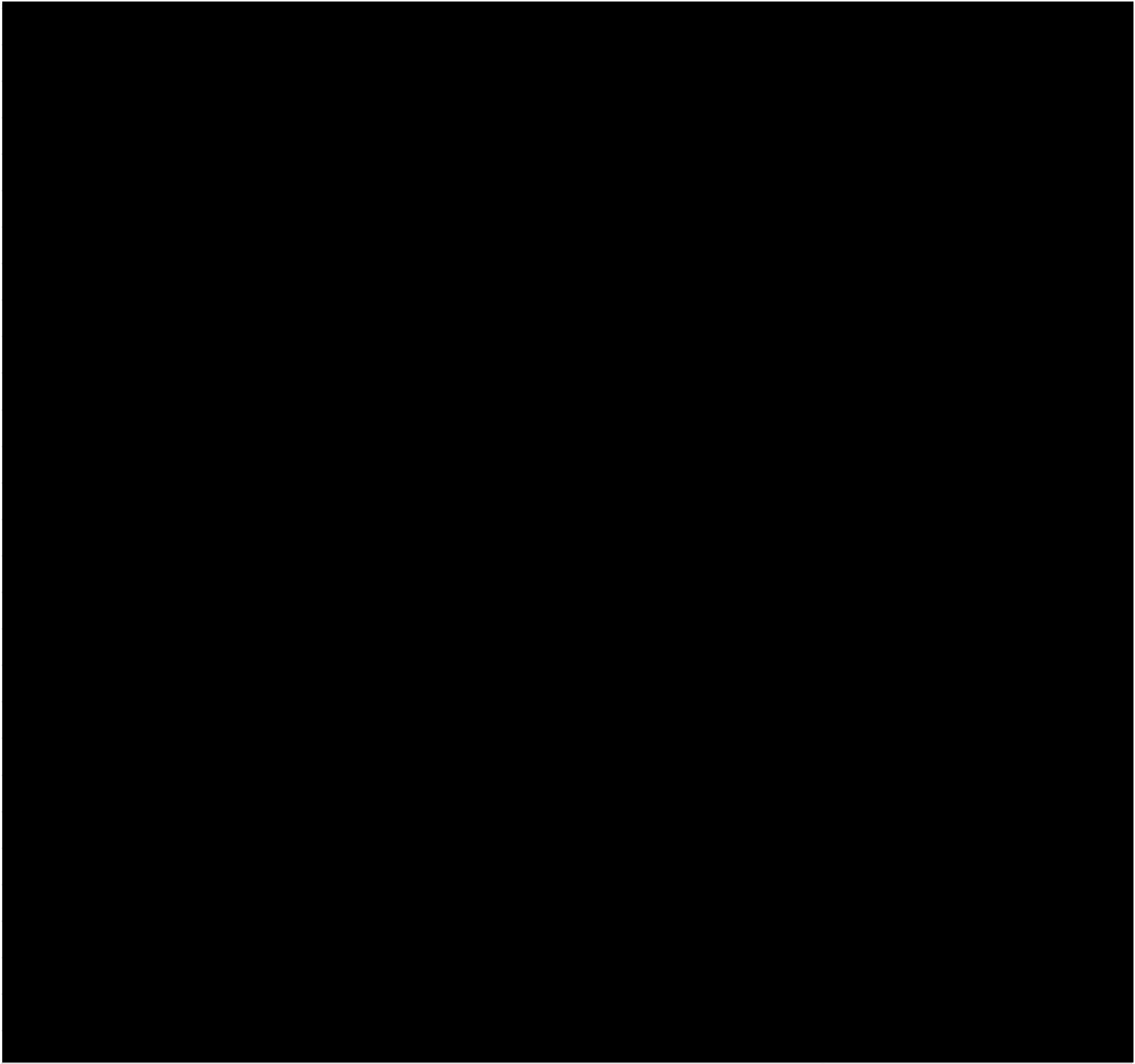
Within four hours of the meeting, Ms. Boylan sent an email to staff within and outside of the Executive Chamber indicating that she had resigned and that her resignation was effective immediately.

I wrote this memorandum on September 26, 2018 based on contemporaneous notes taken during my personal attendance at the above described meeting on September 26, 2018.

/S

Julia Pinover Kupiec
Executive Chamber Ethics Officer






Start Date February 28, 2021 2:16:19 AM UTC


End Date February 28, 2021 2:29:28 AM UTC

Chat Account t Annabel Walsh [REDACTED] (IMessage)>, Jill DesRosiers [REDACTED] (IMessage)>, Jill DesRosiers [REDACTED] (Sms)>, Annabel Walsh [REDACTED] (Sms)>, Annabel Walsh [REDACTED] (Mms)>, Jill DesRosiers [REDACTED] (Mms)>, Annabel Walsh <[REDACTED]> Jill DesRosiers <[REDACTED]>

Annabel Walsh [REDACTED] (IMessage)>


 I'm sorry that fucking sucks - I'm pulling for [REDACTED] and you and [REDACTED] You don't deserve this BS on top of it. It ACTUALLY was nice to hear you voice. I miss you. 02:16:19

Jill DesRosiers [REDACTED] (IMessage)>

 That was the first time she spoke to me. She needed an airbag so she conferenced you 02:17:19

They had judy and peter calling me 02:17:30

Annabel Walsh [REDACTED] (IMessage)>

 That makes me want to VOMIT 02:19:42

Seriously 02:19:46

Since when? Jesus Christ 02:20:03

Jill DesRosiers [REDACTED] (IMessage)>

 Thank you for pulling for [REDACTED] 02:22:39

[REDACTED] 02:22:53

Annabel Walsh <[REDACTED]> (IMessage)>

 [REDACTED] 02:25:22
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

AWALSH00000020